One Gateway Plaza, Los Angeles, CA 90012,
3rd Floor, Metro Board Room

Agenda - Final

Thursday, April 16, 2026

1:00 PM

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Operations, Safety, and Customer Experience Committee

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Imelda Padilla, Vice Chair
Janice Hahn
Tim Sandoval
Katy Yaroslavsky
Gloria Roberts, non-voting member

Stephanie Wiggins, Chief Executive Officer

METROPOLITAN TRANSPORTATION AUTHORITY BOARD AGENDA RULES

(ALSO APPLIES TO BOARD COMMITTEES)

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A member of the public may address the Board on agenda items, before or during the Board or Committee's consideration of the item for one (1) minute per item, or at the discretion of the Chair. A request to address the Board must be submitted electronically using the tablets available in the Board Room lobby. Individuals requesting to speak will be allowed to speak for a total of three (3) minutes per meeting on agenda items in one minute increments per item. For individuals requiring translation service, time allowed will be doubled. The Board shall reserve the right to limit redundant or repetitive comment.

The public may also address the Board on non-agenda items within the subject matter jurisdiction of the Board during the general public comment period, which will be held at the beginning and/or end of each meeting. Each person will be allowed to speak for one (1) minute during this General Public Comment period or at the discretion of the Chair. Speakers will be called according to the order in which their requests are submitted. Elected officials, not their staff or deputies, may be called out of order and prior to the Board's consideration of the relevant item.

Notwithstanding the foregoing, and in accordance with the Brown Act, this agenda does not provide an opportunity for members of the public to address the Board on any Consent Calendar agenda item that has already been considered by a Committee, composed exclusively of members of the Board, at a public meeting wherein all interested members of the public were afforded the opportunity to address the Committee on the item, before or during the Committee's consideration of the item, and which has not been substantially changed since the Committee heard the item.

In accordance with State Law (Brown Act), all matters to be acted on by the MTA Board must be posted at least 72 hours prior to the Board meeting. In case of emergency, or when a subject matter arises subsequent to the posting of the agenda, upon making certain findings, the Board may act on an item that is not on the posted agenda.

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CONDUCT IN THE BOARD ROOM - The following rules pertain to conduct at Metropolitan Transportation Authority meetings:

REMOVAL FROM THE BOARD ROOM - The Chair shall order removed from the Board Room any person who commits the following acts with respect to any meeting of the MTA Board:

a. Disorderly behavior toward the Board or any member of the staff thereof, tending to interrupt the due and orderly course of said meeting.
b. A breach of the peace, boisterous conduct or violent disturbance, tending to interrupt the due and orderly course of said meeting.
c. Disobedience of any lawful order of the Chair, which shall include an order to be seated or to refrain from addressing the Board; and
d. Any other unlawful interference with the due and orderly course of said meeting.

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323.466.3876
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x3 中文 *(Chinese)*
x4 한국어 *(Korean)*
x5 Tiếng Việt *(Vietnamese)*
x6 日本語 *(Japanese)*
x7 русский *(Russian)*
x8 Հայերէն *(Armenian)*

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The Meeting begins at 1:00 PM Pacific Time on April 16, 2026; you may join the call 5 minutes prior to the start of the meeting.

Dial-in: 888-978-8818 and enter
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Spanish Access Code: 7292892#

Public comment will be taken as the Board takes up each item. To give public comment on an item, enter #2 (pound-two) when prompted. Please note that the live video feed lags about 30 seconds behind the actual meeting. There is no lag on the public comment dial-in line.

Instrucciones para comentarios publicos en vivo:

Los comentarios publicos en vivo se pueden dar por telefono o en persona.

La Reunion de la Junta comienza a las 1:00 PM, hora del Pacifico, el 16 de Abril de 2026. Puedes unirte a la llamada 5 minutos antes del comienso de la junta.

Marque: 888-978-8818 y ingrese el codigo
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Los comentarios del público se tomaran cuando se toma cada tema. Para dar un comentario público sobre una tema ingrese # 2 (Tecla de numero y dos) cuando se le solicite. Tenga en cuenta que la transmisión de video en vivo se retrasa unos 30 segundos con respecto a la reunión real. No hay retraso en la línea de acceso telefónico para comentarios públicos.

Written Public Comment Instruction:

Written public comments must be received by 5PM the day before the meeting.
Please include the Item # in your comment and your position of “FOR,” “AGAINST,” "GENERAL COMMENT," or "ITEM NEEDS MORE CONSIDERATION."
Email: BoardClerk@metro.net
Post Office Mail:
Board Administration
One Gateway Plaza
MS: 99-3-1
Los Angeles, CA 90012

CALL TO ORDER

ROLL CALL

APPROVE Consent Calendar Items: 31, 32, 33, 34, 35, and 36.

Consent Calendar items are approved by one motion unless held by a Director for discussion and/or separate action.

CONSENT CALENDAR

31. SUBJECT: EMERGENCY SECURITY OPERATIONS CENTER (ESOC) AUDIO-VISUAL MAINTENANCE AND TROUBLESHOOTING SERVICES - CONTRACT MODIFICATION 2026-0100

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to execute Modification No. 1 to Contract No. PS136554000 with Advanced Cable Solutions to incorporate additional scope and funding associated with the implementation and maintenance of a redundant video wall processor system, in the amount of $660,785, increasing the total contract Not-To-Exceed (NTE) amount from $498,000 to $1,158,785.

Attachments: Attachment A - Procurement Summary
Attachment B - Contract Modification Change Order Log
Attachment C - DEOD Summary

32. SUBJECT: TUNNEL GROUTING SERVICES 2026-0162

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

A. AWARD an Indefinite Delivery/Indefinite Quantity (IDIQ) task order contract, Contract No. OP129922(2)000 to Keller North America, Inc., for Tunnel Grouting Services, in the Not-To-Exceed (NTE) amount of $9,464,800 for the five-year base period and $607,444 for the first one-year option, $631,854 for the second one-year option, and $657,628 for the third one-year option, for a combined NTE amount of $11,361,726, subject to the resolution of any properly submitted protest(s), if any; and

B. EXECUTE individual contract modifications within the Board-approved contract modification authority.

Attachments: Attachment A - Procurement Summary
Attachment B - DEOD Summary
Presentation

33. SUBJECT: GLASS REPLACEMENT AND INSTALLATION SERVICES 2026-0176

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to award a firm fixed unit rate contract, Contract No. OP1349930008370 to Los Angeles Glass Company, Inc., to provide glass replacement and installation services systemwide for a Not-To-Exceed (NTE) amount of $4,737,385.00 for the three-year base period, effective July 1, 2026, subject to the resolution of any properly submitted protest(s), if any.

Attachments: Attachment A - Procurement Summary
Attachment B - DEOD Summary
Presentation

34. SUBJECT: TUNNEL WASHING SERVICES 2026-0177

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to award a firm fixed unit rate Contract No. OP122327(4)000 to Parkwood Landscape Maintenance Inc., to provide tunnel washing services systemwide for a Not-To-Exceed (NTE) amount of $5,295,000.00 for the five-year base term, effective July 1, 2026, subject to the resolution of any properly submitted protests(s), if any.

Attachments: Attachment A - Procurement Summary
Attachment B - DEOD Summary
Presentation

35. SUBJECT: RENEWABLE NATURAL GAS (RNG) PROVIDER 2026-0134

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

A. AWARD a five (5) year Indefinite Delivery/Indefinite Quantity (IDIQ) contract, Contract No. OP132076000, with Shell Energy North America (US), LP for Renewable Natural Gas (RNG), inclusive of a five-year base in the Not-To-Exceed (NTE) amount of $140,004,228.05 and one three-year option in the NTE amount of $88,902,684.81, for a combined NTE amount of $228,906,912.86, subject to the resolution of any properly submitted protest(s), if any; and

B. EXECUTE individual Task Orders, Transaction Confirmations, and

Contract Modifications up to 10% of the contract value.

Attachments: Attachment A - Procurement Summary
Attachment B - DEOD Summary

36. SUBJECT: ELECTRIC VEHICLE CHARGING STATIONS - OPERATION & MAINTENANCE 2026-0030

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

A. AWARD a firm fixed unit rate contract, Contract No. OP127536000 to Axxera Inc. for the Electric Vehicle Charging Stations - Operations & Maintenance services, inclusive of a five-year base in the Not-To-Exceed (NTE) amount of $2,373,210, and $1,008,000 for the first one-year option, and $1,008,000 for the second one-year option, for a total NTE amount of $4,389,210 subject to the resolution of any properly submitted protest, if any; and

B. EXECUTE individual contract modifications within the Board-approved contract modification authority.

Attachments: Attachment A - Procurement Summary
Attachment B - DEOD Summary

NON-CONSENT

37. SUBJECT: OPERATIONS EMPLOYEES OF THE MONTH 2026-0173

RECOMMENDATION

RECOGNIZE Operations Employees of the Month.

Attachments: Presentation

38. SUBJECT: CHIEF OPERATIONS OFFICER'S MONTHLY REPORT 2026-0174

RECOMMENDATION

RECEIVE oral report on Metro Operations.

39. SUBJECT: DEPARTMENT OF PUBLIC SAFETY POST ORDINANCE 2026-0075

RECOMMENDATION

APPROVE the ordinance affirming Metro's commitment to meet the minimum recruitment and training standards for peace officers and public safety dispatchers set by the California Commission on Peace Officer Standards and Training (POST) (Attachment A).

Attachments: Attachment A - POST Ordinance

40. SUBJECT: MONTHLY UPDATE ON PUBLIC SAFETY 2026-0196

RECOMMENDATION

RECEIVE AND FILE the Public Safety Report.

Attachments: Attachment A - Ancillary Areas Quarterly Update

Attachment B - Station Experience Updates

41. SUBJECT: AUDIT OF OVERTIME CONTROLS FOR METRO TRANSIT SECURITY OFFICERS AND SECURITY CONTROL SPECIALISTS 2026-0068

RECOMMENDATION

RECEIVE AND FILE Office of the Inspector General (OIG) Final Report on Audit of Overtime Controls for Metro Transit Security Officers and Security Control Specialists.

Attachments: Attachment A - Final Audit of Overtime Controls Report No. 26-AUD-06

Presentation

42. SUBJECT: OFFICE OF THE INSPECTOR GENERAL (OIG) FISCAL YEAR 2024 BILLINGS REPORT SUPPLEMENT TO METRO TRANSIT SECURITY PERFORMANCE AUDIT FOR FISCAL YEARS 2023 AND 2024 (REPORT NO. 25-AUD-06) 2026-0109

RECOMMENDATION

RECEIVE AND FILE Office of the Inspector General (OIG) Fiscal Year 2024 Billings Report Supplement to Metro Transit Security Performance audit for Fiscal Years 2023 and 2024.

Attachments: Attachment A - Report on Metro Transit Security Services FY24 Billings

Presentation

43. SUBJECT: EMBRACING NEURODIVERSITY IN TRANSPORTATION 2026-0258

RECOMMENDATION

RECEIVE AND FILE the report of the Neurodiverse Rider Experience Survey & Engagement (Initiative) (Attachment A).

Attachments: Attachment A - Neurodiverse Rider Exp. Survey & Engagement Initiative

Attachment B – Motion #32.1

44. SUBJECT: NEXTGEN RIDERSHIP UPDATE - Q4 CY2025 2026-0138

RECOMMENDATION

RECEIVE AND FILE status update on NextGen Bus Ridership.

Attachments:
Attachment A - Weekday Ridership Recovery Comparison by Line & Line Grp
Attachment B - Saturday Ridership Recovery Comparison by Line & Line Grp
Attachment C - Sunday Ridership Recovery Comparison by Line & Line Grp
Attachment D - NextGen Service Tier Changes
Attachment E - NextGen Ridership Review Supporting Data Charts
Presentation

SUBJECT: GENERAL PUBLIC COMMENT 2026-0264

RECEIVE General Public Comment

Consideration of items not on the posted agenda, including: items to be presented and (if requested) referred to staff; items to be placed on the agenda for action at a future meeting of the Committee or Board; and/or items requiring immediate action because of an emergency situation or where the need to take immediate action came to the attention of the Committee subsequent to the posting of the agenda.

COMMENTS FROM THE PUBLIC ON ITEMS OF PUBLIC INTEREST WITHIN COMMITTEE'S SUBJECT MATTER JURISDICTION

Adjournment

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0100, **File Type:** Contract **Agenda Number:** 31.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: EMERGENCY SECURITY OPERATIONS CENTER (ESOC) AUDIO-VISUAL MAINTENANCE AND TROUBLESHOOTING SERVICES - CONTRACT MODIFICATION

ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to execute Modification No. 1 to Contract No. PS136554000 with Advanced Cable Solutions to incorporate additional scope and funding associated with the implementation and maintenance of a redundant video wall processor system, in the amount of $660,785, increasing the total contract Not-To-Exceed (NTE) amount from $498,000 to $1,158,785.

ISSUE

Metro's ESOC is the central hub for monitoring and responding to security incidents across the Metro system. The ESOC relies on a video wall system to provide real-time situational awareness for Department of Public Safety personnel. The current configuration has a single video processor, creating a potential single point of failure that could disrupt operations during an outage or maintenance. This contract modification will implement a fully redundant video wall processor system to ensure uninterrupted operations. Because the modification increases the contract value beyond the CEO's delegated authority, Board approval is required.

BACKGROUND

Enterprise audio-visual systems, including video walls, support real-time monitoring and coordination during security incidents and emergencies. Metro's ESOC, which supports the Emergency Operations Center and Security Operations Center, relies on the video wall processor to display surveillance feeds and operational information used by DPS dispatchers and command staff. The current configuration uses a single processor, creating a potential single point of failure that could disrupt situational awareness during critical incidents. Implementing a fully redundant processor will ensure continuous operations and system resiliency. In February 2026, Metro awarded a three-year contract with Advanced Cable Solutions in the amount of $498,000 for maintenance services and troubleshooting audio-visual equipment.

DISCUSSION

Subsequent assessments have identified a single critical point of failure in the current architecture that could affect situational awareness during critical incidents. The current setup has just one video processor, so there is no backup system in place, creating a single point of failure that could cause disruptions during an outage or maintenance.

As such, staff is requesting the addition of a redundant processor to address this risk. This will ensure system resiliency and continuity of operations.

Implementing a fully redundant video wall processor will eliminate the current single point of failure in the ESOC video wall system and ensure uninterrupted operations. Of note, the system has not been interrupted since going live in April 2025. However, a redundant system will provide automatic failover during hardware failures, system faults, or maintenance, maintaining continuous situational awareness for DPS personnel. The project includes procurement, installation, integration, testing, and commissioning of an additional processor and associated hardware.

The estimated implementation cost is $555,785, with an additional $105,000 for expanded maintenance over the remaining three-year term. Increasing the contract amount will ensure the reliable operation of these mission-critical ESOC systems.

DETERMINATION OF SAFETY IMPACT

Approval of this item will strengthen Metro's safety posture by ensuring uninterrupted operation of mission-critical ESOC video wall systems that enable real-time situational awareness, rapid decision-making, and coordinated emergency and security response.

FINANCIAL IMPACT

The FY26 Budget includes $2.5 million for this contract in Cost Center 2616, Security Operations Center, under Project Number 300018, ESOC.

Since this is a multi-year contract, the cost center manager and the Chief of Police and Emergency Management will be accountable for budgeting the cost in future years.

Impact to Budget
The source of funding for this action is Proposition C (40%), which is eligible for bus and rail operations.

EQUITY PLATFORM

This action supports equitable service delivery by ensuring the continuity and reliability of security monitoring and emergency response operations across the Metro system. Maintaining countywide situational awareness enables the DPS to protect Metro riders, employees, and the diverse communities Metro serves. At the time of solicitation, the Diversity and Economic Opportunity Department did not establish a Small Business Enterprise or Disabled Veteran Business Enterprise goal for this procurement due to the lack of subcontracting opportunities.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages and align with Metro's Board-adopted VMT reduction targets and statewide climate goals, including achieving carbon neutrality by 2045. Consistent with Metro policy, this Board action has been assessed for its potential impact on VMT.

This item is not anticipated to result in a direct or measurable change in VMT. However, by improving the reliability and resilience of the video wall systems that support emergency response and security operations, this action indirectly supports Metro's ability to maintain safe, reliable transit service. Sustained service reliability encourages continued transit use and supports Metro's broader systemwide efforts to reduce VMT through increased transit ridership.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports Strategic Plan Goal #2.1: Deliver outstanding trip experiences for all users of the transportation system; Metro is committed to improving security and #5.6: Provide responsive, accountable, and trustworthy governance within the Metro organization; Metro will foster and maintain a strong "safety" culture.

ALTERNATIVES CONSIDERED

The alternative of not approving this action was considered but is not recommended because it would leave a known single point of failure in the ESOC video wall system. The Board could choose to not award to this vendor and issue a new procurement process. This is not recommended because this vendor was selected based on their existing contract with Metro for specialized audio-visual maintenance, their demonstrated expertise with the ESOC's system, and their role as the current warranty provider. Using the existing contract was the most efficient and cost-effective approach, allowing Metro to address the identified system gap without the delays associated with procuring a new contract. The vendor's familiarity with the existing infrastructure also reduces implementation risk and supports continuity of operations.

NEXT STEPS

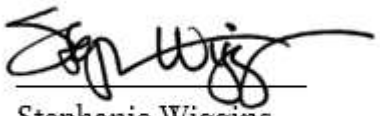
Upon Board approval, staff will execute Contract Modification No. 1 to Contract No. PS136554000 with Advanced Cable Solutions for the implementation of the redundant video wall processor system.

ATTACHMENTS

Attachment A - Procurement Summary
Attachment B - Contract Modification/Change Order Log
Attachment C - DEOD Summary

Prepared by: Robert Gummer, Deputy Chief, System Security and Law Enforcement Officer, (213) 922-4513
Mark Weimerskirch, Senior Executive Officer, System Security and Law Enforcement, (213) 922-7011
Aldon Bordenave, Deputy Executive Officer, System Security and Law Enforcement, (213) 922-4404
Nicholas Kappos, Director, Physical Security, (213) 922-4386
Carolina Coppolo, Deputy Chief Vendor/Contract Management Officer, (213) 922-4471

Reviewed by: William Scott, Chief of Police and Emergency Management, (213) 922-5448
Arnold Hackett, Senior Advisor to the CEO, (213) 922-7403



Stephanie Wiggins
Chief Executive Officer

PROCUREMENT SUMMARY

MAINTENANCE SERVICES AND TROUBLESHOOTING FOR AUDIO-VISUAL EQUIPMENT / PS136554000

1.	**Contract Number**: PS136554000			
2.	**Contractor**: Advanced Cable Solutions			
3.	**Mod. Work Description:** Implement and maintain a fully redundant Christie Spyder video wall processor system at the Emergency and Security Operations Center (ESOC).			
4.	**Contract Work Description**: Provide audio-visual preventive maintenance and troubleshooting services to support continuous command center operations.			
5.	**The following data is current as of:** 3/11/2026			
6.	**Contract Completion Status**			
	Contract Awarded:	2/9/2026	**Contract Award Amount:**	$498,000
	Notice to Proceed (NTP):	N/A	**Total Modifications Approved:**	$0
	Original Complete Date:	2/8/2029	**Pending Modifications (including this action):**	$660,785
	Current Est. Complete Date:	2/8/2029	**Current Contract Value (with this action)**	$1,158,785
7.	**Contract Administrator**: Kathy Khang		**Telephone Number**: (213) 922-5242	
	Project Manager: Nicholas Kappos		**Telephone Number**: (213) 922-4386	

A. Procurement Background

This Board Action is to approve Modification No. 1 to Contract No. PS136554000 to acquire, implement and maintain a fully redundant Christie Spyder video wall processor system to ensure uninterrupted operation of the two video walls at the Emergency and Security Operations Center (ESOC).

This Contract Modification will be processed in accordance with Metro's Acquisition Policy and the contract type is a firm fixed unit rate.

In February 2026, Metro awarded a three-year contract to Advanced Cable Solutions to provide maintenance services and troubleshooting for audio visual equipment at the ESOC.

No modification has been issued to date.

Refer to Attachment B – Contract Modification/Change Order Log.

B. Price Analysis

The recommended price has been determined to be fair and reasonable based upon the Independent Cost Estimate (ICE), technical analysis and price analysis.

Proposal Amount	Metro ICE	Recommended Amount
$660,785	$654,250	$660,785

ATTACHMENT B

CONTRACT MODIFICATION/CHANGE ORDER LOG

MAINTENANCE SERVICES AND TROUBLESHOOTING FOR AUDIO-VISUAL EQUIPMENT / PS136554000

Mod No.	Description	Status (approved or pending)	Date	Amount
1	Implement and maintain a redundant Christie Spyder video wall processor system at the Emergency and Security Operations Center.	**Pending**	**Pending**	**$660,785**
	Modification Total:			**$660,785**
	Original Contract:		**2/9/2026**	**$498,000**
	Total:			**$1,158,785**

DEOD SUMMARY

MAINTENANCE SERVICES AND TROUBLESHOOTING FOR AUDIO-VISUAL EQUIPMENT / PS136554000

A. Small Business Participation

At the time this was solicited, the Diversity & Economic Opportunity Department did not establish a Small Business Enterprise (SBE)/Disabled Veteran Business Enterprise (DVBE) goal. Advanced Cable Solutions (ACS) did not make a commitment for this contract. It is expected that ACS will continue to perform the services with its own workforce.

B. Living Wage and Service Contract Worker Retention Policy Applicability

The Living Wage and Service Contract Worker Retention Policy is not applicable to this modification.

C. Prevailing Wage Applicability

Prevailing wage is not applicable to this modification.

D. Project Labor Agreement/Construction Careers Policy

Project Labor Agreement/Construction Careers Policy is not applicable to this Contract. PLA/CCP is applicable only to construction contracts that have a construction related value in excess of $2.5 million.

E. Manufacturing Careers Policy

The Manufacturing Careers Policy (MCP) does not apply to this contract. The MCP is required on Metro's Rolling Stock RFPs, with an Independent Cost Estimate of at least $50 million.

Emergency Security Operations Center Audio-Visual Systems Maintenance Services Contract Modification

Operations, Safety, & Customer Experience Committee
April 16, 2026

Metro

Staff Recommendation

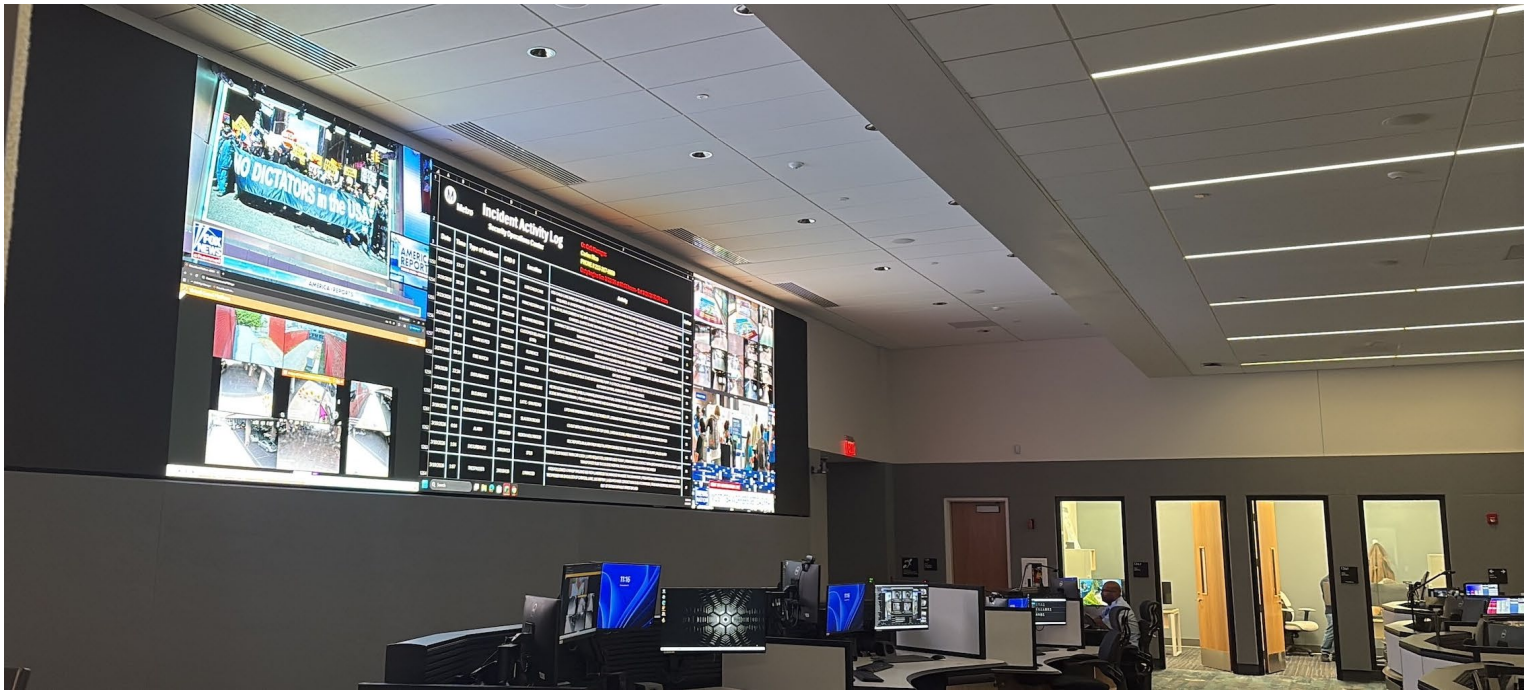
AUTHORIZE the Chief Executive Officer to execute Modification No. 1 to Contract No. PS136554000 with Advanced Cable Solutions (ACS) to incorporate additional scope and funding associated with the implementation and maintenance of a redundant video wall processor system, in the amount of $660,785, increasing the total contract Not-To-Exceed (NTE) amount from $498,000 to $1,158,785.

Metro

Background and Issue

- Metro's ESOC, which supports the Emergency Operations Center and Security Operations Center, relies on the video wall processor to display surveillance feeds and operational information used by the Department of Public Safety (DPS).

- A three-year contract was awarded in February 2026 to provide maintenance and troubleshooting services for the ESOC audio-visual systems.



Background and Issue (cont.)

- However, subsequent assessments by ACS identified a single critical point of failure in the video wall processor that could affect situational awareness during critical incidents.
    - The current setup has just one video processor, so there is no backup system in place, which could cause disruptions during an outage or maintenance.
- **Implementing a fully redundant video wall processor will eliminate the current single point of failure in the ESOC video wall system and ensure uninterrupted operations.**
    - The redundant system will provide automatic failover during hardware failures, system faults, or maintenance, maintaining continuous situational awareness for DPS personnel.

Metro

Next Steps

- Upon Board approval, staff will execute Contract Modification No. 1 to Contract No. PS136554000 with Advanced Cable Solutions for the implementation of the redundant video wall processor system.

Metro

File #: 2026-0162, **File Type:** Contract **Agenda Number:** 32.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: TUNNEL GROUTING SERVICES

ACTION: AWARD CONTRACT

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

A. AWARD an Indefinite Delivery/Indefinite Quantity (IDIQ) task order contract, Contract No. OP129922(2)000 to Keller North America, Inc., for Tunnel Grouting Services, in the Not-To-Exceed (NTE) amount of $9,464,800 for the five-year base period and $607,444 for the first one-year option, $631,854 for the second one-year option, and $657,628 for the third one-year option, for a combined NTE amount of $11,361,726, subject to the resolution of any properly submitted protest(s), if any; and

B. EXECUTE individual contract modifications within the Board-approved contract modification authority.

ISSUE

The Metro rail network consists of facilities interconnected by concrete guideways and subway tunnels. These structures require periodic restoration, patching, and sealing to preserve structural integrity and prevent water intrusion through contact grouting. Approval of this contract is necessary to provide grouting services on the A, B, D, E and K Lines, that extend the service life of these concrete assets, enhance durability, and prevent system deterioration.

BACKGROUND

Over time, Metro rail concrete guideways and subway tunnels are impacted by environmental conditions that can cause cracking, spalling, and water seepage. In underground tunnel environments, certain sections are particularly susceptible to groundwater intrusion due to fluctuating water tables resulting from rainfall or storm events. These conditions require sealing to prevent water inflow into tunnels and protect rail system components. Grouting services involve injecting cementitious or chemical materials into cracks, voids, or other defects within tunnels and guideways to restore concrete substrates and stop water infiltration. These repairs help maintain structural reliability, ensure system safety, and preserve the functionality of Metro’s rail infrastructure assets,

which includes tunnel trackway for the existing A Line, B and D Lines, E Line and K Line, as well as the new D Line extensions.

Inspections of railway concrete structures are conducted regularly under Metro's State of Good Repair (SGR) and Transit Asset Management (TAM) Programs. Tunnel grouting services are implemented as part of this broader SGR and TAM strategy to extend asset life and prevent service disruptions.

Grouting services are currently being provided by the existing Contract No. C1146-2000, which expired on 12/31/2025. Prior to expiration, staff issued the final Task Order 8, with a Period of Performance that ends 6/30/27. Accordingly, the award of a new contract is necessary to allow for additional Task Orders to be executed to ensure continuity of grouting services.

DISCUSSION

The scope of services under the Tunnel Grouting Services contract includes repairing identified cracks, spalling, and voids by injecting specialized grout materials into railway tunnels and concrete structures to prevent and stop water leaks. The work may also include patching damaged concrete, replacing damaged reinforcing steel, and removing and reinstalling electrical, mechanical, or plumbing equipment as needed to complete the repairs. All work will be performed on a task order basis as grouting needs are identified. Additional details regarding the solicitation of IFB No. OP129922(2) are provided in Attachment A, Procurement Summary.

Tunnel Grouting Services is an SGR initiative focused on renewing and maintaining critical transit infrastructure assets, including the A, B, D, E and K Lines, to ensure continued rail service reliability, safety, and accessibility.

DETERMINATION OF SAFETY IMPACT

Award of the Tunnel Grouting Services contract will contribute to maintaining transit infrastructure assets in an SGR, as recommended by Metro's TAM Plan, which is essential to providing safe, reliable, and well-maintained facilities for both Metro riders and employees who utilize Metro rail transit infrastructure daily.

FINANCIAL IMPACT

This task order based contract award action authorizes an NTE spending limit of $9,464,800. As task orders become necessary, funding will be provided from the appropriate project. The funding source differs depending on the individual project. As such, task orders will only be issued when there is sufficient funding within the approved budget for each respective project.

Since this is a multi-year contract, the Project Manager will be responsible and accountable for budgeting any planned annual work program for the current and future fiscal years in Cost Center 3924 Rail Transit Facilities Maintenance under projects 300022 Rail Operations A Line, 300044 Rail Operations B Line, 300066 Rail Operations E Line and 300077 Rail Operations K Line for the term of the contract, including any option(s) exercised.

Impact to Budget

The current source of funds for this action includes operating eligible funds, including Passenger Fares, Propositions A and C, Measures R and M sales tax revenues, State Transit Assistance (STA), and the Transportation Development Act.

EQUITY PLATFORM

This action will continue to advance equity by supporting ongoing SGR maintenance of concrete guideways and subway tunnels, ensuring safe and reliable service throughout the Metro rail network. Metro is committed to maintaining its rail transit assets to provide accessible and dependable transportation to everyone, including low-income households, zero-vehicle households, and Black, Indigenous, and People of Color (BIPOC) communities. In addition, several accessible rail stations function as key transfer points, connecting riders to other Metro rail lines and multiple bus lines. These connections are critical for workers, students, and residents from Equity Focus Communities (EFCs) who rely on the transit system for daily mobility.

The Disadvantaged Business Enterprise (DBE) contract goal for this procurement is zero percent (0%) of the Total Contract Price. The U.S. Department of Transportation (USDOT) has issued an Interim Final Rule (IFR) that makes changes to the DBE Program, including suspension of goals and enforcement, effective October 3, 2025. Metro is currently reviewing the IFR to identify necessary program and procedural changes to ensure full compliance. While the DBE commitment is not a factor in the staff recommendation, there is one certified small business participating in this contract.

VEHICLE MILES TRAVELED (VMT) OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the Southern California Association of Governments (SCAG) region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit. * Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This item supports Metro's systemwide strategy to reduce VMT through SGR maintenance of bus and rail transit infrastructure assets. These investments further encourage transit ridership, ridesharing, and active transportation. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

Approval of the recommendation aligns with Metro's Strategic Plan by advancing Goal No.2, which is to deliver outstanding trip experiences for all transportation system users, and Goal No. 3, which is to

enhance communities and lives through mobility and access to opportunity.

ALTERNATIVES CONSIDERED

The alternative would be to solicit individually separate contract awards each time grouting services are needed. However, this approach is not recommended because it would require significantly more staff and time to process each solicitation, leading to delays due to the extended lead time of each procurement cycle.

In addition, grouting services should not be delayed when a need arises, as concrete spalling, cracking, and water intrusion are not static conditions. These issues can worsen rapidly, leading to accelerated structural deterioration and potential rail operational disruptions.

NEXT STEPS

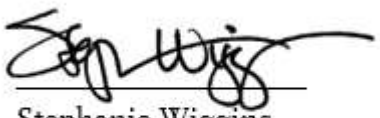
Upon approval by the Board, staff will execute Contract No. OP129922(2)000 to Keller North America, Inc. for tunnel grouting services on a task order basis for guideways and tunnels for a five-year base period plus three one-year options.

ATTACHMENTS

Attachment A - Procurement Summary
Attachment B - DEOD Summary

Prepared by: Geyner Paz, Chief Administrative Analyst, (213) 922-3744
Rudy Loera, Deputy Executive Officer, Facilities Maintenance (213) 617-6225
Errol Taylor, Deputy Chief Operations Officer, Infrastructure Maintenance and Engineering, (213) 922-3227
Debra Avila, Deputy Chief Vendor/Contract Management Officer, (213) 418-3051

Reviewed by: Conan Cheung, Chief Operations Officer, (213) 418-3034



Stephanie Wiggins
Chief Executive Officer

PROCUREMENT SUMMARY
TUNNEL GROUTING SERVICES/ OP129922(2)000

1.	**Contract Number**: OP129922(2)000	
2.	**Recommended Vendor**: Keller North America, Inc.	
3.	**Type of Procurement (check one):** ☒ **IFB** ☐ **RFP** ☐ **RFP–A&E** ☐ **Non-Competitive** ☐ **Modification** ☐ **Task Order**	
4.	**Procurement Dates**:	
	A. Issued: 11/5/2025	
	B. Advertised/Publicized: 11/5/2025	
	C. Pre-Bid Conference: 11/14/2025	
	D. Bids Due: 1/12/2026	
	E. Pre-Qualification Completed: 2/9/2026	
	F. Ethics Declaration Forms Submitted to Ethics: 1/13/2026	
	G. Protest Period End Date: 4/21/2026	
5.	**Solicitations Downloaded**: 39	**Bids Received**: 3
6.	**Contract Administrator**: Johsua Sierra	**Telephone Number**: 213-922-4539
7.	**Project Manager**: Rudy Loera	**Telephone Number**: 213-617-6225

A. Procurement Background

This Board Action is to approve Contract No. OP129922(2)000 issued to support concrete restoration and groundwater intrusion mitigation across Metro's rail system, including guideways, bridges, tunnels, and related facilities, requiring periodic concrete repair, grouting, patching, reinforcement, and associated electrical, mechanical, or plumbing work. Board approval of contract awards is subject to the resolution of any properly submitted protest(s), if any.

Invitation for Bids (IFB) No. OP129922(2) was issued in accordance with Metro's Acquisition Policy and the contract type is Indefinite Delivery/Indefinite Quantity (IDIQ). The Diversity & Economic Opportunity Department did not recommend a Disadvantaged Business Enterprise (DBE) goal.

5 amendments were issued during the solicitation phase of this IFB:

- Amendment No. 1, issued on November 18, 2025 revised the Public Works Verification Form Exhibit;
- Amendment No. 2, issued on November 26, 2025 extended critical dates;
- Amendment No. 3, issued on December 2, 2025 revised language in LOI-01: Notice of Invitation;
- Amendment No. 4, issued on December 12, 2025 revised language in SP-13: Liquidated Damages; replaced Exhibit C in its entirety
- Amendment No. 5, issued on December 15, 2025 replaced Exhibit 2 – Schedule of Quantities and Prices in its entirety.

A total of 39 firms downloaded the IFB and were included in the planholders' list. A virtual pre-bid conference was held on November 14, 2025, and was attended by 13 participants representing eight firms. There were eight questions received for this IFB and responses were provided prior to the bid due date.

A total of three bids were received on January 12, 2026.

B. Evaluation of Bids

This procurement was conducted in accordance and complies with Metro's Acquisition Policy for a competitive sealed bid. The three bids received are listed below in alphabetical order:

1. Frontier-Kemper Constructors, Inc.
2. Keller North America, Inc.
3. Renesco

Keller North America, Inc., was found to be the lowest responsive, responsible bidder.

C. Price Analysis

The recommended bid Not-To-Exceed (NTE) price from Keller North America has been determined to be fair and reasonable based upon price analysis, technical analysis, adequate price competition, Independent Cost Estimate (ICE) and selection of the lowest responsive and responsible bidder.

The ICE is approximately 29% higher than the recommended bid due to differences in the method of calculation of the ICE and the bid itemization. While Metro's ICE was calculated based on Metro's projected needs for tunnel maintenance services, and included some internal costs, the bid documents requested bidders to itemize specific items and their unit rates as well as labor rates for estimated quantities, however, all work will have a discreet scope of work and will only be authorized through a fully executed task order up to the NTE amount.

Bidder Name	Metro ICE	Bid Amount (NTE)
Keller North America, Inc.	$16,000,000.00	$11,361,726.00
Renesco	$16,000,000.00	$32,553,179.21
Frontier-Kemper Constructors, Inc.	$16,000,000.00	$45,279,332.00

D. Background on Recommended Contractor

The recommended firm, Keller North America, Inc., is headquartered in Hanover, Maryland, and maintains multiple offices throughout California. It has been in business for over 100 years and is a leader in the field of specialty geotechnical construction. Keller North America, Inc. is also the incumbent for the current concrete repair, grouting, patching, reinforcement, and associated electrical, mechanical, and plumbing work contract and has performed satisfactorily.

DEOD SUMMARY
TUNNEL GROUTING SERVICES/ OP129922(2)000

A. Small Business Participation

The Disadvantaged Business Enterprise (DBE) contract goal for this procurement is zero percent (0%) of the Total Contract Price. The U.S. Department of Transportation (USDOT) has issued an Interim Final Rule (IFR) that makes changes to the DBE Program, including suspension of goals and enforcement, effective October 3, 2025. Metro is currently reviewing the IFR to identify necessary program and procedural changes to ensure full compliance. While the DBE commitment is not a factor in the staff recommendation, there is one certified small business participating in this contract.

B. Local Small Business Enterprise (LSBE) Preference

The LSBE preference is not applicable to federally funded procurements. Federal law (49 CFR § 661.21) prohibits the use of local procurement preferences on FTA-funded projects.

C. Living Wage and Service Contract Worker Retention Policy Applicability

The Living Wage and Service Contract Worker Retention Policy is not applicable to this contract.

D. Prevailing Wage Applicability

Prevailing Wage requirements are applicable to this project. DEOD will monitor contractors' compliance with the State of California Department of Industrial Relations (DIR), California Labor Code, and, if federally funded, the U S Department of Labor (DOL) Davis Bacon and Related Acts (DBRA).

E. Project Labor Agreement/Construction Careers Policy

Project Labor Agreement/Construction Careers Policy is not applicable to this Contract. PLA/CCP is applicable only to construction contracts that have a construction related value in excess of $2.5 million.

F. Manufacturing Careers Policy

The Manufacturing Careers Policy (MCP) does not apply to this contract. The MCP is required on Metro's Rolling Stock RFPs, with an Independent Cost Estimate of at least $50 million.

MAINTENANCE & ENGINEERING

TUNNEL GROUTING SERVICES

Metro

Operations, Safety, & Customer Experience Committee Meeting
April 16, 2026

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

AWARD an Indefinite Delivery/Indefinite Quantity (IDIQ) task order contract, Contract No. OP129922(2)000 to Keller North America, Inc., for Tunnel Grouting Services, in the Not-To-Exceed (NTE) amount of $9,464,800 for the five-year base period and $607,444.00 for the first one-year option, $631,854.00 for the second one-year option, and $657,628.00 for the third one-year option, for a combined NTE amount of $11,361,726.00, subject to the resolution of any properly submitted protest(s), if any.

EXECUTE individual contract modifications within the Board-approved contract modification authority.

Metro

ISSUE & DISCUSSION

AWARDEE

Keller North America, Inc.

NUMBER OF BIDS/PROPOSALS

Proposer Name	Bid Amount	Metro ICE	Negotiated Amount
Keller North America, Inc.,	$11,361,726.00	$16,000,000.00	$11,361,726.00
Renesco	$32,553,179.21	$16,000,000.00	
Frontier-Kemper Constructors, Inc.	$45,279,332.00	$16,000,000.00	

Metro

ISSUE & DISCUSSION

DEOD COMMITMENT

The Disadvantaged Business Enterprise (DBE) contract goal for this procurement is zero percent (0%) of the Total Contract Price. The U.S. Department of Transportation (USDOT) has issued an Interim Final Rule (IFR) that makes changes to the DBE Program, including suspension of goals and enforcement, effective October 3, 2025. Metro is currently reviewing the IFR to identify necessary program and procedural changes to ensure full compliance. While the DBE commitment is not a factor in the staff recommendation, there is one certified small business participating in this contract.

ISSUE

The Metro rail network consists of facilities interconnected by concrete guideways and subway tunnels. These structures require periodic restoration, patching, and sealing to preserve structural integrity and prevent water intrusion through contact grouting.

Metro

ISSUE & DISCUSSION

DISCUSSION

The scope of services under the Tunnel Grouting Services contract includes repairing identified cracks, spalling, and voids by injecting specialized grout materials into railway tunnels and concrete structures to prevent and stop water leaks. The work may also include patching damaged concrete, replacing damaged reinforcing steel, and removing and reinstalling electrical, mechanical, or plumbing equipment as needed to complete the repairs.

Metro

File #: 2026-0176, **File Type:** Contract **Agenda Number:** 33.

OPERATIONS, SAFETY, AND CUSTOMERS EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: GLASS REPLACEMENT AND INSTALLATION SERVICES

ACTION: AWARD CONTRACT

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to award a firm fixed unit rate contract, Contract No. OP1349930008370 to Los Angeles Glass Company, Inc., to provide glass replacement and installation services systemwide for a Not-To-Exceed (NTE) amount of $4,737,385.00 for the three-year base period, effective July 1, 2026, subject to the resolution of any properly submitted protest(s), if any.

ISSUE

The existing glass replacement and installation services contract expires June 30, 2026. To continue providing these critical as-needed services, ensuring compliance with Metro's standards to maintain safe operations and timely glass replacement and installation services, a new contract award is required, effective July 1, 2026.

BACKGROUND

On January 26, 2023, the Board awarded a firm-fixed unit rate Small Business Enterprise (SBE) Set-Aside Contract No. OP917120008370 to Los Angeles Glass Company, Inc., a Metro-certified SBE to provide glass replacement and installation services, effective March 1, 2023.

Under the current contract, the contractor is required to provide as-needed board-up for broken glass panels, along with glass replacement and installation services systemwide.

There are various types of glass panels used throughout the Metro system for map cases, security guard shacks, fire hose and fire extinguisher cabinets, and elevators within the elevator cab, hoistway, and doors. Glass panels are subject to damage due to vandalism, breakage, accidents, and natural disasters requiring timely board-up and replacement.

Elevator glass panels are special, tempered, laminated, and fire-resistant, in accordance with State Elevator Safety Codes. When vandalized, a timely response for elevator glass board up or replacement is critical to Metro's operations to address emergencies, avoid service interruption, and

ensure patrons' accessibility to Metro stations. This is especially important for individuals with disabilities, senior citizens, and other patrons who rely on elevators, while ensuring a safe and reliable environment for all Metro patrons.

During the term of the existing contract, the scope of services expanded to include the stations along the A Line Foothill Extension Phase 2, D Line (Purple) Extension Phase I, K Lineand LAX/Metro Transit Center.

Under the current contract, Los Angeles Glass Company Inc. has provided satisfactory services for as-needed glass replacement and installation services systemwide.

On August 19, 2025, Metro issued a solicitation to provide as-needed glass replacement and installation services.

DISCUSSION

Under the new contract recommended for award, Los Angeles Glass Company, Inc., will continue to perform as-needed glass replacement and installation services systemwide to ensure safe operations and timely service delivery.

These services support critical safety, operational, and maintenance objectives for Metro's station and elevator infrastructure. Timely repair and replacement of damaged, cracked, or vandalized glass and board-ups help maintain safe working conditions and clear visibility, while enhancing passenger safety and accessibility. Prompt repairs also minimize the risk of injury and service disruptions, ensure reliable and uninterrupted transit operations, deter vandalism, preserve station aesthetics, and maintain a safe, secure, and welcoming environment for all passengers and staff.

During the term of the new contract, the scope of services will further expand to include additional stations along the D Line (Purple) Extension Phases II and III.

DETERMINATION OF SAFETY IMPACT

The approval of this item will ensure continuity of maintenance services with timely responses to as-needed board-up for broken glass panels and glass replacement services, in an effort to provide safe, on-time, and reliable services systemwide.

FINANCIAL IMPACT

Budget will be allocated under cost center 8370 - Facilities Contracted Maintenance Services, account 50308, Service Contract Maintenance, under various rail operating projects.

Since this is a multi-year contract, the cost center manager and Deputy Chief Operation Officer, Shared Mobility, will be accountable for budgeting the cost in FY27 and future years.

Impact to Budget

The current sources of funds for this action are local funds, which are eligible for rail and bus operations.

EQUITY PLATFORM

Providing timely response for as-needed glass replacement and installation services is critical to Metro's patrons to ensure elevators are operational and service is reliable and accessible to those with disabilities, older adults, and others, while providing a safe and reliable environment to our patrons. Prolonged elevator downtime due to vandalized or damaged glass panels causes delays, trip disruptions, and potential safety challenges for patrons requiring the use of elevators to complete their trip. Rail Operations are required to provide alternate accessibility services for impacted customers by requesting Access Services, which extends trip times, limits access to Metro's transit system, and negatively impacts customers' experience.

Metro customers, including those with Limited English Proficiency (LEP), can report broken glass and vandalism through the Customer Relations numbers posted throughout the rail and bus system. Customers have the option of communicating with Metro through nine different languages by utilizing the translation services. Metro also ensures translated signage is posted for those reporting broken glass on the Metro system, in addition to providing signage to be posted in the multiple languages required when an elevator is out of service.

Prior to the release of this solicitation, a Systemwide Metro Connect Industry Forum Outreach event was conducted on July 23, 2025. During this outreach event, staff provided an overview detailing the policy for the Small Business Enterprise (SBE) program requirements for competitively negotiated procurements.

The Diversity & Economic Opportunity Department (DEOD) established a 30% SBE goal and 3% DVBE goal for this solicitation. Los Angeles Glass Inc., a Metro certified SBE prime, exceeded the SBE goal by making a 97% SBE and 3% DVBE commitment.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This item supports Metro's systemwide strategy to reduce VMT through these maintenance activities that will improve bus and rail station safety and further encourage transit ridership. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring

System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

This Board action supports Strategic Goal 5: Provide responsive, accountable, and trustworthy governance within the Metro organization. Performing timely as-needed broken glass panel board-up and replacement services will ensure providing a safe environment to our patrons, accessibility and service reliability, and enhancing customers' overall experience.

ALTERNATIVES CONSIDERED

The Board may elect not to approve this recommendation. This option is not recommended as it would result in a gap in service impacting Metro's system safety, cleanliness, operation, and customer experience.

With the completion of a financial-based insourcing study based on quantitative and qualitative assessment, staff has analyzed insourcing/outsourcing options for glass replacement and installation services, among other services. Based on initial findings, glass replacement and installation services were not recommended for insourcing as this action does not meet the study's qualitative budgetary objectives. Providing this service in-house would require the hiring and training of additional personnel, the acquisition of additional equipment, vehicles, and supplies to support the expanded responsibility. Staff's assessment indicates that this is not a cost-effective option for Metro.

NEXT STEPS

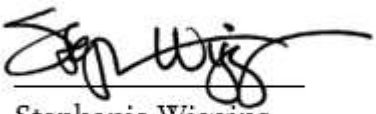
Upon approval by the Board, staff will execute Contract No. OP1349930008370 with Los Angeles Glass Company Inc., effective July 1, 2026, to provide as-needed glass replacement and installation services.

ATTACHMENTS

Attachment A - Procurement Summary
Attachment B - DEOD Summary

Prepared by: Ruben Cardenas, Senior Director, Facilities Contracted Maintenance Services, (213) 922-5932
Lena Babayan, Executive Officer, Operations Administration, (213) 922-6765
Shahrzad Amiri, Deputy Chief Operation Officer, Shared Mobility, (213) 922-3061
Debra Avilla, Deputy Chief Vendor/Contract Management Officer, (213) 418-3051

Reviewed by: Conan Cheung, Chief Operations Officer, (213) 418-3034



Stephanie Wiggins
Chief Executive Officer

ATTACHMENT A

PROCUREMENT SUMMARY

GLASS REPLACEMENT AND INSTALLATION SERVICES/OP1349930008370

1.	**Contract Number**: OP1349930008370	
2.	**Recommended Vendor**: Los Angeles Glass Company, Inc.	
3.	**Type of Procurement (check one):** ☒ **IFB** ☐ **RFP** ☐ **RFP–A&E** ☐ **Non-Competitive** ☐ **Modification** ☐ **Task Order**	
4.	**Procurement Dates**:	
	A. Issued : 8/19/2025	
	B. Advertised/Publicized: 8/19/2025	
	C. Pre-Bid Conference: 8/26/2025	
	D. Bids Due: 9/26/2025	
	E. Pre-Qualification Completed: 11/21/2025	
	F. Ethics Declaration Forms Submitted to Ethics: 9/26/2025	
	G. Protest Period End Date: 4/21/2026	
5.	**Solicitations Downloaded**: 16	**Bids Received**: 2
6.	**Contract Administrator**: Misty Atalanta Alderaan	**Telephone Number**: (213) 922-7673
7.	**Project Manager**: Maral Minasian	**Telephone Number**: (213) 922-6762

A. Procurement Background

This Board Action is to approve the award of Contract No. OP1349930008370 issued to support glass replacement & installation services throughout Metro bus, rail, customer, and administrative support facilities to ensure compliance with regulatory standards and safety requirements. Board approval of contract award is subject to the resolution of any properly submitted protest(s), if any.

On August 19, 2025, Invitation for Bids (IFB) No. OP134993 was issued as a competitive sealed bid procurement in accordance with Metro's Acquisition Policy and the contract type was a firm fixed unit rate. Metro's Diversity & Economic Opportunity Department (DEOD) recommended a 30% SBE goal and 3% Disabled Veteran Business Enterprise (DVBE) goal for this procurement and the solicitation was subject to the Local Small Business Enterprise (LSBE) Preference Program which gives eligible LSBE bidders a 5% scoring preference as a bid price reduction.

Two (2) amendments were issued during the solicitation phase of this IFB:

- Amendment No. 1, issued on August 29, 2025, revised the schedule of quantities, and included the pre-bid conference materials.
- Amendment No. 2, issued on September 23, 2025, revised the schedule of quantities and prices.

A total of 16 firms downloaded the IFB and were included in the planholders' list. A virtual pre-bid conference was held on August 26, 2025, and was attended by 2 firms.

On September 26, 2025, the bid due date, Metro received 2 bids from:

1. Gandy Glass Co., Inc.
2. Los Angeles Glass Company, Inc.

Since only 2 bids were received, Metro staff conducted a market survey of the firms on the planholders' list to determine why no other bids were received. One firm responded to the survey and stated they would be unable to meet the DVBE goal. However, since the solicitation package was released with a list of over 80 Disabled Veteran Business Enterprises (DVBEs) that were listed under the NAICS codes for this project, Metro considered that it was a business decision from the firm not to participate in the solicitation.

On November 18, 2025, Gandy Glass Co. Inc., notified Metro staff that the company would be filing for bankruptcy and, as a result, must withdraw its bid from the solicitation. Accordingly, Metro continued its evaluation of the remaining bid from Los Angeles Glass Company, Inc. Since Gandy Glass withdrew its bid, the LSBE Preference bid reduction, was not applied.

B. Evaluation of Bids

This procurement was conducted in accordance with and complies with Metro's Acquisition Policy for a competitive sealed bid. Los Angeles Glass Company, Inc.'s bid submission was evaluated to determine responsiveness to the solicitation requirements. Areas of responsiveness include meeting all listed minimum qualifications, such as years of experience providing glass replacement and installation services and possession of a current C-17 Specialty license issued by the State of California.

Los Angeles Glass Company, Inc., was determined to be qualified to perform the required services based on the IFB requirements.

C. Cost/Price Analysis

The recommended bid price from Los Angeles Glass Company, Inc., has been determined to be fair and reasonable based on the Independent Cost Estimate (ICE), price analysis, fact-finding, and technical evaluation. The bid is 31.34% below the ICE, resulting in a savings of $1,760,907. Metro staff verified that the bid was complete and accounted for all line items in the bid requirements. The difference between the ICE and the recommended bid amount is attributable to the contractor submitting lower unit rates for the majority of the services to remain competitive in this solicitation.

Bidder Name	Metro ICE	Bid Amount
Los Angeles Glass Company, Inc.	$6,498,293	$4,737,385

Gandy Glass Co., Inc.	$6,498,293	$5,581,805

D. Background on Recommended Contractor

Los Angeles Glass Company, Inc., was founded in 2007 and is a licensed and bonded, full-service glass installation contractor. With nearly 2 decades of industry experience, Los Angeles Glass Company's servicing and engineering departments have been performing similar and related services. Los Angeles Glass Company is the incumbent contractor and has consistently provided satisfactory service since 2020.

DEOD SUMMARY

GLASS REPLACEMENT AND INSTALLATION SERVICES/OP1349930008370

A. Small Business Participation

The Diversity and Economic Opportunity Department (DEOD) established a 30% Small Business Enterprise (SBE) and 3% Disabled Veteran Business Enterprise (DVBE) goal for this solicitation. Los Angeles Glass Company, Inc., an SBE prime, exceeded the goal by making a 97% SBE and 3% DVBE commitment.

Small Business Goal	**30% SBE 3% DVBE**	**Small Business Commitment**	**97% SBE 3% DVBE**

	SBE Subcontractor	**% Committed**	**LSBE**	**Non-LSBE**
1.	Los Angeles Glass Company, Inc. (Prime)	97%	X	
	Total Commitment	**97%**		

	DVBE Subcontractor	**% Committed**	**LSBE**	**Non-LSBE**
1.	Los Angeles Glass Company, Inc. (Prime)	3%	X	
	Total Commitment	**3%**		

B. Local Small Business Preference Program (LSBE)

Los Angeles Glass Company, Inc., an LSBE prime, is eligible to receive the LSBE Preference, as a bid price reduction.

C. Living Wage and Service Contract Worker Retention Policy Applicability

The Living Wage and Service Contract Worker Retention Policy is not applicable to this contract.

D. Prevailing Wage Applicability

Prevailing Wage requirements are applicable to this project. DEOD will monitor contractors' compliance with the State of California Department of Industrial Relations (DIR), California Labor Code, and, if federally funded, the U S Department of Labor (DOL) Davis Bacon and Related Acts (DBRA).

E. Project Labor Agreement/Construction Careers Policy

Project Labor Agreement/Construction Careers Policy is not applicable to this Contract. PLA/CCP is applicable only to construction contracts that have a construction related value in excess of $2.5 million.

F. Manufacturing Careers Policy

The Manufacturing Careers Policy (MCP) does not apply to this contract. The MCP is required on Metro's Rolling Stock RFPs, with an Independent Cost Estimate of at least $50 million.

SHARED MOBILITY - FACILITIES CONTRACTED MAINTENANCE SERVICES

GLASS REPLACEMENT AND INSTALLATION SERVICES OP1349930008370

Metro

Operations, Safety, & Customer Experience Committee Meeting
April 16, 2026

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to award a firm fixed unit rate contract, Contract No. OP1349930008370 to Los Angeles Glass Company Inc., to provide glass replacement and installation services systemwide for a Not-To-Exceed (NTE) amount of $4,737,385.00 for the three-year base period, effective July 1, 2026, subject to the resolution of any properly submitted protest(s), if any.

Metro

ISSUE & DISCUSSION

AWARDEE

Los Angeles Glass Company Inc.

NUMBER OF BIDDERS – 2

- Los Angeles Glass Company Inc. – Responsive
- Gandy Glass Co. Inc. – Withdrawn (Business discontinued on 12/31/25)

DEOD COMMITMENT/

The Diversity and Economic Opportunity Department (DEOD) established a 30% Small Business Enterprise (SBE) goal and 3% Disabled Veterans Business Enterprise (DVBE) goal, with Los Angeles Glass Company, Inc., a Metro certified SBE prime, exceeding the SBE goal by making a 97% SBE and 3% DVBE commitment.

ISSUE

The existing glass replacement and installation services contract expires June 30, 2026. To continue providing these critical as-needed services, ensuring compliance with Metro's standards to maintain safe operations and timely glass replacement and installation services, a new contract award is required effective July 1, 2026.

Metro

ISSUE & DISCUSSION

DISCUSSION

Under the new contract recommended for award, Los Angeles Glass Company, Inc., will continue to perform as-needed glass replacement and installation services systemwide to ensure safe operations and timely service delivery.

These services support critical safety, operational, and maintenance objectives for Metro's station and elevator infrastructure. Timely repair and replacement of damaged, cracked, or vandalized glass and board-ups help maintain safe working conditions and clear visibility, while enhancing passenger safety and accessibility. Prompt repairs also minimize the risk of injury and service disruptions, ensure reliable and uninterrupted transit operations, deter vandalism, preserve station aesthetics, and maintain a safe, secure, and welcoming environment for all passengers and staff.

During the term of the new contract, the scope of services will further expand to include additional stations along the D Line (Purple) Extension Phases II and III

Metro

File #: 2026-0177, **File Type:** Contract **Agenda Number:** 34.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: TUNNEL WASHING SERVICES

ACTION: AWARD CONTRACT

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to award a firm fixed unit rate Contract No. OP122327(4) 000 to Parkwood Landscape Maintenance Inc., to provide tunnel washing services systemwide for a Not-To-Exceed (NTE) amount of $5,295,000.00 for the five-year base term, effective July 1, 2026, subject to the resolution of any properly submitted protests(s), if any.

ISSUE

The existing tunnel-washing services contract expires on June 30, 2026. To continue providing these critical services, ensuring compliance with Metro's cleanliness standards, and maintaining safe operations, a new contract award is required, effective July 1, 2026.

BACKGROUND

On June 22, 2017, the Board awarded a firm-fixed unit rate Contract No. OP778590003367 to Parkwood Landscape Maintenance, Inc., to provide tunnel washing services. The scope of services ensures tunnel cleanliness standards are met and includes the use of pressurized water and degreasing solutions, as necessary, to remove sludge and residue generated by train brake pads and rotors, as well as the removal of debris and particulates, while cleaning walls, tracks, coverboards, insulators, catwalks, handrails, and the entire wall area above the third rail within the stations.

During the term of the existing contract, the scope of services expanded from 39.4 miles of tunnel trackway which included the B/D (Red/Purple) Line and the E Line (Expo) between Mariachi Plaza and Soto Stations to include an additional 13.9 miles of tunnel trackway for the A Line Regional Connector, D Line (Purple) Extension Phase I, and K Line Crenshaw/LAX segments, for a total of 53.3 miles of tunnel trackway; which requires tunnel washing services to improve the overall conditions and cleanliness.

Since the start of the contract, Parkwood Landscape Maintenance, Inc., has collected and removed approximately 159,346 pounds of dry trash, debris and 5,184 pounds of wet sludge from the tunnel trackway.

Under this contract, Parkwood Landscape Maintenance, Inc., has continued to provide satisfactory services, performing tunnel washing services systemwide.

Within the past 24 months, three (3) solicitations were issued on May 14, 2024, October 2, 2024, and February 19, 2025, however were cancelled due to (1) no bids received, (2) changes to the Scope of Services (SOS), and (3) unreasonable pricing, as well as the need to further evaluate and refine the SOS to ensure expanding opportunities for small and medium-sized firms to do business with Metro.

On August 28, 2025, a new solicitation to provide tunnel washing services was issued under the Medium-Size Business Enterprise (MSZ) program.

DISCUSSION

Under the new tunnel washing services contract, Parkwood Landscape Maintenance, Inc., will continue to perform tunnel washing to remove trash and debris necessary to maintain a safe and clean train path and to mitigate potential fire hazards caused by excessive grease and debris accumulation within the rail confined spaces, adjacent to an energized third rail.

These services support critical safety, operational, and maintenance objectives for Metro's station infrastructure. Regular cleaning ensures safe working conditions by removing accumulated soot, exhaust residue, sludge, and grime, maintaining essential visibility, reducing fire hazards, minimizing corrosive damage to extend the lifespan of infrastructure and equipment, and improving air quality and circulation throughout the tunnels, while supporting reliable and uninterrupted transit operations.

During the term of the new contract, the scope of services will further expand to include an additional 6.3 miles of tunnel trackway for D Line (Purple) Extension Phases II and III, resulting in a total of 59.6 miles of tunnel trackway.

DETERMINATION OF SAFETY IMPACT

The approval of this item will ensure service continuity and meet Metro's maintenance standards by providing regularly scheduled service in a timely manner. This will also improve overall safety and cleanliness conditions as well as the air quality within the stations in an effort to continue providing safe, clean, quality, on-time, and reliable services for our customers and the public.

FINANCIAL IMPACT

The new contract starts on July 1, 2026. Budget will be allocated under cost center 8370 - Facilities Contracted Maintenance Services, account 50308, Service Contract Maintenance, under various rail operating projects. Since this is a multi-year contract, the cost center manager and Deputy Chief Operations Officer, Shared Mobility, will be accountable for budgeting the cost in FY27 and future years.

Impact to Budget

The current sources of funds for this action are local funds (fare revenue, advertising revenue, as well as Prop A 35%, Prop C 40%, Measure R 5%, Measure M 5%, and TDA 4), which are eligible for rail operations.

EQUITY PLATFORM

Providing ongoing tunnel washing services supports critical safety, operational, and maintenance of Metro's tunnel trackway infrastructure, enhancing safe working conditions and station safety by removing accumulated soot, exhaust residue, sludge, and grime, to maintain essential visibility, improve air quality, reduce fire hazards, and minimize corrosive damage to equipment and infrastructure. Tunnel washing services enhance Metro staff and patrons' experience while utilizing Metro's facilities and transit system. This is especially critical in Equity Focus Communities, where individuals often depend on public transportation as their primary means of travel.

Prior to the release of this solicitation, a Systemwide Metro Connect Industry Forum Outreach event was conducted on February 7, 2024. During this outreach event, staff provided an overview detailing the policies for the enhanced MSZ and Small Business Enterprise (SBE) Programs for competitively negotiated procurements.

The Diversity and Economic Opportunity Department (DEOD) established a 12% SBE goal and 3% Disabled Veterans Business Enterprise (DVBE) goal. Parkwood Landscape Maintenance, Inc., met the goal by making a 12% SBE and 3% DVBE commitment.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This item supports Metro's systemwide strategy to reduce VMT through these maintenance activities that will improve bus and rail station safety and further encourage transit ridership. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

This Board action supports Strategic Goal 2: Deliver outstanding trip experiences for all users of the transportation system. Performing ongoing regular maintenance services will ensure compliance with Metro's station cleanliness standards to support safe and clean conditions, which result in enhanced

customer experience.

ALTERNATIVES CONSIDERED

The Board may elect not to approve this recommendation. This option is not recommended as it would result in a gap in service impacting Metro's system safety, cleanliness, operation, and customer experience.

With the completion of a financial-based insourcing study based on quantitative and qualitative assessment, staff has analyzed insourcing/outsourcing options for tunnel washing services, among other services. Based on initial findings, tunnel washing services were not recommended for insourcing as this action does not meet the study's qualitative budgetary objectives. Providing this service in-house would require the hiring and training of additional personnel, the acquisition of additional equipment, vehicles, and supplies to support the expanded responsibility. Staff's assessment indicates that this is not a cost-effective option for Metro.

NEXT STEPS

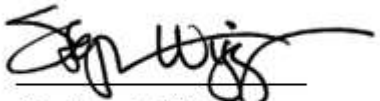
Upon approval by the Board, staff will execute Contract No. OP122327(4)000 to Parkwood Landscape Maintenance Inc., effective July 1, 2026, to provide tunnel washing services systemwide.

ATTACHMENTS

Attachment A - Procurement Summary
Attachment B - DEOD Summary

Prepared by: Ruben Cardenas, Senior Director, Facilities Contracted Maintenance Services, (213) 922-5932
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Debra Avila, Deputy Chief Vendor/Contract Management Officer, (213) 418-3051

Reviewed by: Conan Cheung, Chief Operations Officer, (213) 418-3034



Stephanie Wiggins
Chief Executive Officer

PROCUREMENT SUMMARY

TUNNEL WASHING SERVICES / CONTRACT NO. OP122327(4)000

1.	**Contract Number**: OP122327(4)000	
2.	**Recommended Vendor**: Parkwood Landscape Maintenance, Inc.	
3.	**Type of Procurement (check one):** ☐ **IFB** ☒ **RFP** ☐ **RFP–A&E** ☐ **Non-Competitive** ☐ **Modification** ☐ **Task Order**	
4.	**Procurement Dates**:	
	A. Issued: August 28, 2025	
	B. Advertised/Publicized: August 28, 2025	
	C. Pre-Proposal Conference: September 3, 2025	
	D. Proposals Due: October 2, 2025	
	E. Pre-Qualification Completed: January 9, 2026	
	F. Ethics Declaration Forms submitted to Ethics: October 8, 2025	
	G. Protest Period End Date: March 24, 2026	
5.	**Solicitations Downloaded**: 19	**Proposals Received**: 2
6.	**Contract Administrator**: **Andrew Coppolo**	**Telephone Number**: **(213) 922-1067**
7.	**Project Manager**: **Maral Minasian**	**Telephone Number**: **(213) 922-6762**

A. Procurement Background

This Board Action is to approve Contract No. OP122327(4)000 to provide complete high pressure washing services to clean the walls, ceiling, and floors of rail tunnels from trash debris, dirt, dust, grease, grime, sharps, and other contaminants from Metro Rail tunnels. Board approval of contract award is subject to the resolution of any properly submitted protest, if any.

Request for Proposals (RFP) No. OP122327(4) was issued in accordance with Metro's Acquisition Policy and the contract type is a firm fixed price. The Diversity & Economic Opportunity Department recommended a Small Business Enterprise (SBE) goal of 12%, a Disabled Veteran Business Enterprise (DVBE) goal of 3%, and was subject to the Local Small Business Enterprise (LSBE), which gives eligible proposers a 5% preference bonus points for utilizing local small business firms.

One (1) amendment was issued during the solicitation phase of this RFP:

- Amendment No. 1, issued on December 3, 2025, provided an updated pricing form to incorporate the correct total amount of hours for future locations in Exhibit 2 – Schedule of Quantities and Prices (SQ&P) and provided a Best and Final Offer (BAFO) proposal due date.

A total of 19 firms downloaded the RFP and were included in the planholders' list. A virtual pre-proposal conference was held on September 3, 2025, and was attended by six (6) participants representing four (4) firms. There were six (6) questions received for this RFP and responses were provided prior to the proposal due date.

A total of one (1) proposal was received on time on October 2, 2025, from Parkwood Landscape Maintenance, Inc. (Parkwood). One (1) proposal was received late and was excluded from further consideration.

Staff conducted a market survey to request information from prospective proposers to determine why no additional proposals were submitted. Inquiries were made of all firms that downloaded the solicitation. One firm responded that they lack the required minimum years of experience, one firm responded that they did not possess the required C-61 Contractor License, and one firm responded that they did not provide a proposal because proposals take a lot of time and effort to put together. The results of the market survey indicated that factors beyond Metro's control caused the potential sources not to submit proposals and that there were no restrictive elements in the solicitation documents that prevented competition.

B. Evaluation of Proposals

A Proposal Evaluation Team (PET) consisting of staff from Metro's Facilities Contracted Maintenance Services (FCM) and Project Control Bus Acquisitions was convened and conducted a comprehensive technical evaluation of the proposal received.

The proposal was evaluated based on the following evaluation criteria:

Phase I: Minimum Qualification Review: This is a pass/fail criteria. To be responsive to the RFP minimum qualification requirements, proposers must meet the following:

a) Must have at least three (3) years of experience performing high-pressure washing services and must submit reference information of previous or current contracts, and the annual total value must combine for a minimum of $200,000;
b) Must submit a report listing all safety training completed by all proposed staff working on the project within the last three (3) years;
c) Must submit a copy of the Proposer's/Subcontractor's valid and active State of California License for C61/D-38 Specialty License for Sand and Water Blasting;
d) Must submit a copy of the Proposer's/Subcontractor's valid and active Los Angeles County Waste Hauler's permit;
e) Must submit a copy of Proposer and all proposed Subcontractor's current Department of Industrial Relations (D.I.R.) certificate or other proof of good standing.

The PET determined the single proposal was responsive to the minimum qualification review.

Phase II – Technical Evaluation: Proposers that meet the Phase I Evaluation were evaluated based on the following evaluation criteria and weights:

- Work Plan/Project Approach 35%

- Price 30%
- Project Manager and Key Personnel Qualifications 20%
- Proposing Teams' (Including Subcontractor/s) Experience and Past Performance 15%
- Local Small Business Enterprise (LSBE) Preference Program (Bonus Points) 5%

The evaluation criteria are appropriate and consistent with criteria developed for other, similar professional service procurements. Several factors were considered when developing these weights, giving the greatest importance to work plan/project approach.

On October 14, 2025, the PET met to review the evaluation package criteria, process confidentiality and conflict of interest forms and take receipt of the proposal to initiate the evaluation phase. Evaluations were conducted from October 14, 2025, through November 7, 2025.

On November 7, 2025, the PET reconvened and determined Parkwood was responsive to the requirements of the RFP and recommended the firm for contract award.

Qualifications Summary of Qualified Firm

Parkwood

Parkwood Landscape Maintenance, Inc., has been providing pressure washing, tunnel washing, and hazardous hauling services in the Los Angeles, Ventura and Orange County areas for over 55 years and has relevant public transit system experience. Its current clients includeMetro, the City of Long Beach, the City of Los Angeles, and the City of Palmdale.

1	Firm	Average Score	Factor Weight	Weighted Average Score	Rank
2	**Parkwood Landscape Maintenance, Inc.**				
3	Work Plan/Project Approach	70.00	35.00%	24.50	
4	Price	100.00	30.00%	30.00	
5	Project Manager and Key Personnel Qualifications	76.67	20.00%	15.33	
6	Proposing Teams' (Including Subcontractor/s) Experience and Past Performance	76.67	15.00%	11.50	
7	Local Small Business Enterprise Preference Program (Bonus Points)	0.00	5.00%	0.00	
8	**Total**		**105.00%**	**81.33**	**1**

C. Cost/Price Analysis

The recommended price has been determined to be fair and reasonable based upon an Independent Cost Estimate (ICE), cost analysis, technical evaluation, and negotiations.

	Proposer Name	Proposal Amount	Metro ICE	Negotiated or NTE amount
1.	**Parkwood Landscape Maintenance, Inc.**	**$6,129,880**	**$5,083,200**	**$5,295,000**

The Contract Administrator led discussions with Parkwood to address questions and receive clarification of their proposed work plan, scope of service, and direct hourly labor rate within their Proposal. Following these discussions, Parkwood made price adjustments and submitted a revised Best and Final Offer (BAFO) which included a reduced proposal price in the amount of $5,295,000.

The negotiated BAFO price represents a 13.62% reduction from the initial proposed amount and is 4.17% higher than Metro's ICE, which is determined to be within a reasonable range. Based on historical government pricing, Parkwood's revised final cost is considered fair and reasonable.

D. Background on Recommended Contractor

Parkwood Landscape Maintenance, Inc. (Parkwood), founded in 1967, is located in Van Nuys, California, and has provided professional pressure washing and tunnel washing services in the Los Angeles area for over 56 years. Parkwood currently has contracts with the City of Long Beach, the City of Palmdale, and the City of Los Angeles. The firm is also Metro's current Contractor for tunnel washing services, landscape and irrigation maintenance, and trash and overgrown vegetation removal services.

The Parkwood team includes one SBE firm and one DVBE firm. Both subcontractors have experience providing services to Metro and performance has been satisfactory.

DEOD SUMMARY

TUNNEL WASHING SERVICES / OP122327(4)000

A. Small Business Participation

The Diversity and Economic Opportunity Department (DEOD) established a 12% Small Business Enterprise (SBE) and 3% Disabled Veteran Business Enterprise (DVBE) goal for this solicitation. Parkwood Landscape Maintenance, Inc. (Parkwood) met the goal by making a 12% SBE and 3% DVBE commitment.

Small Business Goal	12% SBE 3% DVBE	Small Business Commitment	12% SBE 3% DVBE

	SBE Subcontractor	% Committed	LSBE	Non-LSBE
1.	Far East Landscape Maintenance, Inc.	12%	X	
	Total Commitment	**12%**		

	DVBE Subcontractor	% Committed	LSBE	Non-LSBE
1.	IECLT	3%		X
	Total Commitment	**3%**		

B. Local Small Business Preference Program (LSBE)

Parkwood Landscape Maintenance, Inc., a non-LSBE prime contractor, subcontracted 12% of the total contract value to an eligible LSBE firm. Because this amount does not meet the 30% minimum subcontracting threshold required to qualify for the LSBE preference, Parkwood is ineligible for the preference.

C. Living Wage and Service Contract Worker Retention Policy Applicability

The Living Wage and Service Contract Worker Retention Policy is not applicable to this contract.

D. Prevailing Wage Applicability

Prevailing Wage requirements are applicable to this project. DEOD will monitor contractors' compliance with the State of California Department of Industrial

Relations (DIR), California Labor Code, and, if federally funded, the U S Department of Labor (DOL) Davis Bacon and Related Acts (DBRA).

E. Project Labor Agreement/Construction Careers Policy

Project Labor Agreement/Construction Careers Policy is not applicable to this Contract. PLA/CCP is applicable only to construction contracts that have a construction related value in excess of $2.5 million.

F. Manufacturing Careers Policy

The Manufacturing Careers Policy (MCP) does not apply to this contract. The MCP is required on Metro's Rolling Stock RFPs, with an Independent Cost Estimate of at least $50 million.

SHARED MOBILITY - FACILITIES CONTRACTED MAINTENANCE SERVICES

TUNNEL WASHING SERVICES
OP122327(4)0008370

Metro

Operations, Safety, & Customer Experience Committee Meeting
April 16, 2026

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to award a firm fixed unit rate Contract No. OP122327(4)0008370 to Parkwood Landscape Maintenance Inc., to provide tunnel washing services systemwide for a Not-To-Exceed (NTE) amount of $5,295,000.00 for the five-year base term, effective July 1, 2026, subject to the resolution of any properly submitted protests(s), if any.

Metro

ISSUE & DISCUSSION

AWARDEE

Parkwood Landscape Maintenance, Inc.

NUMBER OF PROPOSALS – 2

- Parkwood Landscape Maintenance, Inc. – Responsive
- KC Power Clean – Non-Response (Not Submitted Timely)

DEOD COMMITMENT

Medium-Sized Business Enterprise Tier 1 (MSZ-1) Program. The Diversity and Economic Opportunity Department (DEOD) established a 12% Small Business Enterprise (SBE) goal and 3% Disabled Veterans Business Enterprise (DVBE) goal. Parkwood Landscape Maintenance, Inc., met the goal by making a 12% SBE and 3% DVBE commitment.

ISSUE

The existing tunnel-washing services contract expires on June 30, 2026. To continue providing these critical services, ensuring compliance with Metro's cleanliness standards, and maintaining safe operations, a new contract award is required, effective July 1, 2026.

Metro

ISSUE & DISCUSSION

DISCUSSION

Under the new tunnel washing services contract, Parkwood Landscape Maintenance, Inc., will continue to perform tunnel washing to remove trash and debris necessary to maintain a safe and clean train path and to mitigate potential fire hazards caused by excessive grease and debris accumulation within the rail confined spaces, adjacent to an energized third rail.

These services support critical safety, operational, and maintenance objectives for Metro's station infrastructure. Regular cleanings ensure safe working conditions by removing accumulated soot, exhaust residue, sludge, and grime, maintaining essential visibility, reducing fire hazards, minimizing corrosive damage to extend the lifespan of infrastructure and equipment, and improving air quality and circulation throughout the tunnels, while supporting reliable and uninterrupted transit operations.

During the term of the new contract, the scope of services will further expand to include an additional 6.3 miles of tunnel trackway for D Line (Purple) Extension Phases II and III, resulting in a total of 59.6 miles of tunnel trackway.

Metro

File #: 2026-0134, **File Type:** Contract **Agenda Number:** 35.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: RENEWABLE NATURAL GAS (RNG) PROVIDER

ACTION: AWARD CONTRACT

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

A. AWARD a five (5) year Indefinite Delivery/Indefinite Quantity (IDIQ) contract, Contract No. OP132076000, with Shell Energy North America (US), LP for Renewable Natural Gas (RNG), inclusive of a five-year base in the Not-To-Exceed (NTE) amount of $140,004,228.05 and one three-year option in the NTE amount of $88,902,684.81, for a combined NTE amount of $228,906,912.86, subject to the resolution of any properly submitted protest(s), if any; and

B. EXECUTE individual Task Orders, Transaction Confirmations, and Contract Modifications up to 10% of the contract value.

ISSUE

Metro uses Renewable Natural Gas (RNG) fuel to power the engines on the majority of the bus fleet. RNG fuel is currently being procured under four contracts due to previously limited RNG availability from one single supplier.

RNG remains a critical bridge fuel during Metro's transition to a fully Zero-Emission Bus (ZEB) fleet. As charging infrastructure is constructed and new electric buses are phased into service, RNG ensures uninterrupted transit operations while maintaining progress toward greenhouse gas and criteria pollutant reduction goals. Maintaining a reliable RNG supply during this transition period protects operational continuity, safeguards service reliability, and provides flexibility as Metro refines future fleet and energy demand projections.

BACKGROUND

Metro's energy choices have far-reaching implications for climate, air quality, community health, and the stability of our transportation network. Recognizing this, Metro has made long-term commitments to energy efficiency, renewable energy adoption, greenhouse gas reductions, climate adaptation, and systemwide energy resilience. These commitments have been in place since 2007 and are reaffirmed

through the Board-approved 2019 Climate Action and Adaptation Plan, 2025 Climate Action and Adaptation Plan Update, the 2025 Energy Master Plan (EMP), and the 10-Year Strategic Plan, *Moving Beyond Sustainability*, and the 2026 MBS update.

Metro continues the development and installation of the electric bus charging infrastructure and procurement of new electric buses. Metro will continue to achieve greenhouse gas emissions and criteria air pollutant reduction goals during this transition by using Compressed Natural Gas (CNG) buses using RNG fuel during this transition.
Renewable natural gas can be difficult to differentiate from fossil fuel based natural gas, since both gases can be used interchangeably in the same applications. The main difference between natural gas and RNG lies in each gases' production methods, and consequently their environmental impacts.

RNG is a carbon-neutral fuel that captures human-generated biogas already present in the environment in landfills, wastewater treatment plants and livestock operations. Raw biogas or methane from these sources is then converted into RNG at a treatment plant. Methane capturing helps mitigate climate change by capturing harmful gases that would otherwise be released into the atmosphere and pollute the communities where landfills and livestock operations exist. RNG is considered renewable as it comes from naturally occurring sources.

DISCUSSION

As Metro phases in Zero-Emission Buses (ZEBs), beginning with the G and J-Lines, staff will be able to collect data to inform the pace of RNG reduction over the next few years. The phasing of new ZEB deliveries and completion of ZEB infrastructure will further refine the information. The contract's end date synchronization will provide staff with time to accurately assess future gas consumption needs, although RNG consumption is anticipated to decline with the expanded delivery and use of ZEBs. The procurement of electric buses is currently underway, and construction of the charging infrastructure is in process. As additional electric buses are placed into service, staff will be able to more accurately assess the declining demand for RNG as CNG buses are systematically retired from service. Additional funding is required to fuel the existing fleet of Metro buses operating on RNG to prepare Metro for any future significant cost fluctuations. This provides reliable, essential transit service to our customers through the smooth, uninterrupted operation of the bus fleet.

Consolidating the existing RNG agreements into a single contract structure improves administrative efficiency, enhances pricing transparency, and strengthens Metro's negotiating position in a maturing renewable gas market. A unified contract vehicle also allows Metro to better align fuel procurement strategy with long-term energy planning objectives outlined in the Energy Master Plan and Moving Beyond Sustainability framework. This structure enables Metro to respond to market conditions while maintaining consistency across divisions and fueling operations.

The issues and solutions to Metro's energy and climate change challenges are intertwined. In fact, more than half of Metro's climate change strategy is tied to energy, energy management, energy resiliency, and renewable energy. There must be an integrated approach moving forward, and the recommended award of Contract No. OP132076000 to Shell Energy North America (US), LP for Renewable Natural Gas (RNG) Provider Services is designed to fulfill that need. These services will ensure the protection of human health and the environment, address the challenge of operational

sustainability while ensuring a renewable, resilient and reliable energy future.

DETERMINATION OF SAFETY IMPACT

The award of this contract will ensure that all operating divisions have an adequate supply of renewable natural gas for the Metro bus fleet that provides safe, clean, and reliable transportation service for Metro customers. A reliable supply of RNG supports safe transit operations by ensuring uninterrupted fueling of the bus fleet. Maintaining stable fuel access reduces the risk of service disruptions that could affect customers who depend on Metro for essential travel. Operational continuity is a key component of system safety, and this contract ensures that bus divisions have the necessary fuel resources to operate safely and reliably.

The use of RNG further improves safety, as it is a carbon-neutral fuel produced by capturing human-generated biogas already present in the environment at landfills, wastewater treatment plants, and livestock operations. The capturing of these gases improves the safety of our communities by capturing the harmful gases that would otherwise be released into the atmosphere and pollute our environment.

FINANCIAL IMPACT

Funding for RNG will be included in FY26 and FY27 operating budgets in various bus divisions' cost centers, under project 306002 - Operations Maintenance, under line item 50402 FUEL CNG - REVENUE EQUIPMENT. Cost center managers and the Chief Operations Officer will be responsible for budgeting the cost of RNG in the future fiscal years.

Under the California Air Resources Board’s (CARB) Low Carbon Fuel Standard (LCFS) and the US Environmental Protection Agency’s Renewable Index Numbers (RINs) programs, Metro is currently generating carbon credits through the dispensing of natural gas for bus fueling and use of electricity for light and heavy rail propulsion. Specifically to renewable natural gas, the fuel's lower carbon index enables us to generate carbon credits. These carbon credits are managed through the Metro Office of Sustainability and sold by Metro’s Vendor/Contract Management, with proceeds reinvested towards Metro sustainability and resiliency initiatives, consistent with the 2020 10-year Sustainability Strategic Plan. Projected revenue from the future sale of carbon credits generated over the life of this contract is approximately $44.5 million.

Impact to Budget

The current sources of funds for this action are Federal 5307, Proposition A, Proposition C, Measure R, Measure M, and the Transportation Development Act. This funding is eligible for bus and rail operations.

EQUITY PLATFORM

Award of this contract advances Metro’s Equity Platform by delivering energy reliability improvements that protect communities most dependent on transit. lower-income riders, communities of color,

people with disabilities, seniors, youth, and essential workers disproportionately rely on Metro for daily access to jobs, healthcare, and basic services-and they are the first and hardest hit when outages disrupt service. The Energy Master Plan projects a 200% increase in electricity demand by 2050 and identifies three bus divisions and three park-and-ride facilities already operating in constrained utility zones, underscoring the urgency of strengthening system reliability to avoid disproportionate service impacts on equity-priority riders.

This action ensures the uninterrupted operation of Metro's bus fleet that serves Los Angeles County and disproportionately serves marginalized and vulnerable transit riders. RNG is needed to be able to provide reliable and safe bus service until ZEBs can be phased in and ensure that the bus fleet that serves most regions in Los Angeles County, including many underserved communities, can provide safe, clean, and reliable services to neighborhoods where disparities within the region can exist between residents' access to jobs, housing, education, health, and safety. Bus Fleet Management works to maintain equity in bus assignments in accordance with Title VI of the Federal regulations. Fleet Management will continue to focus on maintaining equity in EFC/low-income communities as newer buses arrive in the coming years.

At the time of solicitation, the Diversity & Economic Opportunity Department did not establish a Disadvantaged Business Enterprise (DBE) goal for this procurement due to the lack of subcontracting opportunities. Shell Energy North America (US), LP is expected to perform the work with its own workforce.

VEHICLE MILES TRAVELED (VMT) OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

This item supports Metro's systemwide strategy to reduce VMT through operational activities that will support Metro's maintenance and continued success of its RNG bus feet, need to implement advanced strategies to meet our energy and climate goals and further encourage transit ridership, ridesharing, and active transportation. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The RNG contracts support Strategic Goal 2: Deliver outstanding trip experiences for all users of the transportation system. Renewable natural gas is required for the bus fleet, providing clean, safe, and reliable transportation services for Metro customers.

In addition to supporting Strategic Goal 2, this contract advances Strategic Goal 5 by strengthening Metro's environmental sustainability leadership and accelerating progress toward greenhouse gas reduction and clean energy commitments. The use of RNG as a transition fuel aligns with Metro's

long-term electrification strategy and supports implementation of the Energy Master Plan and Moving Beyond Sustainability objectives.

ALTERNATIVES CONSIDERED

The alternative is to continue procurement of RNG utilizing the four contracts with various contract end dates. In this scenario, Metro would still need to increase the contract authority for three contracts, Contract No. OP59812000A with Clean Energy, Contract No. OP59812000B with Shell, and Contract No. OP59812000C with Trillium as a separate board item. This approach is not recommended since conversion to a single contract for RNG is expected to provide better pricing and services for the delivery of natural gas. There is currently enough renewable natural gas supply accessible to any single supplier in the market. Procurement of renewable natural gas from retail stations outside of the contract is not feasible due to the large size of our bus fleet. The procurement of non-renewable natural gas is not recommended as it would result in the loss of environmental benefits, carbon credits, and revenues.

A single consolidated contract structure also improves coordination across divisions, simplifies contract administration, and enhances Metro’s ability to manage fuel procurement in response to evolving market conditions. This approach reduces duplication of effort and supports integrated planning across fleet operations and energy management programs.

Another alternative considered to address price volatility is hedging. Commodity Swap/Cash Settlement Agreements ("Commodity Hedges") can be entered into to mitigate the volatility in index pricing. Staff monitors the market pricing of Commodity Hedges regularly. Historically, on average the price of entering Commodity Hedges has either exceeded the price of purchasing RNG at market rates or RNG market rates have fallen within a reasonable range of annual budgetary tolerance. At this time, staff does not recommend entering into Commodity Hedges but will continue to monitor market pricing of these instruments.

NEXT STEPS

Upon Board approval, staff will execute Contract No. OP132076000 and proceed with issuing Task Orders as the need for these services arise. Material activities and work products relative to the support provided by this contract will be included in Metro’s annual sustainability report.

Staff will continue monitoring RNG market conditions, carbon credit performance, and fuel consumption trends as Zero-Emission Buses are deployed. Updates will be incorporated into Metro’s annual sustainability reporting and budget planning processes to ensure alignment with operational needs and long-term energy strategy.

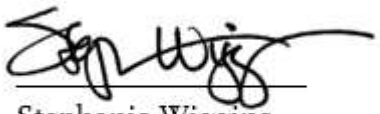
ATTACHMENTS

Attachment A - Procurement Summary
Attachment B - DEOD Summary

Prepared by: Cris B. Liban, Deputy Chief Sustainability Officer, (213) 922-2471

Uduak-Joe Ntuk, Senior. Director, Environmental Compliance/Sustainability, (213) 523-9351
Debra Avila, Deputy Chief Vendor/Contract Management Officer (213) 418-3051

Reviewed by Tim Lindholm, Chief Program Management Officer, (213) 922-7297



Stephanie Wiggins
Chief Executive Officer

ATTACHMENT A

PROCUREMENT SUMMARY
RENEWABLE NATURAL GAS (RNG) PROVIDER/OP132076000

1.	**Contract Number**: OP132076000	
2.	**Recommended Vendor**: Shell Energy North America (US), L.P.	
3.	**Type of Procurement (check one):** ☐ **IFB** ☒ **RFP** ☐ **RFP–A&E** ☐ **Non-Competitive** ☐ **Modification** ☐ **Task Order**	
4.	**Procurement Dates**:	
	A. Issued: 07/02/2025	
	B. Advertised/Publicized: 07/03/2025	
	C. Pre-Proposal Conference: 07/09/2025	
	D. Proposals Due: 08/11/2025	
	E. Pre-Qualification Completed: 09/04/2025	
	F. Ethics Declarations Form Submitted to Ethics: 08/11/2025	
	G. Protest Period End Date: 04/21/2026	
5.	**Solicitations Downloaded**: 33	**Bids/Proposals Received**: 5
6.	**Contract Administrator:** Ricardo E. Narvaez	**Telephone Number:** (213) 418-3158
7.	**Project Manager**: Uduak-Joe Ntuk	**Telephone Number**: (213) 922-4197

A. Procurement Background

This Board Action is to approve Contract No. OP132076000 for the procurement of Renewable Natural Gas (RNG) to fulfill Metro's RNG bus fuel requirements. Board approval of contract awards is subject to the resolution of any properly submitted protest(s), if any.

Request for Proposal (RFP) No. OP132076 was issued in accordance with Metro's Acquisition Policy and the contract type is an Indefinite Delivery/Indefinite Quantity (IDIQ). The Diversity & Economic Opportunity Department (DEOD) did not recommend a goal for this solicitation.

Four (4) amendments were issued for this RFP:

- Amendment No. 1, issued July 25, 2025, revised the schedule of quantities and prices, and added the certification of prospective contractor form exhibit to the RFP.
- Amendment No. 2, issued July 30, 2025, extended the proposal and prequalification due date.
- Amendment No. 3, issued August 8, 2025, revised the evaluation criteria.
- Amendment No. 4, issued November 24, 2025, revised the evaluation criteria.

A total of 104 firms downloaded the RFP and were included on the planholders' list. A virtual pre-proposal conference was held on July 9, 2025, and was attended by 10 participants. There were 31 questions received for this RFP and responses were provided prior to the proposal due date.

A total of five proposals were received by the due date of August 11, 2025, and are listed below in alphabetical order:

1. Anew RNG, LLC (Anew)
2. Clean Energy Renewable Fuels, LLC dba in CA as Clean Energy Renewables (Clean Energy)
3. Shell Energy North America (US), LP (Shell)
4. Trillium USA Company, LLC (Trillium)
5. U.S. Venture, Inc. (U.S. Energy)

B. Evaluation of Proposals

A diverse Proposal Evaluation Team (PET) consisting of staff from Metro's Office of Sustainability, Program Management, and Strategic Financial Management departments was convened to conduct a comprehensive technical evaluation of the proposals received.

The proposals were evaluated according to the following evaluation criteria:

- Qualifications, capabilities and experience 30 percent
- Proposed project organization & staffing 15 percent
- Project approach & work plan 15 percent
- Price Proposal 40 percent

The evaluation criteria are appropriate and consistent with criteria developed for other similar procurements. Several factors were considered when developing these weights, giving the greatest importance to the price and qualifications, capabilities, and experience.

On August 21, 2025, the evaluation committee conducted virtual interviews with the firms. The firm's key personnel had an opportunity to present each team's qualifications and respond to the evaluation committee's questions. In general, each team's presentation addressed each firm's technical proposal with a focus on the industry experience, organizational resources, and work plan to deliver the requirements.

Each firm was asked questions regarding their strategy for ensuring supply continuity, systems in place for transparent tracking of RNG volumes, commitment to supply Metro's full requirement and volume availability, existing RNG production sites relative to the pipeline interconnection serving Metro CNG stations, process to ensure regulatory compliance, and experience mitigating challenges with RNG credits to past clients.

All five (5) firms were determined to be in the competitive range.

Qualifications Summary of Firms within the Competitive Range:

Anew RNG, LLC (Anew)

Anew is headquartered in Houston, Texas and has a global presence in other US and European cities.

It is a wholly owned subsidiary of Anew Climate, LLC founded in 2005, and is one of the largest environmental commodity companies in North America, with a focus on RNG marketing and environmental commodities. It serves RNG, low carbon fuels, electric vehicles, emissions, carbon, renewable fuel, and renewable energy credit markets.

Its clients include the Orange County Transportation Authority, SunLine Transit Agency and the Dallas Area Rapid Transit Authority.

Clean Energy Renewable Fuels, LLC dba in CA as Clean Energy Renewables (Clean Energy)

Clean Energy is headquartered in Newport Beach, California and has regional offices across North America.

Founded in 1996 and publicly traded since 2007, it is one of the largest providers of RNG for the transportation market in North America. Its clean fuel solutions include RNG, Compressed Natural Gas (CNG), Liquefied Natural Gas (LNG), renewable electricity, and hydrogen fuel.

Its clients include some of the largest fleets in the nation such as Republic Services, Amazon, UPS, the New York MTA, and LA Metro. It has supported LA Metro's CNG fleet operations since 2009. Currently, it supplies 11 CNG fueling stations, which include three designed and constructed facilities, as well as RNG to some Metro Divisions.

Shell Energy North America (US), LP (Shell)

Shell Energy is headquartered in Houston, Texas and has regional offices throughout the US and Canada. It is among North America's largest wholesale energy marketers and traders of natural gas, power, environmental, and risk management products. Its operating center in San Diego, California focuses on gas, power, carbon products and RNG services.

Founded in 1998, its parent company, Shell PLC, operates core business areas in Integrated Gas, Upstream and Downstream, and Renewables and Energy Solutions globally in over 70 countries. Its clients include the City of Los Angeles, the State of California, Waste Management Renewable Energy and LA Metro, where it has a current RNG supply contract.

Trillium USA Company, LLC (Trillium)

Trillium is headquartered in Houston, Texas and is one of the largest owners and operators of alternative fueling stations across the US, including CNG, RNG, hydrogen and electric vehicle charging.

Founded in 1964, it is a member of the Love's Family of Companies, which owns and operates hundreds of vehicle fuel stations across multiple states in the US. Collectively, these companies provide a wide range of fueling solutions for heavy-duty fleets. In addition to CNG and RNG, it offers biodiesel, renewable diesel, solar, and microgrids.

Its clients include Cities of Norwalk, Victory Valley, San Diego and Culver City, Orange County Transportation Authority, North County Transit District, and LA Metro, where it has a current RNG supply contract.

U.S. Venture, Inc. (U.S. Energy)

U.S Energy is headquartered in Appleton, Wisconsin and is one of the biggest providers in the US for the supply of renewable natural gas and renewable diesel, development of renewable natural gas projects, and generation and monetization of environmental credit markets such as the federal Renewable Fuel Standard (RFS) and California's Low Carbon Fuel Standard (LCFS).

Over the past 70 years, it has become vertically integrated throughout the fuel supply chain, and as a U.S. Venture company, a leading provider of transportation products and data-based insights, it has a huge portfolio of development projects where it is capturing methane at dairies, landfills, and wastewater treatment plants and converting it to RNG.

Its clients include SoCal Gas, RTC Las Vegas, MARTA (Atlanta, GA), Stanislaw Regional Transit Authority, Modesto, CA and the Salem Mass Area Transit, Salem, OR

Metro conducted individual discussions with Anew, Clean Energy, Shell, Trillium and U.S. Energy regarding the firms' technical proposals, clarifications, contract exceptions, and price assumptions. These discussions were held to give the proposers within the competitive range an opportunity to fully address and meet Metro's requirements.

Upon conclusion of the discussions, Metro issued a request for Best and Final Offers (BAFO) on January 27, 2026. BAFO proposals were distributed to the PET for technical scoring in accordance with the evaluation criteria established in the solicitation.

At the conclusion of the evaluation process, which was comprised of technical evaluations of submitted proposals, oral interviews and presentations, comprehensive discussions with all firms in the competitive range, and review of BAFOs, the proposal of SHELL ENERGY was determined to be the highest-ranked proposal.

The following is a summary of the PET scores:

1	Firm	Average Score	Factor Weight	Weighted Average Score	Rank
2	**Shell Energy North America (US), LP**				
3	Qualifications, Capabilities & Experience	92.23	30.00%	27.67	
4	Proposed Project Organization & Staffing	92.20	15.00%	13.83	
5	Project Approach & Work Plan	88.33	15.00%	13.25	
6	Price Proposal	100.00	40.00%	40.00	
7	**Total**		**100.00%**	**94.75**	**1**
8	**Clean Energy Renewable Fuels, LLC dba in CA as Clean Energy Renewables**				
9	Qualifications, Capabilities & Experience	98.33	30.00%	29.50	
10	Proposed Project Organization & Staffing	98.87	15.00%	14.83	
11	Project Approach & Work Plan	98.33	15.00%	14.75	
12	Price Proposal	88.45	40.00%	35.38	
13	**Total**		**100.00%**	**94.46**	**2**
14	**U.S. Venture, Inc.**				
15	Qualifications, Capabilities & Experience	93.90	30.00%	28.17	
16	Proposed Project Organization & Staffing	92.20	15.00%	13.83	
17	Project Approach & Work Plan	90.00	15.00%	13.50	
18	Price Proposal	54.58	40.00%	21.83	
19	**Total**		**100.00%**	**77.33**	**3**
20	**Anew RNG, LLC**				
21	Qualifications, Capabilities & Experience	95.57	30.00%	28.67	
22	Proposed Project Organization & Staffing	96.67	15.00%	14.50	

23	Project Approach & Work Plan	93.33	15.00%	14.00	
24	Price Proposal	0.00	40.00%	0.00	
25	**Total**		**100.00%**	**57.17**	**4**
26	**Trillium USA Company, LLC**				
27	Qualifications, Capabilities & Experience	93.33	30.00%	28.00	
28	Proposed Project Organization & Staffing	91.13	15.00%	13.67	
29	Project Approach & Work Plan	85.87	15.00%	12.88	
30	Price Proposal	1.32	40.00%	0.53	
31	**Total**		**100.00%**	**55.08**	**5**

C. Cost/Price Analysis

The recommended price has been determined to be fair and reasonable based upon the Independent Cost Estimate (ICE), price analysis, fact finding, and technical evaluation.

The Metro ICE was estimated using only the Commodity Price that Metro will pay to purchase the RNG fuel. It did not account for any monetization of environmental credits that Metro will receive as part of this agreement.

Shell's BAFO Commodity Price of $228,906,912.87 is approximately 1.5% lower than the Metro ICE of $232,407,019.

When applied, Shell's proposed BAFO LCFS and RINs Credits are likely to offset Shell's BAFO Commodity Price, and yielded a total of $44,486,197.41 in potential revenue to Metro.

Proposer	Metro ICE (Commodity Price Only)	Commodity Price	LCFS Credits	RINs Credits	Total* Proposed Price
Shell	**$232,407,019.00**	**$228,906,912.87**	**$59,473,556.68**	**$213,919,553.60**	**($44,486,197.41)**
Clean Energy		$197,452,629.63	$0.00	$229,199,521.68	($31,746,892.05)
U.S. Energy		$269,741,479.38	$72,001,840.18	$192,094,432.96	$5,645,206.24
Trillium		$269,741,479.38	$30,731,246.21	$174,628,207.04	$64,382,026.13
Anew		$297,182,308.08	$60,247,154.25	$171,081,071.56	$65,854,082.27

*Total Proposed Price (D) = (A) – (B) – (C):
(A) = Commodity Price: The price of the RNG that Metro will pay (Cost to Metro)
(B) & (C) = Environmental Credits: Incentives for using low-carbon fuel (Revenues to Metro)
- (B) = LCFS Credits (Low Carbon Fuel Standard): State-level (e.g., California) credits based on the carbon intensity of fuels
- (C) = RINs Credits (Renewable Identification Numbers): Federal EPA-regulated tracking codes for biofuels

D. Background on Recommended Contractor

Shell Energy is headquartered in Houston, Texas and has regional offices throughout the US and Canada. It is among North America's largest wholesale energy marketers and traders of natural gas, power, environmental, and risk management products. Its operating center in San Diego, CA focuses on gas, power, carbon products and RNG services.

Shell's clients include the City of Los Angeles, the State of California, Waste Management Renewable Energy and LA Metro, where it has a current RNG supply contract. Shell has performed satisfactorily on its contracts with Metro.

DEOD SUMMARY

RENEWABLE NATURAL GAS (RNG) PROVIDER / OP132076000

A. Small Business Participation

At the time of solicitation, the Diversity & Economic Opportunity Department did not establish a Disadvantaged Business Enterprise (DBE) goal for this procurement due to the lack of subcontracting opportunities. Shell Energy North America (US), LP is expected to perform the work with its own workforce.

B. Local Small Business Enterprise (LSBE) Preference

LSBE preference is not applicable to federally funded procurements. Federal law (49 CFR § 661.21) prohibits the use of local procurement preferences on FTA-funded projects.

C. Living Wage and Service Contract Worker Retention Policy Applicability

The Living Wage and Service Contract Worker Retention Policy is not applicable to this contract.

D. Prevailing Wage Applicability

Prevailing Wage requirements are applicable to this project. DEOD will continue to monitor contractors' compliance with the State of California Department of Industrial Relations (DIR), California Labor Code, and, if federally funded, the U S Department of Labor (DOL) Davis Bacon and Related Acts (DBRA).

E. Project Labor Agreement/Construction Careers Policy

Project Labor Agreement/Construction Careers Policy is not applicable to this Contract. PLA/CCP is applicable only to construction contracts that have a construction related value in excess of $2.5 million.

F. Manufacturing Careers Policy

The Manufacturing Careers Policy (MCP) does not apply to this contract. The MCP is required on Metro's Rolling Stock RFPs, with an Independent Cost Estimate of at least $50 million.

Renewable Natural Gas (RNG) Provider Contract

Contract No. OP132076000

Operations, Safety, and Customer Experience Committee
April 16, 2026

Metro

Recommendation

AUTHORIZE the Chief Executive Officer to:

A AWARD a five (5) year Indefinite Delivery/Indefinite Quantity (IDIQ) contract, Contract No. OP132076000, with Shell Energy North America (US), LP for Renewable Natural Gas (RNG), inclusive of a five-year base in the Not-To-Exceed (NTE) amount of $140,004,228.05 and one three-year option in the NTE amount of $88,902,684.81, for a combined NTE amount of $228,906,912.86, subject to the resolution of any properly submitted protest(s), if any; and

B. EXECUTE individual Task Orders, Transaction Confirmations, and Contract Modifications up to 10% of the contract value.

Issue

Metro uses Renewable Natural Gas (RNG) fuel to power the engines on the majority of the bus fleet. RNG fuel is currently being procured under four contracts due to previously limited RNG availability from one single supplier.

RNG remains a critical bridge fuel during Metro's transition to a fully Zero-Emission Bus (ZEB) fleet. As charging infrastructure is constructed and new electric buses are phased into service, RNG ensures uninterrupted transit operations while maintaining progress toward greenhouse gas and criteria pollutant reduction goals. Maintaining a reliable RNG supply during this transition period protects operational continuity, safeguards service reliability, and provides flexibility as Metro refines future fleet and energy demand projections.

Discussion

- ***Zero-emission transition underway:*** Electric buses + charging infrastructure; RNG use declines as CNG buses retire.
- ***Bridge fuel needed:*** RNG ensures service reliability, continuity, and operational flexibility during transition.
- ***One contract approach:*** Streamlines administration, improves price transparency, strengthens negotiating power.
- ***Strategic alignment:*** Supports Energy Master Plan and Moving Beyond Sustainability; adapts to market changes.
- ***Award of Contract No. OP132076000*** to Shell Energy North America ensures a resilient, renewable energy supply that supports public health, environmental goals, and operational sustainability.

Proposal Evaluation 1

AWARDEE

Shell Energy North America (US), LP

EVALUATION CRITERIA	MAXIMUM POINTS	Shell Energy North America (US), LP	Clean Energy Renewable Fuels, LLC dba in CA as Clean Energy Renewables	U.S. Venture, Inc.	Anew RNG, LLC	Trillium USA Company, LLC
Qualifications, Capabilities & Experience	30	27.67	29.50	28.17	28.67	28
Proposed Project Organization & Staffing	15	13.83	14.83	13.83	14.50	13.67
Project Approach & Work Plan	15	13.25	14.75	13.50	14	12.88
Price Proposal	40	40	35.38	21.83	0	.53
Total Score	**100**	94.75	94.46	77.33	57.17	55.08

Proposal Evaluation 2

PRICE ANALYSIS: 40% of Evaluation Criteria

Proposer Name	Bid Amount	Metro ICE	LCFS Credits	RINS Credits	Negotiated Amount (see Notes below)
Shell Energy	$228,906,912.87	$232,407,019.00	$59,473,556.68	$213,919,553.60	($44,486,197.41)
Clean Energy	$197,452,629.63	$232,407,019.00	$0.00	$229,199,521.68	($31,746,892.05)
U.S. Energy	$269,741,479.38	$232,407,019.00	$72,001,840.18	$192,094,432.96	$5,645,206.24
Trillium	$269,741,479.38	$232,407,019.00	$30,731,246.21	$174,628,207.04	$64,382,026.13
Anew	$297,182,308.08	$232,407,019.00	$60,247,154.25	$171,081,071.56	$65,854,082.27

Notes:
1. The Metro ICE estimated using only the Commodity Price that Metro will pay to purchase the RNG fuel.
2. The ICE did not account for any monetization of environmental credits that Metro will receive as part of this agreement.
3. Shell's BAFO Commodity Price of $228,906,912.87 and when applied will likely yield a total of $44,486,197.41 in potential revenue to Metro.
4. Same process was applied to all proposals and results are shown in last column of the above table.

DEOD COMMITMENT

At the time of solicitation, the Diversity & Economic Opportunity Department did not establish a Disadvantaged Business Enterprise (DBE) goal for this procurement due to the lack of subcontracting opportunities. Shell Energy North America (US), LP is expected to perform the work with its own workforce.

Local Small Business Enterprise (LSBE) preference is not applicable to federally funded procurements. Federal law (49 CFR § 661.21) prohibits the use of local procurement preferences on FTA-funded projects.

NEXT STEPS

Upon Board approval, staff will execute Contract No. OP132076000 and proceed with issuing Task Orders as the need for these services arise. Material activities and work products relative to the support provided by this contract will be included in Metro's annual sustainability report.

Staff will continue monitoring RNG market conditions, carbon credit performance, and fuel consumption trends as Zero-Emission Buses are deployed. Updates will be incorporated into Metro's annual sustainability reporting and budget planning processes to ensure alignment with operational needs and long-term energy strategy.

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0030, **File Type:** Contract **Agenda Number:** 36.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: ELECTRIC VEHICLE CHARGING STATIONS - OPERATION & MAINTENANCE

ACTION: AWARD CONTRACT

RECOMMENDATION

AUTHORIZE the Chief Executive Officer to:

A. AWARD a firm fixed unit rate contract, Contract No. OP127536000 to Axxera Inc. for the Electric Vehicle Charging Stations - Operations & Maintenance services, inclusive of a five-year base in the Not-To-Exceed (NTE) amount of $2,373,210, and $1,008,000 for the first one-year option, and $1,008,000 for the second one-year option, for a total NTE amount of $4,389,210 subject to the resolution of any properly submitted protest, if any; and

B. EXECUTE individual contract modifications within the Board-approved contract modification authority.

ISSUE

Metro's existing Electric Vehicle Supply Equipment (EVSE) network is managed by a third-party vendor, which has provided these networking, operations, maintenance, and installation services since August 2019. The current contract expires on April 30, 2026.

As of January 2026, Metro's existing Electric Vehicle Supply Equipment (EVSE) inventory includes 168 Level 2 EVSE units, 148 of which are currently installed and active across several Metro operating divisions and park-and-ride facilities. This network will grow to as much as 3,000 chargers over the next five years and operation and maintenance of new EVSE installations will be crucial for charging across four use-types: 1) employee charging, 2) non-revenue fleet charging, 3) park-and-ride charging, and 4) public charging.

The competitive solicitation process summarized in this report has allowed Metro to select a vendor to continue the operations of the existing network and support future expansion.

…Background
BACKGROUND

Metro is committed to meeting ambitious emissions-reduction goals through various strategies across our service region, including promoting electric vehicles. Installation of EV chargers is an essential component of EV deployment. The regional availability of EV chargers must be in place to achieve successful growth in EV usage.

The Metro Board approved the 2023-2028 Electric Vehicle Parking Strategic Plan (EVPSP) in June 2022 as a strategic blueprint for sustainable, cost-effective, and efficient investments in electric vehicle (EV) charging infrastructure for our region. These commitments have been in place since 2007 and are reaffirmed through the Board-approved 2025 Climate Action and Adaptation Plan Update, the 2025 Energy Master Plan (EMP), and the 2025 Moving Beyond Sustainability Strategic Plan Update.
Metro is committed to meeting ambitious emissions reduction goals through various strategies across our service region, including promoting the use of electric vehicles. Installation and ongoing operation of EV Chargers is an essential component of EV adoption. The regional availability of EV chargers must be in place to achieve successful growth in EV usage.

Metro has committed to regionally deploying EV chargers to meet internal, local, and state ambitious emissions reduction goals. The EVPSP defines the charging infrastructure requirements, outlines a prioritized approach to charging deployment, and estimates the costs and benefits associated with completing the EV Parking Strategy. The Plan also defines policies and management strategies to facilitate a successful charging program for internal operations and public use.

With over a decade of deployment, the Metro EV Charger network serves approximately 7,000 subscribed customers. Metro's charging equipment is compliant with the Open Charge Point Protocol (OCPP), which allows for the flexibility and interoperability of various charging network service providers across Metro's network and on existing charging hardware. Metro's current network of 168 chargers is operated and maintained through a contract with the current contractor, Axxera.

As of January 2026, Metro operates 168 Level 2 EV charging ports, of which 146 are deployed at Park and Ride (P&R) locations for public use. There are two chargers reserved for Board use at Metro's Gateway building. Metro does not currently have chargers installed for dedicated employee use at its facilities.

Metro crafted the EV Parking Strategic Plan to prioritize funding availability from utility programs and other potential future grant sources. Staff has been pursuing all possible grants or other funds to reduce the capital or operational costs of completing the EV Parking Strategy.

Since January 2020, Metro has earned a cumulative total of $385,121.37 from the EV charger network of about 100 chargers. At full build-out and current EV charger pricing and actual range of charger utilization, the forecasted *annual* revenue is anticipated to be between $2M-$2.5M.

DISCUSSION

The proposed contract will provide comprehensive services to operate, maintain, and expand Metro's EV charging network across employee and public facilities. The contractor will be responsible for network management, equipment maintenance, customer service, data reporting, and system

optimization for Metro's existing chargers, as well as supporting the operations and maintenance, and the phased deployment of additional charging infrastructure. The contract will also enable integration with third-party financing and delivery models, including potential public-private partnerships, to accelerate installation of up to 3,000 chargers while minimizing upfront capital costs to Metro.

Services will include: (1) operation and maintenance of existing EV chargers; (2) network services and payment systems; (3) customer access and subscription management; (4) performance monitoring and reporting; and (5) support for future charger deployment, including coordination with utility programs, grants, and private partners.

Staff recommended the use of a competitive negotiation process for the Electric Vehicle Charging Stations to allow for the consideration of technical and commercial factors, such as past performance related to schedule adherence, quality and reliability, as well as price in the contract award selection process. By establishing explicit factors that identified Metro's priorities, the solicitation used evaluation criteria important to Metro to augment price considerations.

In addition to the ability to evaluate key technical and schedule factors, the competitive negotiation process permits direct discussions and negotiations with Proposers to clarify requirements and cost prior to an award recommendation. This process minimizes the risks associated with a complex specification and scope of work by allowing the parties to clarify ambiguities and correct deficiencies.

The scope of work for this procurement does not come into conflict with existing union agreements and does not overstep the work and performance expectations of existing operations, facilities and maintenance staff.

DETERMINATION OF SAFETY IMPACT

The award of this contract will have a direct and positive impact on safety, service quality, system reliability, performance, and overall customer satisfaction. The existing and new electric vehicle charging stations are going to be operationally installed, operated, and maintained consistently across the system.

FINANCIAL IMPACT

The funding of $2,373,210.00for the Contract No. OP127536000 is included in Cost Center 2150, Project 450003. There are two scopes of work in this contract: operations of the EV charger network and the maintenance of the EV chargers due to vandalism, weather impacts, on-ground software updates, and charger replacements.

Obligations and authorizations made within the total Contract Amount will be against specific project or operations budgets which make up the Board-approved Metro budget for any particular fiscal year. Specific funding for this contract will parallel the project approved by the Board under separate actions. The Deputy Chief Sustainability Officer, Chief Program Management Officer, and Project Manager of each of the projects will be responsible for developing and overseeing the appropriate

annual budgets.

Impact to Budget

The current source of funding for this action is the Metro Green Fund (derived from carbon credits). This fund source is eligible for Metro Bus and Rail operating and capital projects. Revenues are anticipated to be used to offset any operations and maintenance program costs.

EQUITY PLATFORM

Award of this contract advances Metro's Equity Platform by delivering energy reliability improvements that protect communities most dependent on transit. Lower-income riders, communities of color, people with disabilities, seniors, youth, and essential workers disproportionately rely on Metro for daily access to jobs, healthcare, and basic services-and they are the first and hardest hit when outages disrupt service.
At least half of the existing charger locations are in or adjacent to the Equity Focus Communities. Continuing the EV charger service under this contract will facilitate continued access to EV charging for Metro's non-revenue fleet and transit riders, while a new more comprehensive expansion program is in development. While there are currently ~7,000 public customers that are served by the EV Charger Program, the current program does not capture the demographics of EV owners that use our service.

The Diversity & Economic Opportunity Department established a 30% Small Business Enterprise (SBE) and 3% Disabled Veteran Business Enterprise (DVBE) goal for this solicitation; and was issued as a Medium-Size Enterprise I set-aside. Axxera, Inc., an SBE firm, met the goal by making a 30% SBE and 3% DVBE commitment.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This item supports Metro's systemwide strategy to reduce VMT through operational activities that will support Metro's need to implement advanced strategies to meet our energy and climate goals and further encourage transit ridership, ridesharing, and active transportation. This item supports Metro's systemwide strategy to reduce VMT through operational activities that will support Metro's EV charging infrastructure expansion at Metro stations and need to implement advanced strategies to meet our energy and climate goals. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

Continuing our EV charger operations while developing the PDA supports the implementation of Metro's Strategic Plan Goals, aligning with the following goals:

1.2.D: Improve connectivity to provide seamless journeys by improving Park & Ride experience for electric vehicle owners and providing charging access to those who lack access to home charging.

4: Transform LA County through regional collaboration and national leadership with partners to develop EV charging and help meet City and State initiatives to accelerate EV adoption through greater access to electricity as a transportation fuel.

5.7: Metro will build and nurture a diverse, inspired, and high-performing workforce by providing workplace charging to employees and supporting those who drive EVs or are interested in owning an EV but lack reliable locations to charge one.

Further, the continued use of EV chargers addresses the 2025 CAAP Update, 2025 MBS Plan, and 2025 EMP goals. The CAAP committed Metro to a 79% reduction in greenhouse gas emissions from our internal operations by 2030 and included measures to install EV charging at Metro facilities for employee commuter use. The MBS Plan emissions and pollution control Goal 5.4 included exploring "further measures to reduce employee commuting emissions."

ALTERNATIVES CONSIDERED

The Board may choose not to approve the recommendation to award the Electric Vehicle Charging Stations and Services under Contract No. OP127536000. Staff does not recommend this alternative because it would risk the use and service of all Metro EV Chargers for our 7,000 subscribed customers while we develop an accelerated path for EV charger deployment.

NEXT STEPS

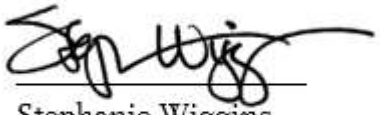
Upon Board approval, staff will execute the contract. Material activities and work products relative to the support provided by this contract will be included in Metro's annual sustainability report.

ATTACHMENTS

Attachment A - Procurement Summary
Attachment B - DEOD Summary

Prepared by: Cris B. Liban, Chief Sustainability Officer, (213) 922-2471
Uduak-Joe Ntuk, Senior Director, (213) 523-9351
Debra Avila, Deputy Chief Vendor/Contract Management Officer (213) 418-3051

Reviewed by Timothy Lindholm, Chief Program Management Officer
(213) 922-7297



Stephanie Wiggins
Chief Executive Officer

PROCUREMENT SUMMARY

ELECTRIC VEHICLE CHARGING STATIONS- OPERATION AND MAINTENANCE/OP127536000

1.	**Contract Number**: OP127536000	
2.	**Recommended Vendor**: Axxera, Inc.	
3.	**Type of Procurement (check one):** ☐ **IFB** ☒ **RFP** ☐ **RFP–A&E** ☐ **Non-Competitive** ☐ **Modification** ☐ **Task Order**	
4.	**Procurement Dates**:	
	A. Issued: 03/17/2025	
	B. Advertised/Publicized: 03/17/2025	
	C. Pre-Proposal Conference: 03/28/2025	
	D. Proposals Due: 07/11/2025	
	E. Pre-Qualification Completed: 01/23/ 2026	
	F. Ethics Declaration Forms submitted to Ethics: 07/21/2025	
	G. Protest Period End Date: 04/21/2026	
5.	**Solicitations Downloaded**: 86	**Bids/Proposals Received**: 5
6.	**Contract Administrator**: Crystal Larios	**Telephone Number**: (213) 922-2413
7.	**Project Manager**: Uduak-Joe Ntuk	**Telephone Number**: (213) 922-4197

A. Procurement Background

This Board Action is to approve Contract No. OP127536000 to operate and maintain existing and future Metro electric vehicle charging stations. Board approval of contract awards is subject to the resolution of any properly submitted protest(s), if any.

Request for Proposals (RFP) No. OP127536 was issued in accordance with Metro's Acquisition Policy and the contract type is a firm fixed unit price.
This RFP was issued under the Medium Sized Business Enterprise I (MSZ-I) Program which requires that bidders must be MSZ-I firms, Metro Certified Small Business Enterprises (SBE), Disadvantaged Business Enterprises (DBE), or Disabled Veterans Business Enterprises (DVBE) to be eligible to participate in this solicitation. Bidders were also required to meet or exceed the recommended SBE goal of 30% and a DVBE goal of 3%.

Eight amendments were issued during the solicitation phase of this RFP:

- Amendment No. 1, issued on March 20, 2025, revised the scope of services and the schedule of quantities and prices.
- Amendment No. 2, issued on April 1, 2025, updated the contract administrator assigned to the RFP.
- Amendment No. 3, issued on April 15, 2025, revised the critical dates and the proposal letter exhibit.
- Amendment No. 4, issued on May 1, 2025, extended the proposal due date.

- Amendment No. 5, issued on May 16, 2025, extended the proposal due date, updated the contract administrator assigned to the RFP, and revised the submittal requirements, schedule of quantities and prices, evaluation criteria, and scope of services.
- Amendment No. 6, issued on May 22, 2025, clarified the DEOD program requirements.
- Amendment No. 7, issued on May 30, 2025, extended the proposal due date.
- Amendment No. 8, issued on June 20, 2025, extended the proposal due date.

A total of 86 firms downloaded the RFP and were included in the planholders' list. A virtual pre-proposal conference was held on March 28, 2025, and was attended by 13 participants representing 10 firms. There were 25 questions received for this RFP and responses were provided prior to the proposal due date.

A total of five proposals were received by the due date of July 11, 2025, and are listed below in alphabetical order:

1. Axxera, Inc.
2. Chargie LLC.
3. Epic Charging
4. GreenWealth Energy Solutions, Inc. & SWTCH Energy Inc. (Joint Venture)
5. OP Connect

B. Evaluation of Proposals

A diverse Proposal Evaluation Team (PET) consisting of staff from the Sustainability Policy, Customer Experience, Office of Strategic Innovation, and Bus Maintenance departments were convened and conducted a comprehensive technical evaluation of the proposals received.

The proposals received were forwarded to the Pre-Qualification Office to determine eligibility with the MSZ-I program requirements. All proposers were deemed responsive to the MSZ-I requirement.

The RFP required that all proposals first be evaluated on the minimum qualifications on a pass/fail basis. Any proposer that received a single rating of "fail" for any of the minimum qualifications would be eliminated from further consideration.

The minimum qualifications were as follows:

1. Proposer shall demonstrate that they have a minimum of five (5) years of experience with administering, operating, and maintaining networks of installed Level 2 and Level 3 (Direct Current Fast Charging) Electric Vehicle Charging Stations (EVCS), with at least one of those networks comprising a minimum of 100 EVCS.

2. Proposer shall demonstrate a minimum of five (5) years of experience working within the State of California and operating EVCS networks in compliance with pertinent State regulations.

3. Proposer shall demonstrate a minimum of five (5) years administering a 24-hour customer service system for a network of EVCS stations and providing customer support to EVCS users.

4. Proposer shall demonstrate knowledge and experience with the Open Charge Point Protocol (OCPP) and maintaining stations and a network in compliance with the OCPP.

Two proposers met the minimum qualifications requirements and were further evaluated according to the following evaluation criteria:

- Qualifications of the Prime's Experience and Skills 30 percent
- Capability to Provide Ongoing Services 35 percent
- Capability to Transition and Implement Services 20 percent
- Price Proposal 15 percent
- Local Small Business Enterprise Preference Program 5 Percent

The evaluation criteria are appropriate and consistent with criteria developed for other, similar RFP's. Several factors were considered when developing these weights, giving the greatest importance to capability to provide ongoing services.

Both proposers who met the minimum qualifications were determined to be within the competitive range. The firms within the competitive range are listed below:

1. Axxera, Inc.
2. GreenWealth Energy Solutions, Inc. &SWTCH (JV)

During the week of November 12, 2025 the evaluation committee met with the firms in the competitive range for a presentation and interview. The firms' project managers and key team members had an opportunity to present each team's qualifications and respond to the PET's questions. In general the team's presentation addressed the requirements of the RFP, experience with all aspects of the required tasks, and stressed each firm's commitment to the success of the project. Also highlighted were staffing plans, work plans, and perceived project issues. The team was asked questions relative to the firm's proposed alternatives and previous experience.

Upon DEOD review, GreenWealth Energy Solutions, Inc.& SWTCH (JV), was found to not have met the DVBE requirements established for this solicitation and were therefore determined to be non-responsive and ineligible for contract award.

At the conclusion of the evaluation, the PET members determined that Axxera, Inc., met the requirement of the RFP and was technically qualified to perform the work.

The following is a summary of the PET scores for the eligible proposer:

1	Firm	Average Score	Factor Weight	Weighted Average Score	Rank
2	**Axxera, Inc.**				
3	Qualifications of the Prime's Experience and Skills	89.50	30.00%	26.85	
4	Capability to Provide Ongoing Services	91.29	35.00%	31.95	
5	Capability to Transition and Implement Services	85.50	20.00%	17.10	
6	Cost Proposal	100.00	15.00%	15.00	
7	Local Small Business Enterprise Preference Program	0.00	5.00%	0.00	
8	**Total**		**105.00%**	**90.90**	**1**

C. Cost/Price Analysis

The recommended price has been determined to be fair and reasonable based upon the Independent Cost Estimate (ICE), cost analysis, fact finding, and technical evaluation.

The ICE is $14,726,125 higher than the proposal amount. The primary reason for this large variance is due to Metro's assumption that the rates proposed for the current contract, when it was awarded in 2018, were significantly below other bidders and did not include an escalation factor over the years. To compensate for this, the ICE preparers assumed higher estimated monthly costs per charger and escalated by an annual 6%. Results of the proposals revealed these estimates were much higher than market costs and projected escalations. Although the estimates proved to be higher than actual market pricing, the competitive solicitation resulted in proposals that provide the required services at a significantly lower cost than anticipated. Because of this, it is in Metro's best interest to proceed with the award and realize the benefits and cost savings achieved through this solicitation.

	Proposer Name	Proposal Amount	Metro ICE	Negotiated amount
1.	Axxera, Inc.	$4,389,210	**$19,115,335**	**$4,389,210**

D. Background on Recommended Contractor

The recommended firm, Axxera, Inc. located in Irvine, CA has been in business for over 17 years and is one of the leaders in the field of EV Charging, software integration, and operations support. Axxera, Inc's clients include LA Metro, Zum, LUX Costa Mesa, UCLA Health, and USC Keck Medical Center. Axxera, Inc. has provided services for Metro and performance has been satisfactory.

DEOD SUMMARY

ELECTRIC VEHICLE CHARGING STATIONS - OPERATION & MAINTENANCE CONTRACT / OP127536000

A. Small Business Participation

The Diversity and Economic Opportunity Department (DEOD) established a 30% Small Business Enterprise (SBE) and 3% Disabled Veteran Business Enterprise (DVBE) goal for this solicitation; and was issued as a Medium-Size Enterprise I (MSZ-I) set-aside. Axxera, Inc., an SBE firm, met the goal by making a 30% SBE and 3% DVBE commitment.

Small Business Goal	**30% SBE 3% DVBE**	**Small Business Commitment**	**30% SBE 3% DVBE**

	SBE Subcontractor	**% Committed**	**LSBE**	**Non-LSBE**
1.	Axxera, Inc. (SBE Prime)	30%		X
	Total Commitment	**30%**		

	DVBE Subcontractor	**% Committed**	**LSBE**	**Non-LSBE**
1.	EVI Design and Consulting, Inc.	3%		X
	Total Commitment	**3%**		

B. Medium Size Business Enterprise Program

As a SBE certified firm, Axxera, Inc., is an eligible MSZ-I.

C. Local Small Business Preference Program (LSBE)

Axxera, Inc., a non-LSBE prime, did not subcontract at least 30% of its contract value with eligible LSBE firms and was ineligible for the preference.

D. Living Wage and Service Contract Worker Retention Policy Applicability

The Living Wage and Service Contract Worker Retention Policy is not applicable to this contract.

E. Prevailing Wage Applicability

Prevailing Wage requirements are applicable to this project. DEOD will monitor contractors' compliance with the State of California Department of Industrial Relations

(DIR), California Labor Code, and, if federally funded, the US Department of Labor (DOL) Davis Bacon and Related Acts (DBRA).

F. Project Labor Agreement/Construction Careers Policy

Project Labor Agreement/Construction Careers Policy is not applicable to this Contract. PLA/CCP is applicable only to construction contracts that have a construction related value in excess of $2.5 million.

G. Manufacturing Careers Policy

The Manufacturing Careers Policy (MCP) does not apply to this contract. The MCP is required on Metro's Rolling Stock RFPs, with an Independent Cost Estimate of at least $50 million.

Electric Vehicle Charging Stations Operations and Maintenance Services Contract

Contract No. OP127536000

Operations, Safety, and Customer Experience Committee
April 16, 2026

Metro

Recommendation

AUTHORIZE the Chief Executive Officer to:

A. AWARD a firm fixed unit rate contract, Contract No. OP127536000 to Axxera Inc. for the Electric Vehicle Charging Stations – Operations & Maintenance services, inclusive of a five-year base in the Not-To-Exceed (NTE) amount of $2,373,210, and $1,008,000 for the first one-year option, and $1,008,000 for the second one-year option, for a total NTE amount of $4,389,210 subject to the resolution of any properly submitted protest, if any;

B. EXECUTE individual contract modifications within the Board-approved contract modification authority.

Issue

- ***Current network & contract:*** Third-party vendor has managed EV charging (operations, maintenance, installation) since 2019; contract expires April 30, 2026.
- ***Existing system:*** 168 Level 2 chargers (148 active) across Metro divisions and park-and-ride sites.
- ***Planned expansion:*** Network expected to grow to ~3,000 chargers within five years.
- ***Critical operations:*** O&M needed to support four uses—employee, non-revenue fleet, park-and-ride, and public charging.
- ***Procurement action:*** Competitive solicitation ensures continuity of current operations and supports future system expansion.

Discussion

Comprehensive services: Operate & maintain chargers; network/payment systems; customer access & subscriptions; performance reporting; support future deployment.

Scale & delivery model: Enables up to ~3,000 chargers using utility programs, grants, private partners, and potential public-private partnerships to reduce upfront Metro costs.

Competitive process: Evaluated technical performance (schedule, quality, reliability) and price, with direct negotiations to clarify scope and costs.

Risk reduction: Negotiated procurement helps resolve ambiguities and minimize delivery risks for a complex program.

Labor alignment: No conflict with union agreements; does not impact existing staff roles or responsibilities.

DEOD Commitment

- ***Participation goals:*** 30% Small Business Enterprise (SBE) and 3% Disabled Veteran Business Enterprise (DVBE) targets; RFP issued as a Medium-Size Enterprise/set-aside.
- ***Compliance:*** Axxera (SBE prime) met goals with 30% SBE and 3% DVBE commitments.

- ***Local Small Business Enterprise (LSBE) program:*** Offers 5% evaluation bonus for ≥30% local small business subcontracting.
- ***LSBE status:*** Axxera is not an LSBE and did not commit to LSBE subcontracting; not eligible for the LSBE preference.

Proposal Evaluation

AWARDEE: Axxera, Inc.

EVALUATION CRITERIA	MAXIMUM POINTS	Axxera, Inc.
Qualifications of the Prime's Experience and Skills	30.00	26.85
Capability to Provide Ongoing Services	35.00	31.95
Capability to Transition and Implement Services	20.00	17.10
Price Proposal	15.00	15.00
Local Small Business Enterprise Preference Program*	5.00	0.00
Total Score	105.00	90.90

*Axxera, a non-LSBE Prime, did not make a commitment to LSBE subcontractors and is ineligible for the LSBE Preference.

Next Steps

Upon Board approval, staff will execute the contract. Material activities and work products relative to the support provided by this contract will be included in Metro's annual sustainability report.

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

Metro

Board Report

File #: 2026-0173, **File Type:** Informational Report **Agenda Number:** 37.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: OPERATIONS EMPLOYEES OF THE MONTH

RECOMMENDATION

RECOGNIZE Operations Employees of the Month.

ISSUE

The Operations Department is celebrating two Employees of the Month (EOM) for April 2026. This presentation will highlight the EOMs' work ethic, tenure, and outstanding achievements, among other respectable attributes.

EQUITY PLATFORM

EOM nominations submitted to the Chief Operations Officer (COO) must be for frontline employees or field supervisors in a customer-facing role. Operations management is encouraged to nominate employees who have achieved excellence, went above and beyond their assigned job description, and are diverse in both genders/ethnicities. In addition, a review of the location, job responsibilities, and seniority is considered for final selections to ensure diverse representation among the various groups within the department. Operations also works with Logistics and System Security & Law Enforcement (SSLE) to nominate employees at various Metro locations.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

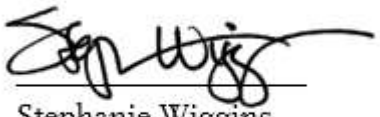
While this item does not directly encourage taking transit, sharing a ride, or using active transportation, it is a vital part of Metro operations, as it highlights frontline employees and field supervisors in the Operations, Logistics, and System Security and Law Enforcement (SSLE) Departments. Because the Metro Board has adopted an agency-wide VMT Reduction Target, which generally supports the agency's overall function, it is consistent with the goal of reducing VMT.

powered by Legistar™

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

Prepared by: Diane Corral-Lopez, Executive Officer, Operations Admin (213) 922-7676

Reviewed by: Conan Cheung, Chief Operations Officer (213) 418-3034



Stephanie Wiggins
Chief Executive Officer

April 2026

Employees of the Month

April Employees of the Month



Bus Transportation

Bus Operator

Lateefah Bussey





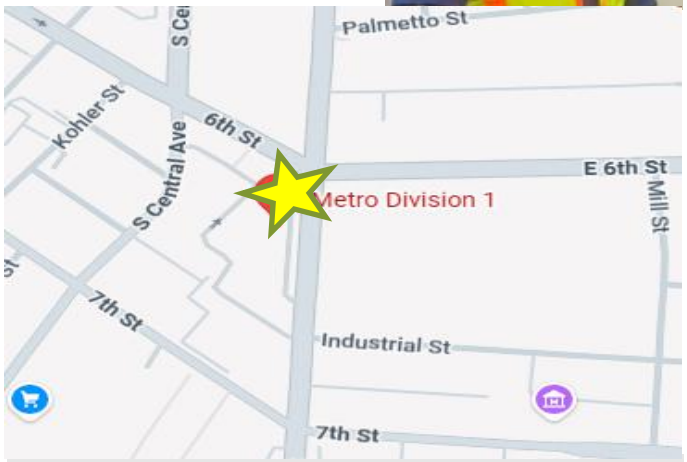
Division 1 – Los Angeles

Logistics

Storekeeper

Troynell Williams





Division 1 – Los Angeles

Metro

Employees of the Month



Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0174, **File Type:** Oral Report / Presentation **Agenda Number:** 38.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: CHIEF OPERATIONS OFFICER'S MONTHLY REPORT

ACTION: ORAL REPORT

RECOMMENDATION

RECEIVE oral report on Metro Operations.

ISSUE

This report will update Metro's monthly ridership and cancellations. It also highlights recent department accomplishments, projects, and other special events.

EQUITY PLATFORM

The Chief Operations Officer's Monthly Report includes an assessment of the percentage of bus and rail activity in Equity Focus Communities (EFCs). It also assesses the percentage of line miles within EFCs for the lines with the most service cancellations.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

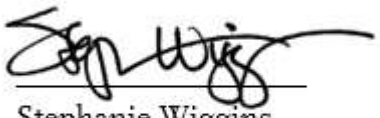
As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This item supports Metro's systemwide strategy to reduce VMT through the reporting of operational activities that will improve and further encourage transit ridership. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring

System (HPMS) data between 2001-2019.

Prepared by: Diane Corral-Lopez, Executive Officer, Operations Administration, (213) 922-7676

Reviewed by: Conan Cheung, Chief Operations Officer, (213) 418-3034

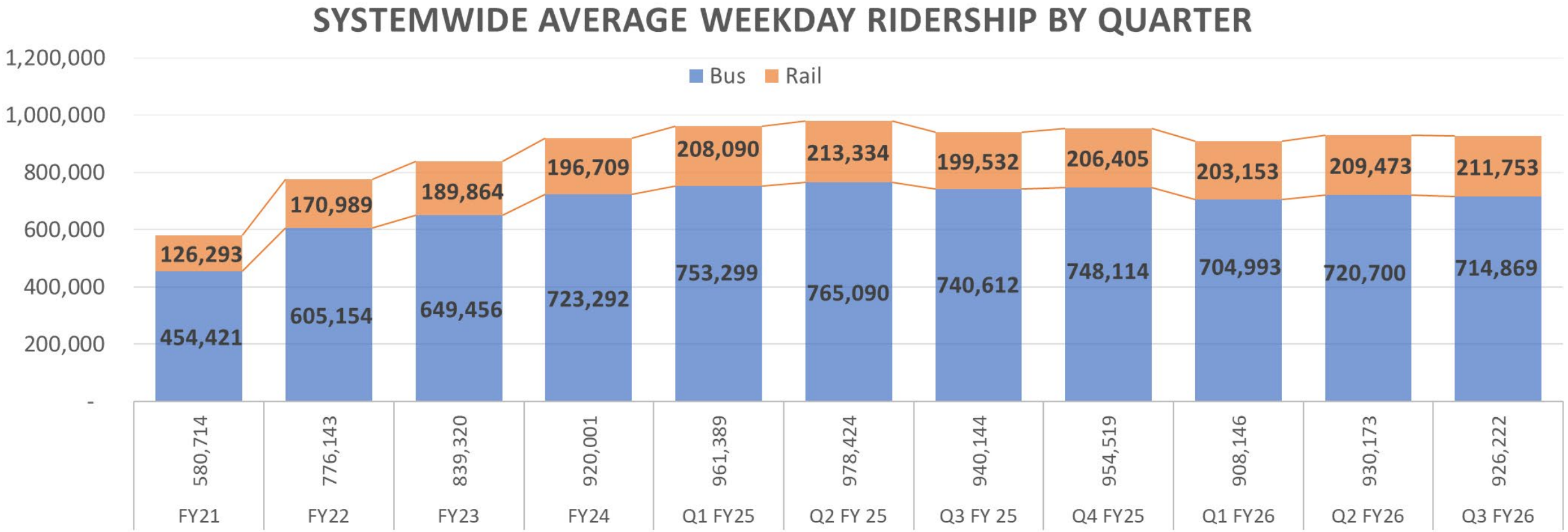


Stephanie Wiggins
Chief Executive Officer

COO Monthly Report

Operations, Safety & Customer Experience Committee Meeting
April 16, 2026

Ridership Update



March Total Ridership Percentage Change 2026 over 2025:

- Bus: -2% Rail: +8%

Average Weekday Rail Ridership By Line - Mar 2026			
Line	**Mar-26**	**Mar-25**	**% Recovery**
A/E/L	127,496	114,198	111.6%
B/D	63,451	66,033	96.1%
C/K	30,497	24,112	126.5%

Ridership Analysis Relative to Equity Focus Communities (Metro 2022 EFC Map):

- Bus – Percent of all weekday bus activity within Equity Focus Communities increased from 73% in November 2019 to 79.4% in March 2026 (bus stop data available month to month)
- Rail – Percent of all weekday rail activity within Equity Focus Communities increased from 51.7% in FY19 to 77.2% in March 2026 (rail station data available month to month)

Cancelled Service

- Metro fully restored scheduled bus service to 7 million revenue service hours (annualized), effective December 11, 2022. Full operator staff was achieved in August 2023 resulting in very low cancellations and was again achieved since January 2025.
- Cancellation rates overall had decreased at the end of 2024 through 2025 but are now seeing an increase in January through March 2026. While increased bus and rail service have needed more operators and attrition and absenteeism have continued, recruitment has been increased, and restoring at or close to full bus operator staffing will help again reduce cancellations in 2026.

March 2026 Top Ten Highest Service Cancellations by Line

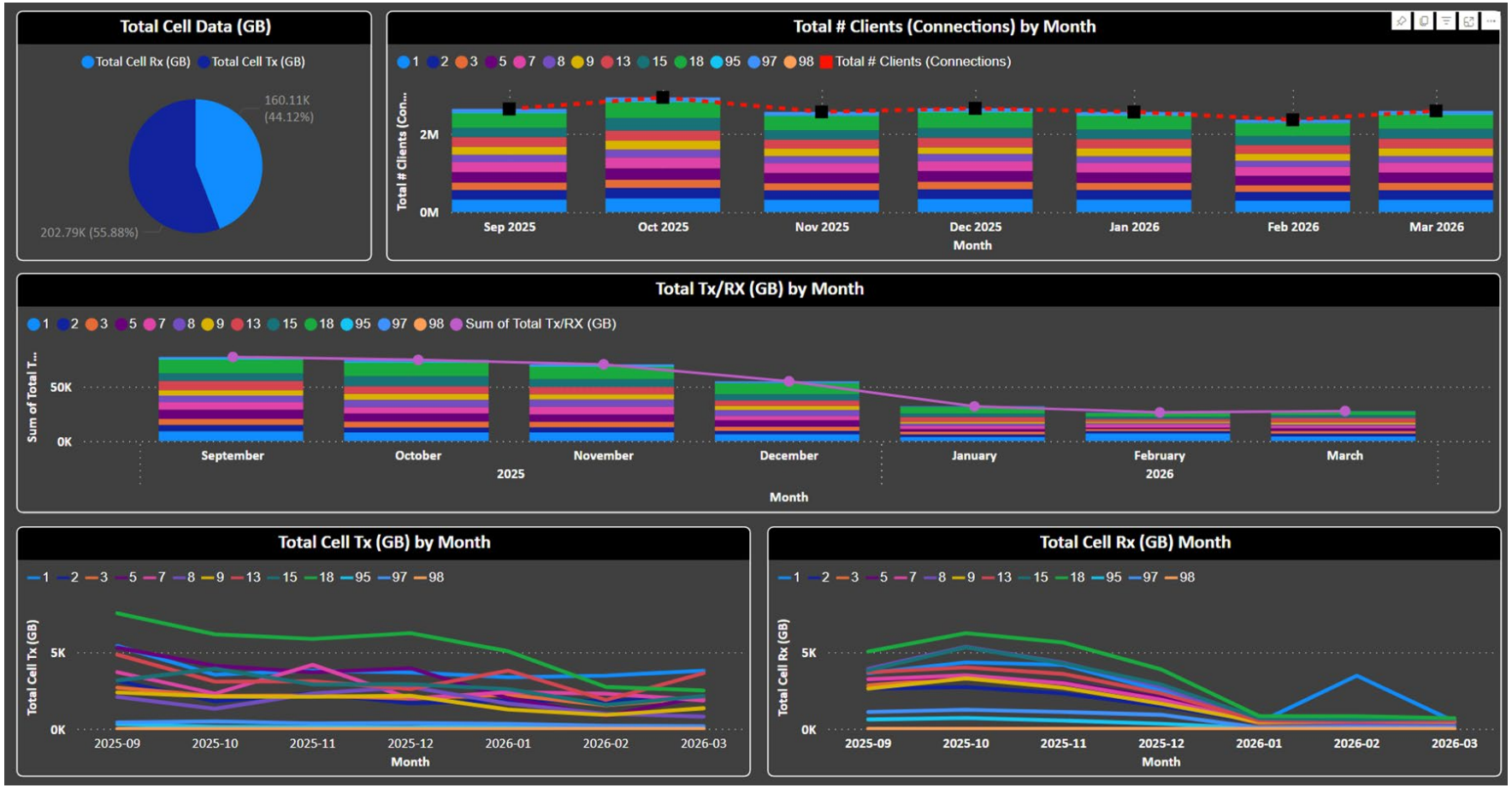
Division	Line	Name	Mar-26	Mar-25	% of Line Miles in EFC
2	55	Compton Av	4.1%	2.5%	83%
2	60	Long Beach Bl	3.6%	2.3%	61%
2	105	Vernon Av/La Cienega Bl	3.4%	1.4%	57%
2	51	Avalon Bl/W. 7th St	3.4%	1.8%	75%
5	212	La Brea Av.	3.4%	1.0%	54%
5, 18	204	Vermont Av Local	2.4%	1.4%	98%
5, 18	207	Western Av	2.4%	1.5%	89%
5	108	Slauson Av	2.3%	1.3%	55%
5	754	Vermont Av Rapid	2.0%	0.3%	98%
9	70	Garvey Av/Atlantic Av	1.8%	0.4%	76%

% Cancelled Service	Weekday	Saturday	Sunday
Pre- Dec 2022 Service Change 4 week Average	3.2%	3.9%	7.4%
One Year Ago WE 4/12/25	0.3%	0.4%	0.8%
Week Ending 4/11/26	0.7%	0.1%	2.2%
Week Ending 4/4/26	0.8%	0.1%	2.0%
Week Ending 3/28/26	0.9%	0.9%	2.2%
Week Ending 3/21/26	1.2%	1.1%	2.4%
Week Ending 3/14/26	0.8%	0.5%	1.7%
Week Ending 3/7/26	1.0%	0.6%	1.5%
February 2026	0.7%	0.5%	1.5%
January 2026	0.7%	0.4%	1.2%
December 2025	0.5%	0.8%	1.1%
November 2025	0.4%	0.7%	1.0%
October 2025	0.8%	0.7%	1.3%
September 2025	0.4%	0.6%	1.5%
August 2025	0.6%	0.6%	0.9%
July 2025	0.4%	0.5%	0.8%
June 2025	0.6%	0.7%	1.7%
May 2025	0.6%	0.9%	1.2%
April 2025	0.6%	0.8%	1.5%
March 2025	0.5%	0.6%	1.8%
February 2025	0.9%	0.8%	1.4%
January 2025	0.7%	0.4%	1.0%
December 2024	0.9%	1.0%	2.4%
November 2024	1.3%	1.0%	1.5%
October 2024	1.5%	1.7%	4.4%
September 2024	1.6%	1.8%	4.1%
August 2024	2.1%	1.7%	4.7%
July 2024	1.9%	1.9%	5.5%
June 2024	1.7%	2.5%	5.4%
May 2024	1.8%	1.8%	4.7%
April 2024	1.0%	1.0%	3.2%
March 2024	1.1%	0.9%	2.5%
February 2024	1.2%	0.7%	2.7%
January 2024	1.0%	0.8%	1.7%
2023 (Full Year)	1.5%	1.4%	3.6%
December 2022 (from 12/11 service change)	4.2%	3.4%	11.4%

Metro Bus Wi-Fi Connection

- Cellular data is used to collect real-time data/video from the fleet (operational use) as well as provide free Wi-Fi service to transit riders (customer experience).
- Access to Wi-Fi is reduced in dense urban areas more than suburban areas because there are more potential 4G users trying to access diminishing bandwidth availability.
- Metro operational demand is also increasing with higher volumes of video downloads, live video streaming and open payment.
- Verizon is currently shifting their infrastructure to support 5G while gradually reducing bandwidth availability and signal strength for older 4G users which is what Metro currently uses.
- Metro is on schedule to upgrade to 5G by 2028 as part of its ATMS II fleet radio and CAD/AVL upgrade project.

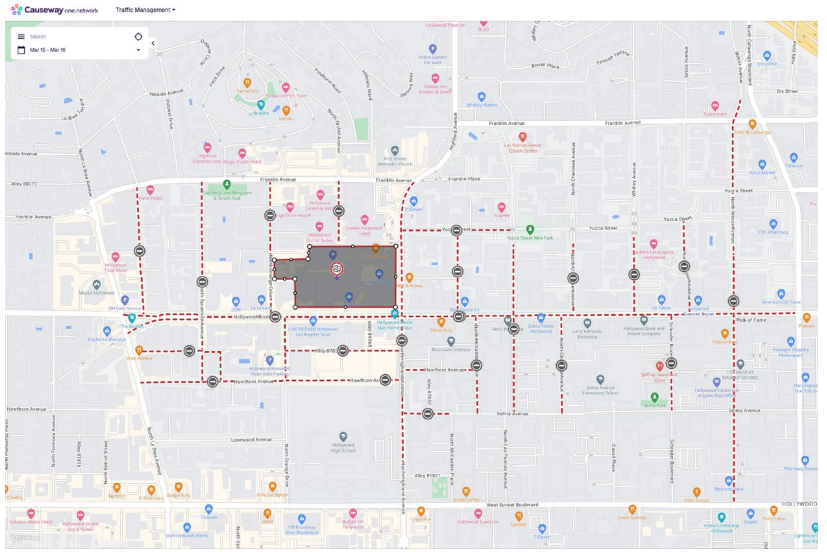
Metro Bus Wi-Fi Connection

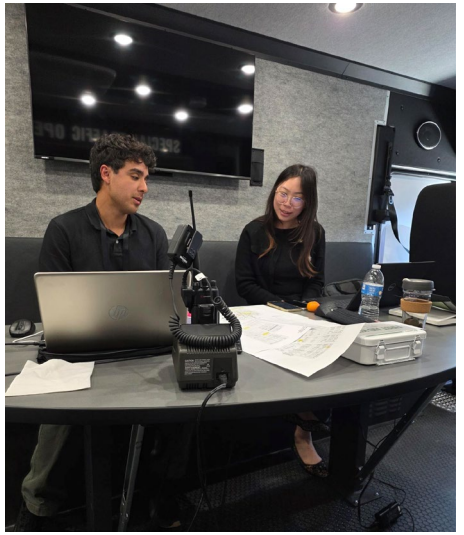


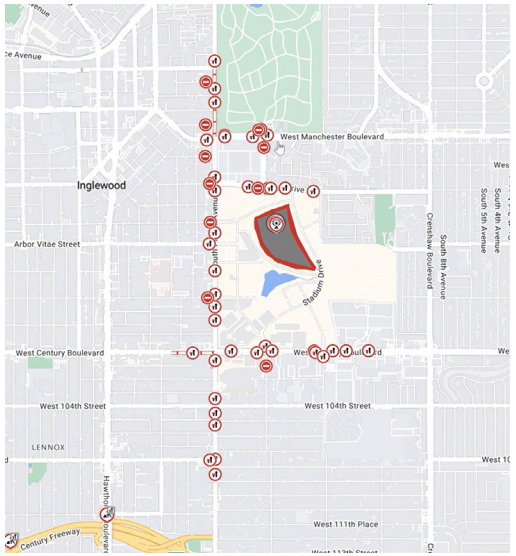
- Wi-Fi connection trend has been decreasing over the last 6 months.
- Connection issues due to increased traffic occur across all divisions.
- Data communication is generally 60% transmission from the bus vs 40% transmission to the bus.

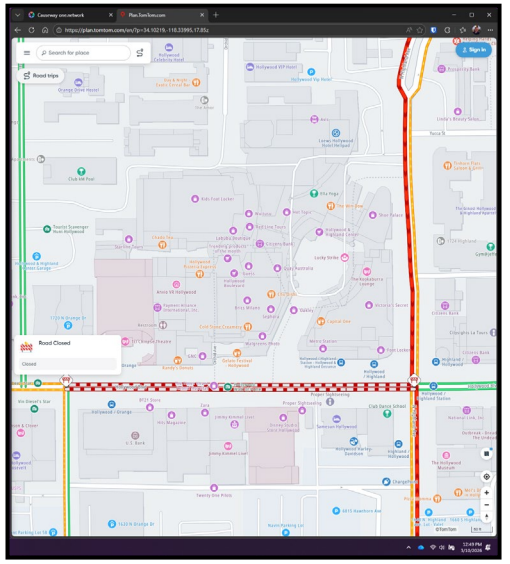
RIITS (Regional Event Manager)

- Piloting of a regional event manager to consolidate real-time roadway lane closure information was tested with LADOT for the Academy Awards and with City of Inglewood for the April 3rd Kanye West concert at Sofi Stadium.
- First demonstration in the region of a multi-agency approach to ensure accurate delivery of road closure information to all major third-party app providers
- System is ready for World Cup with LADOT and Inglewood participation well in advance of the original scheduled release for the 2028 Games



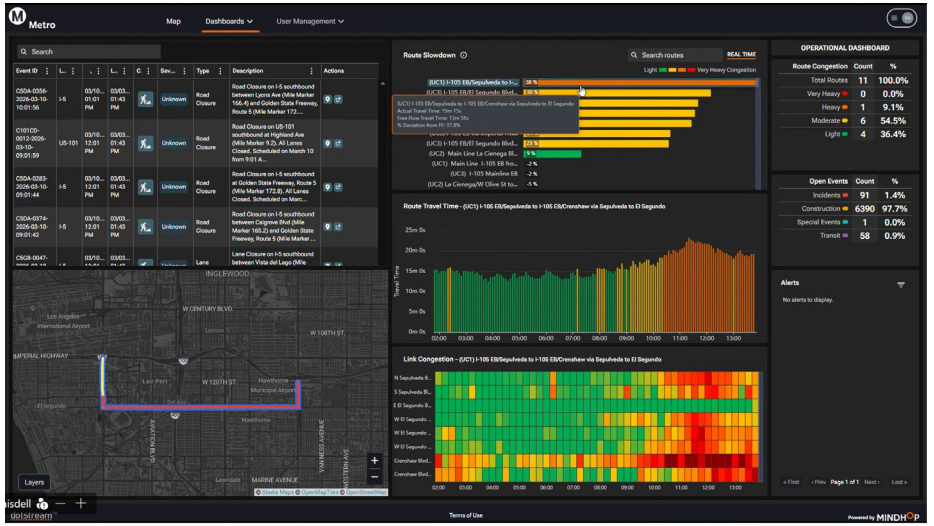


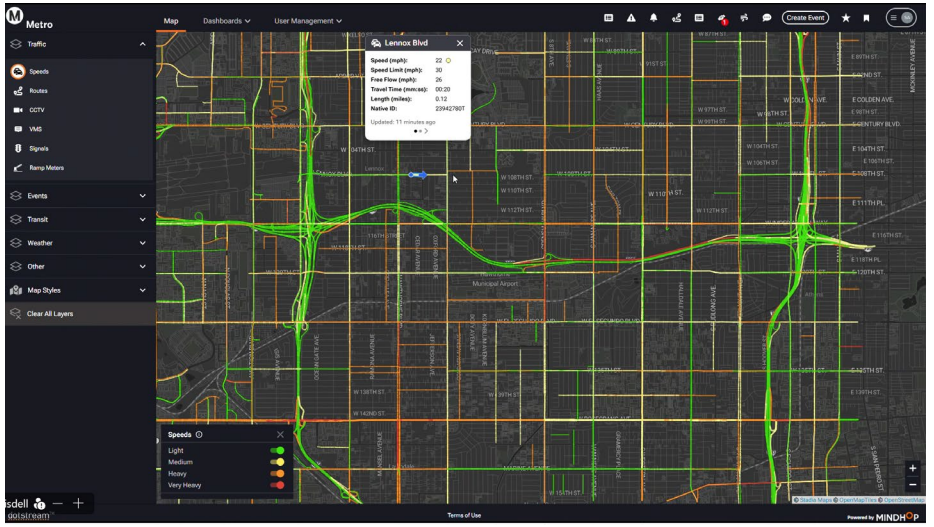




RIITS (Regional Decision Support System)

- Regional Decision Support System to support Metro's I-710 and I-105/405 projects which go into operation December 2027 is being early advanced to support World Cup.
- Integration of third-party speed data, GTFS-RT, road closures, Caltrans ramp meters, and CHP data has been completed
- Integration of Inglewood traffic signals, response plans, and signal performance measures is underway
- Inclusion of Inglewood CCTV, dynamic message signs, and Bluetooth speed data is being assessed
- World Cup will serve as the first demonstration of the system which will be significantly enhanced to support a broader application for the 2028 Games and provide ongoing legacy benefits





Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0075, **File Type:** Ordinance / Administrative Code **Agenda Number:** 39.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: DEPARTMENT OF PUBLIC SAFETY POST ORDINANCE

ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

APPROVE the ordinance affirming Metro's commitment to meet the minimum recruitment and training standards for peace officers and public safety dispatchers set by the California Commission on Peace Officer Standards and Training (POST) (Attachment A).

ISSUE

In alignment with Metro's mission and comprehensive safety and security framework, staff continue to implement the plan to stand up Metro's Department of Public Safety (DPS), formerly named the Transit Community Public Safety Department (TCPSD). As part of that implementation, Metro plans to begin hiring sworn officers this fiscal year and is committed to following the minimum hiring and training requirements established by POST. Metro also plans to join POST as a member agency.

To become a POST member agency, the Metro Board must approve an ordinance affirming its commitment to comply with POST's recruitment and training requirements. At its March 2026 Board meeting, Metro introduced an ordinance affirming this commitment for peace officers and public safety dispatchers. The Board is required to wait at least five days following the ordinance's introduction before taking action. As this requirement has been met, staff now requests that the Board approve the ordinance.

BACKGROUND

California Public Utilities Code Section 30504 authorizes Metro to form a transit police department and requires that Metro adhere to the standards for recruitment and training of peace officers as established by POST. At its September 2025 meeting, the Board approved a resolution affirming its commitment to comply with POST requirements for the hiring and training of sworn officers, a necessary step in order for Metro to become a POST member agency. POST's mission is to promote professionalism in California law enforcement by upholding the highest standards of quality, integrity, and accountability. These minimum standards apply to newly hired peace officers, reserve officers, and public safety dispatch personnel.

In addition to complying with the POST hiring and recruitment requirements, California law enforcement agencies can choose to participate as members in the POST Program. Joining the POST program is voluntary, and there is no cost to the agency. More than 600 agencies have joined this program, which has provided its members with access to many benefits, including management counseling services, development of new training courses, reimbursement for eligible training, quality leadership training programs, and a variety of training resources, such as instructional and training videos.

After reviewing the Board-approved resolution, POST requested that Metro adopt a more formal ordinance affirming the commitments outlined in the resolution. That ordinance was introduced at the March 2026 Operations, Safety, and Customer Experience Committee meeting.

DISCUSSION

Staff recommends that the Board approve the attached ordinance, introduced in March 2026, formally committing Metro to comply with the minimum recruitment and training standards established by POST. The ordinance affirms that, pursuant to Sections 13510 and 13512 of Chapter 1, Title 4, Part 4 of the California Penal Code, the Los Angeles County Metropolitan Transportation Authority will adhere to the standards for recruitment and training of Peace Officers and Public Safety Dispatchers established by POST.

These standards and training will promote professionalism in the recruitment and hiring of peace officers and public safety dispatchers within the DPS. Upon adoption, Metro will submit the ordinance to POST along with a request to join POST as a member agency. If Metro's application is approved, membership will allow Metro access to the numerous resources and benefits available to POST member agencies. Staff has been working closely with POST, and this ordinance is the only remaining issue still needing approval.

DETERMINATION OF SAFETY IMPACT

The DPS will enhance systemwide safety by increasing visibility, strengthening accountability, and supporting community engagement throughout the Metro transit system.

FINANCIAL IMPACT

There is no financial impact to this action.

EQUITY PLATFORM

In their publication "Becoming an Exemplary Peace Officer, The Guide to Ethical Decision Making" POST posits "The most basic responsibility of policing agencies is to protect and serve the community by equitably and respectfully enforcing the law."

As a benefit of joining the POST Program, Metro's DPS sworn officers will gain access to valuable resources, including management counseling services, development of new training courses, leadership development programs, and updated training materials, including training domains

focused on equitable policing and procedural justice.

Resources include training on recognizing and avoiding racial profiling and interacting with individuals with support needs related to mental health and cognitive development.

These resources will help ensure that Metro's sworn officers and public safety dispatchers are well-trained, highly qualified, and prepared to respectfully and equitably serve the diverse communities that rely on the Metro system.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. While this item does not directly encourage taking transit, sharing a ride, or using active transportation, it is a vital part of Metro operations, as it will improve and further encourage transit ridership through enhancing safety on the Metro system and providing an improved customer experience. Because the Metro Board has adopted an agency-wide VMT Reduction Target, and this item supports the overall function of the agency, this item is consistent with the goals of reducing VMT.

**Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.*

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports Strategic Plan Goals #2.1: Deliver outstanding trip experiences for all users of the transportation system; Metro is committed to improving security and #5.6: Provide responsive, accountable, and trustworthy governance within the Metro organization; Metro will foster and maintain a strong safety culture.

NEXT STEPS

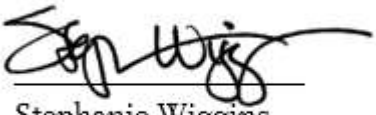
Staff will continue to actively engage employees and the public during the implementation of the DPS. Staff will report back to the Board quarterly with progress updates.

ATTACHMENT

Attachment A - POST Ordinance

Prepared by: Imelda Hernandez, Senior Manager, Transportation Planning, (213) 922-4848

Reviewed by: William Scott, Chief of Police and Emergency Management, (213) 922-5448



Stephanie Wiggins
Chief Executive Officer

CHAPTER 2-55

AN ORDINANCE TO ACCEPT THE REQUIREMENTS OF SECTIONS 13510, 13512, AND 13522 OF THE CALIFORNIA PENAL CODE RELATING TO THE RECRUITMENT AND TRAINING OF PEACE OFFICERS AND PUBLIC SAFETY DISPATCHERS.

Be it ordained by the Board of the Los Angeles County Metropolitan Transportation Authority:

2-55-010 Findings and Objectives

On June 27, 2024, the Board of Directors of the Los Angeles County Metropolitan Transportation Authority (Metro) approved an implementation plan for the Transit Community Public Safety Department, now known as the Metro Department of Public Safety. The California Commission on Peace Officer Standards and Training (POST) provides resources and benefits to over 600 member agencies in the State of California. The Department of Public Safety seeks to join POST in order to receive the numerous benefits available to member agencies. POST requires the governing body of Metro adopt an ordinance committing to adhere to the minimum standards for recruitment and training established by POST in order become a member agency.

2-55-020 Membership

The governing body of Los Angeles County Metropolitan Transportation Authority declares that it desires to become a POST member agency and qualify to receive aid from the State of California under the provisions of Section 13522, Chapter 1 of Title 4, Part 4 of the California Penal Code.

2-55-030 Adherence to POST Standards

Pursuant to Sections 13510 and 13512 of said Chapter 1, the Los Angeles County Metropolitan Transportation Authority will adhere to the standards for recruitment and training of Peace Officers and Public Safety Dispatchers established by the Commission on Peace Officer Standards and Training.

2-55-040 Compliance

Los Angeles County Metropolitan Transportation Authority acknowledges that the Commission and its representatives may make such inquiries as deemed necessary to ascertain that the Peace Officers and Public Safety Dispatchers of the Los Angeles County Transportation Authority adhere to the standards for recruitment and training established by the California Commission on Peace Officer Standards and Training.

Department of Public Safety
Peace Officer Standards and Training (POST) Ordinance

Operations, Safety, and Customer Experience Committee Meeting
April 16, 2026

Metro

POST Program

- The mission of POST is to promote professionalism within California law enforcement agencies by upholding the highest standards of quality, integrity and accountability.
- POST has minimum hiring and recruitment standards for sworn officers that must be followed in order for agencies to join POST as a member agency. **Joining the POST program is voluntary, and there is no cost to the agency to join.**
    - More than 600 agencies have joined this program, providing its members with access to many benefits, including management counseling services, development of new training courses, reimbursement for eligible training, quality leadership training programs, and a variety of training resources.
    - It is in Metro's interest to join POST as a member agency to bring credibility to the new department, to ensure that its officers have the most up-to-date training, and to take advantage of the benefits and resources offered by POST to its member agencies.
- In September 2025, the Board approved a resolution affirming its commitment to comply with POST requirements for the hiring and training of sworn officers, a necessary step for Metro to become a POST member agency.

Metro

POST Ordinance

- Metro submitted the approved Board resolution to POST, requesting to join POST as a member agency.
- POST requested Metro adopt a more formal ordinance to affirm the commitments set forth in the resolution.
- At the March 2026 Board Meeting, staff introduced the ordinance. The Board was required to wait at least five days following the ordinance's introduction before taking action.
- As this requirement has been met, **Metro staff now recommends that the Board approve the POST ordinance, formally committing Metro to comply with the minimum recruitment and training standards established by POST.**

Metro

Next Steps

- With the approval of the POST ordinance, Metro will apply for membership in the POST Program.

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0196, **File Type:** Informational Report **Agenda Number:** 40.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: MONTHLY UPDATE ON PUBLIC SAFETY

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE the Public Safety Report.

ISSUE

Metro is committed to providing outstanding trip experiences for all transportation system users. The agency implemented a multifaceted plan to improve safety outcomes and safety perceptions for riders and employees. The following summarizes current initiatives to accomplish this objective and recent public safety trends. This report summarizes February 2026 activity unless otherwise noted.

BACKGROUND

The Department of Public Safety (DPS) focuses on a human-centered approach, compassion, and a culture of care, recognizing diversity and respecting the wide range of people and communities it serves. DPS seeks a reparative public safety model to address the root causes of crime and disorder that can occur within the system, minimize harm, and promote inclusion. By openly sharing public safety-related statistics, DPS builds trust in the public safety model, fosters transparency, improves public perception of safety in the system, and encourages community engagement. The Metro Safety Hub <https://www.metro.net/safety-support/by-the-numbers/> and data dashboard, which provide additional data, are accessible online. This hub demonstrates the department's commitment to openness, accountability, and the safety and well-being of employees and the transit community.

DISCUSSION

THE SAFETY ENVIRONMENT IN FEBRUARY

February saw typical fluctuations in crime, with no major incidents, underscoring the importance of sustained visible deployments on the Metro system. Most incidents were non-violent and related to fare enforcement and the Code of Conduct. Total reported violent crimes were 169, and property crimes totaled 70, equating to approximately 7.09 and 2.94 per million boardings, respectively. Since there was no spike, deployments remained largely unchanged.

There were a few demonstrations and an impactful rainstorm, and DPS was well prepared and collaborated with other internal and external groups to monitor for potential service disruptions and implement any necessary safety measures. Preparations for the FIFA World Cup continued with DPS personnel facilitating a tabletop exercise with Metro departments, federal, state, and local stakeholders. Public safety personnel coordinated deployments to maintain visibility across the system with fixed and roving teams. There were reported cleanliness issues and Code of Conduct violations at Expo/Western, Pico Station, and 7th Street/Metro Transit Center, which were considered and resulted in deployment adjustments to address the issues.

METRO'S THREE-PART SAFETY STRATEGY

1. Engaged and Visible Presence

Visible presence contributes directly to order, predictability, and rider confidence across the system. Law enforcement conducted 7,826 bus boardings as part of visible engagement and deterrence efforts. With consistent visible and engaged presence, along with other measures already implemented, such as bus safety riding teams and operator barriers, staff expect to see a decrease in crime per million boardings and a continued decrease in operator assaults.

Monthly operational review identified no abnormal fluctuations in crime on the system, with crime remaining steady compared to the prior month. All public safety personnel - uniformed and care-based - continued their regular deployments across the system. Patrons were more willing to exit trains at the last stop, resulting in a smoother experience for riders as they leave for their destinations.

2. Enhancing Access Control & Station Experience

Access control and station improvements reduce the risk of escalation, improve access control integrity, and predictability for riders and employees. Transit Security officers continued weapons-detection screening and monitored faregates at select stations during peak hours, deterring weapons and fare evasion. Updated protocols and frequent security patrols in the ancillary areas continued to deter unauthorized access, resulting in a cleaner and safer environment (see Attachment A).

Station experience measures create a cleaner, more welcoming environment and encourage appropriate behavior that complies with Metro's Code of Conduct. The recent removal of former emergency swing gates at Sierra Madre Villa and Douglas stations, which had been a vulnerability to fare evasion, has led to increases in valid TAPs of 50% and 384%, respectively, in the first week after securing those areas. See Attachment B for more details.

These access control and station experience efforts will continue to ensure riders are there solely for transit purposes.

3. Building Partnerships to Address Societal Impacts

Since safety solutions vary by situation, Metro invests in and implements care-based interventions. Ambassadors and Community Intervention Specialists engaged 51,648 individuals, helping riders navigate the system more effectively, connect to essential Metro resources such as reduced fare programs, Bike Lockers, and Metro Micro, and TAP assistance, and be informed of service alerts. Outreach teams engaged 461 individuals experiencing homelessness in February, resulting in 208

interim and 16 permanent housing placements through coordination with regional service providers.

To date, the HOME teams have placed 1,776 individuals in interim or permanent housing, making Metro well-positioned to exceed its FY26 goal of 2,100 housing placements. Outreach teams are deployed in fixed locations at end-of-line stations to provide support and offer services as needed.

IMPLEMENTING METRO'S THREE-PART STRATEGY

Frontline Protection

Any assault on a Metro employee is unacceptable and is addressed with investigative priority. There were 20 assaults on Metro employees and contractors this month. Operator assaults totaled five in February, down from nine in January and seven in February 2025. Four of these incidents occurred while the operator was behind the retrofit safety barrier, with two of those occurring through the driver's side window. The remaining incident occurred when the operator walked to the back of the bus to investigate possible drug use and was spat on. None of the five incidents required medical transport. Assaults on other frontline staff, including contract security, MTS, and Ambassadors, totaled 15 in February, up from 12 in January but down from 16 in February 2025.

Metro takes assaults on any employees or contractors very seriously, and staff work with local law enforcement to ensure that they receive justice if an assault occurs. Between July 7, 2025, and February 13, 2026, LASD detectives investigated 22 assaults on Metro or contract security officers and 12 assaults on Metro bus operators. Of the 22 assaults on security officers, 21 resulted in either a citation or arrest of the perpetrator. 15 (68%) of the 22 assaults were solved. Nine were filed by prosecutors, four have charges pending, one was declined for prosecution, one is pending lab results before the case can be presented to prosecutors, and six are under investigation. Of the 12 assaults on bus operators, four resulted in either a citation or arrest of the perpetrator. Four assault incidents were solved. Of these four, three were filed by prosecutors, and one perpetrator was placed on psychological hold.

Regarding next steps, staff requested investigation outcomes from the LAPD and are awaiting their data. Assaults often escalated into physical fights when enforcing the Code of Conduct or when requesting that a patron get off a bus or train. MTS Bus Safety Teams patrol the top 10 bus lines with the highest rates of operator assaults, and security personnel are stationed at end-of-line stations when service concludes.

Enforcement and Accountability

Maintaining a visible presence is crucial to enhancing both system safety and perceptions of safety. Enforcement activity during February included 660 arrests, 725 citations, and 5,799 Code of Conduct removals. 43% of removals were for attempted fare evasion.

Law enforcement, MTS, and contract security officers continued patrols on the system with no notable special operations or changes in deployments this month. MTS officers are enforcing the Code of Conduct, which includes fare compliance, and removing individuals who violate Metro's policies. Weekly activities were shared with DPS but did not warrant any new targeted deployments.

Major Arrests

On February 18, the LAPD arrested three suspects responsible for several E and K line robberies. The officers leveraged technology to quickly identify the suspects from video surveillance footage. The suspects admitted to the crimes and were arrested and booked for the robberies. They are believed to be serial robbery suspects, and these high-impact arrests are expected to have a positive impact on the reduction of serious crimes on the system.

Emergency Preparedness and System Readiness
Scenario-based discussions strengthen Metro's readiness for any emergency event. Throughout February, DPS organized and conducted multi-agency discussion-based exercises in preparation for real crises and major events. Personnel participated in table-top exercises to test continuity plans, identify gaps, and improve communication.

On February 25, Metro's Emergency Management Department, in partnership with TSA, conducted a multi-agency tabletop exercise to prepare for the 2026 FIFA World Cup. 116 participants from various agencies collaborated on operational coordination, communication, and scenario discussions to identify gaps and improve readiness for these high-profile Special Event Assessment Rating (SEAR) 2 series of games. They discussed information sharing, crowd control, emergency response, and transportation logistics to enhance interagency coordination.

Medical Emergencies
Trained staff in first aid has proven critical for medical emergencies on the system. Throughout February, DPS responded to 259 medical emergencies experienced by riders or staff. Narcan reversals in February totaled 28, compared to 19 in January. Overdose incidents fluctuate monthly and reflect broader regional public health conditions. Each reversal reflects trained intervention and rapid-response capability.

EQUITY PLATFORM

The Metro transit system spans many diverse communities across Los Angeles County. Because Metro serves communities that vary significantly in both economic and ethnic composition, their public safety needs are equally varied and require tailored approaches. Metro continues to take a cross-disciplinary approach to sustain and grow ridership, improve customer experience, and, most importantly, ensure the safety of Metro's system is equitable across Los Angeles County. The Care-Based Services Division demonstrates the agency's holistic approach to improving public safety by bringing together all of Metro's care-centered programs.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This

item supports Metro's systemwide strategy to reduce VMT through operational activities that will improve public safety and customer experience on Metro's bus and rail system and further encourage transit ridership. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports Strategic Plan Goals #2.1: Deliver outstanding trip experiences for all users of the transportation system; Metro is committed to improving security and #5.6: Provide responsive, accountable, and trustworthy governance within the Metro organization; Metro will foster and maintain a strong safety culture.

NEXT STEPS

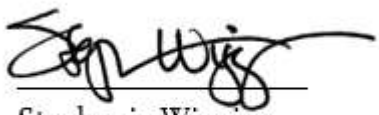
DPS will continue to monitor the performance of its law enforcement partners, private security, Transit Security Officers, and Care-Based Services members, as well as the agency's crime statistics. It also considers information from system operations, surveys, customer complaints, and physical security assessments, amongst other sources, to analyze safety-related issues, adjust deployment strategies, and formulate new interventions.

ATTACHMENTS

Attachment A - Ancillary Areas Quarterly Update
Attachment B - Station Experience Updates

Prepared by: Robert Gummer, Deputy Chief, System Security and Law Enforcement Officer, (213) 922-4513
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Karen Parks, Senior Director, Special Projects, (213) 922-4612

Reviewed by: William Scott, Chief of Police and Emergency Management, (213) 922-5448
Conan Cheung, Chief Operations Officer, (213) 418-3034



Stephanie Wiggins
Chief Executive Officer

Ancillary Areas Motion 30 Response – Quarterly Update

The following is a quarterly update, covering January to March 2026, outlining progress on securing and cleaning ancillary areas as required by Motion 30 by Directors Bass, Horvath, Krekorian, Najarian, Solis, and Hahn. This Motion increased Contract Security at all subway stations and mandated more inspections of ancillary areas. Response efforts shifted to prioritize arresting trespassers over removals. The ancillary areas are now much cleaner, and the updated protocols effectively deter unauthorized access, addressing previous concerns and disruptions to critical infrastructure.

Maintenance

- Custodial Services continued to maintain the cleanliness of all ancillary areas along the **B, D, E, and K lines** by performing a **weekly cleanup and odor neutralization in each corridor**.
- The maintenance team has increased the time for the audible alarm to activate when emergency exit doors at the B and D Line stations are entered by trespassers.
- The maintenance team is progressing with the **installation of the upgraded Intrusion Detection System (IDS)** with cameras, strobe lights, and announcements at the B and D Line ancillary areas. Installations are complete at Westlake/MacArthur Park, Vermont/Sunset, Pershing Square, and Vermont/Beverly stations. Universal City Station is 85% complete, and Union Station is 25% complete. The next scheduled station is Hollywood/Western.
    - Before these targeted efforts began, special cleanup requests were received daily from at least 12 of the 16 underground stations on the B and D Lines.
    - These requests decreased to once every other week at one of the 16 stations, which was a direct result of the increased frequency of corridor inspections by Contract Security officers, maintaining an increased frequency of station corridor cleaning, and new cleaning products.
    - The number of special cleanup requests has remained low for at least twelve consecutive months.
- As part of these targeted efforts, Metro also updated standard operating procedures for chemical and staff safety and equipment to protect staff from potential exposure to untreated corridors.

Security

- **35 Contract Security officers** were **deployed 24/7** at 16 subway stations on the B, D, E, and K Lines. Following the completion of the Intrusion Detection System (IDS) at several B and D Line subway stations.
- Contract Security responds to ancillary IDS alarms with real-time information provided by the Metro Security Operation Center personnel.
- Contract Security inspects every ancillary area **nine times daily** and arrests any trespasser that they encounter.
- Contract Security continues to support ancillary cleaning efforts by providing

security escorts for the Metro custodian staff during cleaning operations.

- Contract Security reports property damage and submits repair and clean-up requests via the Metro Transit Watch app that occur outside the regularly scheduled clean-up times.

Station Experience Updates

New Throne Restrooms Arrive This Week with More Positive Reviews

In February, the Station Experience team worked with Throne to add eight more restrooms to the Metro system, bringing the total to eight public restrooms this month. The Station Experience team remain on an accelerated track to complete up to 64 units in time for this summer's World Cup matches.

Staff have been completing this project under the "One Metro" approach, collaborating with a number of Metro departments, both within Gateway and with our frontline employees, to ensure our stations align with community and core business needs.

In February 2026, new Throne Restrooms were installed at the following locations:

1. Florence (A)
2. Mariachi Plaza (E)
3. Cesar Chavez Bus Pavilion / Union Station East (A)(B)(D)[J]
4. Balboa [G]
5. Hollywood/Western (B)
6. Westwood/Rancho Park (E)
7. Downtown Inglewood (K)
8. Avalon (C)

In March 2026, eight additional Throne Restrooms were installed:

1. Aviation/Century (C)(K) – a key World Cup hotel station
2. Hawthorne/Lennox (C) – a key World Cup shuttle station
3. Historic Broadway (A)(E) – providing added restroom capacity one stop from Little Tokyo/Arts District (which is the busiest Throne in North America)
4. Jefferson/USC (E) – a key LA28 station next to the Galen Center
5. 17th St/Santa Monica College (E)
6. Heritage Square/Arroyo (A), next to Metro's Lost & Found Office
7. Glendora (A)
8. Pershing Square (B)(D) at 4th St North Entrance near Grand Central Market & Angels Flight

Reaching the 50th Throne milestone means we have completed **nearly 80%** of our goal of 64 Throne units before this summer's World Cup games. Metro remains on schedule to meet this unprecedented task, where clean and safe public restrooms were nearly non-existent just several years ago.

Throne Restrooms made possible by Metro have now served over 700,000 people across the transit network, with a resilient 3.8 out of 5-star user cleanliness rating. The latest Metro Stations with Restroom Access map can always be accessed at metro.net/restrooms.

Key Stations Receive Refreshed Paint in Preparation for This Summer's Events
Facilities Maintenance Painters have been fanning out across the Metro system to repaint key stations as part of a renewal campaign to prepare for Metro's major events on the global stage, including this summer's FIFA World Cup and the return of Dodgers baseball.

Sierra Madre Villa Sees 50% Jump in Paid Entries After Eliminating Emergency Swing Gate Abuse
During the previous phase of taller faregate expansion led by TAP, Sierra Madre Villa (A) was one of the selected stations, with fare evasion among the selection criteria. While this station served as the terminal for the Gold Line from 2003 through 2016, it has now evolved into an intermediate station as the Foothill Extension has extended the line towards Azusa and Pomona. This station used to consistently see full parking utilization in its multilevel parking structure, but now sees reduced demand because many riders from farther away can board the A Line at a closer station along the new extension.

As a result, the station feels less busy than before, and there is visible evidence of trespassing between the ground floor of the parking structure and the 210 Freeway embankment, which is under Caltrans jurisdiction.

Staff had previously reported that installing taller faregates had helped increase valid entries, but that persistent fare evaders have adapted to these faregates by misusing the emergency swing gates installed with the older turnstiles.

As a result, staff have been working with TAP, Fire/Life Safety, and Lead Architecture on different strategies to combat this misuse, which have included:

- Installing taller, wraparound partitions that make it more difficult to reach around/over the emergency gate (Firestone, Lake)
- Adding crowd control stanchions that funnel passenger flow through appropriate areas and deter misuse of emergency gates (North Hollywood and Downtown Santa Monica)
- Replacing emergency swing gates with taller faregates that have enhanced egress capacity (Norwalk, Allen, El Segundo)

In addition to the three tactics above, they are adding a fourth strategy: repurposing emergency swing gates at stations with upgraded faregates and securing them for maintenance and special events. This strategy makes sense where the previous emergency gates are not directly next to the faregates, leaving an awkward area that would remain vulnerable if left unaddressed.

On January 26, 2026, this station received taller faregate upgrades but kept the old emergency gate in its place. This resulted in a modest 22% increase in valid TAPs when comparing the first week to the same week last year (1/26/26-2/1/26 vs. 1/27/25-2/2/25). However, numerous CCTV observations revealed that many fare evaders simply

changed their behavior by bypassing the taller faregates and walking around the corner to reach over and pop open the emergency gate to enter the paid area.

Therefore, on March 9, 2026, staff implemented the latest strategy to secure these former emergency gates, which are no longer needed given the enhanced egress capacity of the taller faregates. When comparing the first week of securing this gate to the same week last year (3/9-15/26 vs. 3/10-16/25), we saw a **50% increase in valid TAPs** (from 3,369 to 5,060). Since these access control improvements were made, Sierra Madre Villa Station has collected **$5,340 more in fare revenue** in the first month and a half when comparing YoY, without any additional security or other customer-facing staffing.

Douglas Station Collects Nearly 400% Increase in Valid Entries After Addressing Emergency Gate Misuse

Following the success at Sierra Madre Villa, staff are coordinating with TAP to return to other stations affected by this lingering access control vulnerability, including Douglas (K) Station in El Segundo. Staff is pleased to report that the first week of **emergency swing gate removal at Douglas (K) Station has already resulted in a 384% increase in valid TAPs** at this station, when comparing YoY.

Staff is continuing to work with TAP, DPS, and Fire/Life Safety to ensure that future stations receiving taller faregates also include coordination to remove the outdated emergency gates from the design and operations.

Monthly Update on Public Safety

Operations, Safety, & Customer Experience Committee Meeting

April 16, 2026

Engaged & Visible Presence

February 2026

Incident Free Trips
99.998%

Passenger Boardings
24M

Crime per 1M Boardings
27

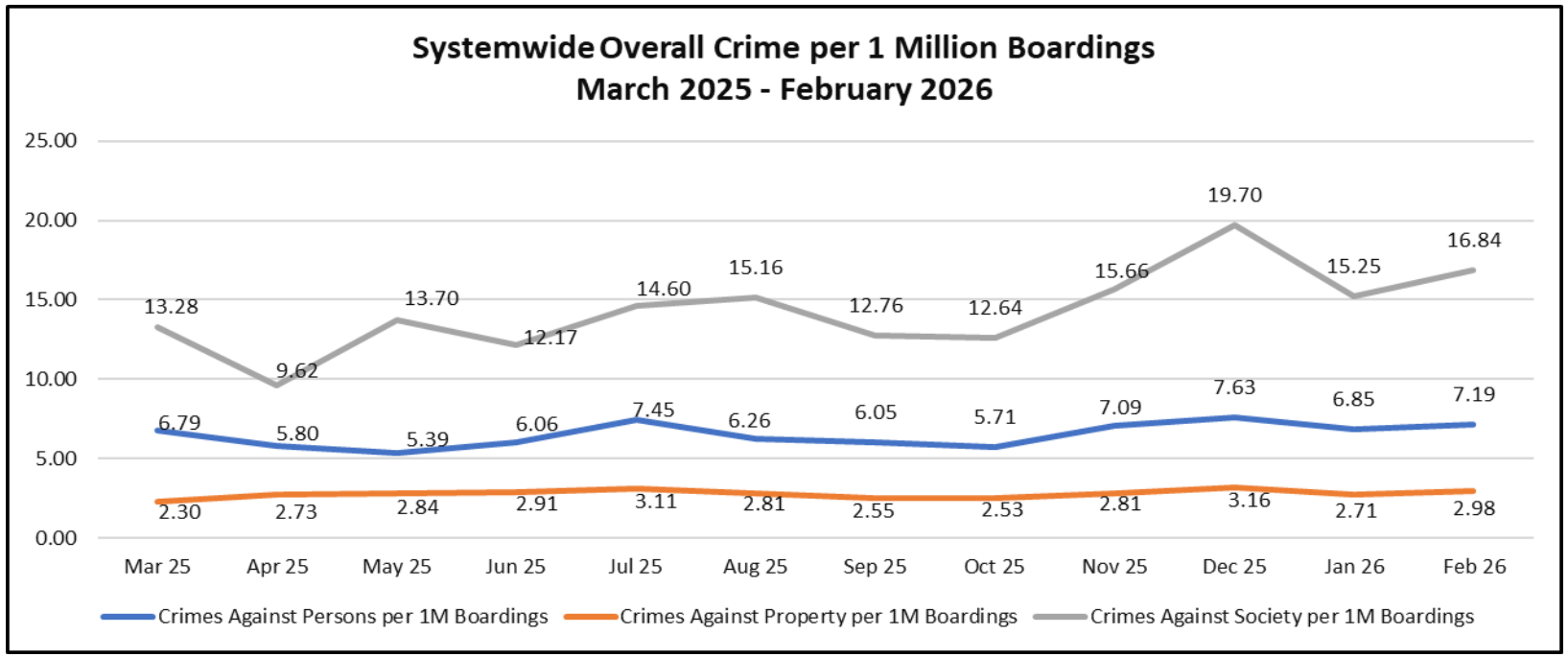
February 2026: Total Crimes
635
605 (+5%) Jan 2026
472 (+35%) Feb 2025

January 2026: Total Crimes
605
763 (-21%) Dec 2025
490 (+23%) Jan 2025

Vs Previous Year (Feb 2025 to Feb 2026)
↑ **12%**

Vs Previous Month (Jan 2026 to Feb 2026)
↑ **5%**

Crimes per 1 million boardings (Feb 2026)
27 (0.0027%)



February saw typical fluctuations in crime, with no major incidents. All public safety personnel—uniformed and care-based—continued their regular deployments across the system.

106,320
Tap Visual Inspections

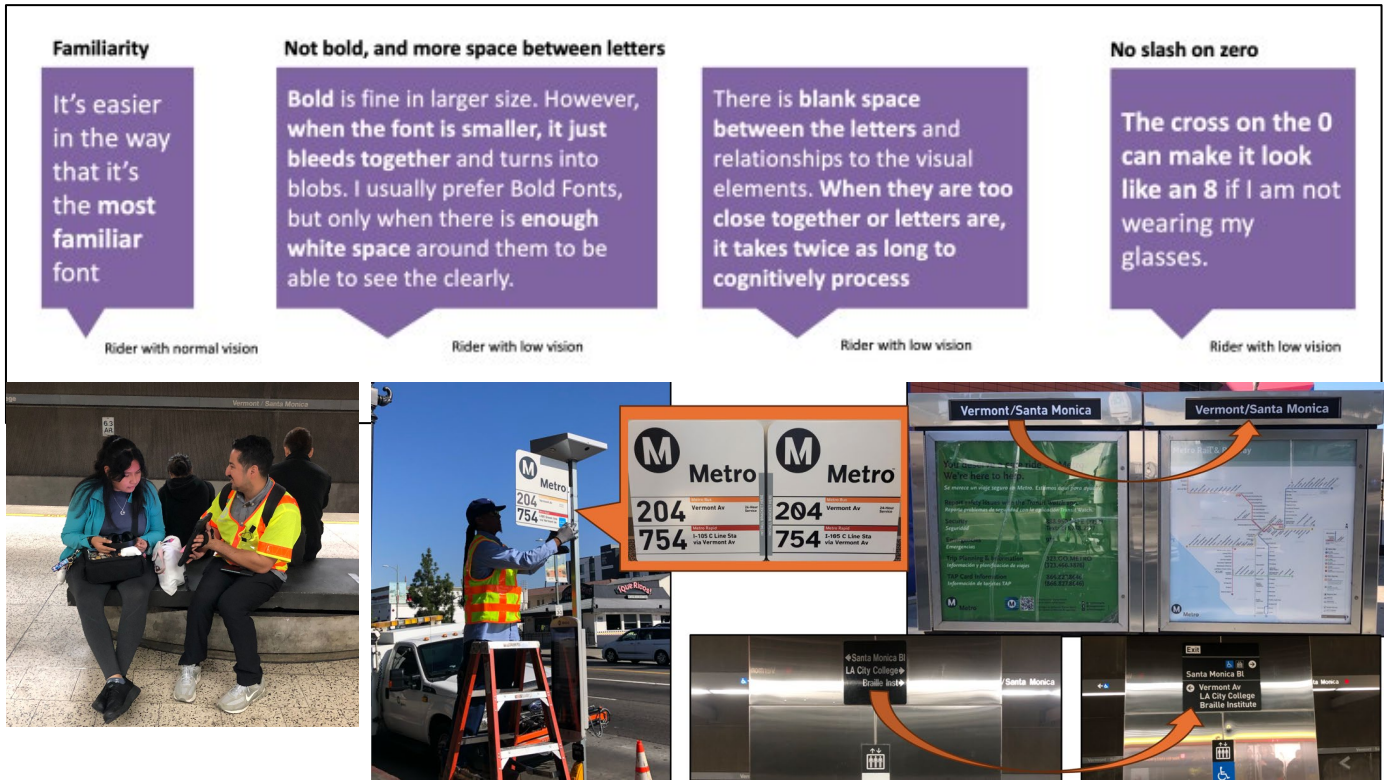
5,993
MTS Fare Checks

807
Citations

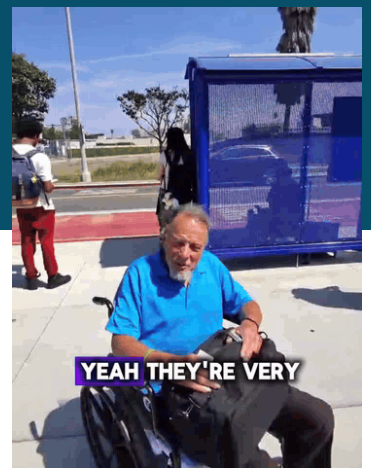
5,799
Ejections

Access Control & Station Experience

- 16 newly added Throne Restrooms, reaching 80% completion
- Metro riders w/ diverse abilities evaluate hyperlegible fonts
- Key stations see major jump in paid entries after addressing emergency swing gate misuse















Above: After the former emergency swing gates were removed, rider paid the fare at the faregate.

Partnerships to Address Societal Impacts

February 2026

Since safety solutions vary by situation, Metro invests in and implements care-based interventions.

Ambassador & Community Intervention Specialist Engagements	HOME Engagements	Interim Housing	Permanent Housing
51,648 people	461 people	208 people	16 people

To date, the HOME teams have placed 1,776 individuals in interim or permanent housing, positioning Metro to exceed its FY26 goal of 2,100 total placements.





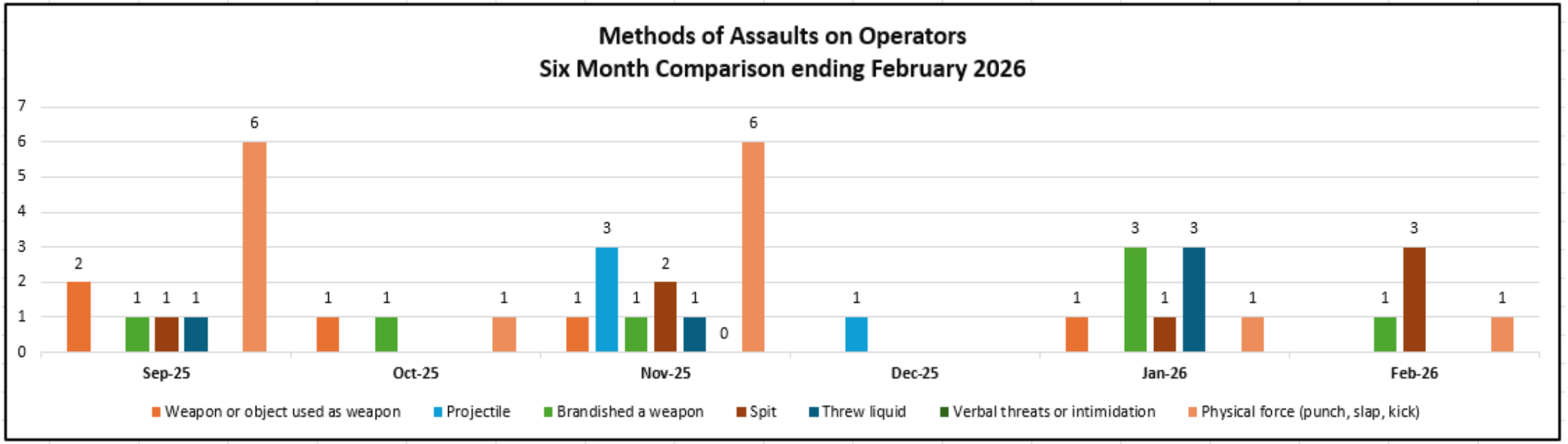


Frontline Protection

February 2026

- In February, there were 20 assaults on Metro frontline personnel, with five operator assaults.
- Four of these incidents occurred while the operator was behind the operator safety barrier. The remaining incident occurred when the operator walked to the back of the bus due to possible drug use.
    - None required medical transport to a hospital.
- MTS Bus Safety Teams ride the top ten bus lines with the highest operator assault rates, and security is at end-of-line stations when service ends.

Assaults on Metro Employees & Contractors		
Type	**Jan-26**	**Feb-26**
Bus Operators	9	5
Rail Operators	0	0
Transit Security Officers	0	0
Contract Security Officers	5	11
Ambassadors	1	2
Blue Shirts	0	0
Community Intervention Specialists	4	0
Custodians	2	2
Total	**21**	**20**



Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0068, **File Type:** Informational Report **Agenda Number:** 41.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: AUDIT OF OVERTIME CONTROLS FOR METRO TRANSIT SECURITY OFFICERS AND SECURITY CONTROL SPECIALISTS

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE Office of the Inspector General (OIG) Final Report on Audit of Overtime Controls for Metro Transit Security Officers and Security Control Specialists.

ISSUE

The Office of the Inspector General (OIG) conducted an audit of overtime controls for Metro Transit Security Officers (TSOs) and Security Control Specialists (SCSs). The objective of the audit was to assess whether overtime controls for Metro Transit Security Officers and Security Control Specialists are adequate and effective to ensure that overtime is properly authorized, accurately recorded, supported by legitimate operational needs, and compliant with Metro policies, labor agreements, and budgetary requirements.

BACKGROUND

Transit Security Officers (TSOs) and Security Control Specialists (SCSs) work under Metro Transit Security (MTS), which operates within the Department of Public Safety (DPS), whose mission is to ensure that Metro patrons and employees can ride and work safely, without fear, at all times. DPS operates 24 hours a day, seven days a week, and is responsible for providing security and protection at Metro facilities and infrastructure.

MTS supports the safety and security of Metro's transit system through field operations, monitoring, and coordination activities. These functions include patrol operations (mobile and foot), staffing fixed posts at designated Metro locations, enforcing the Metro Code of Conduct and fare compliance, supporting revenue protection efforts, providing escorts for General Services and Facilities Maintenance staff, and supporting special events. Due to the nature of these operational responsibilities, overtime is used to address staffing needs related to service coverage, special events, service disruptions, training, and unplanned employee absences.

The work rules and compensation for TSOs and SCSs are governed by the Collective Bargaining

Agreement between Metro and the International Brotherhood of Teamsters, Local 911 (Teamsters). Section 8.1 of the Agreement states that "*All employees shall be paid one and one-half (1 ½) times their straight time hours for all work they perform in excess of forty (40) hours per week, at their regular straight time hourly rate of pay*."

MTS uses the ETime system for employee timekeeping. The MTS timekeepers enter time and attendance information for MTS personnel into the system based on the rollouts. At the end of each pay period, timekeepers submit employee payroll records through ETime for review and approval by the appropriate supervisory staff.

DISCUSSION

The audit found that overall, overtime controls for TSOs and SCSs were generally adequate and operated largely as intended. Policies and procedures governing overtime were in place, and timekeeping processes were generally consistent with labor agreement provisions.

However, the audit identified opportunities to strengthen oversight and compliance. Overtime expenditures exceeded the approved budgeted amounts in both FY 2024 and FY 2025. The OIG also noted instances in which employees exceeded the weekly overtime threshold of 32 hours, as well as situations in which operational demands affected compliance with meal-break requirements. In addition, overtime usage was concentrated among a limited number of employees, with 50 of 247 employees accounting for approximately half of total overtime hours in Fiscal Year 2025.

To mitigate excessive and costly overtime, management should implement a strategic workforce planning approach that prioritizes the review and timely filling of persistent vacancies in critical classifications. As noted in the 2016 Audit of Overtime Usage (16-AGW-P03, dated August 31, 2016) conducted by Management Audit Services, staffing levels were found to be inadequate, and many Transit Security Officers worked overtime on their regular days off due to personnel shortage. Management should reassess current vacancy rates and ensure that staffing levels are appropriately aligned with operational needs to reduce reliance on overtime.

Effective management of overtime is important to help mitigate employee fatigue, which may affect individual performance and overall operational effectiveness. Given the public-facing and safety-sensitive nature of Transit Security Officer duties, appropriate oversight of overtime usage supports both workforce well-being and the security of Metro patrons and employees.

OIG made recommendations to strengthen oversight of overtime authorization, monitoring, and reporting; enhance compliance with established thresholds and requirements; and improve coordination among scheduling, timekeeping, and management functions to support improved accountability over overtime usage and expenditures.

Given current fiscal constraints, it is imperative that all Metro departments operate within approved budgetary limits and significantly reduce reliance on overtime, an exceptionally high-cost staffing practice.

RECOMMENDATIONS

Department of Public Safety (System Security/Transit Security):

Finding A: Actual Overtime Cost Exceeded the Budget

1. Improve overtime budget development and controls.
2. Strengthen overtime monitoring and reporting.
3. Evaluate staffing levels and hiring strategies.
4. Develop a long-term workforce planning strategy.

Finding B: Overpayment/Underpayment of Overtime Due to Incorrect Earning Codes

5. Implement automated system controls in the timekeeping and payroll system.
6. Strengthen supervisor review and approval procedures.
7. Provide mandatory refresher training for timekeepers.
8. Enhance payroll review and monitoring controls.
9. Align policies and procedures with the CBA and communicate changes.
10. Perform periodic internal audits or spot checks.

Finding C: Weekly Overtime Thresholds Exceeded by Some Employees

11. Reinforce and communicate overtime policy requirements.
12. Implement a preventive overtime monitoring process.
13. Require documented justification and approval for all exceedances.
14. Integrate overtime controls into scheduling practices.
15. Perform periodic management review of overtime trends.
16. Establish accountability for non-compliance.
17. Assess fatigue and safety risks associated with high overtime.
18. Assess current vacancy rates and align staffing levels with operational needs.
19. Implement a strategic workforce planning approach that prioritizes reviewing and filling persistent vacancies in critical classifications to mitigate excessive and costly overtime.

Finding D: Overtime in Excess of 32 Hours per Week Without Prior Written Authorization

20. Reinforce the requirement for prior written authorization.
21. Implement automated alerts for employees approaching the 32-hour threshold.
22. Establish a standardized submission timeline and escalation process.
23. Require watch commander accountability for late or missing forms.
24. Centralize tracking and periodic review of authorization forms.
25. Provide refresher training on overtime processes for employees and watch commanders.

Finding E: Lunch Break Erroneously Included in Overtime Hours

26. Enhance employee training on overtime reporting.
27. Update standard operating procedures (sops).
28. Implement system validations in mts roll-out.
29. Reinforce supervisor review and approval.

Finding F: Overtime of 30 Minutes Due to Skipped Lunch Break

30. Strengthen staffing and coverage controls.
31. Reinforce policy expectations on meal breaks.
32. Enhance documentation requirements.
33. Implement monitoring and trend analysis.
34. Evaluate the need for additional training or guidance.

Finding G: Discrepancy in Reported Overtime Hours

35. Implement a formal reconciliation process.
36. Strengthen system interface controls.
37. Require documentation of manual adjustments.
38. Provide training to supervisors and payroll staff.
39. Perform periodic monitoring and quality assurance reviews.
40. Communicate corrections and provide feedback.

Finding H: Inconsistencies in Entering Overtime Hours in the Scheduling Software

41. Reinforce standardized time-entry protocols.
42. Provide targeted refresher training.
43. Implement validation or system controls.
44. Strengthen supervisory review.
45. Monitor and follow up.

Finding I: Overtime Sign-Up Discrepancies in the Rollout

46. Implement a standardized overtime sign-up workflow.
47. Automate tracking and updates where possible.
48. Introduce verification and audit checks.
49. Enhance communication with staff.
50. Provide training for roll-out management.
51. Conduct periodic review and continuous improvement.

Chief People Office (Talent Acquisition):

Finding J: Overpayment of Military Leave Pay

52. Recover overpayment.
53. Strengthen review controls.
54. Provide training and guidance.
55. Document lessons learned.

EQUITY PLATFORM

The results of this review could lead to positive equity outcomes should Metro implement the recommendations. By strengthening oversight of overtime usage, Metro can promote workforce well-being while safeguarding patrons and employees.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This item supports Metro's systemwide strategy to reduce VMT through operational/administrative activities that will improve and further encourage transit ridership, ridesharing, and active transportation. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

Recommendations support strategic plan goal no. 2: Deliver outstanding trip experiences for all users of the transportation system.

NEXT STEPS

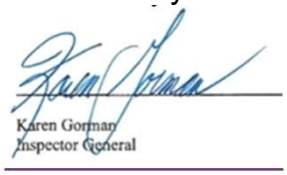
Metro management will implement the recommendations and corrective action plans.

ATTACHMENT

Attachment A - Final Report on Audit of Overtime Controls for Metro Transit Security Officers and Security Control Specialists (Report No. 26-AUD-06)

Prepared by: Asuncion Dimaculangan, Senior Auditor, (213) 244-7311
Yvonne Zheng, Senior Manager, Audit, (213) 244-7301
George Maycott, Senior Director, Special Projects, (213) 244-7310

Reviewed by: Karen Gorman, Inspector General, (213) 922-2975



ATTACHMENT A
LEGISTAR FILE # 2026-0068

Los Angeles County
Metropolitan Transportation Authority
Office of the Inspector General

Audit of Overtime Controls for Metro Transit Security Officers and Security Control Specialists

Report No. 26-AUD-06

March 17, 2026

Metro

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Los Angeles County
Metropolitan Transportation Authority

Office of the Inspector General
818 West 7th Street, Suite 500
Los Angeles, CA 90017

213.244.7300 Tel
213 244-7318 Fax

DATE: March 17, 2026

TO: Metro Board of Directors
Metro Chief Executive Officer

FROM: Yvonne Zheng, Senior Manager, Audit
Office of the Inspector General

E-SIGNED by Yvonne Zheng on 2026-03-17 11:57:29 PDT

SUBJECT: Final Report on Audit of Overtime Controls for Metro Transit Security Officers and Security Control Specialists (Report No. 26-AUD-06)

EXECUTIVE SUMMARY

The Office of the Inspector General (OIG) conducted an audit of overtime controls for Metro Transit Security Officers (TSOs) and Security Control Specialists (SCSs). The objective of the audit was to assess whether overtime was properly authorized, accurately recorded, and compensated in accordance with applicable policies, labor agreements, and budgetary requirements. The audit was performed as part of OIG's oversight responsibilities to promote accountability, safety, integrity, and efficiency in Metro operations.

The audit focused on overtime administration and timekeeping practices within Metro Transit Security for Fiscal Years 2024 and 2025. OIG reviewed applicable policies and procedures and analyzed overtime usage, expenditures, and selected compliance with collective bargaining agreement provisions and operational requirements related to overtime and meal breaks.

The audit found that overall, overtime controls for TSOs and SCSs were generally adequate and operated largely as intended. Policies and procedures governing overtime were in place, and timekeeping processes were generally consistent with labor agreement provisions.

However, the audit identified opportunities to strengthen oversight and compliance. Overtime expenditures exceeded the approved budgeted amounts in both FY 2024 and FY 2025. The OIG also noted instances in which employees exceeded the weekly overtime threshold of 32 hours, as well as situations in which operational demands affected compliance with meal-break requirements. In addition, overtime usage was concentrated among a limited number of employees, with 50 of 247 employees accounting for approximately half of total overtime hours in Fiscal Year 2025.

Effective management of overtime is important to help mitigate employee fatigue, which may affect individual performance and overall operational effectiveness. Given the public-facing and safety-sensitive nature of Transit Security Officer duties, appropriate oversight of overtime usage supports both workforce well-being and the security of Metro patrons and employees.

OIG made recommendations to strengthen oversight of overtime authorization, monitoring, and reporting; enhance compliance with established thresholds and requirements; and improve coordination among scheduling, timekeeping, and management functions to support improved accountability over overtime usage and expenditures.

AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of the audit was to assess whether overtime controls for Metro Transit Security Officers and Security Control Specialists are adequate and effective to ensure that overtime is properly authorized, accurately recorded, supported by legitimate operational needs, and compliant with Metro policies, labor agreements, and budgetary requirements.

The audit reviewed controls over overtime eligibility, approval, scheduling, and payroll processing. The review included compliance with established overtime limits, authorization requirements, accuracy of earning codes, and management oversight and monitoring practices. The audit period covered July 1, 2023 through June 30, 2025 (FY24 and FY25).

To achieve the audit objectives, we reviewed applicable Metro policies and procedures related to overtime, interviewed personnel from Transit Security, Talent Acquisition, and Accounting, analyzed overtime and payroll data, and examined selected overtime transactions and payroll records. We also reviewed Collective Bargaining Agreements (CBA) for TSO and SCS positions. The CBA details the assignment and approval of overtime for TSO and SCS positions.

This performance audit was conducted in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusion based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusion based on our audit objective.

BACKGROUND

Transit Security Officers (TSOs) and Security Control Specialists (SCSs) work under Metro Transit Security (MTS), which operates within the System Security and Law Enforcement (SSLE) Department, whose mission is to ensure that Metro patrons and employees can ride and work

safely, without fear, at all times. SSLE operates 24 hours a day, seven days a week, and is responsible for providing security and protection at Metro facilities and infrastructure.

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MTS uses the ETime system for employee timekeeping. The MTS timekeepers enter time and attendance information for MTS personnel into the system based on the rollouts. At the end of each pay period, timekeepers submit employee payroll records through ETime for review and approval by the appropriate supervisory staff.

RESULTS OF AUDIT

Overtime costs for Transit Security Officers (TSOs) and Security Control Specialists (SCSs) accounted for 26% and 25% of their total payroll in FY24 and FY25, respectively. The following tables present overtime details by job title.

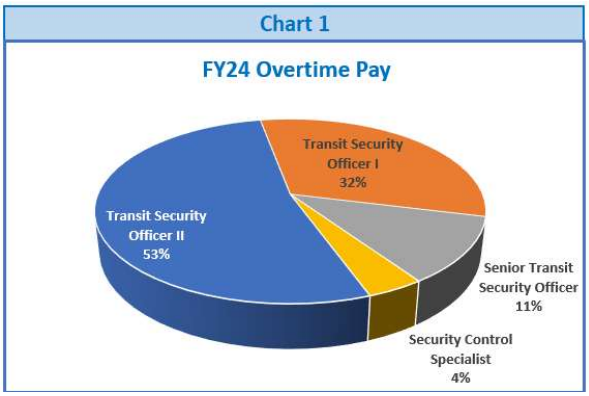
Table 1
FY24 Summary of Overtime by Job Title

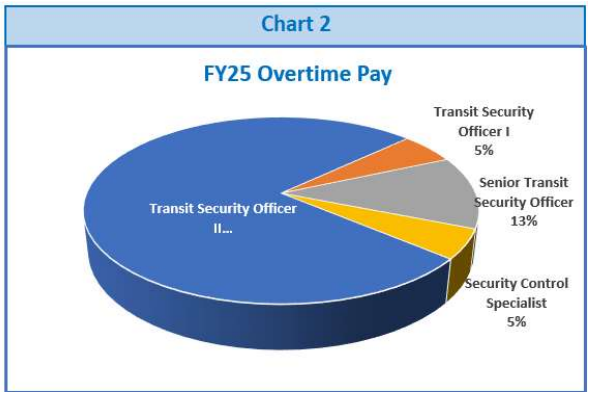
Job Title	No. of Employees	Overtime Hours	Overtime Amount
Transit Security Officer I	104	41,013	$ 1,320,763
Transit Security Officer II	121	45,353	2,184,627
Senior Transit Security Officer	21	8,456	480,402
Security Control Specialist	15	3,191	166,694
Total	**261**	**98,013**	**$ 4,152,486**
Total Payroll of TSOs and SCSs			$ 15,793,525
% of Overtime to Total Payroll of TSOs and SCSs			**26%**

Table 2 FY25 Summary of Overtime by Job Title			
Job Title	No. of Employees	Overtime Hours	Overtime Amount
Transit Security Officer I	20	7,661	$ 262,492
Transit Security Officer II	181	83,928	3,746,809
Senior Transit Security Officer	19	10,459	613,500
Security Control Specialist	27	4,419	247,717
Total	**247**	**106,467**	**$ 4,870,518**
Total Payroll of TSOs and SCSs			$ 19,175,926
% of Overtime to Total Payroll of TSOs and SCSs			**25%**

Overtime for Transit Security Officers and Security Control Specialists exceeded the budgeted amounts by 9% in FY24 and 66% in FY25, as detailed in Finding A below.

The charts below indicate that Transit Security Officer II (TSO II) consistently incurred the highest overtime costs each year. In FY25, TSO II accounted for 77% of total overtime costs. This was largely attributable to the promotion of a significant number of TSO I employees to TSO II during FY25, which shifted overtime hours to a higher pay classification and increased the share of overtime costs attributed to TSO II.





(Source: Payroll Reports from LIMS)

The audit found the following issues:

A. Actual Overtime Cost Exceeded the Budget

We noted that the cost of overtime for Transit Security Officers and Security Control Specialists exceeded the budgeted amounts for FY24 and FY25 by 9% and 66%, respectively, as shown in the table below:

Table 3
Budget vs. Actual Overtime per Payroll Reports

Fiscal Year	Budget	Actual	Actual over Budget	Budget Overrun %
FY24	$ 3,800,000	$ 4,152,486	$ 352,486	9%
FY25	$ 2,942,503	$ 4,870,518	$ 1,928,015	66%

Transit Security management stated that the budget overrun resulted from additional special overtime assignments requested throughout the year in response to system-related issues and concerns. Management also stated that the FY25 budget appears significantly lower than the FY24 budget due to inaccuracies in the FY25 budget entry process following a management transition, during which staffing and operational needs were not fully understood.

We conducted a comparative cost analysis to evaluate staffing coverage achieved through the hiring of additional employees versus reliance on extended overtime hours for existing employees. Based on the assumption that a Transit Security Officer II (TSO II) works 20 overtime hours per week, the analysis demonstrated that, on a sustained basis, staffing coverage provided through overtime is more costly than coverage achieved by hiring an additional employee. As previously noted, senior employees are given priority for overtime assignments; therefore, we used the highest hourly pay rate applicable to TSO II in our analysis. While the highest overtime earners typically work 32 or more overtime hours per week, we conservatively used 20 hours per week in the estimates presented below:

Table 4 - Comparison Between Salary of New Hire vs. Overtime Cost of Current Employee

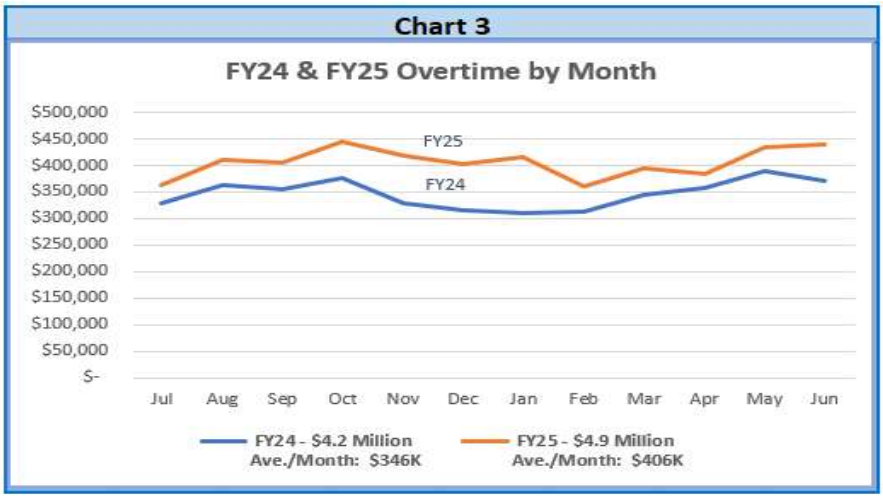
Description	Rate per Hour	No. of Hours	Total per Year
New Hire - Transit Security Officer II:			
Base Salary	$ 28.09	2,080	$ 58,427.00
Estimated Overtime Cost of Current TSO II:			
Overtime Hours: 20 hours/week or 1,040 hours for the whole FY	$ 58.25	1,040	$ 60,574.80
Difference			**$ 2,147.80**

This means that for half the number of work hours, Metro pays $2,147.80 more than one full-time employee.

(Note: The above comparison does not include benefit costs. Because benefit costs generally increase as salary levels rise, the actual cost differential may be greater.)

Beyond cost considerations, hiring additional employees may reduce reliance on overtime, support more predictable labor costs, and enhance workforce sustainability. Increased staffing may also mitigate employee fatigue and support health and safety, while providing riders with more consistent service coverage and safety presence.

The chart below shows that overtime costs were incurred each month consistently, with average monthly overtime of $346,041 in FY24 and $405,876 in FY25.



(Source: Payroll Reports from LIMS)

We prepared a schedule identifying employees with the highest overtime usage in FY25. As shown in Attachment B, 50 employees accounted for 52,247 overtime hours, representing nearly half of the total 106,467 overtime hours incurred during the fiscal year. For these employees, overtime hours ranged from 38 percent to 77 percent of their regular work hours. The highest individual amount totaled 1,602 overtime hours, equivalent to 77 percent of the employee's regular work hours.

Table 5 presents the distribution of FY25 overtime hours and the corresponding percentages relative to employees' 2,080 total regular work hours during the fiscal year.

Table 5 - Summary of Overtime Hours - FY25				
Number of Employees	Overtime Hours		% of Overtime Hours to Total Regular Hours	
	From	To	From	To
Top 50*	790	1,602	38%	77%
5	749	770	36%	37%
19	645	728	31%	35%
19	541	624	26%	30%
16	437	520	21%	25%
21	333	416	16%	20%
17	229	312	11%	15%
24	125	208	6%	10%
49	21	104	1%	5%
27	No Overtime		0%	0%
247				

*Top 50 Overtime Earners (See Attachment A)

Management should evaluate the underlying drivers of consistently high overtime costs and assess staffing levels, scheduling practices, and deployment strategies to determine whether overtime usage can be better managed or reduced while maintaining operational requirements.

Recommendations:

To address overtime costs exceeding budgeted amounts, Transit Security management should:

1. **Improve Overtime Budget Development and Controls.**
   - Establish procedures to reduce overtime and ensure that budgets are based on accurate staffing levels. Overtime planning and budget development should take into account special events and anticipated operational needs. Budget assumptions must be clearly documented and reviewed during management transitions to minimize the risk of data entry errors or underfunding. Additionally, management should increase efforts to operate within established budgets, promoting more efficient and cost-effective operations.

2. **Strengthen Overtime Monitoring and Reporting.**
   - Implement regular monitoring of overtime expenditures against budgeted amounts throughout the fiscal year. Management should review variance reports and take timely corrective action when overtime costs exceed established thresholds.

3. **Evaluate Staffing Levels and Hiring Strategies.**
   - Assess whether additional permanent positions are warranted to meet operational requirements and reduce reliance on sustained overtime. Consideration should be

given to the cost-effectiveness and workforce sustainability of hiring additional staff versus continued use of overtime.

4. **Develop a Long-Term Workforce Planning Strategy.**
   - Create a workforce plan that aligns staffing, overtime usage, and budget projections with anticipated system demands. The plan should address succession planning, management transitions, and mechanisms to reduce reliance on extended overtime while maintaining service coverage and safety.

B. Overpayment/Underpayment of Overtime Due to Incorrect Earning Codes

1. Overpayment

Overtime is calculated for hours worked in excess of 40 hours per workweek. Under the Collective Bargaining Agreement with Teamsters, certain earning codes - such as Vacation, Bereavement, Holiday Floating, and Holiday Legal - are eligible to be counted as time worked toward the 40-hour threshold and are therefore considered eligible hours when determining overtime pay.

Conversely, some earning codes are ineligible and should not be included in the 40-hour calculation. Examples include Sick Pay, Off with Permission, Administrative Leave, Family Care Leave, and Family Leave Vacation. See attachment A for list of eligible and ineligible earning codes for overtime purposes.

Our review of payroll records of Transit Security Officers (TSOs) and Security Control Specialists (SCSs) for FY24 and FY25 disclosed overpayment due to the inclusion of ineligible earning codes in the 40-hour workweek calculation. Please see Table 6.

Table 6 - Overpayment

Fiscal Year	No. of Employees	No. of Overpayment	Overpayment in Hours	Amount of Overpayment
FY24	9	10	76	$1,053
FY25	18	19	187	$2,580

2. Underpayment:

On the other hand, we identified instances, in which employees exceeded the 40-hour workweek but were not paid overtime for the excess hours. This issue occurred because the payroll code "RGW" (Regular to Complete Workweek) was not counted toward the 40-hour threshold; thus, they were paid at a regular rate, instead of an overtime rate. Please see Table 7.

Table 7 - Underpayment				
Fiscal Year	No. of Employees	No. of Underpayment	Underpayment in Hours	Amount of Underpayment
FY24	11	11	40	$563
FY25	11	14	83	$1,411

We informed the Transit Security management about the above findings, and they made the corrections in the pay period ending October 11, 2025.

Transit Security Management explained that these errors resulted from timekeeper input mistakes and oversight by the approving Supervisors. The mistakes can also be attributed to an absence of automated system controls to flag or prevent ineligible codes from being included in overtime computations.

The erroneous overtime payments resulted in additional administrative workload for payroll correction and adjustment. It could also result in potential employee dissatisfaction and risk of non-compliance with the collective bargaining agreement and labor regulations.

Recommendations:

1. **Implement Automated System Controls in the Timekeeping and Payroll System**
   Work with Information Technology Services to configure system validation rules that prevent ineligible earning codes from being counted toward the 40-hour workweek threshold.
   - Configure system rules to automatically exclude ineligible earning codes (e.g., Sick Pay, Administrative Leave, Off with Permission) from counting toward the 40-hour overtime threshold.
   - Set up validation alerts or error messages to flag overtime entries that appear inconsistent with allowable earning codes.
   - Require system prompts for approvers to review any overtime that is generated by a combination of eligible and ineligible codes.

2. **Strengthen Supervisor Review and Approval Procedures**
   - Reinforce expectations that Supervisors verify the accuracy of earning codes and weekly hour totals prior to approving timesheets.
   - Require periodic refresher training for Supervisors on timekeeping rules and collective bargaining agreement (CBA) provisions.
   - Implement a checklist or standardized approval guidance that highlights common coding errors and high-risk areas.

3. **Provide Mandatory Refresher Training for Timekeepers**
   - Conduct training on eligible versus ineligible earning codes for overtime calculations, including examples of common mistakes leading to overpayment or underpayment.
   - Distribute a quick-reference guide or job aid summarizing proper coding and overtime rules.
   - Enforce periodic refresher training or certification for timekeepers to ensure ongoing competency.

4. **Enhance Payroll Review and Monitoring Controls**
   - Require Payroll staff to perform a secondary review of overtime hours each pay period, focusing on employees whose total hours fall close to the 40-hour threshold.
   - Strengthen review and approval procedures by requiring a secondary review of overtime submissions to verify the accuracy of earning codes before approval.

5. **Align Policies and Procedures with the CBA and Communicate Changes**
   - Update Transit Security's timekeeping and overtime procedures to clearly reflect which codes are included or excluded in the overtime calculation under the Teamsters agreement.
   - Issue updated time keeping procedures to all Supervisors, timekeepers, and Payroll staff, and obtain signed acknowledgment.
   - Ensure that any future CBA changes are promptly incorporated into system controls and workflow documentation.

6. **Perform Periodic Internal Audits or Spot Checks**
   - Conduct periodic spot reviews of earning codes and overtime calculations for selected pay periods, especially during periods of staffing changes or revised CBA provisions.
   - Compare reported hours to system-generated totals to ensure consistency and identify emerging trends or weaknesses.

C. Weekly Overtime Thresholds Exceeded by Some Employees

Section 4.4 of the MTS Standard Operating Procedures for Payroll-Timekeeping states, "*Overtime, including pre-scheduled sign-ups, shall be limited to thirty-two (32) hours per week*."

Our review of payroll records for Transit Security Officers and Security Control Specialists for FY24 and FY25 identified multiple instances in which employees exceeded Metro's 32-hour weekly overtime limit. In FY24, there were 37 instances involving 27 employees who surpassed the overtime threshold. In FY25, there were 49 instances involving 28 employees who exceeded the limit. In these cases, employees worked between 33 and 56 hours of overtime in a single week.

Exceeding established overtime parameters creates potential compliance risks and may contribute to employee fatigue, which can impact safety and job performance.
Please see Tables 8 and 9 for the details:

Table 8
Employees Exceeding 32 Hours of Overtime per Week - FY24

Job Title	Number of Employees	Overtime Hours per Employee per Week	Total Overtime Hours	Number of Weeks	Mean Overtime Hours per Week
Security Control Specialists	1	34 Hours	34	1	34
Transit Security Officer I	21	33 to 56 Hours	990	28	35
Transit Security Officer II	5	33 to 38 Hours	281	8	35
Totals	**27**		**1,305**	**37**	**35**

Table 9
Employees Exceeding 32 Hours of Overtime per Week - FY25

Job Title	Number of Employees	Overtime Hours per Employee per Week	Total Overtime Hours	Number of Weeks	Mean Overtime Hours per Week
Transit Security Officer I	7	33 to 45 Hours	367	10	37
Transit Security Officer II	20	33 to 51 Hours	1,380	37	37
Senior Transit Security Officer	1	34 to 40 Hours	74	2	37
Totals	**28**		**1,821**	**49**	**37**

In 2016, Management Audit Services (MAS) conducted a performance audit on the internal controls of overtime usage for Maintenance Specialists, Mechanics, and Transit Security Officers (16-AGW-P03 dated August 31, 2016). The audit found that there was inadequate staffing to meet work requirements. It was noted that many of the Transit Security Officers worked overtime on their regular days off. Metro Transit Security management stated that this was due to staff shortage.

Given the above findings from the 2016 MAS audit, and to mitigate excessive and costly overtime, management should reassess current vacancy rates, align staffing levels with operational needs and implement a strategic workforce planning approach that prioritizes reviewing and filling persistent vacancies in critical job classifications.

Table 10 below presents the number of vacancies by job title based on the organizational charts for FY24 and FY25:

Table 10 - Vacancies by Job Title						
	Fiscal Year 2024			Fiscal Year 2025		
Job Title	Per Org. Chart	Actual Number	Vacancies (Variance)	Per Org. Chart	Actual Number	Vacancies (Variance)
Transit Security Officer I	113	104	9	145	20	125
Transit Security Officer II	136	121	15	154	181	(27)
Senior Transit Security Officer	15	21	(6)	16	19	(3)
Secrity Control Specialist	15	15	0	15	27	(12)
Total	**279**	**261**	**18**	**330**	**247**	**83**

Any variance exceeding the numbers reflected in the organizational charts is attributable to employees whose employment terminated during the fiscal year but before year-end. The actual numbers shown in the table include these employees.

Metro Security Management should strengthen controls to ensure compliance with the 32-hour weekly overtime limit and to ensure overtime is properly managed, consistently enforced, and aligned with operational and budgetary requirements.

Recommendations:

1. **Reinforce and Communicate Overtime Policy Requirements**
   - Formally re-communicate the 32-hour weekly overtime limit to all Transit Security personnel and supervisory staff.
   - Ensure the policy is included in onboarding materials and periodic refresher trainings.

2. **Implement a Preventive Overtime Monitoring Process**
   - Monitor overtime usage in real time or near real time using available scheduling or payroll systems.
   - Establish a weekly overtime dashboard or automatic alerts to identify employees who are approaching the 32-hour limit.

3. **Require Documented Justification and Approval for All Exceedances**
   - Ensure the required authorization form is completed, retained, and reviewed for completeness for any overtime that exceeds 32 hours per week.
   - Escalate to management instances without proper approvals and address through corrective action, coaching, or retraining, depending on severity and frequency.

4. **Integrate Overtime Controls into Scheduling Practices**
   - Require scheduling staff to review weekly overtime projections when assigning shifts. Assigning shifts that knowingly put employees above the 32-hour limit should be

prohibited unless a documented operational necessity exists and advance approval has been secured.

5. **Perform Periodic Management Review of Overtime Trends**
   - Conduct quarterly reviews of overtime usage by employee, shift, and location to identify patterns, operational drivers, or staffing shortages contributing to excessive overtime. Results should be used to inform workforce planning, hiring needs, or shift adjustments.

6. **Establish Accountability for Non-Compliance**
   - Define clear consequences for repeated policy violations, such as failure to obtain required approvals or scheduling employees beyond allowable limits. Accountability measures may include supervisor coaching, written reminders, or escalation to higher-level management for persistent non-compliance.

7. **Assess Fatigue and Safety Risks Associated with High Overtime**
   - Evaluate safety implications for posts requiring heightened attention or rapid response and consider implementing post-rotation guidelines or mandatory rest periods when overtime approaches higher thresholds.

8. **Assess Current Vacancy Rates and Align Staffing Levels with Operational Needs**

9. **Implement a Strategic Workforce Planning Approach that Prioritizes Reviewing and Filling Persistent Vacancies in Critical Classifications to Mitigate Excessive and Costly Overtime**

D. Overtime in Excess of 32 Hours per Week Without Prior Written Authorization

MTS policy states, "*It is the employee's responsibility to track their overtime and obtain the appropriate pre-approval to work any overtime that exceeds 32 hours, as stated in the Transit Security General Order about Overtime.*"

In cases where the employee will exceed the 32-hour maximum limit per week, the employee should fill out an *Authorization to Exceed 32 Hours of Overtime* form to be approved by the Captain/Director of Transit Security.

Our review disclosed the following:

1. Lack of prior written authorization: Some employees exceeded the 32-hour limit without submitting the required form. The MTS Timekeepers did not receive the *Authorization to Exceed 32 Hours of Overtime* forms for 10 (out of 37) and 29 (out of 49) for FY24 and FY25,

respectively. Consequently, certain overtime hours were worked without documented management approval.

2. Late submission of authorization forms: In 15 cases, the forms were submitted after the overtime work had already been completed. The policy clearly requires prior written approval to ensure that additional overtime is properly justified, reviewed, and authorized before being incurred.

The *Authorization to Exceed 32 Hours of Overtime* form is an important internal control designed to ensure that overtime is appropriately justified and approved by management in advance. It documents that the additional hours are necessary to meet critical staffing or security requirements and that management oversight has been exercised over overtime usage.

Our review indicates that some employees and Watch Commanders do not consistently follow the established overtime approval procedures. MTS Timekeepers reported that they frequently had to follow up with employees or Watch Commanders to obtain the necessary forms.

Failure to comply with overtime approval requirements weakens internal controls and limits management's ability to monitor and control overtime usage. Unapproved overtime may result in unnecessary labor costs, inaccurate reporting, and potential inequities in work distribution.

Recommendations:

To strengthen internal controls and ensure consistent compliance with overtime approval requirements, we recommend the following:

1. **Reinforce the Requirement for Prior Written Authorization**
   - Re-communicate the policy that employees must obtain written approval *before* working overtime in excess of 32 hours per week. This should include reminders during shift briefings, email notifications, and periodic policy refreshers to ensure all employees and Watch Commanders understand the requirement.
   - Ensure the policy is included in onboarding materials and periodic refresher trainings.

2. **Implement Automated Alerts for Employees Approaching the 32-Hour Threshold**
   - Ensure that the payroll or scheduling system generates automated notifications to both the employee and the Watch Commander when an employee is projected to exceed 32 overtime hours in a week. This will prompt timely submission and approval of the Authorization to Exceed 32 Hours of Overtime form.

3. **Establish a Standardized Submission Timeline and Escalation Process**
   - Set clear expectations that authorization forms must be submitted before the start of the shift in which overtime will exceed the limit. For instances in which the form is not submitted on time, an escalation protocol should be implemented, requiring Watch Commander justification and higher-level review before payroll processing.

4. **Require Watch Commander Accountability for Late or Missing Forms**
   - Remind supervisors that they are responsible for ensuring that overtime is pre-approved. Late submissions should be tracked, and repeated noncompliance should be addressed through performance counseling or refresher training.

5. **Centralize Tracking and Periodic Review of Authorization Forms**
   - Require Transit Security Timekeepers to maintain a centralized repository for all approved Authorization to Exceed 32 Hours of Overtime forms, including dates of receipt and approval. This will assist with compliance monitoring, audit readiness, and improved transparency in overtime decision-making. A monthly or quarterly compliance report should be provided to management to identify trends, monitor adherence, and detect recurring issues.

6. **Provide Refresher Training on Overtime Processes for Employees and Watch Commanders**
   - Conduct regular training or brief refresher sessions to ensure all personnel understand how to complete the authorization form, the need for timely approval, and the consequences of noncompliance.

Implementing these recommendations will help ensure that overtime exceeding the 32-hour weekly limit is properly justified, authorized in advance, and supported by effective internal controls. It will also improve oversight of labor costs and promote equitable overtime assignment practices.

E. Lunch Break Erroneously Included in Overtime Hours

For FY24, we reviewed the approved Overtime Reports submitted by employees for two payroll periods, with pay end dates of October 28, 2023, and June 8, 2024, and compared the reported overtime hours to those reflected in the Payroll Reports. Our review identified discrepancies involving five employees who were each paid an additional 30 minutes of overtime. The errors occurred because employees inadvertently included their 30-minute lunch breaks as overtime worked. We advised MTS about the error, and they made the payroll correction for the pay end date November 22, 2025.

While the total overpayment for the periods reviewed was less than $100 and may be considered immaterial, it is important that overtime hours be recorded accurately to ensure proper payroll processing and compliance with the policy. Inaccurate reporting, even in small amounts, can accumulate over time and result in inappropriate labor costs, inconsistent application of overtime rules, and potential disputes or misunderstandings regarding employee compensation.

Recommendations:

1. **Enhance Employee Training on Overtime Reporting**
   - Conduct refresher training for all Transit Security staff on how to correctly report overtime hours, specifically emphasizing that lunch breaks and other non-work periods should not be included in overtime calculations. Include examples from prior errors to illustrate common mistakes.

2. **Update Standard Operating Procedures (SOPs)**
   - Revise or update the SOPs for overtime reporting to explicitly address the treatment of meal periods. Ensure these procedures are readily accessible in both electronic and printed formats for employees and supervisors.

3. **Implement System Validations in MTS Roll-Out**
   - Collaborate with Information Technology Services to configure the MTS Roll-Out system to flag potential errors automatically, such as when overtime hours include typical break periods or exceed standard shift durations.

4. **Reinforce Supervisor Review and Approval**
   - Reinforce the requirement for supervisors to carefully review overtime submissions in the Roll-Out system prior to approval. Supervisors should verify that reported hours match actual work performed and exclude non-compensable periods.

F. Overtime of 30 Minutes Due to Skipped Lunch Break

Our review of FY25 overtime data identified some recurring 30-minute overtime entries attributed to skipped lunch breaks. Security Control Specialists (SCSs) had the highest frequency of these occurrences. From this group, we selected two SCS employees included in our audit sample and reviewed their Overtime Reports to understand the underlying reasons.

Based on Overtime Reports, the two Security Control Specialists (SCSs) reported 30 minutes of overtime for missed meal periods on 12 and 14 occasions, respectively. Both employees attributed the missed meal periods to staffing shortages. In addition, we identified instances in which these employees worked an additional 7.5-hour shift following their regular shift, resulting in workdays of nearly 16 hours.

Section 6.4 of the Agreement with Teamsters states, "*Employees covered by this Agreement shall receive a thirty (30) minute meal period.*" California Labor Code Section 512(a) similarly prohibits an employer from requiring employees to work more than five hours per day without a meal period of at least 30 minutes, except in limited circumstances when the total shift does not exceed six hours and the meal period is mutually waived. Failure to provide compliant meal periods exposes Metro to legal and contractual risk and may also adversely affect employee comfort and well-being.

The MTS Supervisor explained that "*we experienced staffing shortages on the Watch which warranted SCS working through their lunches due to the nature of their assignment and the necessity of having enough Dispatchers at the consoles (i.e., officer safety*)." He added that they cannot leave the dispatch consoles unstaffed or undermanned. The MTS Captain further clarified that skipped lunches should occur *only* under exigent circumstances — such as use-of-force incidents, traffic collisions, or other emergencies — and that these situations must be properly documented.

As part of our FY24 review, we also noted that a Transit Security Officer (TSO) worked 30 minutes of overtime on both June 3 and June 7, 2024, with "*No lunch due to fare enforcemen*t" noted as the justification. Follow-up with Transit Security confirmed that on June 3, the TSO assisted with a suicidal individual, and on June 7, the TSO responded to an incident in which a patron challenged officers to a fight, resulting in an officer injury requiring medical transport. Because both incidents occurred during the TSO's scheduled lunch period and concluded near the end of his shift, the missed meal breaks warranted overtime compensation. These situations meet the threshold for exigent circumstances and constitute valid exceptions.

While some missed-meal occurrences were justified, skipped lunches due to staffing shortages indicates a systemic issue that increases overtime costs and exposes Metro to legal compliance risks. We recommend that Transit Security management implement measures to minimize similar occurrences in the future. It is also recommended to enhance documentation practices to clearly articulate and support the basis for missed-meal justifications.

Recommendations:

1. **Strengthen Staffing and Coverage Controls**
   - Assess staffing levels and scheduling practices within the Watch to ensure sufficient coverage during meal periods. This may include implementing staggered lunches, float coverage, or temporary reassignments to avoid requiring employees to remain at consoles.

2. **Reinforce Policy Expectations on Meal Breaks**
   - Reiterate to supervisors and employees that skipping lunch is allowed only under bona fide exigent circumstances, consistent with Labor Code Section 512 and the Teamsters Agreement. Non-exigent operational gaps should not result in missed meal periods.

3. **Enhance Documentation Requirements**
   - Require supervisors and employees to clearly document the specific circumstances leading to each missed lunch, including whether the situation qualifies as an exigent event. Documentation should be consistent, descriptive, and retained for audit and compliance purposes.

4. **Implement Monitoring and Trend Analysis**
   - Establish periodic reviews of 30-minute overtime entries to identify patterns, repeat occurrences, and units experiencing frequent staffing shortages. Early detection will allow management to intervene proactively.

5. **Evaluate the Need for Additional Training or Guidance**
   - Provide supervisors with training on meal-period compliance requirements, proper documentation standards, and appropriate decision-making when staff request or are instructed to skip lunch.

G. Overtime Discrepancies Between the Scheduling Software and Payroll Reports

In November 2024, Transit Security Department started using the MTS Roll-Out, their new scheduling software, which was developed by Metro's Information Technology Services. This new system eliminated the need to submit pre-approved overtime authorization - the employees now sign up for overtime, which is approved by their supervisors in the Roll-Outs.

As part of our FY25 audit procedures, we reconciled overtime hours for a sample of employees by comparing the Payroll Report to the Overtime Detail Report generated from the MTS Roll-Out for June 2025. This reconciliation identified a discrepancy of 75 overtime hours, with the Overtime Detail Report reflecting fewer overtime hours than those recorded in the Payroll Report. The variance occurred because certain overtime hours included in the Roll-Out were not captured in the Overtime Detail Report. The MTS Timekeeper appropriately used the overtime hours on the Roll-Out when processing payroll. Although the resulting payroll adjustment of $458 was not financially material, the discrepancy indicates that overtime hours recorded in the operational scheduling system were not fully aligned with the hours processed for payroll.

Based on MTS payroll and scheduling procedures, overtime hours recorded in the Roll-Out system should accurately reflect the hours worked and approved for each employee. These

system-generated overtime hours serve as the basis for payroll processing and must be consistent with payroll records to ensure accuracy of employee compensation and compliance with internal control standards for timekeeping and payroll.

The discrepancy appears to be due to inadequate reconciliation procedures between the operational Roll-Out system and the Payroll system prior to payroll processing. Contributing factors may include delays in updating the Overtime Detail Report, manual adjustments made directly in payroll without corresponding updates to the Roll-Out, or system interface issues that prevent consistent synchronization of overtime data.

Inaccurate reporting of overtime hours can result in overpayment or underpayment to employees, inconsistent financial reporting, and weakened internal controls over payroll. The identified variance of 75 hours increases the risk of payroll errors and exposes the organization to potential disputes, additional administrative review, and financial loss. Continued discrepancies may also undermine the reliability of both the Roll-Out and Payroll systems used for labor cost monitoring and operational decision-making.

Recommendations:

1. **Implement a Formal Reconciliation Process**
   - Establish and document a standardized reconciliation procedure to ensure that overtime hours in the Payroll system match those reported in the Roll-Out Overtime Detail Report before payroll is processed. This procedure should require supervisors or payroll staff to verify and resolve all variances prior to payroll submission.

2. **Strengthen System Interface Controls**
   - Work with ITS and system administrators to assess and improve the user interface between the Roll-Out scheduling system and the Payroll system. Enhancements should ensure that overtime entries automatically transfer, are complete, and accurately reflect approved hours. Any system limitations should be documented and compensated for with manual controls.

3. **Require Documentation of Manual Adjustments**
   - Require supporting documentation and corresponding updates to the Roll-Out system when overtime adjustments must be entered manually into the Payroll system. All manual entries should be reviewed and approved by a supervisor who can confirm that the edits align with actual hours worked.

4. **Provide Training to Supervisors and Payroll Staff**
   - Conduct refresher training for supervisors and timekeepers on overtime reporting requirements, system processes, and reconciliation expectations. Training will help

ensure consistent application of procedures and reduce errors resulting from inconsistent data entry or misunderstanding of the workflow.

5. **Perform Periodic Monitoring and Quality Assurance Reviews**
   - Institute periodic oversight reviews to validate the accuracy of overtime reporting between the two systems. These reviews should focus on identifying recurring discrepancies, assessing root causes, and confirming that corrective actions implemented are effective in preventing future variances.

6. **Communicate Corrections and Provide Feedback**
   - Notify affected employees promptly when payroll corrections occur due to reporting errors, and provide feedback to prevent recurrence. This reinforces accountability and improves accuracy over time.

H. Inconsistencies in Entering Overtime Hours in the Scheduling Software

Our review of the Overtime Detail Report for June 20, 2025, identified inconsistencies in how 30-minute overtime increments were entered into the new MTS roll-out software. Specifically, the 30-minute increment was recorded both as ".30" and ".50," depending on the employee or data-entry instance. For example, shifts totaling 7 ½ hours appeared as either 7.30 or 7.50, indicating a lack of uniformity in entering partial hours.

MTS explained that "*it was purely human error during data entry. These mistakes were made during the transition period after the email from Lt. [xxx], and the old way of entering ".5" for half an hour still made their way onto the rollouts."*

Notably, the MTS Payroll Team is aware that ".5" correctly translates to 30 minutes in E-Time.

Inconsistent entry of partial overtime hours increases the risk of confusion, misinterpretation, or data inaccuracies within scheduling and payroll records. Although E-Time correctly converts ".5" to 30 minutes, the lack of standardized data entry practices may reduce the reliability of overtime reports, hinder effective review and reconciliation processes, and complicate management oversight. Consistent entry conventions are important to ensure clarity, data integrity, and accurate monitoring of overtime usage across the department.

To ensure accurate and consistent overtime reporting in the new rollout software, we recommend the following:

Recommendations:

1. **Reinforce Standardized Time-Entry Protocols**
   - Issue a clear, updated directive detailing the correct format for entering partial hours in the new system, with specific examples illustrating the required conventions.

2. **Provide Targeted Refresher Training**
   - Conduct short, mandatory refresher sessions for all staff responsible for time entry. Training should emphasize the differences between the old and new systems, highlight common errors observed during the transition, and include hands-on practice.

3. **Implement Validation or System Controls**
   - Work with Metro's Information Technology Services to explore whether the system can reject or flag incorrect formats (e.g., ".5") to prevent inaccurate entries at the point of input.

4. **Strengthen Supervisory Review**
   - Require supervisors to perform routine reviews of overtime entries during the transition period to identify and correct any remaining inconsistencies before payroll processing.

5. **Monitor and Follow Up.**
   - For a defined period, periodically review Overtime Detail Reports to confirm that the corrective measures are effective and that incorrect entries no longer occur.

These actions will help ensure consistent data entry practices, support accurate payroll processing, and reduce the risk of recurring errors as staff continue to transition to the new system.

I. Overtime Sign-up Discrepancies in the Roll-Out

The current practice for overtime sign-ups allows Transit Security Officers (TSOs) to sign up for overtime assignments for the following week once the rollout is released. Under this procedure and according to Teamsters Collective Bargaining Agreement, a more senior employee has up to 72 hours before the start of the overtime assignment to sign up and exercise their right to "bump" a less senior employee. A final rollout is then published, reflecting all confirmed overtime sign-ups and any changes due to the bumping process.

Based on staff interviews, there have been instances where employees' names appeared on the original rollout but were missing or not reflected on the final version. This inconsistency appears

to result from human error during the preparation or updating of the rollout. Such discrepancies can create confusion and mistrust among staff, potentially leading to perceptions of favoritism or unfair treatment in the distribution of overtime opportunities.

Recommendations:

1. **Implement a Standardized Overtime Sign-Up Workflow:**
   - Develop and document a formal procedure for creating, updating, and publishing the Roll-Out to ensure consistency.
   - Include step-by-step guidance on how to handle seniority "bumping" and how changes should be reflected in the final Roll-Out.

2. **Automate Tracking and Updates Where Possible:**
   - Explore using the MTS Roll-Out software to automatically track sign-ups, bumps, and final confirmations.
   - Reduce reliance on manual updates to minimize human error and discrepancies.
   - Retain copies of the original Roll-Out for a reasonable period to serve as a reference in case disputes or questions arise regarding overtime assignments.

3. **Introduce Verification and Audit Checks:**
   - Require a secondary review or cross-check of the final Roll-Out by a supervisor before publication to confirm all assignments are accurate.

4. **Enhance Communication with Staff:**
   - Notify employees immediately of any changes to their assignments and provide a clear explanation for the update.

5. **Provide Training for Roll-Out Management:**
   - Train staff responsible for preparing and updating the Roll-Out on the correct procedures and use of the software system.

   - Emphasize the importance of accuracy and fairness in the overtime assignment process.

6. **Conduct Periodic Review and Continuous Improvement:**
   - Conduct periodic audits of the overtime sign-up process to identify recurring errors or inefficiencies.
   - Use feedback from staff to improve the process and maintain trust in overtime distribution.

J. Overpayment of Military Leave Pay

In the course of our review of overtime for Transit Security staff, we identified an employee who has been on military leave since August 2021.

According to Section 1.1.1 of Metro Policy HR 14, "*Military leave is generally unpaid. However, California law requires that an employee who is granted military leave of absence and has a minimum of one year service prior to the effective date active duty begins, is entitled to receive his/her regular pay for the first 30 calendar days of active duty within any given fiscal year. This means that the employee will receive his/her regular pay for the workdays he/she would be normally scheduled to work during the first 30 calendar days of active duty. Pay will not exceed 8 hours per day or 80 hours in a pay period, or exceed 22 days or 176 hours in a fiscal year.*

All employee rights and benefits remain in effect during the employee's military leave, as long as the periods of duty do not exceed a cumulative total of five years."

Our audit found that in FY25, the employee was paid for 184 hours, exceeding the maximum allowable hours by 8 hours. In addition, 48 of these hours were calculated using an incorrect pay rate, resulting in a total overpayment of $376.88. We notified Talent Acquisition staff responsible for the calculation. The overpayment resulted from an administrative oversight and the use of an incorrect pay rate due to the selection of an incorrect job classification. Without corrective measures, similar errors may recur and adversely affect payroll accuracy.

Recommendations to Human Capital and Development (Talent Acquisition):

1. **Recover Overpayment:**
   - Initiate corrective action to recover the overpaid amount of $376.88 from the employee, in accordance with Metro payroll recovery procedures and applicable labor laws.
   - Ensure repayment agreements are documented and communicated clearly to avoid disputes.

2. **Strengthen Review Controls:**
   - Require a second-level payroll verification for all military leave pay calculations to ensure accuracy of hours and pay rates.
   - Include a checklist to verify that hours paid do not exceed policy limits and that correct rates are applied.

3. **Provide Training and Guidance:**
   - Provide refresher training to payroll staff on Metro Policy HR 14 and California military leave pay requirements.

- Develop clear guidance documents detailing calculation procedures, maximum hours, and pay rate application for military leave.

4. **Document Lessons Learned:**
   - Update internal procedures to highlight common errors and corrective actions regarding military leave payments.

CONCLUSION

The audit found that overall, overtime controls for TSOs and SCSs were generally adequate and operated largely as intended. Policies and procedures governing overtime were in place, and timekeeping processes were generally consistent with labor agreement provisions.

However, the audit identified opportunities to strengthen oversight and compliance. Overtime expenditures exceeded the approved budgeted amounts in both FY 2024 and FY 2025. The OIG also noted instances in which employees exceeded the weekly overtime threshold of 32 hours, as well as situations in which operational demands affected compliance with meal-break requirements. In addition, overtime usage was concentrated among a limited number of employees, with 50 of 247 employees accounting for approximately half of total overtime hours in Fiscal Year 2025.

To mitigate excessive and costly overtime, management should implement a strategic workforce planning approach that prioritizes the review and timely filling of persistent vacancies in critical classifications. As noted in the 2016 Audit of Overtime Usage (16-AGW-P03, dated August 31, 2016) conducted by Management Audit Services, staffing levels were found to be inadequate, and many Transit Security Officers worked overtime on their regular days off due to personnel shortage. Management should reassess current vacancy rates and ensure that staffing levels are appropriately aligned with operational needs to reduce reliance on overtime.

Effective management of overtime is important to help mitigate employee fatigue, which may affect individual performance and overall operational effectiveness. Given the public-facing and safety-sensitive nature of Transit Security Officer duties, appropriate oversight of overtime usage supports both workforce well-being and the security of Metro patrons and employees.

OIG made recommendations to strengthen oversight of overtime authorization, monitoring, and reporting; enhance compliance with established thresholds and requirements; and improve coordination among scheduling, timekeeping, and management functions to support improved accountability over overtime usage and expenditures.

Given current fiscal constraints, it is imperative that all Metro departments operate within approved budgetary limits and significantly reduce reliance on overtime, an exceptionally high-cost staffing practice.

RECOMMENDATIONS

The recommendations discussed above are presented below:

Department of Public Safety (System Security/Transit Security):

Finding A: Actual Overtime Cost Exceeded the Budget

1. **Improve Overtime Budget Development and Controls.**
   - Establish procedures to reduce overtime and ensure that budgets are based on accurate staffing levels. Overtime planning and budget development should take into account special events and anticipated operational needs. Budget assumptions must be clearly documented and reviewed during management transitions to minimize the risk of data entry errors or underfunding. Additionally, management should increase efforts to operate within established budgets, promoting more efficient and cost-effective operations.

2. **Strengthen Overtime Monitoring and Reporting.**
   - Implement regular monitoring of overtime expenditures against budgeted amounts throughout the fiscal year. Management should review variance reports and take timely corrective action when overtime costs exceed established thresholds.

3. **Evaluate Staffing Levels and Hiring Strategies.**
   - Assess whether additional permanent positions are warranted to meet operational requirements and reduce reliance on sustained overtime. Consideration should be given to the cost-effectiveness and workforce sustainability of hiring additional staff versus continued use of overtime.

4. **Develop a Long-Term Workforce Planning Strategy.**
   - Create a workforce plan that aligns staffing, overtime usage, and budget projections with anticipated system demands. The plan should address succession planning, management transitions, and mechanisms to reduce reliance on extended overtime while maintaining service coverage and safety.

Finding B: Overpayment/Underpayment of Overtime Due to Incorrect Earning Codes

5. **Implement Automated System Controls in the Timekeeping and Payroll System**
   Work with Information Technology Services to configure system validation rules that prevent ineligible earning codes from being counted toward the 40-hour workweek threshold.
   - Configure system rules to automatically exclude ineligible earning codes (e.g., Sick Pay, Administrative Leave, Off with Permission) from counting toward the 40-hour overtime threshold.
   - Set up validation alerts or error messages to flag overtime entries that appear inconsistent with allowable earning codes.
   - Require system prompts for approvers to review any overtime that is generated by a combination of eligible and ineligible codes.

6. **Strengthen Supervisor Review and Approval Procedures**
   - Reinforce expectations that Supervisors verify the accuracy of earning codes and weekly hour totals prior to approving timesheets.
   - Require periodic refresher training for Supervisors on timekeeping rules and collective bargaining agreement (CBA) provisions.
   - Implement a checklist or standardized approval guidance that highlights common coding errors and high-risk areas.

7. **Provide Mandatory Refresher Training for Timekeepers**
   - Conduct training on eligible versus ineligible earning codes for overtime calculations, including examples of common mistakes leading to overpayment or underpayment.
   - Distribute a quick-reference guide or job aid summarizing proper coding and overtime rules.
   - Enforce periodic retraining or certification for timekeepers to ensure ongoing competency.

8. **Enhance Payroll Review and Monitoring Controls**
   - Require Payroll staff to perform a secondary review of overtime hours each pay period, focusing on employees whose total hours fall close to the 40-hour threshold.
   - Strengthen review and approval procedures by requiring a secondary review of overtime submissions to verify the accuracy of earning codes before approval.

9. Align Policies and Procedures with the CBA and Communicate Changes

- Update Transit Security's timekeeping and overtime procedures to clearly reflect which codes are included or excluded in the overtime calculation under the Teamsters agreement.
- Issue updated procedures to all Supervisors, timekeepers, and Payroll staff, and obtain signed acknowledgment.
- Ensure that any future CBA changes are promptly incorporated into system controls and workflow documentation.

10. Perform Periodic Internal Audits or Spot Checks

- Conduct periodic spot reviews of earning codes and overtime calculations for selected pay periods, especially during periods of staffing changes or revised CBA provisions.
- Compare reported hours to system-generated totals to ensure consistency and identify emerging trends or weaknesses.

Finding C: Weekly Overtime Thresholds Exceeded by Some Employees

11. Reinforce and Communicate Overtime Policy Requirements

- Formally re-communicate the 32-hour weekly overtime limit to all Transit Security personnel and supervisory staff.
- Ensure the policy is included in onboarding materials and periodic refresher trainings.

12. Implement a Preventive Overtime Monitoring Process

- Monitor overtime usage in real time or near real time using available scheduling or payroll systems.
- Establish a weekly overtime dashboard or automatic alerts to identify employees who are approaching the 32-hour limit.

13. Require Documented Justification and Approval for All Exceedances

- Ensure the required authorization form is completed, retained, and reviewed for completeness for any overtime that exceeds 32 hours per week.
- Escalate to management Instances without proper approvals and address through corrective action, coaching, or retraining, depending on severity and frequency.

14. Integrate Overtime Controls into Scheduling Practices

- Require scheduling staff to review weekly overtime projections when assigning shifts. Assigning shifts that knowingly put employees above the 32-hour limit should be prohibited unless a documented operational necessity exists and advance approval has been secured.

15. Perform Periodic Management Review of Overtime Trends

- Conduct quarterly reviews of overtime usage by employee, shift, and location to identify patterns, operational drivers, or staffing shortages contributing to excessive overtime. Results should be used to inform workforce planning, hiring needs, or shift adjustments.

16. Establish Accountability for Non-Compliance

- Define clear consequences for repeated policy violations, such as failure to obtain required approvals or scheduling employees beyond allowable limits. Accountability measures may include supervisor coaching, written reminders, or escalation to higher-level management for persistent non-compliance.

17. Assess Fatigue and Safety Risks Associated with High Overtime

- Evaluate safety implications for posts requiring heightened attention or rapid response and consider implementing post-rotation guidelines or mandatory rest periods when overtime approaches higher thresholds.

18. Assess Current Vacancy Rates and Align Staffing Levels with Operational Needs

19. Implement a Strategic Workforce Planning Approach that Prioritizes Reviewing and Filling Persistent Vacancies in Critical Classifications to Mitigate Excessive and Costly Overtime

Finding D: Overtime in Excess of 32 Hours per Week Without Prior Written Authorization

20. Reinforce the Requirement for Prior Written Authorization

- Re-communicate the policy that employees must obtain written approval *before* working overtime in excess of 32 hours per week. This should include reminders during shift briefings, email notifications, and periodic policy refreshers to ensure all employees and Watch Commanders understand the requirement.
- Ensure the policy is included in onboarding materials and periodic refresher trainings.

21. Implement Automated Alerts for Employees Approaching the 32-Hour Threshold

- Ensure that the payroll or scheduling system generates automated notifications to both the employee and the Watch Commander when an employee is projected to exceed 32 overtime hours in a week. This will prompt timely submission and approval of the Authorization to Exceed 32 Hours of Overtime form.

22. Establish a Standardized Submission Timeline and Escalation Process

- Set clear expectations that authorization forms must be submitted before the start of the shift in which overtime will exceed the limit. For instances in which the form is not submitted on time, an escalation protocol should be implemented, requiring Watch Commander justification and higher-level review before payroll processing.

23. Require Watch Commander Accountability for Late or Missing Forms

- Remind supervisors that they are responsible for ensuring that overtime is pre-approved. Late submissions should be tracked, and repeated noncompliance should be addressed through performance counseling or refresher training.

24. Centralize Tracking and Periodic Review of Authorization Forms

- Require Transit Security Timekeepers to maintain a centralized repository for all approved Authorization to Exceed 32 Hours of Overtime forms, including dates of receipt and approval. This will assist with compliance monitoring, audit readiness, and improved transparency in overtime decision-making. A monthly or quarterly compliance report should be provided to management to identify trends, monitor adherence, and detect recurring issues.

25. Provide Refresher Training on Overtime Processes for Employees and Watch Commanders

- Conduct regular training or brief refresher sessions to ensure all personnel understand how to complete the authorization form, the need for timely approval, and the consequences of noncompliance.

Finding E: Lunch Break Erroneously Included in Overtime Hours

26. Enhance Employee Training on Overtime Reporting

- Conduct refresher training for all Transit Security staff on how to correctly report overtime hours, specifically emphasizing that lunch breaks and other non-work periods should not be included in overtime calculations. Include examples from prior errors to illustrate common mistakes.

27. Update Standard Operating Procedures (SOPs)

- Revise or update the SOPs for overtime reporting to explicitly address the treatment of meal periods. Ensure these procedures are readily accessible in both electronic and printed formats for employees and supervisors.

28. Implement System Validations in MTS Roll-Out

- Collaborate with Information Technology Services to configure the MTS Roll-Out system to flag potential errors automatically, such as when overtime hours include typical break periods or exceed standard shift durations.

29. Reinforce Supervisor Review and Approval

- Reinforce the requirement for supervisors to carefully review overtime submissions in the Roll-Out system prior to approval. Supervisors should verify that reported hours match actual work performed and exclude non-compensable periods.

Finding F: Overtime of 30 Minutes Due to Skipped Lunch Break

30. Strengthen Staffing and Coverage Controls

- Assess staffing levels and scheduling practices within the Watch to ensure sufficient coverage during meal periods. This may include implementing staggered lunches, float coverage, or temporary reassignments to avoid requiring employees to remain at consoles.

31. Reinforce Policy Expectations on Meal Breaks

- Reiterate to supervisors and employees that skipping lunch is allowed only under bona fide exigent circumstances, consistent with Labor Code § 512 and the Teamsters Agreement. Non-exigent operational gaps should not result in missed meal periods.

32. Enhance Documentation Requirements

- Require supervisors and employees to clearly document the specific circumstances leading to each missed lunch, including whether the situation qualifies as an exigent event. Documentation should be consistent, descriptive, and retained for audit and compliance purposes.

33. Implement Monitoring and Trend Analysis

- Establish periodic reviews of 30-minute overtime entries to identify patterns, repeat occurrences, and units experiencing frequent staffing shortages. Early detection will allow management to intervene proactively.

34. Evaluate the Need for Additional Training or Guidance

- Provide supervisors with training on meal-period compliance requirements, proper documentation standards, and appropriate decision-making when staff request or are instructed to skip lunch.

Finding G: Discrepancy in Reported Overtime Hours

35. Implement a Formal Reconciliation Process

- Establish and document a standardized reconciliation procedure to ensure that overtime hours in the Payroll system match those reported in the Roll-Out Overtime Detail Report before payroll is processed. This procedure should require supervisors or payroll staff to verify and resolve all variances prior to payroll submission.

36. Strengthen System Interface Controls

- Work with ITS and system administrators to assess and improve the data interface between the Roll-Out scheduling system and the Payroll system. Enhancements should ensure that overtime entries automatically transfer, are complete, and accurately reflect approved hours. Any system limitations should be documented and compensated for with manual controls.

37. Require Documentation of Manual Adjustments

- Require supporting documentation and corresponding updates to the Roll-Out system when overtime adjustments must be entered manually into the Payroll system. All manual entries should be reviewed and approved by a supervisor who can confirm that the edits align with actual hours worked.

38. Provide Training to Supervisors and Payroll Staff

- Conduct refresher training for supervisors and timekeepers on overtime reporting requirements, system processes, and reconciliation expectations. Training will help ensure consistent application of procedures and reduce errors resulting from inconsistent data entry or misunderstanding of the workflow.

39. Perform Periodic Monitoring and Quality Assurance Reviews

- Institute periodic oversight reviews to validate the accuracy of overtime reporting between the two systems. These reviews should focus on identifying recurring discrepancies, assessing root causes, and confirming that corrective actions implemented are effective in preventing future variances.

40. Communicate Corrections and Provide Feedback

- Notify affected employees promptly when payroll corrections occur due to reporting errors, and provide feedback to prevent recurrence. This reinforces accountability and improves accuracy over time.

Finding H: Inconsistencies in Entering Overtime Hours in the Scheduling Software

41. Reinforce Standardized Time-Entry Protocols

- Issue a clear, updated directive detailing the correct format for entering partial hours in the new system, with specific examples illustrating the required conventions.

42. Provide Targeted Refresher Training

- Conduct short, mandatory refresher sessions for all staff responsible for time entry. Training should emphasize the differences between the old and new systems, highlight common errors observed during the transition, and include hands-on practice.

43. Implement Validation or System Controls

- Work with the software administrator to explore whether the system can reject or flag incorrect formats (e.g., ".5") to prevent inaccurate entries at the point of input.

44. Strengthen Supervisory Review

- Require supervisors to perform routine reviews of overtime entries during the transition period to identify and correct any remaining inconsistencies before payroll processing.

45. Monitor and Follow Up:

- For a defined period, periodically review Overtime Detail Reports to confirm that the corrective measures are effective and that incorrect entries no longer occur.

Finding I: Overtime Sign-Up Discrepancies in the Rollout

46. Implement a Standardized Overtime Sign-Up Workflow:

- Develop and document a formal procedure for creating, updating, and publishing the Roll-Out to ensure consistency.
- Include step-by-step guidance on how to handle seniority "bumping" and how changes should be reflected in the final Roll-Out.

47. Automate Tracking and Updates Where Possible:

- Explore using the MTS Roll-Out software to automatically track sign-ups, bumps, and final confirmations.
- Reduce reliance on manual updates to minimize human error and discrepancies.
- Retain copies of the original Roll-Out for a reasonable period to serve as a reference in case disputes or questions arise regarding overtime assignments.

48. Introduce Verification and Audit Checks:

- Require a secondary review or cross-check of the final Roll-Out by a supervisor before publication to confirm all assignments are accurate.

49. Enhance Communication with Staff:

- Notify employees immediately of any changes to their assignments and provide a clear explanation for the update.

50. Provide Training for Roll-Out Management:

- Train staff responsible for preparing and updating the Roll-Out on the correct procedures and use of the software system.
- Emphasize the importance of accuracy and fairness in the overtime assignment process.

51. Conduct Periodic Review and Continuous Improvement:

- Conduct periodic audits of the overtime sign-up process to identify recurring errors or inefficiencies.
- Use feedback from staff to improve the process and maintain trust in overtime distribution.

Chief People Office (Human Capital and Development):

Finding J: Overpayment of Military Leave Pay

52. Recover Overpayment:

- Initiate corrective action to recover the overpaid amount of $376.88 from the employee, in accordance with Metro payroll recovery procedures and applicable labor laws.
- Ensure repayment agreements are documented and communicated clearly to avoid disputes.

53. Strengthen Review Controls:

- Require a second-level payroll verification for all military leave pay calculations to ensure accuracy of hours and pay rates.
- Include a checklist to verify that hours paid do not exceed policy limits and that correct rates are applied.

54. Provide Training and Guidance:

- Provide refresher training to payroll staff on Metro Policy HR 14 and California military leave pay requirements.

- Develop clear guidance documents detailing calculation procedures, maximum hours, and pay rate application for military leave.

55. Document Lessons Learned:

- Update internal procedures to highlight common errors and corrective actions regarding military leave payments.

MANAGEMENT COMMENTS TO RECOMMENDATIONS

On February 9, 2026, we provided Metro Management our draft report. By March 13, 2026, Metro management submitted their response summarizing their corrective actions. See Attachment C.

OIG EVALUATION OF MANAGEMENT RESPONSE

Metro Management's responses and corrective actions taken are responsive to the findings and recommendations in the report. Therefore, we consider all issues related to the recommendations resolved based on the corrective actions taken.

Earning Codes Eligible for Overtime Calculations	
Earning Code	**Description**
BER	Bereavement
HLF	Holiday Floating
HOL	Holiday Legal
II	Industrial Injury
IPD	Injured Partial Day
JUR	Jury Duty
PCT	Phy Exam On Co Time
RGW	Reg to Complete Work Week
REG	Regular
TDP	Transitional Duty Program
UNP	Union Bus Paid
VAC	Vacation
WNA	Witness-No Appearance

Earning Codes Ineligible for Overtime Calculations	
Earning Code	**Description**
ASD	Acting Sgt Diff 5%
ADM	Administrative Leave
CAN	Canine Handler Diff
DSL	Disability Leave/Long
SUS	Disciplinary Suspension
DIS	Dispatcher
DOG	Dog Assignment Costs
FML	Family Care Leave
FMS	Family Leave Sick
FMV	Family Leave Vacation
FTO	Field Training Officer
HLP	Holiday Premium
IIR	Indus Injury -Reoccur.
LC1	Labor Code 233 - Contract
LTE	Long Term Excuse Leave
LTS	Long Term Sick Leave
NEM	Non-Employee
OWP	Off With Permission
PS4	Prem Shift Diff 4.5%
PS5	Prem Shift Diff 7.5%
RNG	Rangemaster
RPD	Retro Pay Dollar
SDI	SDI Integration
STL	Settlement
S02	Shift 2%
S03	Shift 3%
S05	Shift 5%
SCC	Sick Cash In
SCK	Sick Pay
SOI	Sick Pay - Occup.Injury
SCW	Sick Without Pay
TAR	Tardy
TUI	Tuition Reimburse Taxable
UAL	Uniform Allowance
VCT	Vacation Bal At Term
VPO	Vacation Pay Off
WCI	Workers Comp Integration

Overtime Pay and Total Payroll of Top 50 Overtime Earners – FY25

Top Overtime Hours by Employee[1]

Ranking	Title	Overtime Hours	% of Overtime Hours to Total Regular Hours for FY25	Overtime Pay	Average Overtime Rate per Hour	Total Payroll	% of Overtime Pay to Total Payroll
1	TRANSIT SECURITY OFCR II	1,602	77%	$ 69,191.18	$ 43.20	$ 140,366.87	49%
2	TRANSIT SECURITY OFCR II	1,529	73%	$ 86,868.44	$ 56.83	$ 177,477.08	49%
3	TRANSIT SECURITY OFCR II	1,479	71%	$ 84,118.74	$ 56.88	$ 187,981.36	45%
4	TRANSIT SECURITY OFCR II	1,395	67%	$ 79,532.88	$ 57.01	$ 179,530.18	44%
5	TRANSIT SECURITY OFCR II	1,274	61%	$ 50,834.72	$ 39.90	$ 115,605.08	44%
6	SR TRANSIT SECURITY OFCR	1,248	60%	$ 72,989.88	$ 58.47	$ 166,675.67	44%
7	SR TRANSIT SECURITY OFCR	1,215	58%	$ 65,570.40	$ 53.97	$ 157,448.28	42%
8	TRANSIT SECURITY OFCR II	1,203	58%	$ 44,805.95	$ 37.25	$ 103,453.71	43%
9	TRANSIT SECURITY OFCR II	1,189	57%	$ 48,983.74	$ 41.20	$ 113,843.63	43%
10	SR TRANSIT SECURITY OFCR	1,186	57%	$ 70,622.22	$ 59.53	$ 172,422.50	41%
11	TRANSIT SECURITY OFCR II	1,186	57%	$ 67,326.36	$ 56.79	$ 160,311.89	42%
12	TRANSIT SECURITY OFCR II	1,176	57%	$ 46,861.44	$ 39.85	$ 110,666.93	42%
13	TRANSIT SECURITY OFCR II	1,150	55%	$ 48,255.20	$ 41.96	$ 115,927.95	42%
14	TRANSIT SECURITY OFCR II	1,142	55%	$ 45,809.23	$ 40.10	$ 110,544.08	41%
15	TRANSIT SECURITY OFCR II	1,136	55%	$ 46,801.46	$ 41.19	$ 118,135.50	40%
16	SR TRANSIT SECURITY OFCR	1,135	55%	$ 66,862.05	$ 58.91	$ 162,193.04	41%
17	TRANSIT SECURITY OFCR I	1,132	54%	$ 38,045.87	$ 33.61	$ 92,127.56	41%
18	TRANSIT SECURITY OFCR II	1,124	54%	$ 63,708.64	$ 56.68	$ 141,802.72	45%
19	TRANSIT SECURITY OFCR II	1,120	54%	$ 48,801.54	$ 43.58	$ 118,625.50	41%
20	TRANSIT SECURITY OFCR II	1,102	53%	$ 45,243.76	$ 41.07	$ 111,244.17	41%
21	TRANSIT SECURITY OFCR II	1,087	52%	$ 45,342.40	$ 41.73	$ 112,879.89	40%
22	TRANSIT SECURITY OFCR II	1,074	52%	$ 48,658.62	$ 45.32	$ 122,518.46	40%
23	TRANSIT SECURITY OFCR II	1,066	51%	$ 60,493.58	$ 56.75	$ 151,184.03	40%
24	TRANSIT SECURITY OFCR II	1,054	51%	$ 59,843.66	$ 56.78	$ 144,839.95	41%
25	TRANSIT SECURITY OFCR II	1,033	50%	$ 44,935.49	$ 43.51	$ 117,433.05	38%
26	TRANSIT SECURITY OFCR I	1,006	48%	$ 34,463.01	$ 34.27	$ 89,251.43	39%
27	TRANSIT SECURITY OFCR II	997	48%	$ 40,059.99	$ 40.18	$ 104,451.25	38%
28	TRANSIT SECURITY OFCR II	960	46%	$ 38,606.28	$ 40.20	$ 102,772.31	38%
29	TRANSIT SECURITY OFCR II	957	46%	$ 38,439.34	$ 40.17	$ 102,755.89	37%
30	TRANSIT SECURITY OFCR II	956	46%	$ 54,537.83	$ 57.08	$ 141,891.30	38%
31	TRANSIT SECURITY OFCR II	940	45%	$ 39,323.81	$ 41.86	$ 104,187.28	38%
32	TRANSIT SECURITY OFCR II	934	45%	$ 33,652.04	$ 36.05	$ 90,026.31	37%
33	TRANSIT SECURITY OFCR II	930	45%	$ 37,270.07	$ 40.09	$ 101,673.50	37%
34	SR TRANSIT SECURITY OFCR	928	45%	$ 54,625.53	$ 58.90	$ 150,912.55	36%
35	TRANSIT SECURITY OFCR II	905	43%	$ 35,930.69	$ 39.71	$ 102,301.64	35%
36	TRANSIT SECURITY OFCR II	904	43%	$ 35,825.70	$ 39.64	$ 99,985.92	36%
37	TRANSIT SECURITY OFCR II	903	43%	$ 40,904.11	$ 45.28	$ 113,313.51	36%
38	TRANSIT SECURITY OFCR II	899	43%	$ 35,781.33	$ 39.80	$ 100,091.44	36%
39	SR TRANSIT SECURITY OFCR	879	42%	$ 52,373.74	$ 59.62	$ 146,573.10	36%
40	TRANSIT SECURITY OFCR II	877	42%	$ 49,798.85	$ 56.78	$ 138,779.24	36%
41	TRANSIT SECURITY OFCR II	863	41%	$ 30,715.84	$ 35.59	$ 86,807.29	35%
42	TRANSIT SECURITY OFCR II	862	41%	$ 30,250.04	$ 35.09	$ 87,083.47	35%
43	TRANSIT SECURITY OFCR II	844	41%	$ 34,561.23	$ 40.96	$ 100,010.91	35%
44	TRANSIT SECURITY OFCR II	838	40%	$ 33,621.57	$ 40.10	$ 96,971.29	35%
45	TRANSIT SECURITY OFCR II	833	40%	$ 35,029.53	$ 42.07	$ 99,658.70	35%
46	TRANSIT SECURITY OFCR II	808	39%	$ 32,885.99	$ 40.73	$ 98,310.58	33%
47	TRANSIT SECURITY OFCR II	804	39%	$ 32,905.19	$ 40.91	$ 99,257.62	33%
48	TRANSIT SECURITY OFCR II	802	39%	$ 36,439.19	$ 45.44	$ 106,279.57	34%
49	TRANSIT SECURITY OFCR II	797	38%	$ 28,604.71	$ 35.89	$ 83,629.52	34%
50	TRANSIT SECURITY OFCR II	789	38%	$ 31,637.02	$ 40.09	$ 97,093.51	33%
	TOTAL	52,247		$ 2,398,750.08		$ 6,049,308.21	

(Regular Hours: 2,080)

[1] Detailed information for the employees included in this table is available for Metro management's review upon request.

Department of Public Safety

Metropolitan Transportation Authority

Metro Interoffice Memo

Date:	February 20, 2026
To:	Sr. Manager, Audit Office of Inspector General
From:	William Scott, WS Chief of Police and Emergency Management
cc:	
Subject:	Response(s) to Audit Recommendations in Report No. 26-AUD-06

Thank you for the opportunity to respond to the finding(s) and recommendation(s) in the draft report (Audit Report No. 26-AUD-06, Review of Controls Over Overtime of Metro Transit Security Officers and Security Control Specialists Aud-26-02) prior to the release of the final report. We have reviewed the draft report and provide our response(s) to the recommendation(s) below.

RECOMMENDATION(S):

Finding A: Actual Overtime Cost Exceeded the Budget

1. **Improve Overtime Budget Development and Controls.**
   - Establish procedures to reduce overtime and ensure that budgets are based on accurate staffing levels. Overtime planning and budget development should consider special events and anticipated operational needs. Budget assumptions must be clearly documented and reviewed during management transitions to minimize the risk of data entry errors or underfunding. Additionally, management should increase efforts to operate within established budgets, promoting more efficient and cost-effective operations.

2. **Strengthen Overtime Monitoring and Reporting.**
   - Implement regular monitoring of overtime expenditures against budgeted amounts throughout the fiscal year. Management should review variance reports and take timely corrective action when overtime costs exceed established thresholds.

3. **Evaluate Staffing Levels and Hiring Strategies.**
   - Assess whether additional permanent positions are warranted to meet operational requirements and reduce reliance on sustained overtime.

Department of Public Safety (Continued)

Consideration should be given to the cost-effectiveness and workforce sustainability of hiring additional staff versus continued use of overtime.

4. Develop a Long-Term Workforce Planning Strategy.

- Create a workforce plan that aligns staffing, overtime usage, and budget projections with anticipated system demands. The plan should address succession planning, management transitions, and mechanisms to reduce reliance on extended overtime while maintaining service coverage and safety.

MANAGEMENT RESPONSE: AGREES

1. Management will re-evaluate deployment process to best utilize our resources, cost effectively and efficiently. Discussions at budget development to establish thresholds for special events and potential extra needs going forward.
2. The new payroll system, WFM, will run weekly reports on overtime hours and costs, so management can monitor any variances and determine any areas where overtime is exceeding established cost thresholds.
3. Management will evaluate whether additional permanent positions are needed.
4. Management will determine a workforce strategy to enable less reliance on overtime to fill demands. This strategy will consider deployment, budget, staffing modules, and anticipated needs to determine the best course for action moving forward.

IMPLEMENTATION DATE:

Re-evaluate Deployment – August 2026
Workforce Strategy Plan – August, 2026
Reports – Weekly starting in May, 2026

Finding B: Overpayment/Underpayment of Overtime Due to Incorrect Earning Codes

5. Implement Automated System Controls in the Timekeeping and Payroll System

Work with Information Technology Services to configure system validation rules that prevent ineligible earning codes from being counted toward the 40-hour workweek threshold.

- Configure system rules to automatically exclude ineligible earning codes (e.g., Sick Pay, Administrative Leave, Off with Permission) from counting toward the 40-hour overtime threshold.
- Set up validation alerts or error messages to flag overtime entries that appear inconsistent with allowable earning codes.

Department of Public Safety (Continued)

- Require system prompts for approvers to review any overtime that is generated by a combination of eligible and ineligible codes.

6. Strengthen Supervisor Review and Approval Procedures

- Reinforce expectations that Supervisors verify the accuracy of earning codes and weekly hour totals prior to approving timesheets.
- Require periodic refresher training for Supervisors on timekeeping rules and collective bargaining agreement (CBA) provisions.
- Implement a checklist or standardized approval guidance that highlights common coding errors and high-risk areas.

7. Provide Mandatory Refresher Training for Timekeepers

- Conduct training on eligible versus ineligible earning codes for overtime calculations, including examples of common mistakes leading to overpayment or underpayment.
- Distribute a quick-reference guide or job aid summarizing proper coding and overtime rules.
- Enforce periodic retraining or certification for timekeepers to ensure ongoing competency.

8. Enhance Payroll Review and Monitoring Controls

- Require Payroll staff to perform a secondary review of overtime hours each pay period, focusing on employees whose total hours fall close to the 40-hour threshold.
- Strengthen review and approval procedures by requiring a secondary review of overtime submissions to verify the accuracy of earning codes before approval.

9. Align Policies and Procedures with the CBA and Communicate Changes

- Update Transit Security's timekeeping and overtime procedures to clearly reflect which codes are included or excluded in the overtime calculation under the Teamsters agreement.
- Issue updated procedures to all Supervisors, timekeepers, and Payroll staff, and obtain signed acknowledgment.
- Ensure that any future CBA changes are promptly incorporated into system controls and workflow documentation.

10. Perform Periodic Internal Audits or Spot Checks

- Conduct periodic spot reviews of earning codes and overtime calculations for selected pay periods, especially during periods of staffing changes or revised CBA provisions.
- Compare reported hours to system-generated totals to ensure consistency and identify emerging trends or weaknesses.

Department of Public Safety (Continued)

MANAGEMENT RESPONSE: AGREES

5. MTS will be moving to an automated payroll system, WFM in May, 2026. This new system will have validation rules that will eliminate the payment issues with incorrect earning codes.
6. Supervisory training will be mandatory with the implementation of the new WFM system. Training guides will be given to all supervisors for use with common situations for reference. Monthly reports will be run to show any concerns or issues that will need additional training and/ or disciplinary actions, if needed.
7. Timekeeper training will be mandatory with the implementation of the new WFM system. Training guides will be given to all timekeepers for use with common situations for reference. Monthly reports will be run to show any concerns or issues that will need additional training and/ or disciplinary actions, if needed.
8. Overtime reports will be run every pay period for monitoring and accuracy of overtime entries, all timekeepers will review and monitor reports.
9. Timekeeping procedures will be updated to reflect correct coding and CBA agreements. Updated procedures will be issued and will obtain signed acknowledge.
10. Quarterly reviews will be conducted to ensure consistency and accuracy.

IMPLEMENTATION DATE:

Training – May, 2026
Procedures for Timekeepers – May, 2026
Reports – Bi-Weekly, Monthly, and Quarterly starting in May, 2026

Finding C: Weekly Overtime Thresholds Exceeded by Some Employees

11. Reinforce and Communicate Overtime Policy Requirements
- Formally re-communicate the 32-hour weekly overtime limit to all Transit Security personnel and supervisory staff.
- Ensure the policy is included in onboarding materials and periodic refresher trainings.

12. Implement a Preventive Overtime Monitoring Process
- Monitor overtime usage in real time or near real time using available scheduling or payroll systems.
- Establish a weekly overtime dashboard or automatic alerts to identify employees who are approaching the 32-hour limit.

13. Require Documented Justification and Approval for All Exceedances
- Ensure the required authorization form is completed, retained, and reviewed for completeness for any overtime that exceeds 32 hours per week.

Department of Public Safety (Continued)

- Escalate to management Instances without proper approvals and address through corrective action, coaching, or retraining, depending on severity and frequency.

14. Integrate Overtime Controls into Scheduling Practices

- Require scheduling staff to review weekly overtime projections when assigning shifts. Assigning shifts that knowingly put employees above the 32-hour limit should be prohibited unless a documented operational necessity exists and advance approval has been secured.

15. Perform Periodic Management Review of Overtime Trends

- Conduct quarterly reviews of overtime usage by employee, shift, and location to identify patterns, operational drivers, or staffing shortages contributing to excessive overtime. Results should be used to inform workforce planning, hiring needs, or shift adjustments.

16. Establish Accountability for Non-Compliance

- Define clear consequences for repeated policy violations, such as failure to obtain required approvals or scheduling employees beyond allowable limits. Accountability measures may include supervisor coaching, written reminders, or escalation to higher-level management for persistent non-compliance.

17. Assess Fatigue and Safety Risks Associated with High Overtime

- Evaluate safety implications for posts requiring heightened attention or rapid response and consider implementing post-rotation guidelines or mandatory rest periods when overtime approaches higher thresholds.

18. Assess Current Vacancy Rates and Align Staffing Levels with Operational Needs

19. Implement a Strategic Workforce Planning Approach that Prioritizes Reviewing and Filling Persistent Vacancies in Critical Classifications to Mitigate Excessive and Costly Overtime.

MANAGEMENT RESPONSE: AGREES

11. Transit Security Management will re-communicate the 32- hour weekly overtime limit to all supervisors with a requirement to obtain a signed acknowledgement of understanding. This will also be included as on-board training for all new supervisors.
12. The new payroll system, WFM, will have a threshold "error code" prompt that will alert the supervisor when scheduling the employee who has reached the 32-hour threshold.
13. The new payroll system, WFM, will have a threshold "error code" prompt that will require a justification if the employee is allowed to exceed the 32-Hour overtime

Department of Public Safety (Continued)

policy. A weekly report will be run and monitored by the Timekeepers for accuracy, performance review, frequency, and retraining if needed.

14. Timekeeping procedures will be updated to reflect weekly review of projected overtime needs for supervisors. Updated procedures will be issued and will obtain signed acknowledge. The new payroll system, WFM, will produce an error code when
entering a shift for an employee that puts their overtime over 32 hours.
15. Quarterly reviews will be conducted to review trends and needs using new system/reports. Timekeepers will review and identity patterns, areas of excess overtime use, to help Management reassess scheduling.
16. With weekly and quarterly review of payroll processes in new system, Management will have information that can be used for performance evaluations. Supervisors will be held accountable for discrepancies, and violations, that will demand additional training and / or disciplinary action if needed.
17. Management will review.
18. Management will review.
19. Management will review.

IMPLEMENTATION DATE:

System Upgrades – May, 2026
Procedures for Supervisors / Timekeepers – May, 2026
Reports – Weekly, Monthly, and Quarterly starting in May, 2026
Re-evaluate Deployment – August 2026
Workforce Strategy Plan – August, 2026

Finding D: Overtime in Excess of 32 Hours per Week Without Prior Written Authorization

20. Reinforce the Requirement for Prior Written Authorization

- Re-communicate the policy that employees must obtain written approval *before* working overtime in excess of 32 hours per week. This should include reminders during shift briefings, email notifications, and periodic policy refreshers to ensure all employees and Watch Commanders understand the requirement.
- Ensure the policy is included in onboarding materials and periodic refresher trainings.

21. Implement Automated Alerts for Employees Approaching the 32-Hour Threshold

- Ensure that the payroll or scheduling system generates automated notifications to both the employee and the Watch Commander when an

Department of Public Safety (Continued)

employee is projected to exceed 32 overtime hours in a week. This will prompt timely submission and approval of the Authorization to Exceed 32 Hours of Overtime form.

22. Establish a Standardized Submission Timeline and Escalation Process

- Set clear expectations that authorization forms must be submitted before the start of the shift in which overtime will exceed the limit. For instances in which the form is not submitted on time, an escalation protocol should be implemented, requiring Watch Commander justification and higher-level review before payroll processing.

23. Require Watch Commander Accountability for Late or Missing Forms

- Remind supervisors that they are responsible for ensuring that overtime is pre-approved. Late submissions should be tracked, and repeated noncompliance should be addressed through performance counseling or refresher training.

24. Centralize Tracking and Periodic Review of Authorization Forms

- Require Transit Security Timekeepers to maintain a centralized repository for all approved Authorization to Exceed 32 Hours of Overtime forms, including dates of receipt and approval. This will assist with compliance monitoring, audit readiness, and improved transparency in overtime decision-making. A monthly or quarterly compliance report should be provided to management to identify trends, monitor adherence, and detect recurring issues.

25. Provide Refresher Training on Overtime Processes for Employees and Watch Commanders

- Conduct regular training or brief refresher sessions to ensure all personnel understand how to complete the authorization form, the need for timely approval, and the consequences of noncompliance.

MANAGEMENT RESPONSE: AGREES

20. Transit Security Management will re-communicate the 32-hour weekly overtime limit to all employees with a requirement to obtain a signed acknowledgement of understanding. This will also be included as on-board training for all new employees.
21. The new payroll system, WFM, will have a threshold "error code" prompt that will alert the supervisor when scheduling the employee who has reached the 32-hour threshold.
22. Timekeeping procedures will be updated to reflect new process for paperwork submittals with new payroll system. A weekly report will be run and monitored by the Timekeepers for accuracy, performance review, frequency, and retraining if needed. Updated procedures will be issued and will obtain signed acknowledgement.

Department of Public Safety (Continued)

23. Supervisors will be held accountable for discrepancies, and violations, that will demand additional training and / or disciplinary action if needed.
24. Timekeepers will maintain a centralized process for all recordkeeping for payroll, with a focus on specialized folders, whether digital or not, that house compliance items. Quarterly reports will be provided to management with status.
25. Refresher training will be established and provided once new procedures have been established with new system.

IMPLEMENTATION DATE:

Communicate Procedures for Officers – May, 2026
Procedures for Timekeepers – May, 2026
Reports – Weekly, Monthly, and Quarterly starting in May, 2026

Finding E: Lunch Break Erroneously Included in Overtime Hours

26. Enhance Employee Training on Overtime Reporting

- Conduct refresher training for all Transit Security staff on how to correctly report overtime hours, specifically emphasizing that lunch breaks and other non-work periods should not be included in overtime calculations. Include examples from prior errors to illustrate common mistakes.

27. Update Standard Operating Procedures (SOPs)

- Revise or update the SOPs for overtime reporting to explicitly address the treatment of meal periods. Ensure these procedures are readily accessible in both electronic and printed formats for employees and supervisors.

28. Implement System Validations in MTS Roll-Out

- Collaborate with Information Technology Services to configure the MTS Roll-Out system to flag potential errors automatically, such as when overtime hours include typical break periods or exceed standard shift durations.

29. Reinforce Supervisor Review and Approval

- Reinforce the requirement for supervisors to carefully review overtime submissions in the Roll-Out system prior to approval. Supervisors should verify that reported hours match actual work performed and exclude non-compensable periods.

MANAGEMENT RESPONSE: AGREES

26. Transit Security Management will re-communicate lunch break guidelines and rules to the supervisors. Discussion will have a focus on lunchtime vs. overtime with a requirement to obtain a signed acknowledgement of understanding.

Department of Public Safety (Continued)

27. Payroll SOPs will be updated with new processes once new payroll system is established. Copies of the SOPs will be distributed to all employees of Transit Security.
28. The new payroll system, WFM, will flag potential errors automatically that do not fall within common shift configurations.
29. New payroll system will require supervisors to review weekly reg/overtime submissions prior to approval. This will allow management to review schedules and actual work.

IMPLEMENTATION DATE:

Communicate Procedures for Supervisors – May, 2026
SOP Updated – June, 2026

Finding F: Overtime of 30 Minutes Due to Skipped Lunch Break

30. Strengthen Staffing and Coverage Controls

- Assess staffing levels and scheduling practices within the Watch to ensure sufficient coverage during meal periods. This may include implementing staggered lunches, float coverage, or temporary reassignments to avoid requiring employees to remain at consoles.

31. Reinforce Policy Expectations on Meal Breaks

- Reiterate to supervisors and employees that skipping lunch is allowed only under bona fide exigent circumstances, consistent with Labor Code § 512 and the Teamsters Agreement. Non-exigent operational gaps should not result in missed meal periods.

32. Enhance Documentation Requirements

- Require supervisors and employees to clearly document the specific circumstances leading to each missed lunch, including whether the situation qualifies as an exigent event. Documentation should be consistent, descriptive, and retained for audit and compliance purposes.

33. Implement Monitoring and Trend Analysis

- Establish periodic reviews of 30-minute overtime entries to identify patterns, repeat occurrences, and units experiencing frequent staffing shortages. Early detection will allow management to intervene proactively.

34. Evaluate the Need for Additional Training or Guidance

- Provide supervisors with training on meal-period compliance requirements, proper documentation standards, and appropriate decision-making when staff request or are instructed to skip lunch.

Department of Public Safety (Continued)

MANAGEMENT RESPONSE: AGREES

30. Transit Security has strengthened their staff and may continue to do so. The supervisors will continue to monitor for sufficient coverage, by using techniques like staggering lunch breaks, or temporary re-assignments to avoid requiring employees to work through their lunch.
31. Transit Security Management will re-communicate lunch break guidelines and rules to the supervisors and staff and will require a signed acknowledgement of understanding.
32. The new payroll system will require a mandatory comment if approving a paid lunch break. Training on required comments and appropriate information will be given to supervisors once system is available for use. A signed acknowledgement of understanding will be required.
33. Timekeepers will run reports weekly in new system to review if paid lunches were approved and if appropriate comments were added. Information will be given to management for performance and/or additional training.
34. Management will review.

IMPLEMENTATION DATE:

Communicate Procedures to Supervisors – May, 2026
Reports – Weekly starting in May, 2026

Finding G: Discrepancy in Reported Overtime Hours

35. Implement a Formal Reconciliation Process

- Establish and document a standardized reconciliation procedure to ensure that overtime hours in the Payroll system match those reported in the Roll-Out Overtime Detail Report before payroll is processed. This procedure should require supervisors or payroll staff to verify and resolve all variances prior to payroll submission.

36. Strengthen System Interface Controls

- Work with ITS and system administrators to assess and improve the data interface between the Roll-Out scheduling system and the Payroll system. Enhancements should ensure that overtime entries automatically transfer, are complete, and accurately reflect approved hours. Any system limitations should be documented and compensated for with manual controls.

37. Require Documentation of Manual Adjustments

- Require supporting documentation and corresponding updates to the Roll-Out system when overtime adjustments must be entered manually into the Payroll system. All manual entries should be reviewed and approved by a supervisor who can confirm that the edits align with actual hours worked.

Department of Public Safety (Continued)

38. Provide Training to Supervisors and Payroll Staff

- Conduct refresher training for supervisors and timekeepers on overtime reporting requirements, system processes, and reconciliation expectations. Training will help ensure consistent application of procedures and reduce errors resulting from inconsistent data entry or misunderstanding of the workflow.

39. Perform Periodic Monitoring and Quality Assurance Reviews

- Institute periodic oversight reviews to validate the accuracy of overtime reporting between the two systems. These reviews should focus on identifying recurring discrepancies, assessing root causes, and confirming that corrective actions implemented are effective in preventing future variances.

40. Communicate Corrections and Provide Feedback

- Notify affected employees promptly when payroll corrections occur due to reporting errors and provide feedback to prevent recurrence. This reinforces accountability and improves accuracy over time.

MANAGEMENT RESPONSE: AGREES

35. Payroll SOPs will be updated with new processes once new payroll system is established.
36. Will review scheduling software and how it will work with new payroll system. If Enhancements are available for interfacing, Timekeepers will work with system administrators to include.
37. New payroll system requires comments to be added when manually entering overtime. Weekly overtime reports will recognize the edits, who entered them and the comments provided.
38. Training will be required of all supervisors and Timekeepers pertaining to system processes, reporting, overtime, etc. Working with system administrators to have guidelines and reference material to give to all user for daily use.
39. Quarterly reviews will be conducted to review the accuracy between both systems. Review for discrepancies, work with ITS to upgrade any inefficiencies or inaccurate report that needs to be reworked.
40. Timekeepers will notify employees promptly when payroll corrections are needed. They will also notify the employees supervisor.

IMPLEMENTATION DATE:

System Upgrades – May, 2026
Procedures for Supervisors / Timekeepers – May, 2026

Department of Public Safety (Continued)

Training – May, 2026
Reports – Weekly, and Quarterly starting in May, 2026

Finding H: Inconsistencies in Entering Overtime Hours in the Scheduling Software

41. Reinforce Standardized Time-Entry Protocols
- Issue a clear, updated directive detailing the correct format for entering partial hours in the new system, with specific examples illustrating the required conventions.

42. Provide Targeted Refresher Training
- Conduct short, mandatory refresher sessions for all staff responsible for time entry. Training should emphasize the differences between the old and new systems, highlight common errors observed during the transition, and include hands-on practice.

43. Implement Validation or System Controls
- Work with the software administrator to explore whether the system can reject or flag incorrect formats (e.g., ".5") to prevent inaccurate entries at the point of input.

44. Strengthen Supervisory Review
- Require supervisors to perform routine reviews of overtime entries during the transition period to identify and correct any remaining inconsistencies before payroll processing.

45. Monitor and Follow Up.
- For a defined period, periodically review Overtime Detail Reports to confirm that the corrective measures are effective and that incorrect entries no longer occur.

MANAGEMENT RESPONSE: AGREES

41. Payroll SOPs will be updated and include the proper format for entering partial hours with examples for reference once new payroll system is established.
42. Refresher training will be provided for all supervisors. This training will be needed when new payroll system goes live so that employee time is entered properly.
43. Will consult ITS on the need for a flag that will reject incorrect formats in the software system.
44. Management to discuss with supervisors the concerns with inconsistencies of overtime entries on the scheduling software. Will work together to build a process for daily/weekly review with consequences if not performed.

Department of Public Safety (Continued)

45. After process has been determined, Timekeepers will run Overtime Detail Reports on a weekly basis to review with actual patrol for discrepancies. Once Management feels that the corrective measures are effective, the review will stop.

IMPLEMENTATION DATE:

System Upgrades – May, 2026
Procedures for Supervisors / Timekeepers – May, 2026
Training – May, 2026
Reports – Weekly starting in May, 2026

Finding I: Overtime Sign-Up Discrepancies in the Rollout

46. Implement a Standardized Overtime Sign-Up Workflow:
- Develop and document a formal procedure for creating, updating, and publishing the Roll-Out to ensure consistency.
- Include step-by-step guidance on how to handle seniority **"bumping"** and how changes should be reflected in the final Roll-Out.

47. Automate Tracking and Updates Where Possible:
- Explore using the MTS Roll-Out software to automatically track sign-ups, bumps, and final confirmations.
- Reduce reliance on manual updates to minimize human error and discrepancies.
- Retain copies of the original Roll-Out for a reasonable period to serve as a reference in case disputes or questions arise regarding overtime assignments.

48. Introduce Verification and Audit Checks:
- Require a secondary review or cross-check of the final Roll-Out by a supervisor before publication to confirm all assignments are accurate.

49. Enhance Communication with Staff:
- Notify employees immediately of any changes to their assignments and provide a clear explanation for the update.

50. Provide Training for Roll-Out Management:
- Train staff responsible for preparing and updating the Roll-Out on the correct procedures and use of the software system.
- Emphasize the importance of accuracy and fairness in the overtime assignment process.

51. Conduct Periodic Review and Continuous Improvement:

Department of Public Safety (Continued)

- Conduct periodic audits of the overtime sign-up process to identify recurring errors or inefficiencies.
- Use feedback from staff to improve the process and maintain trust in overtime distribution.

MANAGEMENT RESPONSE: AGREES

46. Payroll SOPs will be updated and include a formal procedure for the Rollout process once new payroll system is established.
47. Will discuss with ITS the possibility of adding an automated process to the Rollouts pertaining to tracking sign-ups, bumps and final confirmations.
48. Will work with ITS to finalize the scheduling software to track changes between original and final rollouts. Include a report that can be produced with all editions or changes made.
49. Management will determine the best process to notify staff of any changes to their assignments that will include a clear explanation of the changes and determine a process for the staff to offer their issues and/or discrepancies to Management so that they can get direction promptly.
50. Refresher training will be provided for all supervisors. This training will be needed when new payroll system goes live so that each system works properly together.
51. Management will determine a quarterly audit check process to identify errors or discrepancies.

IMPLEMENTATION DATE:

System Upgrades – May, 2026
Procedures for Supervisors / Timekeepers – May, 2026
Training – May, 2026

Chief People Office

Metro Interoffice Memo

Date	March 13, 2026
To	Yvonne Zheng Senior Manager, Audit Office of the Inspector General
From	Dawn Jackson-Perkins Chief People Officer Dawn Jackson-Perkins Digitally signed by Dawn Jackson-Perkins Date: 2026.03.13 09:33:17 -07'00'
Subject	Audit of Overtime Controls for Metro Transit Security Officers and Security Control Specialists (Report No. 26-AUD-06)

Thank you for the opportunity to respond to the findings and recommendations prior to the final release of the Audit Report. The Office of the Inspector General (OIG) conducted an audit of overtime controls for Metro Transit Security Officers (TSOs) and Security Control Specialists (SCSs). The objective of the audit was to assess whether overtime was properly authorized, accurately recorded, and compensated in accordance with applicable policies, labor agreements, and budgetary requirements. The audit was performed as part of OIG's oversight responsibilities to promote accountability, safety, integrity, and efficiency in Metro operations. Please see the responses below for the recommendation pertaining to the Chief People Office (CPO).

Recommendation

#52. **Recover Payment:**

- Initiate corrective action to recover the overpaid amount of $376.88 from the employee, in accordance with Metro payroll recovery procedures and applicable labor laws.
- Ensure repayment agreements are documented and communicated clearly to avoid disputes.

Response: Agree; CPO's Human Resources Information Systems (HRIS) team investigated this overpayment and will work in coordination with the Payroll Department to initiate corrective actions to recover the overpaid amount of $376.88 from the employee, upon their return from Military Leave, in accordance with Metro payroll recovery procedures and applicable labor laws. Additionally, the Chief People Office will ensure repayment agreements are documented and communicated clearly to avoid disputes.

Completion Date: Date is contingent on employee's return to work status.

#53. **Strengthen Review Controls:**

- Require a second-level payroll verification for all military leave pay calculations to ensure accuracy of hours and pay rates.
- Include a checklist to verify that hours paid do not exceed policy limits and that correct rates are applied.

Chief People Office (Continued)

Metro Interoffice Memo

Response: Agree; CPO's HRIS team will strengthen review controls by requiring a second-level payroll verification for all military leave pay calculations to ensure accuracy of hours and pay rates and developing a checklist to verify that hours paid do not exceed policy limits and that correct rates are applied. Furthermore, Metro's new Payroll System, along with an upgraded HR system (Human Capital Management), when implemented will incorporate enhanced system-based controls to reduce manual intervention and mitigate the risk of calculation errors. These controls will enable automated validation rules to prevent payments exceeding policy thresholds, system-enforced rate tables to ensure correct pay calculations, workflow-based approval routing for military leave transactions, and audit trail functionality to improve transparency and accountability.

Completion Date: December 31, 2026

#54. **Provide Training and Guidance:**

- Provide refresher training to payroll staff on Metro Policy HR 14 and California military leave pay requirements.
- Develop clear guidance documents detailing calculation procedures, maximum hours, and pay rate application for military leave.

Response: Agree; CPO will provide refresher training to HRIS and Payroll staff regarding Metro Policy HR 14 and California military leave pay requirements. In addition, CPO will develop clear guidance documents detailing calculation procedures, maximum hours, and pay rate application for military leave.

Completion Date: September 30, 2026

#55. **Document Lessons Learned:**

- Upgrade internal procedures to highlight common errors and corrective actions regarding military leave payments.

Response: Agree; CPO will work in partnership with Payroll to upgrade internal procedures to highlight common errors and corrective actions regarding military leave payments.

Completion Date: September 30, 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
Finding A: Actual Overtime Cost Exceeded the Budget	**DPS (MTS)**			
1. Improve Overtime Budget Development and Controls. ○ Establish procedures to reduce overtime and ensure that budgets are based on accurate staffing levels. Overtime planning and budget development should take into account special events and anticipated operational needs. Budget assumptions must be clearly documented and reviewed during management transitions to minimize the risk of data entry errors or underfunding. Additionally, management should increase efforts to operate within established budgets, promoting more efficient and cost-effective operations.		**Agree**	1. Management will re-evaluate deployment process to best utilize our resources, cost effectively and efficiently. Discussions at budget development to establish thresholds for special events and potential extra needs going forward.	August 2026
2. Strengthen Overtime Monitoring and Reporting. ○ Implement regular monitoring of overtime expenditures against budgeted amounts throughout the fiscal year. Management should review variance reports and take timely corrective action when overtime costs exceed established thresholds.		**Agree**	2. The new payroll system, WFM, will run weekly reports on overtime hours and costs, so management can monitor any variances and determine any areas	Weekly starting in May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
			where overtime is exceeding established cost thresholds.	
3. Evaluate Staffing Levels and Hiring Strategies. ○ Assess whether additional permanent positions are warranted to meet operational requirements and reduce reliance on sustained overtime. Consideration should be given to the cost-effectiveness and workforce sustainability of hiring additional staff versus continued use of overtime.		**Agree**	3. Management will evaluate whether additional permanent positions are needed.	August 2026
4. Develop a Long-Term Workforce Planning Strategy. ○ Create a workforce plan that aligns staffing, overtime usage, and budget projections with anticipated system demands. The plan should address succession planning, management transitions, and mechanisms to reduce reliance on extended overtime while maintaining service coverage and safety.		**Agree**	4. Management will determine a workforce strategy to enable less reliance on overtime to fill demands. This strategy will consider deployment, budget, staffing modules, and anticipated needs to determine the best course for action moving forward.	August 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
Finding B: Overpayment/Underpayment of Overtime Due to Incorrect Earning Codes	**DPS (MTS)**			
5. Implement Automated System Controls in the Timekeeping and Payroll System Work with Information Technology Services to configure system validation rules that prevent ineligible earning codes from being counted toward the 40-hour workweek threshold. ○ Configure system rules to automatically exclude ineligible earning codes (e.g., Sick Pay, Administrative Leave, Off with Permission) from counting toward the 40-hour overtime threshold. ○ Set up validation alerts or error messages to flag overtime entries that appear inconsistent with allowable earning codes. ○ Require system prompts for approvers to review any overtime that is generated by a combination of eligible and ineligible codes.		**Agree**	5. MTS will be moving to an automated payroll system, WFM in May, 2026. This new system will have validation rules that will eliminate the payment issues with incorrect earning codes.	May 2026
6. Strengthen Supervisor Review and Approval Procedures ○ Reinforce expectations that Supervisors verify the accuracy of earning codes and weekly hour totals prior to approving timesheets.		**Agree**	6. Supervisory training will be mandatory with the implementation of the new WFM system. Training guides will be given to all supervisors for use with	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
○ Require periodic refresher training for Supervisors on timekeeping rules and collective bargaining agreement (CBA) provisions. ○ Implement a checklist or standardized approval guidance that highlights common coding errors and high-risk areas.			common situations for reference. Monthly reports will be run to show any concerns or issues that will need additional training and/ or disciplinary actions, if needed.	
7. Provide Mandatory Refresher Training for Timekeepers ○ Conduct training on eligible versus ineligible earning codes for overtime calculations, including examples of common mistakes leading to overpayment or underpayment. ○ Distribute a quick-reference guide or job aid summarizing proper coding and overtime rules. ○ Enforce periodic retraining or certification for timekeepers to ensure ongoing competency.		**Agree**	7. Timekeeper training will be mandatory with the implementation of the new WFM system. Training guides will be given to all timekeepers for use with common situations for reference. Monthly reports will be run to show any concerns or issues that will need additional training and/ or disciplinary actions, if needed.	May 2026
8. Enhance Payroll Review and Monitoring Controls ○ Require Payroll staff to perform a secondary review of overtime hours each pay period,		**Agree**	8. Overtime reports will be run every pay period for monitoring and accuracy of overtime	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
focusing on employees whose total hours fall close to the 40-hour threshold. ○ Strengthen review and approval procedures by requiring a secondary review of overtime submissions to verify the accuracy of earning codes before approval.			entries, all timekeepers will review and monitor reports.	
9. Align Policies and Procedures with the CBA and Communicate Changes ○ Update Transit Security's timekeeping and overtime procedures to clearly reflect which codes are included or excluded in the overtime calculation under the Teamsters agreement. ○ Issue updated procedures to all Supervisors, timekeepers, and Payroll staff, and obtain signed acknowledgment. ○ Ensure that any future CBA changes are promptly incorporated into system controls and workflow documentation.		**Agree**	9. Timekeeping procedures will be updated to reflect correct coding and CBA agreements. Updated procedures will be issued and will obtain signed acknowledge.	May 2026
10. Perform Periodic Internal Audits or Spot Checks ○ Conduct periodic spot reviews of earning codes and overtime calculations for selected pay periods, especially during periods of staffing changes or revised CBA provisions.		**Agree**	10. Quarterly reviews will be conducted to ensure consistency and accuracy.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
○ Compare reported hours to system-generated totals to ensure consistency and identify emerging trends or weaknesses.				
Finding C: Weekly Overtime Thresholds Exceeded by Some Employees	**DPS (MTS)**			
11. Reinforce and Communicate Overtime Policy Requirements ○ Formally re-communicate the 32-hour weekly overtime limit to all Transit Security personnel and supervisory staff. ○ Ensure the policy is included in onboarding materials and periodic refresher trainings.		**Agree**	11. Transit Security Management will re-communicate the 32- hour weekly overtime limit to all supervisors with a requirement to obtain a signed acknowledgement of understanding. This will also be included as on-board training for all new supervisors.	May 2026
12. Implement a Preventive Overtime Monitoring Process ○ Monitor overtime usage in real time or near real time using available scheduling or payroll systems. ○ Establish a weekly overtime dashboard or automatic alerts to identify employees who are approaching the 32-hour limit.		**Agree**	12. The new payroll system, WFM, will have a threshold "error code" prompt that will alert the supervisor when scheduling the employee who has reached the 32-hour threshold.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
13. Require Documented Justification and Approval for All Exceedances o Ensure the required authorization form is completed, retained, and reviewed for completeness for any overtime that exceeds 32 hours per week. o Escalate to management Instances without proper approvals and address through corrective action, coaching, or retraining, depending on severity and frequency.		**Agree**	13. The new payroll system, WFM, will have a threshold "error code" prompt that will require a justification if the employee is allowed to exceed the 32-Hour overtime policy. A weekly report will be run and monitored by the Timekeepers for accuracy, performance review, frequency, and retraining if needed.	May 2026
14. Integrate Overtime Controls into Scheduling Practices o Require scheduling staff to review weekly overtime projections when assigning shifts. Assigning shifts that knowingly put employees above the 32-hour limit should be prohibited unless a documented operational necessity exists and advance approval has been secured.		**Agree**	14. Timekeeping procedures will be updated to reflect weekly review of projected overtime needs for supervisors. Updated procedures will be issued and will obtain signed acknowledge. The new payroll system, WFM, will produce an error code when entering a shift for an employee that puts their overtime over 32 hours.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
15. Perform Periodic Management Review of Overtime Trends ○ Conduct quarterly reviews of overtime usage by employee, shift, and location to identify patterns, operational drivers, or staffing shortages contributing to excessive overtime. Results should be used to inform workforce planning, hiring needs, or shift adjustments.		**Agree**	15. Quarterly reviews will be conducted to review trends and needs using new system/reports. Timekeepers will review and identity patterns, areas of excess overtime use, to help Management reassess scheduling.	May 2026
16. Establish Accountability for Non-Compliance ○ Define clear consequences for repeated policy violations, such as failure to obtain required approvals or scheduling employees beyond allowable limits. Accountability measures may include supervisor coaching, written reminders, or escalation to higher-level management for persistent non-compliance.		**Agree**	16. With weekly and quarterly review of payroll processes in new system, Management will have information that can be used for performance evaluations. Supervisors will be held accountable for discrepancies, and violations, that will demand additional training and / or disciplinary action if needed.	May 2026
17. Assess Fatigue and Safety Risks Associated with High Overtime Evaluate safety implications for posts requiring heightened attention or rapid response and consider implementing post-		**Agree**	17. Management will review.	August 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
rotation guidelines or mandatory rest periods when overtime approaches higher thresholds. **18. Asses Current Vacancy Rates and Align Staffing Levels with Operational Needs** **19. Implement a Strategic Workforce Planning Approach that Prioritizes Reviewing and Filling Persistent Vacancies in Critical Classifications to Mitigate Excessive and Costly Overtime**.		**Agree** **Agree**	18. Management will review. 19. Management will review.	August 2026 August 2026
Finding D: Overtime in Excess of 32 Hours per Week Without Prior Written Authorization **20. Reinforce the Requirement for Prior Written Authorization** ○ Re-communicate the policy that employees must obtain written approval *before* working overtime in excess of 32 hours per week. This should include reminders during shift briefings, email notifications, and periodic policy refreshers to ensure all employees and Watch Commanders understand the requirement. ○ Ensure the policy is included in onboarding materials and periodic refresher trainings.	**DPS (MTS)**	**Agree**	20. Transit Security Management will re-communicate the 32-hour weekly overtime limit to all employees with a requirement to obtain a signed acknowledgement of understanding. This will also be included as on-board training for all new employees.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
21. Implement Automated Alerts for Employees Approaching the 32-Hour Threshold ○ Ensure that the payroll or scheduling system generates automated notifications to both the employee and the Watch Commander when an employee is projected to exceed 32 overtime hours in a week. This will prompt timely submission and approval of the Authorization to Exceed 32 Hours of Overtime form.		**Agree**	21. The new payroll system, WFM, will have a threshold "error code" prompt that will alert the supervisor when scheduling the employee who has reached the 32-hour threshold.	May 2026
22. Establish a Standardized Submission Timeline and Escalation Process ○ Set clear expectations that authorization forms must be submitted before the start of the shift in which overtime will exceed the limit. For instances in which the form is not submitted on time, an escalation protocol should be implemented, requiring Watch Commander justification and higher-level review before payroll processing.		**Agree**	22. Timekeeping procedures will be updated to reflect new process for paperwork submittals with new payroll system. A weekly report will be run and monitored by the Timekeepers for accuracy, performance review, frequency, and retraining if needed. Updated procedures will be issued and will obtain signed acknowledgement.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
23. Require Watch Commander Accountability for Late or Missing Forms ○ Remind supervisors that they are responsible for ensuring that overtime is pre-approved. Late submissions should be tracked, and repeated noncompliance should be addressed through performance counseling or refresher training.		**Agree**	23. Supervisors will be held accountable for discrepancies, and violations, that will demand additional training and / or disciplinary action if needed.	May 2026
24. Centralize Tracking and Periodic Review of Authorization Forms ○ Require Transit Security Timekeepers to maintain a centralized repository for all approved Authorization to Exceed 32 Hours of Overtime forms, including dates of receipt and approval. This will assist with compliance monitoring, audit readiness, and improved transparency in overtime decision-making. A monthly or quarterly compliance report should be provided to management to identify trends, monitor adherence, and detect recurring issues.		**Agree**	24. Timekeepers will maintain a centralized process for all recordkeeping for payroll, with a focus on specialized folders, whether digital or not, that house compliance items. Quarterly reports will be provided to management with status.	May 2026
25. Provide Refresher Training on Overtime Processes for Employees and Watch Commanders ○ Conduct regular training or brief refresher sessions to ensure all personnel understand how to complete the authorization form, the		**Agree**	25. Refresher training will be established and provided once new procedures have been established with new system.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
need for timely approval, and the consequences of noncompliance.				
Finding E: Lunch Break Erroneously Included in Overtime Hours	**DPS (MTS)**			
26. Enhance Employee Training on Overtime Reporting ○ Conduct refresher training for all Transit Security staff on how to correctly report overtime hours, specifically emphasizing that lunch breaks and other non-work periods should not be included in overtime calculations. Include examples from prior errors to illustrate common mistakes.		**Agree**	26. Transit Security Management will re-communicate lunch break guidelines and rules to the supervisors. Discussion will have a focus on lunchtime vs. overtime with a requirement to obtain a signed acknowledgement of understanding.	May 2026
27. Update Standard Operating Procedures (SOPs) ○ Revise or update the SOPs for overtime reporting to explicitly address the treatment of meal periods. Ensure these procedures are readily accessible in both electronic and printed formats for employees and supervisors.		**Agree**	27. Payroll SOPs will be updated with new processes once new payroll system is established. Copies of the SOPs will be distributed to all employees of Transit Security.	June 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
28. Implement System Validations in MTS Roll-Out ○ Collaborate with Information Technology Services to configure the MTS Roll-Out system to flag potential errors automatically, such as when overtime hours include typical break periods or exceed standard shift durations.		**Agree**	28. The new payroll system, WFM, will flag potential errors automatically that do not fall within common shift configurations.	May 2026
29. Reinforce Supervisor Review and Approval ○ Reinforce the requirement for supervisors to carefully review overtime submissions in the Roll-Out system prior to approval. Supervisors should verify that reported hours match actual work performed and exclude non-compensable periods.		**Agree**	29. New payroll system will require supervisors to review weekly reg/overtime submissions prior to approval. This will allow management to review schedules and actual work.	May 2026
Finding F: Overtime of 30 Minutes Due to Skipped Lunch Break	**DPS (MTS)**			
30. Strengthen Staffing and Coverage Controls ○ Assess staffing levels and scheduling practices within the Watch to ensure sufficient coverage during meal periods. This may include implementing staggered lunches, float coverage, or temporary reassignments to avoid requiring employees to remain at consoles.		**Agree**	30. Transit Security has strengthened their staff and may continue to do so. The supervisors will continue to monitor for sufficient coverage, by using techniques like staggering lunch breaks, or	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
			temporary re-assignments to avoid requiring employees to work through their lunch.	
31. Reinforce Policy Expectations on Meal Breaks ○ Reiterate to supervisors and employees that skipping lunch is allowed only under bona fide exigent circumstances, consistent with Labor Code § 512 and the Teamsters Agreement. Non-exigent operational gaps should not result in missed meal periods.		**Agree**	31. Transit Security Management will re-communicate lunch break guidelines and rules to the supervisors and staff and will require a signed acknowledgement of understanding.	May 2026
32. Enhance Documentation Requirements ○ Require supervisors and employees to clearly document the specific circumstances leading to each missed lunch, including whether the situation qualifies as an exigent event. Documentation should be consistent, descriptive, and retained for audit and compliance purposes.		**Agree**	32. The new payroll system will require a mandatory comment if approving a paid lunch break. Training on required comments and appropriate information will be given to supervisors once system is available for use. A signed acknowledgement of understanding will be required.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
33. Implement Monitoring and Trend Analysis ○ Establish periodic reviews of 30-minute overtime entries to identify patterns, repeat occurrences, and units experiencing frequent staffing shortages. Early detection will allow management to intervene proactively.		**Agree**	33. Timekeepers will run reports weekly in new system to review if paid lunches were approved and if appropriate comments were added. Information will be given to management for performance and/or additional training.	May 2026
34. Evaluate the Need for Additional Training or Guidance ○ Provide supervisors with training on meal-period compliance requirements, proper documentation standards, and appropriate decision-making when staff request or are instructed to skip lunch.		**Agree**	34. Management will review.	May 2026
Finding G: Discrepancy in Reported Overtime Hours	**DPS (MTS)**			
35. Implement a Formal Reconciliation Process ○ Establish and document a standardized reconciliation procedure to ensure that overtime hours in the Payroll system match those reported in the Roll-Out Overtime Detail Report before payroll is processed. This		**Agree**	35. Payroll SOPs will be updated with new processes once new payroll system is established.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
procedure should require supervisors or payroll staff to verify and resolve all variances prior to payroll submission.				
36. Strengthen System Interface Controls ○ Work with ITS and system administrators to assess and improve the data interface between the Roll-Out scheduling system and the Payroll system. Enhancements should ensure that overtime entries automatically transfer, are complete, and accurately reflect approved hours. Any system limitations should be documented and compensated for with manual controls.		**Agree**	36. Will review scheduling software and how it will work with new payroll system. If Enhancements are available for interfacing, Timekeepers will work with system administrators to include.	May 2026
37. Require Documentation of Manual Adjustments ○ Require supporting documentation and corresponding updates to the Roll-Out system when overtime adjustments must be entered manually into the Payroll system. All manual entries should be reviewed and approved by a supervisor who can confirm that the edits align with actual hours worked.		**Agree**	37. New payroll system requires comments to be added when manually entering overtime. Weekly overtime reports will recognize the edits, who entered them and the comments provided.	May 2026
38. Provide Training to Supervisors and Payroll Staff ○ Conduct refresher training for supervisors and timekeepers on overtime reporting		**Agree**	38. Training will be required of all supervisors and Timekeepers pertaining to system	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
requirements, system processes, and reconciliation expectations. Training will help ensure consistent application of procedures and reduce errors resulting from inconsistent data entry or misunderstanding of the workflow.			processes, reporting, overtime, etc. Working with system administrators to have guidelines and reference material to give to all user for daily use.	
39. Perform Periodic Monitoring and Quality Assurance Reviews ○ Institute periodic oversight reviews to validate the accuracy of overtime reporting between the two systems. These reviews should focus on identifying recurring discrepancies, assessing root causes, and confirming that corrective actions implemented are effective in preventing future variances.		**Agree**	39. Quarterly reviews will be conducted to review the accuracy between both systems. Review for discrepancies, work with ITS to upgrade any inefficiencies or inaccurate report that needs to be reworked.	May 2026
40. Communicate Corrections and Provide Feedback ○ Notify affected employees promptly when payroll corrections occur due to reporting errors, and provide feedback to prevent recurrence. This reinforces accountability and improves accuracy over time.		**Agree**	40. Timekeepers will notify employees promptly when payroll corrections are needed. They will also notify the employees supervisor.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
Finding H: Inconsistencies in Entering Overtime Hours in the Scheduling Software	**DPS (MTS)**			
41. Reinforce Standardized Time-Entry Protocols ○ Issue a clear, updated directive detailing the correct format for entering partial hours in the new system, with specific examples illustrating the required conventions.		**Agree**	41. Payroll SOPs will be updated and include the proper format for entering partial hours with examples for reference once new payroll system is established.	May 2026
42. Provide Targeted Refresher Training ○ Conduct short, mandatory refresher sessions for all staff responsible for time entry. Training should emphasize the differences between the old and new systems, highlight common errors observed during the transition, and include hands-on practice.		**Agree**	42. Refresher training will be provided for all supervisors. This training will be needed when new payroll system goes live so that employee time is entered properly.	May 2026
43. Implement Validation or System Controls ○ Work with the software administrator to explore whether the system can reject or flag incorrect formats (e.g., ".5") to prevent inaccurate entries at the point of input.		**Agree**	43. Will consult ITS on the need for a flag that will reject incorrect formats in the software system.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
44. Strengthen Supervisory Review ○ Require supervisors to perform routine reviews of overtime entries during the transition period to identify and correct any remaining inconsistencies before payroll processing.		**Agree**	44. Management to discuss with supervisors the concerns with inconsistencies of overtime entries on the scheduling software. Will work together to build a process for daily/weekly review with consequences if not performed	May 2026
45. Monitor and Follow Up. ○ For a defined period, periodically review Overtime Detail Reports to confirm that the corrective measures are effective and that incorrect entries no longer occur.		**Agree**	45. After process has been determined, Timekeepers will run Overtime Detail Reports on a weekly basis to review with actual patrol for discrepancies. Once Management feels that the corrective measures are effective, the review will stop.	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
Finding I: Overtime Sign-Up Discrepancies in the Rollout	**DPS (MTS)**			
46. Implement a Standardized Overtime Sign-Up Workflow: ○ Develop and document a formal procedure for creating, updating, and publishing the Roll-Out to ensure consistency. ○ Include step-by-step guidance on how to handle seniority "bumping" and how changes should be reflected in the final Roll-Out.		**Agree**	46. Payroll SOPs will be updated and include a formal procedure for the Rollout process once new payroll system is established.	May 2026
47. Automate Tracking and Updates Where Possible: ○ Explore using the MTS Roll-Out software to automatically track sign-ups, bumps, and final confirmations. ○ Reduce reliance on manual updates to minimize human error and discrepancies. ○ Retain copies of the original Roll-Out for a reasonable period to serve as a reference in case disputes or questions arise regarding overtime assignments.		**Agree**	47. Will discuss with ITS the possibility of adding an automated process to the Rollouts pertaining to tracking sign-ups, bumps and final confirmations.	May 2026
48. Introduce Verification and Audit Checks: ○ Require a secondary review or cross-check of the final Roll-Out by a supervisor before		**Agree**	48. Will work with ITS to finalize the scheduling software to track changes between	May 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
publication to confirm all assignments are accurate.			original and final rollouts. Include a report that can be produced with all editions or changes made.	
49. Enhance Communication with Staff: ○ Notify employees immediately of any changes to their assignments and provide a clear explanation for the update.		**Agree**	49. Management will determine the best process to notify staff of any changes to their assignments that will include a clear explanation of the changes and determine a process for the staff to offer their issues and/or discrepancies to Management so that they can get direction promptly.	May 2026
50. Provide Training for Roll-Out Management: ○ Train staff responsible for preparing and updating the Roll-Out on the correct procedures and use of the software system. ○ Emphasize the importance of accuracy and fairness in the overtime assignment process.		**Agree**	50. Refresher training will be provided for all supervisors. This training will be needed when new payroll system goes live so that each system works properly together.	May 2026
51. Conduct Periodic Review and Continuous Improvement:		**Agree**	51. Management will determine a quarterly	May

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
○ Conduct periodic audits of the overtime sign-up process to identify recurring errors or inefficiencies. ○ Use feedback from staff to improve the process and maintain trust in overtime distribution.			audit check process to identify errors or discrepancies.	2026
Finding J: Overpayment of Military Leave Pay **52. Recover Overpayment:** ○ Initiate corrective action to recover the overpaid amount of $376.88 from the employee, in accordance with Metro payroll recovery procedures and applicable labor laws. ○ Ensure repayment agreements are documented and communicated clearly to avoid disputes.	**CPO (HCD)**	**Agree**	52. CPO's Human Resources Information Systems (HRIS) team investigated this overpayment and will work in coordination with the Payroll Department to initiate corrective actions to recover the overpaid amount of $376.88 from the employee, upon their return from Military Leave, in accordance with Metro payroll recovery procedures and applicable labor laws. Additionally, the Chief People Office will ensure repayment agreements are documented and communicated clearly to avoid disputes.	Date is contingent on employee's return to work status.

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
53. Strengthen Review Controls: ○ Require a second-level payroll verification for all military leave pay calculations to ensure accuracy of hours and pay rates. ○ Include a checklist to verify that hours paid do not exceed policy limits and that correct rates are applied.		**Agree**	53. CPO's HRIS team will strengthen review controls by requiring a second-level payroll verification for all military leave pay calculations to ensure accuracy of hours and pay rates and developing a checklist to verify that hours paid do not exceed policy limits and that correct rates are applied. Furthermore, Metro's new Payroll System, along with an upgraded HR system (Human Capital Management), when implemented will incorporate enhanced system-based controls to reduce manual intervention and mitigate the risk of calculation errors. These controls will enable automated validation rules to prevent payments exceeding policy thresholds, system-enforced rate tables to ensure correct pay calculations, workflow-based approval routing for military leave transactions, and audit	Dec. 31, 2026

Recommendation	Staff Assigned	Agree/ Disagree	Proposed Action	Estimated Completion Date
			trail functionality to improve transparency and accountability.	
54. Provide Training and Guidance: ○ Provide refresher training to payroll staff on Metro Policy HR 14 and California military leave pay requirements. ○ Develop clear guidance documents detailing calculation procedures, maximum hours, and pay rate application for military leave.		**Agree**	54. CPO will provide refresher training to HRIS and Payroll staff regarding Metro Policy HR 14 and California military leave pay requirements. In addition, CPO will develop clear guidance documents detailing calculation procedures, maximum hours, and pay rate application for military leave.	Sep. 30, 2026
55. Document Lessons Learned: ○ Update internal procedures to highlight common errors and corrective actions regarding military leave payments.		**Agree**	55. CPO will work in partnership with Payroll to upgrade internal procedures to highlight common errors and corrective actions regarding military leave payments.	Sep. 30, 2026

Final Report Distribution

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AUDIT OF OVERTIME CONTROLS FOR METRO TRANSIT SECURITY OFFICERS AND SECURITY CONTROL SPECIALISTS

OIG Report 26-AUD-06
Karen Gorman, Inspector General
Asuncion Dimaculangan, Senior Auditor
(Office of the Inspector General)

Operations, Safety, and Customer Experience Committee
April 16, 2026

Metro

Legistar File # 2026-0068

Objective

To assess whether overtime controls for Metro Transit Security Officers and Security Control Specialists are adequate and effective to ensure that overtime is:

- **Authorized;**
- **Accurately recorded;**
- **Supported by legitimate operational needs; and**
- **Compliant with Metro policies, labor agreements, and budgetary requirements.**

Audit Results

Summary:

- Controls were generally adequate and operated as intended.
- Policies and timekeeping were largely consistent with labor agreements.
- Opportunities exist to strengthen oversight and compliance.

Key Issues Identified:

- Overtime exceeded budget in FY 2024 and FY 2025.
- Employees exceeded the 32-hour weekly overtime threshold.
- Operational demands affected meal-break compliance.
- Overtime was concentrated among a small group.

Overtime – Budget vs. Actual

Budget vs. Actual Overtime per Payroll Reports				
Fiscal Year	Budget	Actual	Actual over Budget	Budget Overrun %
FY24	$ 3,800,000	$ 4,152,486	$ 352,486	9%
FY25	$ 2,942,503	$ 4,870,518	$ 1,928,015	66%

FY24 Overtime by Job Title			
Job Title	No. of Employee	Overtime Hours	Overtime Amount
Transit Security Officer I	104	41,013	$ 1,320,763
Transit Security Officer II	121	45,353	$ 2,184,627
Senior Transit Security Officer	21	8,456	$ 480,402
Security Control Specialist	15	3,191	$ 166,694
Total	**261**	**98,013**	**$ 4,152,486**
Total Payroll of TSOs and SCSs			$ 15,793,525
% of Overtime to Total Payroll of TSOs and SCSs			**26%**

FY25 Overtime by Job Title			
Job Title	No. of Employee	Overtime Hours	Overtime Amount
Transit Security Officer I	20	7,661	$ 262,492
Transit Security Officer II	181	83,928	$ 3,746,809
Senior Transit Security Officer	19	10,459	$ 613,500
Security Control Specialist	27	4,419	$ 247,717
Total	**247**	**106,467**	**$ 4,870,518**
Total Payroll of TSOs and SCSs			$ 19,175,926
% of Overtime to Total Payroll of TSOs and SCSs			**25%**

Metro

Legistar File # 2026-0068

Vacancies

Vacancies by Job Title									
	Fiscal Year 24			Fiscal Year 25			As of 4/01/2026		
Job Title	Per Org. Chart	Actual	Vacancies (Excess)	Per Org. Chart	Actual	Vacancies (Excess)	Per Org. Chart	Actual	Vacancies (Excess)
Transit Security Officer I	113	104	**9**	145	20	**125**	157	15	**142**
Transit Security Officer II	136	121	**15**	154	181	**(27)**	204	198	**6**
Senior Transit Security Officer	15	21	**(6)**	16	19	**(3)**	21	21	**0**
Security Control Specialist	15	15	**0**	15	27	**(12)**	26	24	**2**
Total	**279**	**261**	**18**	**330**	**247**	**83**	**408**	**258**	**150**

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Recommendations

OIG provided 55 recommendations to improve the following:

- **Budgeting & Workforce Planning**
- **System Controls & Automation**
- **Oversight & Accountability**
- **Training & Communication**

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File #: 2026-0109, **File Type:** Informational Report **Agenda Number:** 42.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: OFFICE OF THE INSPECTOR GENERAL (OIG) FISCAL YEAR 2024 BILLINGS REPORT SUPPLEMENT TO METRO TRANSIT SECURITY PERFORMANCE AUDIT FOR FISCAL YEARS 2023 AND 2024 (REPORT NO. 25-AUD-06)

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE Office of the Inspector General (OIG) Fiscal Year 2024 Billings Report Supplement to Metro Transit Security Performance audit for Fiscal Years 2023 and 2024.

ISSUE

On February 23, 2017, the Metro Board passed a motion directing the Office of the Inspector General (OIG) to conduct an annual audit of each law enforcement services contract to determine how key performance indicators measure up against actual performance metrics. The audit is to ensure that Metro is receiving the services it is paying for.

BACKGROUND

Metro is the region's principal agency for multi-modal transit operations. Metro operates transit service from 11 geographically distinct bus divisions, four light rail lines, and two subway lines. In addition, critical rail infrastructure includes Union Station, 7th Street/Metro Center, and Willowbrook/Rosa Parks Station. Critical bus infrastructure includes the Harbor/Gateway Station and El Monte Transit Center. In 2017, Metro awarded three separate 5-year firm fixed unit rate contracts to the LAPD, the LASD, and the LBPD ("Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire service area.

DISCUSSION

Findings

The overall objective of this audit is to evaluate transit security billings for the period of FY 2024 for services performance provided by each of the three law enforcement contractors (LAPD, LASD, and LBPD), and Metro's System Security and Law Enforcement (SSLE) Department. The specific review areas covered by this audit include Billings, Payments, and Use of Budgeted Funds for each Law

Enforcement Contract. Other aspects of services provided by the law enforcement agencies in FY 2024 were included in the primary report issued on June 3, 2025, 25-AUD-06, Board Report number 2025-0421. We reviewed the budget and billings for each of the law enforcement agencies to identify the nature and scope of budget variances. To accomplish this objective, we completed the following procedures:

- Obtained, reviewed, and evaluated the Fiscal Year 2024 (FY 2024) budgets, billings, and payments for each law enforcement agency, including (1) summarized budget-to-actuals for each agency and (2) identified any budget variances.
- Verified by sample testing of monthly invoices that each of the three law enforcement agency billings complied with their respective contract sections regarding billings for services.

Considerations

While there have been improvements in compliance and oversight over time, this report notes several continuing issues of concern relating to reporting and contract oversight and Contractor billings.

Below is a summary of the more significant findings.

- The daily target minutes that LASD used in the calculation of monthly credit amounts did not meet the service levels required under contract.
- A miscalculation was made in February 2024 resulting in a credit due to Metro
- The Cost Allocation Plan rates used by LAPD to bill Metro were not current and resulted in an overbilling.

For FY23 and FY24, we reviewed a sample of three invoices for each contracted law enforcement agency. Our audit identified the following overbilling amounts based on the three months sampled across the entire audit period (FY23-FY24):

- LASD: $1,897,301.28
- LAPD: $1,606,730.22
- LBPD: $230,272.82

LASD concurred with the audit in that the daily target minutes used in the calculation of the credit amount did not meet the service levels promised. They also said three 2-deputy 56 hour units were not included in their billings. Their Contract Law Enforcement Bureau (CLEB) will conduct an analysis of contracted service minutes and calculate a revised billing amount for the audit period.

LASD agreed a miscalculation was made on the February 2024 invoice resulting in a $9,870 credit to Metro.

LAPD billed Metro with cost allocation plan (CAP) rates for FY19. The City’s Office of the Controller had published lower CAP rates for FY23 and FY24 however, did not inform or adjust the CAP rates used to bill Metro for LAPD services.

A reconciliation is necessary to determine the entire amount due to Metro for overbillings during FY23 and FY24.

The audit found billing discrepancies with LBPD related to Paid Time Off, mathematical errors in fully burdened hourly rates and other direct costs were not supported or allowed by the contract.

The invoice testing for each law enforcement contract resulted in findings of overbilling using only three months of invoicing and likely indicates additional funds due to Metro when all invoices are audited, potentially 4 times the amount. We have engaged our contracted auditor to review the remaining invoices for FY23 and FY24 to determine any additional overbilling or underbilling for the full audit period.

RECOMMENDATIONS
The Office of the Inspector General is providing 10 recommendations to improve/strengthen the controls over billing, payments, and use of budgeted funds for each law enforcement contract.

Metro should review the remaining FY 2024 invoices not tested and calculate any additional credit amount owed by LASD, LAPD and LBPD to Metro.

We recommend that Metro collaborate with LASD to review Fiscal Year 2024 invoices to ensure that all calculations align with the authorized service framework.

Metro should negotiate a change in contract language with LAPD and utilize the published CAP rates for future billing and invoicing.

EQUITY PLATFORM

It is the opinion of the OIG that there is no direct equity impact by production of this audit alone. However, failure to act on our recommendations could lead to providing less equitable service or not promoting equity in our operations to the best and highest level reasonably possible.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

While this item does not directly encourage taking transit, sharing a ride, or using active transportation, it is a vital part of Metro operations, as it contributes to fiscal responsibility and reports on miscellaneous expenditures of the Los Angeles County Metropolitan Transportation Authority (Metro). The Metro Board has adopted an agency-wide VMT Reduction Target, and this item supports the overall function of the agency and is consistent with the goals of reducing VMT.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendations in this report support the following Strategic Plan Goals:
Goal 2.1: Metro is committed to improving security.
Goal 5.2: Metro will exercise good public policy judgment and sound fiscal stewardship.
Goal 5.6: Metro will foster and maintain a strong safety culture.

NEXT STEPS

Metro management should:

- Complete the Schedule for Tracking Metro's Proposed Actions in Response to the recommendations in the report as determinations are made on implementing the recommendations; and
- Periodically report to the Metro Board on the status of actions taken to implement the recommendations.

ATTACHMENT

Attachment A - Final Supplemental Report on Fiscal Year 2024 Billings of Metro Transit Security Performance audit for Fiscal Years 2023 and 2024

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Los Angeles County
Metropolitan Transportation Authority
Office of the Inspector General

Audit of Metro Transit Security Services Performance Fiscal Years 2023 and 2024

Supplemental Report for Fiscal Year 2024 Billings

Report No. 25-AUD-06 **February 24, 2026**

Metro

Los Angeles County
Metropolitan Transportation Authority

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DATE: February 24, 2026

TO: Metro Board of Directors
Metro Chief Executive Officer

FROM: Yvonne Zheng, Senior Manager, Audit
Office of the Inspector General

E-SIGNED by Yvonne Zheng on 2026-02-24 12:59:42 PST

SUBJECT: Fiscal Year 2024 Billings Report Supplement to Metro Transit Security Performance Audit for Fiscal Years 2023 and 2024 (Report No. 25-AUD-06)

The Office of the Inspector General (OIG) engaged BCA Watson Rice LLP to conduct an audit of Metro's three law enforcement contracts with the Los Angeles County Sheriff's Department (LASD), Los Angeles Police Department (LAPD), and Long Beach Police Department (LBPD) for Fiscal Year 2024 (July 1, 2023 – June 30, 2024). Our original report, issued June 3, 2025, reviewed billings for FY23. Our supplemental report includes a review of billings for FY24.

The purpose of the audit was to evaluate contract compliance, billing accuracy, and the use of budgeted funds. Our review identified **13 findings** and **10 recommendations.** Our testing of invoices from each agency identified several areas of non-compliance with contract requirements and billing errors

Details of these findings and recommendations, including responses from Metro and the three Law Enforcement Agencies, are presented in the detailed audit results section and as an appendix at the end of this report.

We appreciate the cooperation and assistance provided by Metro staff throughout this engagement. If you have any questions, please contact Karen Gorman, Inspector General, at GormanK@metro.net or me at ZhengY@metro.net. Thank you!

Enclosure: Supplemental Report – FY2024 Law Enforcement Contract Billings

CC:

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LA Metro
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Transit Security Services Performance Review
Supplemental Billings Review
Fiscal Year 2024

February 2026

FINAL REPORT

Submitted by:

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A. Executive Summary

Introduction and Objectives

The Los Angeles County Metropolitan Transportation Authority (Metro) is the region's principal agency for multi-modal transit operations. In 2017, Metro awarded three separate contracts ("Agreements") to the Los Angeles Police Department (LAPD), the Los Angeles County Sheriff's Department (LASD), and the Long Beach Police Department (LBPD) ("Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire service area. The objective of this audit is to verify contract performance and compliance for transit security function services for all three law enforcement agencies during FY 2024 (July 1, 2023, to June 30, 2024). The specific review areas covered by this audit include Billing, Payments, and Use of Budgeted Funds for each Law Enforcement Contract.

Metro's Office of the Inspector General ("OIG") conducts an annual audit of the Agreements to review compliance with the terms of the contract and to ensure adequate oversight of the Agreements by Metro's Safety, Security, and Law Enforcement (SSLE) Department. While there have been improvements in compliance and oversight over time, this report notes several continuing issues of concern relating to Contractor billings.

Below is a summary of the more significant audit issues and recommendations for each law enforcement agency. A more detailed discussion is included in the body of this report beginning on page 6. Additionally, law enforcement agency responses to the findings and recommendations are included in the body of this report. SSLE management responses to the findings and recommendations are included as an attachment to this report.

Based on our testing of 3 monthly invoices each for LASD, LAPD, and LBPD, we found instances of billings non-compliance with the respective law enforcement contract agreements, resulting in a credit due to Metro of $1,897,301.28 from LASD, $1,606,730.22 from LAPD, and $230,273 from LBPD.

LASD Contract Budget and Billings Compliance

On June 23, 2023, Metro approved the Service Level Authorization SH-AD 575 for FY 2024 for an estimated total annual cost of $78,975,282. For FY 2024, the total amount billed and paid to LASD was $78,867,939. Thus, the total amount billed and paid for FY 2024 did not exceed the contract authorization amount.

Based on our sample testing of three-monthly invoices for FY 2024, we found that the daily target minutes that LASD used in the calculation of the credit amount due to Metro were erroneous, resulting in an understatement of the credit amount due to Metro totaling

$1,887,430.62 for the three invoices tested. In addition, we found a mathematical error of $9,870.66 on the February 2024 invoice. A reconciliation of amounts billed and paid for the other nine (9) months for FY2024 may result in other amounts due to Metro.

Recommendation: Metro should apply a credit amount of $1,897,301.28 for the January 2024, February 2024, and March 2024 invoice tested. Metro should review the remaining FY 2024 invoices not tested and calculate the additional credit amount owed by LASD to Metro.

LAPD Contract Budget and Billings Compliance

For FY 2024, the contract amount approved under Modification No. 8 was $104,919,116. The total amount billed and paid to LAPD was $98,002,288. Thus, the total amount billed and paid for FY 2024 did not exceed the contract authorization amount.

Based on our sample testing of three-monthly invoices for FY 2024, we found LAPD was not in compliance with the contract requirement regarding the calculations of amounts owed using the current CAP rates. CAP 41 indirect cost rates used by LAPD to bill Metro were not current, resulting in an overbilling of $1,601,995.78. In addition, one of LAPD's labor classifications totaling $4,734.44 on two sample invoices was not found on Metro's approved List of Maximum Fully Burdened Hourly Rates.

Recommendation: LAPD depends on the Los Angeles City Finance Office to supply them with the correct CAP rates. If that Finance Office has not provided LAPD with current rates, then it should do so. Notwithstanding that, Metro should apply a credit for the overbilling amounts detailed above for $1,606,730.22. Metro should review the remaining FY 2024 invoices not tested and calculate the additional amount owed by LAPD to Metro.

LBPD Contract Budget and Billings Compliance

For FY 2024, the contract amount approved under Modification No. 9 was $10,157,293. The total amount billed and paid to LBPD was $8,423,222. Thus, the total amount billed and paid for FY 2024 did not exceed the contract authorization amount.

Based on our sample testing of three-monthly invoices for FY 2024, we found LBPD Paid Time Off (PTO) accrual hours billed to Metro totaling $186,899 was unallowable under Contract Modification No. 2. Also, PTO accrual hours were found to be billed twice. Additionally, we found mathematical errors of $8,051.13 on the adjustments made by Metro for the three sample invoices. Lastly, some Other Direct Costs (ODC) totaling $35,322.69 billed were not adequately supported nor allowed by the contract.

Recommendation: Metro should apply a credit of $230,272.82 for the overbilling amounts detailed above. Metro should review the remaining FY 2024 invoices not tested and calculate the additional amount owed by LBPD to Metro.

B. Background

Metro is the region's principal agency for multi-modal transit operations. Metro operates transit service from eleven (11) geographically distinct bus divisions, four light rail lines, and two subway lines. In addition, critical rail infrastructure includes Union Station, 7th Street/Metro Center, and Willowbrook/Rosa Parks Station. Critical bus infrastructure includes the Harbor/Gateway Station and El Monte Transit Center.

In 2017, Metro awarded three separate 5-year firm fixed unit rate contracts to the LAPD, the LASD, and the LBPD ("Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire service area.

In addition to contract transit law enforcement services, Metro's SSLE Department employs Contract Security, Metro Transit Security Officers (MTS), Metro Ambassadors, and Homeless Outreach staff who all assist in providing safety and security for the Metro system.

C. Objectives, Scope and Methodology

The overall objective of this audit is to evaluate transit security billings for the period of FY 2024 for three months of services performance provided by each of the three law enforcement contractors (LAPD, LASD, and LBPD), and Metro's System Security and Law Enforcement (SSLE) Department. The specific review areas covered by this audit include Billings, Payments, and Use of Budgeted Funds for each Law Enforcement Contract. Other aspects of services provided by the law enforcement agencies in FY 2024 were included in the primary report issued on June 3, 2025, 25-AUD-06, Board Report number 2025-0421. We reviewed the budget and billings for each of the law enforcement agencies to identify the nature and scope of budget variances. To accomplish this objective, we completed the following procedures:

- Obtained, reviewed, and evaluated the Fiscal Year 2024 (FY 2024) budgets, billings, and payments for each law enforcement agency, including (1) summarized budget-to-actuals for each agency and (2) identified any budget variances.
- Verified by sample testing of monthly invoices that each of the three law enforcement agency billings complied with their respective contract sections regarding billings for services.

D. Detailed Review Results

The following sections provide information on the detailed results of the performance audit of Metro's transit security function concerning billings in FY 2024.

Los Angeles County Sheriff's Department (LASD)

On September 1, 2017, Metro entered a five-year contract with LASD for a not-to-exceed amount of $246,270,631 with a start date of September 1, 2017, and end date of June 30, 2022. This contract was subsequently modified by eight (8) modifications amending the Statement of Work, Contract Price, and Period of Performance. For FY 2024, Modification No. 8 was executed, extending the performance period to June 30, 2024, and increasing the not-to-exceed total contract price to $439,413,869. The table below summarizes the amount approved up to June 30, 2024.

Description	Period of Performance	Contract Price Increase	Not-To-Exceed Contract Price
Base Contract	9/1/2017 - 6/30/2022		$ 246,270,631
Modification No. 2		$ 11,325,520	
Modification No. 3		32,842,679	
Modification No. 6	7/1/2022 - 12/31/2022	34,239,050	
Modification No. 7	1/1/2023 - 6/30/2023	35,760,707	
Modification No. 8	7/1/2023 - 6/30/2024	78,975,282	
TOTAL		**$ 193,143,238**	**$ 439,413,869**

Finding 1: Total amount billed and paid to LASD for FY 2024 did not exceed Metro's estimated annual cost of $78,975,282 approved on Form SH-AD 575.

According to Article IV.A of the contract agreement, Metro will pay LASD up to but not greater than the monthly pro-rata amounts of the annual Firm Fixed Unit Rate based on agreed-upon service levels set forth in the Los Angeles County Sheriff's Department SH-AD 575 Deployment of Personnel Form for each fiscal year. On June 23, 2023, Metro approved the Service Level Authorization SH-AD 575 for FY 2024 for an estimated total annual cost of $78,975,282. For FY 2024, the total amount billed and paid to LASD was $78,867,939. Thus, the total amount billed and paid for FY 2024 did not exceed the estimated cost of $78,975,282 as detailed in the schedule below.

Description	FY 2024
Estimated Total Annual Cost (SH-AD 575)	$ 78,975,282
Billing and Payment - Actual	78,867,939
Difference	**$ 107,343**

Finding 2: The daily target minutes that LASD used in the calculation of the credit amount do not meet the service levels promised on Form SH-AD 575.

According to the contract, if the daily patrol service target minutes fall below ninety-eight percent (98%) of the service level minutes promised on Form SH-AD 575, then Metro or LASD shall adjust that month's invoice for the number of service level minutes that fell short compared to the promised daily service level minutes for that month.

For FY 2024, we reviewed and sampled LASD's billing for three invoices (January 2024, February 2024, and March 2024). For each invoice, we compared the annual and monthly rates billed to the annual firm fixed rate specified on Form SH-AD 575. We found that the annual rate and monthly rate for each level of service were computed in accordance with the contract requirement. However, we found the daily target minutes that LASD used in the calculation of the credit amount do not meet the service levels promised on Form SH-AD 575.

For the days that LASD did not meet the required 98% daily patrol service minutes, LASD calculated and included a credit amount in the invoice to refund Metro. The credit amount was calculated using the daily target minutes less than the provided minutes, multiplied by the rate per minute. The daily target minutes that LASD used to calculate the credit amount ranged from 33,120 minutes to 60,000 minutes, depending on the day of the week. The minutes provided were based on the Service Minutes Detailed Report (RAPS 500E rollcall sheets). For the three sample invoices tested, credit amounts of $15,967.18 were included in the January 2024 invoice, $10,123.76 in the February 2024 invoice, and $34,436.96 in the March 2024 invoice.

LASD provided two letters to Metro dated January 19, 2022, and January 31, 2022, with an explanation on the change to the deployment models. According to LASD, the target minutes used to calculate the credit amount were based on a Metro-approved modification to the deployment model, which allowed for the redistribution of target minutes based on ridership demand, rather than adhering to a fixed, seven-day-a-week structure. This operational adjustment was authorized through written correspondence between Transit Services Bureau Captain Shawn Kehoe and Metro Deputy Chief Judy Gerhardt. In that correspondence, Metro approved a change in the redeployment of target minutes to align law enforcement resources more effectively with ridership patterns. While this change altered the distribution of target minutes throughout the week, the total number of contracted minutes remained unchanged. Deputy Chief Gerhardt's letter confirmed the revised deployment model would be effective from April 3, 2022, through June 30, 2022, the end of the existing contract term. However, Metro continued to reflect its acceptance of this restructured approach through its approval of subsequent Service Level Authorization forms (SH-AD 575). After June 23, 2023, SH-AD 575 requirements should have been used for FY 2024.

Based on our review of the two letters dated January 19, 2022, and January 31, 2022, and Form SH-AD 575, we found the target minutes that LASD used in the calculation of the credit amount were less than the purchased minutes approved on form SH-AD 575. The table below summarizes the results of our review of the patrol service minutes.

Description	Form SH-AD 575
Effective Date	7/1/23 - 6/30/24
Annual Minutes Purchased (a)	20,148,000
Daily Compliance Percentage (b)	98%
Target Annual Minutes Purchased (c=a*b)	19,745,040
Target Minutes Used in the Calculation of the Credit Amount (d)	18,761,280
Minutes Variance (c-d)	983,760

According to Form SH-AD 575 for Fiscal Year 2024, the annual minutes purchased for patrol services are 20,148,000 minutes. Since LASD is required to provide a minimum of 98% daily compliance in purchased patrol service minutes, 98% of 20,148,000 minutes would equal to 19,745,040 minutes. However, the target minutes that LASD used to calculate the credit amount were 358,560 minutes per week or 18,761,280 minutes for the period from July 1, 2023, to June 30, 2024, a difference of 983,760 minutes.

Since the target minutes that LASD used in the calculation of the credit amount do not meet the service levels promised on Form SH-AD 575, we used the annual minutes of 20,148,000 to calculate the credit amount due to Metro. Given that LASD bills Metro the monthly pro-rata amounts of the annual firm fixed unit rate, the daily target minutes should be 20,148,000 annual minutes divided by 366 days, which equates to 55,049 daily minutes times 98%, resulting in 53,948 target minutes per day. For the days that LASD did not meet the 53,948 required daily target minutes, we calculated an additional credit amount due to Metro totaling $1,887,430.62 for the three sample invoices.

Recommendation 1: We recommend that Metro collaborate with LASD to review Fiscal Year 2024 invoices to ensure that all calculations align with the authorized service framework, particularly the variance between the target minutes used in the calculation of the credit amount and the purchased minutes approved on Form SH-AD 575. Also, since Metro's letter dated January 31, 2022, only confirmed approval of the revised deployment model for the period from April 3, 2022, through June 30, 2022, Metro's SSLE Department should obtain an updated Deployment Plan annually from LASD that reflects the same number of purchased patrol service minutes approved on Form SH-AD 575.

LASD Management Response

We concur that the daily target minutes used in the calculation of the credit amount do not meet the service levels promised on Form SH-AD 575. Our Contract Law Enforcement Bureau (CLEB) will conduct an analysis of the 98% daily tracker to reflect the corrected daily target minutes associated with the addition of three 2-deputy, 56-hour units, which became effective July 1, 2023. The analysis will cover FY 2023–24, FY 2024–25, and the first four months of FY 2025–26.

While we value the analysis conducted by your auditors from BCA Watson Rice LLP, we believe there may have been a misinterpretation of how the daily target minutes were structured and redistributed each day of the week, based on ridership demand. Looking at the second paragraph on page 8, auditors divided the total annual minutes purchased (20,148,000) by 366 calendar days, which provided an equal distribution of minutes across all seven days of the week and did not account for the daily variation in staffing levels based on ridership. The purported credit amount due to Metro ($1,887,430.62) for three months of invoices is calculated using the auditor's aforementioned method.

Remedy: CLEB has already begun an analysis of FY 2023–24, FY 2024–25, and the first four months of FY 2025–26. CLEB will work with LASD leadership to seek a remedy. I will work with CLEB and Metro's SSLE to obtain an updated deployment plan that reflects the same number of purchased patrol service minutes. Additionally, the 98% daily tracker will be updated to reflect the corrected daily target minutes by each day of the week, accounting for variations in staffing based on ridership.

Finding 3: A mathematical error of $9,870.66 was found on invoice no. 242243MC for February 2024.

For the February 2024 invoice (invoice no. 242243MC), LASD was below 98% compliance on two occasions: February 28 and February 29. LASD issued a credit of $10,123.75 for the shortage in minutes. We reviewed LASD's detailed calculation of the credit amount shown on the Patrol Compliance Schedule and noted that the credit amount of $9,677.12 for February 28 was not properly included in the total credit column. Thus, the credit amount of $9,677.12 plus 2% liability insurance of $193.54 for a total of $9,870.66 was erroneously excluded from the February 2024 invoice. The table below summarizes the results of our review of LASD's calculation of the credit amount due Metro for February 2024.

Date	Target Minutes	Provided Minutes	Minutes Variance	Rate Per Minute	Credit Amount	2% Liability Insurance	Total Amount
2/28/2024	60,000	57,660	2,340	$ 4.14	$ 9,677.12	$ 193.54	$ 9,870.66
2/29/2024	60,000	57,600	2,400	$ 4.14	$ 9,925.25	$ 198.50	$ 10,123.75
						Total Credit Amount Due Metro	$ 19,994.41
						Credit Amount per Invoice	$ 10,123.75
						Difference	$ 9,870.66

Recommendation 2: We recommend that Metro obtain a refund of $9,870.66 from LASD for the mathematical error found in the February 2024 invoice. We also recommend Metro review the remaining FY 2024 invoices not tested to ensure the credit amounts due to Metro were accurately calculated.

LASD Management Response

After a closer review of this finding, we concur with the recommendation pertaining to the error of $9,870.66 in favor of Metro.

Los Angeles Police Department (LAPD)

On March 1, 2017, Metro entered a five-year contract with LAPD for a not-to-exceed amount of $369,330,499 with a start date of March 1, 2017, and end date of June 30, 2022. This contract was subsequently modified by eight (8) modifications amending the Statement of Work, Contract Price, and Period of Performance. For FY 2024, Modification No. 8 was executed, extending the period of performance to June 30, 2024, and increasing the not-to-exceed total contract price to $616,910,858. The table below summarizes the amount approved up to June 30, 2024.

Description	Period of Performance	Contract Price Increase	Not-To-Exceed Contract Price
Base Contract	3/1/2017 - 6/30/2022		$ 369,330,499
Modification No. 2		$ 21,526,518	
Modification No. 3		38,628,480	
Modification No. 6	7/1/2022 - 12/31/2022	54,000,000	
Modification No. 7	1/1/2023 - 6/30/2023	28,506,245	
Modification No. 8	7/1/2023 - 6/30/2024	104,919,116	
TOTAL		**$ 247,580,359**	**$ 616,910,858**

Finding 4: Total amount billed and paid to LAPD for FY 2024 did not exceed the contract amount of $104,919,116 approved under Modification No. 8.

For FY 2024, the contract amount approved under Modification No. 8 was $104,919,116. The total amount billed and paid to LAPD was $98,002,288. Thus, the total amount billed and paid for FY 2024 did not exceed the contract amount of $104,919,116 as detailed in the table below.

Description	FY 2024
Modification No. 8 Contract Amount	$ 104,919,116
Billing and Payment - Actual	98,002,288
Difference	**$ 6,916,828**

Finding 5: The CAP 41 indirect cost rates used by LAPD to bill Metro were not current, resulting in an overbilling of $1,601,995.78.

LAPD continued to use CAP 41 indirect cost rates to bill Metro for FY 2024. We searched the City of Los Angeles website and found an Intradepartmental Correspondence to the Honorable Board of Police Commissioners for each fiscal year. This report was submitted annually to comply with the Mayor's Executive Directive No. FM-3, which directs all Departments to submit annually to the City Administrative Officer a report setting forth the costs for each special service they provide.

Based on our review of the Intradepartmental Correspondence to the Honorable Board of Police Commissioners, we found that the CAP rates decreased significantly since FY 2021. See the schedule below for CAP 41 to CAP 45 rates applicable for each fiscal year. These City-Wide rates established in the Cost Allocation Plan were prepared by the Controller's Office.

Fiscal Year	CAP No.	Civilian	Sworn With Field Support	Sworn without Field Support
FY 2020 - 2021	CAP 41	181.66%	171.28%	127.89%
FY 2021 - 2022	CAP 42	136.32%	153.23%	129.53%
FY 2022 - 2023	CAP 43	137.73%	161.76%	140.59%
FY 2023 - 2024	CAP 45	68.90%	111.53%	82.54%

Source: Board of Police Commissioners Intradepartmental Correspondence from City of Los Angeles Website

LAPD should have used CAP 42, CAP 43, and CAP 45 for FY 2022, FY 2023, and FY 2024, respectively, for invoicing its indirect costs to Metro. For FY 2024, we selected and reviewed LAPD's billings for three invoices (invoice no. 24MTADP01, 24MTADP02, and 24MTADP03). Invoice No. 24MTADP01 was for the period from January 14, 2024, to February 10, 2024, in the amount of $7,384,366.13. Invoice No. 24MTADP02 was for the period from February 11, 2024, to March 9, 2024, in the amount of $7,328,105.46. Invoice No. 24MTADP03 was for the period from March 10, 2024, to April 6, 2024, in the amount of $7,375,553.90. For the three sample invoices, if CAP 45 were properly used to bill Metro, the total CAP 45 amount would have been $2,367,729.39, which is $1,601,995.78 less than what Metro was billed using the CAP 41 amount of $3,969,725.17. The table below summarizes the calculation of the indirect cost overbilling of $1,601,995.78.

Invoice No.	Datasheet Name	Type	Labor Costs	CAP 41 Rate	CAP 41 Amount	CAP 45 Rate	CAP 45 Amount	Questioned CAP Amount
24MTADP01	TSB OH (Div 305)	Civilian	$ 58,636.80	174.09%	$ 102,080.80	61.33%	$ 35,961.95	$ 66,118.85
24MTADP01	TSB OH (Div 305)	Sworn	$ 718,337.48	160.85%	$ 1,155,445.83	101.10%	$ 726,239.19	$ 429,206.64
24MTADP01	TSB OH (Non-305)	Civilian	$ 29,079.67	181.66%	$ 52,826.12	68.90%	$ 20,035.89	$ 32,790.23
	Subtotal		$ 806,053.95		$ 1,310,352.75		$ 782,237.03	$ 528,115.72
24MTADP02	TSB OH (Div 305)	Civilian	$ 61,816.80	174.09%	$ 107,616.86	61.33%	$ 37,912.24	$ 69,704.62
24MTADP02	TSB OH (Div 305)	Sworn	$ 727,430.82	160.85%	$ 1,170,072.46	101.10%	$ 735,432.56	$ 434,639.90
24MTADP02	TSB OH (Non-305)	Civilian	$ 28,712.13	181.66%	$ 52,158.45	68.90%	$ 19,782.66	$ 32,375.79
	Subtotal		$ 817,959.75		$ 1,329,847.77		$ 793,127.46	$ 536,720.31
24MTADP03	TSB OH (Div 305)	Civilian	$ 61,816.80	174.09%	$ 107,616.86	61.33%	$ 37,912.24	$ 69,704.62
24MTADP03	TSB OH (Div 305)	Sworn	$ 725,834.50	160.85%	$ 1,167,504.78	101.10%	$ 733,818.68	$ 433,686.10
24MTADP03	TSB OH (Non-305)	Civilian	$ 29,947.71	181.66%	$ 54,403.01	68.90%	$ 20,633.97	$ 33,769.04
	Subtotal		$ 817,599.01		$ 1,329,524.65		$ 792,364.90	$ 537,159.75
	Total		$ 2,441,612.71		$ 3,969,725.17		$ 2,367,729.39	$ 1,601,995.78

For CAP 45, we used the City-Wide rates of 68.90% for Civilian and 111.53% for Sworn with Field Support. These rates were applicable to full time (straight time) positions not working at a Metro Office. According to the instructions for CAP 41, if the entity provides office space, telephone service, computers, vehicles, or any other items listed in the CAP rate calculations, LAPD's rates must be adjusted to exclude those items. Since Metro provides office space (telephones, water, electricity, all cleaning supplies, and custodial services), discounted monthly parking, cell phones, copy machines, and ink cartridges to the regular full-time staff working at Metro Office (Division 305), the Central Services rates were adjusted downward by 7.57% for Civilian and 10.43% for Sworn. The table below summarizes the CAP 41 charges to Metro and CAP 45 rates that should have been used in the calculation of the questioned cost of $1,601,995.78 above.

Description	City Wide Rate	Adjustments (Metro Office)	Metro Office Rate
CAP 41			
Civilian	181.66%	(7.57%)	174.09%
Sworn With Field Support	171.28%	(10.43%)	160.85%
CAP 45			
Civilian	68.90%	(7.57%)	61.33%
Sworn With Field Support	111.53%	(10.43%)	101.10%

Recommendation 3: Metro should enforce the contract requiring LAPD to submit annually the List of Maximum Fully Burdened Hourly Rates and all the required supporting documentation ninety (90) days prior to the start of each fiscal year and any changes to the CAP rates during the fiscal year. Metro should also review the billing rates for all invoices not reviewed by BCA for FY2024 to determine the extent of overbillings for FY 2024.

LAPD Management Response

The LAPD agrees with the process for notifications on changes to the Maximum Fully Burden Rates and supporting documentation. The LAPD disagrees that there was overbilling based on the federally approved CAP rate 41.

The Law Enforcement Services Contract's EXHIBIT B - MEMORANDUM OF COSTS states:

"The overhead rate for civilian and/or sworn personnel shall be based on the CAP overhead rate approved by the Federal Government (currently CAP37 - Attachment 3) in effect at the time the work was performed. This rate may change during the fiscal year based on approval by the Federal Government and shall be applied prospectively. The CAP rate changes shall be effective on the deployment period immediately succeeding each CAP change notification".

In accordance with the above, the (CAP) rates used in the calculation of the indirect cost for the contract were updated upon federal approval of such rates. The federal approval of CAP rate 41 was communicated to City Departments via the City Controller memo/notification dated January 6, 2021. The federal approval of CAP 42 were communicated to City Departments via the City Controller memo/notification dated October 17, 2024, and the CAP 42 rates were applied to contract invoices effective on the Deployment Period (DP) (DP 11: October 20, 2024, through November 16, 2024) following such notice.

Based on the latest communication from the City Controller dated March 12, 2025, "the CAP 43 to CAP 46 rates are pending approval by our Federal cognizant agency". The CAP rates being referred to are "draft" rates and not yet federally approved rates.

Based on the signed contract that specifically states the federally approved CAP rates are to be utilized for billing and invoicing and not the published CAP rates. The LAPD disagrees that the CAP rate 41 indirect cost rates used by the LAPD to bill Metro were not current, resulting in an overbilling of $1,601,995.78.

The LAPD's recommendation is to negotiate a change of language and utilize the published CAP rates for future billing and invoicing.

OIG Response to LAPD Management Response

The OIG agrees that more clear language can be negotiated, however we believe that the intention of the current language is clear enough, such that LAPD owes LA Metro a credit for the period of FY 2023 through 2024. Note that the amount set forth above encompasses only the audited quarter of FY24 not the entire years of credits for FY23-24. The OIG will perform a reconciliation for the exact amount for those years shortly hereafter.

Finding 6: One of LAPD's labor classifications totaling $4,734.44 on two sample invoices was not found on Metro's approved List of Maximum Fully Burdened Hourly Rates.

LAPD is required to submit annually a List of Maximum Fully Burdened Hourly Rates listing all the labor classifications and applicable rates. The contract further states that in no case shall the billing rate for personnel exceed the maximum fully burdened rate set for each personnel's labor classification.

For each of the three sample invoices, we compared the hourly rates billed to Metro's approved List of Maximum Fully Burdened Hourly Rates for full time (straight time) personnel and overtime personnel that LAPD submitted to Metro for FY 2024. Based on our review, we found one labor classification no. 2214C (Police Officer in Training or Police Officer II) that appears on invoice no. 24MTADP01 and 24MTADP03 but is not included Metro's approved List of Maximum Fully Burdened Hourly Rates. The total amount billed for this labor classification was $4,734.44, see table below.

Invoice No.	Amount Billed (CSC/G - 2214C)
24MTADP01	$ 3,548.21
24MTADP03	1,186.23
Total	$ 4,734.44

Recommendation 4: For any additional labor classifications not identified in the Lists of Maximum Fully Burdened Hourly Rates for full time (straight time) personnel and overtime personnel, LAPD should submit the revised lists to Metro for approval prior to incurring and billing the cost. Metro should continue to monitor LAPD's billings to ensure only the approved labor classifications are billed. Metro should also review the billing classifications for all invoices to determine the extent of overbillings for unapproved labor classifications.

LAPD Management Response

The LAPD agrees the labor classifications for full time and overtime list requires consistent updating. The LAPD disagrees that there is an overbilling for an unapproved classification.

Classification No. 2214C (Police Officer in Training/ Police Officer II) represents personnel who have completed the Metro Federal Safety Training but have not yet been authorized to perform line duties or billable overtime assignments under the current Metro contract. These officers are in a transitional training phase and are not deployed on the system.

As part of LAPD's internal controls, each officer who completes the Metro Federal Safety Training receives written notification outlining their probationary status and

specifying the date when they may begin working Metro overtime assignments.

Accordingly, no overbilling occurred, as the time associated with classification 2214C pertains strictly to completion of required Metro Federal Safety Training, rather than to field deployment or overtime assignment.

The next submission of the list of Maximum Fully Burdened Hourly Rates to Metro will include classification 2214C to ensure that all training-related classifications are fully documented and properly reflected.

Therefore, LAPD disagrees with an overbilling of $4,734.44 identified in the finding, as these charges represent training-related activities rather than unapproved or billable field assignments. Any law enforcement personnel who work the COAST overtime assignments have successfully completed their probationary period and possess a minimum of eighteen (18) months of law enforcement experience, ensuring full compliance with contractual staffing and experience requirements.

The LAPD's recommendation is to designate the difference between required federally approved training and patrol officers working operations. This can be articulated on the Overtime Slips and the E214s by the training instructors at time of the federally approved training.

Finding 7: Union benefits may have been billed twice to Metro, once using the fringe benefits rates and again as direct costs.

For the three sample invoices, a total of $512,006.95 was directly billed to the Metro contract for union benefits. These costs were billed using various timekeeping codes (VAR Codes). According to LAPD, these timekeeping codes (VAR Codes) were added due to negotiations with employees' labor unions or City Administrative changes. The table below summarizes the union benefits billed to Metro by VAR Codes.

VAR CODE	VARCODE DESCRIPTION	24MTADP01	24MTADP02	24MTADP03	Total
AR	Adjustment Permanent Variation in Rate	$ -	$ 763.33	$ -	$ 763.33
BE	Unknown	-	-	1,460.76	1,460.76
BR	LAPD Associates Degree Bonus	20,815.83	20,815.83	20,815.83	62,447.49
BV	LAPD Bachelors Degree Bonus	37,823.25	38,579.72	37,823.25	114,226.22
EB	Crime and Intelligence Analyst Cert	1,644.54	1,644.54	1,644.54	4,933.62
HY	Smoothing Variation for HW - System Generated	-	-	3,074.93	3,074.93
ID	I.O.D. Pay (Pension)	19,965.04	-	52,477.39	72,442.43
KS	Old Overtime Off At Straight Time - Police	-	3,217.17	3,011.57	6,228.73
KT	Old Overtime Off At 1 1/2 Times - Police	1,447.46	5,836.73	3,591.43	10,875.62
L1	Hourly Bonus - Lead Assignment Pay	190.23	-	-	190.23
LP	Leave With Pay	47,296.54	76,925.06	57,872.62	182,094.22
MK	LAPD Marksmanship Bonus (+ Or -)	1,836.38	1,836.38	1,606.84	5,279.60
PL	Personal Leave Hours	8,915.65	6,350.50	1,053.48	16,319.62
QZ	FML Covid 19 - Child Care (Not Supplementing)	8,093.65	-	-	8,093.65
RH	LAPD Vehicle Equipment Bonus	844.98	844.98	844.98	2,534.94
SE	Banked Excess Sick Time - Time Off	969.21	753.83	430.77	2,153.81
T9	Covid19 Work From Home Pay	10,757.70	4,446.71	1,983.45	17,187.86
TA	Tool Allowance	844.98	-	-	844.98
TO	Overtime Taken Off (1.5)	22.67	367.56	-	390.24
TS	Overtime Taken Off (Straight)	-	-	464.66	464.66
	Total	$161,468.12	$162,382.33	$188,156.49	$512,006.95

Concurrently, LAPD may have also billed Metro union benefits as part of their fringe benefits costs of $1,779,352.97 using the CAP 41 fringe benefits rates of 49.28% for Civilian and 75.81% for Sworn positions (see table below). According to the instructions for CAP 41, LAPD should contact the CAP Office for adjusted rates to determine if any costs listed in fringe benefits were directly billed to the contract to avoid double billing.

Invoice No.	Datasheet Name	Type	Labor Costs	Fringe Benefit Rate (CAP 41)	Fringe Benefit Amount
24MTADP01	TSB OH (Div 305)	Civilian	$ 58,636.80	49.28%	$ 28,896.22
24MTADP01	TSB OH (Div 305)	Sworn	718,337.48	75.81%	544,571.64
24MTADP01	TSB OH (Non-305)	Civilian	29,079.67	49.28%	14,330.46
	Subtotal		806,053.95		587,798.32
24MTADP02	TSB OH (Div 305)	Civilian	61,816.80	49.28%	30,463.32
24MTADP02	TSB OH (Div 305)	Sworn	727,430.82	75.81%	551,465.30
24MTADP02	TSB OH (Non-305)	Civilian	28,712.13	49.28%	14,149.34
	Subtotal		817,959.75		596,077.96
24MTADP03	TSB OH (Div 305)	Civilian	61,816.80	49.28%	30,463.32
24MTADP03	TSB OH (Div 305)	Sworn	725,834.50	75.81%	550,255.13
24MTADP03	TSB OH (Non-305)	Civilian	29,947.71	49.28%	14,758.23
	Subtotal		817,599.01		595,476.68
	Total		$ 2,441,612.71		$ 1,779,352.97

Recommendation 5: LAPD should contact the CAP office to obtain clarification and any supporting documentation regarding whether the additional union benefits billed directly to the Metro contract were included in the calculation of the fringe benefits rates, and whether the fringe benefits rates should be adjusted if additional union benefits were directly billed to Metro. Metro should also review the explanation and any supporting documents from the CAP office to ensure that the union benefits were not billed twice. Metro should provide written notice on this clarification and any recalculation within 45 days.

LAPD Management Response

The LAPD disagrees with the assertion that there was double billing caused by the inclusion of union-sponsored benefits as part of Fringe Benefits.

The "union-sponsored benefits" line-item encompasses union-sponsored optical, dental, and life insurance. These special City-subsidized benefits were extended to several employee bargaining units because of salary negotiations, in lieu of a partial general salary increase, and constitute a separate cost pool.

The inclusion of these costs under Fringe benefits is entirely separate from billing reimbursable bonuses, supplemental pay, and other CTO elements specifically allowed in the contract.

NOTE: The subsidy payments for these union-sponsored benefits are reported as a line-item expenditure by the Personnel Department from the Human Resource Benefits Account (Dept 61, Account #9330, net of additional Life insurance per ordinance for upper management) in the Controller's RECAP OF EXPENDITURE REPORT. The Personnel Department's Employee Benefits Office provides a report detailing the City subsidy amount paid towards these Union-sponsored benefit plans during the fiscal year.

Finding 8: The overhead rates billed for overtime were not adequately supported.

For overtime personnel working at Metro Office (Division 305), LAPD billed Metro using the overhead rates of 5.02% for Civilian and 10.59% for Sworn. For personnel not working at Metro Office (Division 305), LAPD billed Metro using the rates of 6.27% for Civilian and 11.44% for Sworn. A copy of Memorandum No. 21-001 dated January 6, 2021, was provided to support the Cost Allocation Plan (CAP) 41 indirect cost rates for regular full-time staff. According to the instructions for CAP 41, these rates are to be applied only to straight time for full time gross salaries. For rates applicable to part time or overtime salaries, LAPD needs to contact the CAP office. No documentation was provided to support the overhead rates for overtime. Thus, we are unable to verify the validity of these

overhead rates billed to Metro. For the three sample invoices, LAPD billed a total of $1,467,793.35 in overhead costs for overtime.

Recommendation 6: LAPD should contact the CAP office to obtain the CAP rates for overtime and submit these documents to Metro within 45 days, together with the List of Maximum Fully Burdened Hourly Rates. Metro should continue to monitor LAPD's billings to ensure the overhead rates billed for overtime were adequately supported. Any revised billing based on that correction should be provided promptly following contact with the CAP office.

LAPD Management Response

The LAPD agrees to provide documents supporting CAP 41 Central Services and Fringe Benefit rates. As per the attached document (titled "City of Los Angeles, CAP rate 41 For Central Services and Fringe Benefits"), the CAP rate charged for overtime is fully documented as follows:

	CAP 41 RATES	
CAP Rates	(no CS, MTA facility)	(w CS, LAPD facility)
Civilian FT	174.09%	181.66%
Civilian OT	5 .0 2%	6 .27 %
Sworn FT	1 60.85 %	171.28%
Sworn OT	10.59 %	11.44%

Long Beach Police Department (LBPD)

On March 23, 2017, Metro entered a five-year contract with LBPD for a not-to-exceed amount of $30,074,628 with a start date of March 23, 2017, and end date of June 30, 2022. This contract was subsequently modified by nine (9) modifications amending the Statement of Work, Contract Price, and Period of Performance. For FY 2024, Modification No. 9 was executed, extending the period of performance to June 30, 2024, and increasing the not-to-exceed total contract price to $54,238,916. The table below summarizes the amount approved up to June 30, 2024.

Description	Period of Performance	Contract Price Increase	Not-To-Exceed Contract Price
Base Contract	3/23/2017 - 6/30/2022		$ 30,074,628
Modification No. 3		$ 3,147,962	
Modification No. 4		$ 3,730,814	
Modification No. 7	7/1/2022 - 12/31/2022	$ 4,500,000	
Modification No. 8	1/1/2023 - 6/30/2023	$ 2,628,219	
Modification No. 9	7/1/2023 - 6/30/2024	$ 10,157,293	
TOTAL		**$ 24,164,288**	**$ 54,238,916**

Finding 9: The total amount billed and paid to LBPD for FY 2024 did not exceed the contract amount of $10,157,293.

For FY 2024, the contract amount approved under Modification No. 9 was $10,157,293. The total amount billed and paid to LBPD was $8,423,222. Thus, the total amount billed and paid for FY 2024 did not exceed the contract amount of $10,157,293 as detailed in the table below.

Description	FY 2024
Modification No. 9 Contract Amount	$ 10,157,293
Billing and Payment - Actual	8,423,222
Difference	**$ 1,734,071**

Finding 10: Invoices were supported by bi-weekly Work Hour Detail Schedules, Daily Metro Cost, Regular Overtime Report, and Employee Time Records. However, payroll records were not submitted with the invoices.

According to Modification No. 6, Section 7.0 of the Statement of Work, the Contractor's monthly invoice shall be based on actual services provided under the terms of the contract. The billing must be accompanied by supporting documentation, to include but shall not be limited to, daily summary of assignments and hours worked, ***and payroll records***. Also, Modification No. 2, Memorandum of Costs, specified that total direct labor cost shall be calculated based on actual hourly direct labor rate multiplied by number of actual hours worked.

We reviewed LBPD's billing for three invoices in the amounts of $653,331.33 for February 2024, $1,000,387.54 for March 2024, and $654,385.20 for April 2024. For each invoice, LBPD submitted a Work Hour Detail schedule by pay period, Daily Metro Cost, Regular Overtime Report, and Employee Time Records. However, payroll records were not submitted with the invoices to support the actual hourly direct labor rates billed.

According to LBPD, the Bi-Weekly Work Hour Detail Schedules are generated directly from LBPD's financial system and reflect the payroll data used to determine employee compensation and associated costs. The Regular Overtime Reports and Employee Time

Records serve as the source data that is entered into the financial system, enabling the generation of the Bi-Weekly Work Hour Detail Schedules. These documents have been submitted consistently since the beginning of the contract and serve as LBPD's official payroll records in support of all invoiced amounts.

Recommendation 7: Metro's SSLE Department should document the acceptance of the Bi-Weekly Work Hour Detail Schedules as payroll data.

Finding 11: Paid Time Off (PTO) accrual hours billed totaling $186,899 were found to be unallowable per Contract Modification No. 2.

LBPD Work Hour Detail Schedules included with the invoices show that the hours billed included PTO accrual hours. However, according to revised Memorandum of Costs (Contract Modification No. 2), total direct labor cost shall be calculated based on actual hourly direct labor rate multiplied by number of actual hours worked. Since PTO accrual hours were not actual hours worked, PTO hours are not allowed according to Contract Modification No. 2.

According to LBPD's May 7, 2021, memo to Metro's SSLE, monthly invoices submitted will include a PTO factor that allows for the billable hours to capture the real cost of employee benefits according to the labor MOUs. Full time employees were compensated for 2,088 annual hours, which accounts for both direct work hours, as well as the accruals for PTO hours, which were based on years of service under the employee labor agreements. The hours for which PTO was collected had been excluded from previous billing calculations. Without their inclusion, LBPD would be subsidizing the costs of staff assigned to the Metro contract instead of collecting the full costs. Metro is not billed for time off when employees assigned to the contract take time off.

According to Metro SSLE, PTO accrual hours included were for transparency purposes. Prior to May 2021, LBPD work details reflected hours that did not align with the timecards reviewed by the Metro compliance group. LBPD informed the compliance group that the hours in the work detail reflected PTO accrual because PTO was actual costs. The compliance group requested that LBPD include the PTO hours in the Work Detail Schedules. PTO hours could therefore be provided for transparency purposes but not for billing to Metro.

The Work Hour Detail Schedule only shows total hours and a lump sum amount for each line item without showing each employee's actual pay rate and the cost breakdown of the associated benefit costs. Thus, we reviewed the detailed cost breakdown shown on LBPD Daily Metro Cost Reports and found that a benefit rate of 64.014% was included in the total labor cost for Police Sergeant and Police Lieutenant. For Administrative Analyst III and Clerk Typist III, a benefit rate of 57.883% was included in the total labor cost. There was no detailed cost breakdown of the labor rates billed for a Police Officer position.

Based on these daily reports, the benefit rates of 64.014% and 57.883% include: (1) PERS Pension, (2) Health/Dental/Life Insurance, (3) Vacation/Sick Leave Overhead Rate, (4) Medicare, (5) Retirement Sick Leave Overhead Rate, and (6) Workers Comp. No documentation was provided to support the benefit rates of 64.014% and 57.883%. If PTO was already included in the benefit rates and reflected in the hourly rates billed, billing PTO hours again in addition to actual hours worked appears to be double billing. For the three sample invoices, the amount billed for PTO hours totaled $186,899 (see schedule below).

Invoice No.	Invoice Period	PTO Amount
0580MTA-2405	02/01/24 - 02/29/24	$ 58,055.82
0580MTA-2406	03/01/24 - 03/31/24	78,399.89
0580MTA-2407	04/01/24 - 04/30/24	50,443.29
Total		$ 186,899.00

Recommendation 8: LBPD should provide Metro with the Cost Allocation Plan to support the benefit rates of 64.014% and 57.883% included in the billing rates. If PTO is already included in the benefit rates, then Metro should disallow the costs billed for PTO hours of $186,899, since PTO costs are already recovered through the benefit rates and reflected in the hourly rate billed for each employee.

LBPD Response

The Bi-Weekly Work Hour Detail Schedules are generated directly from LBPD's financial system and reflect the payroll data used to determine employee compensation and associated costs. The Regular Overtime Reports and Employee Time Records serve as the source data that is entered into the financial system, enabling the generation of the Bi-Weekly Work Hour Detail Schedules. These documents have been submitted consistently since the beginning of the contract and serve as LBPD's official payroll records in support of all invoiced amounts.

Finding 12: Mathematical errors were found on LBPD's List of Maximum Fully Burdened Hourly Rates, resulting in an overbilling of $8,051.13.

According to contract Modification No. 2, ninety (90) days prior to the start of each fiscal year, LBPD is required to submit for Metro's approval, a List of Maximum Fully Burdened Hourly Rates per labor classification, together with the necessary documentation in support of the proposed rates, including applicable MOUs with labor union and current payroll records. We reviewed LBPD's List of Maximum Fully Burdened Hourly Rates for FY 2024 and found that the rates were not properly calculated. The table below summarizes our calculation of the math errors.

Classification	Hourly Rate with Benefits	Administrative Overhead Rate (25%)	Maximum Burdened Rate Recalculated	Maximum Burdened Rate Per LBPD's List	Difference (Math Error)
	(a)	(b=a*25%)	(c=a+b)	(d)	(d-c)
Police Lieutenant	$ 177.42	$ 44.35	$ 221.77	$ 232.86	$ 11.09
Police Sergeant	$ 153.29	$ 38.32	$ 191.61	$ 201.19	$ 9.58
Police Corporal	$ 134.31	$ 33.58	$ 167.89	$ 176.28	$ 8.39
Police Officer	$ 134.31	$ 33.58	$ 167.89	$ 176.28	$ 8.39
Administrative Analyst III	$ 79.15	$ 19.79	$ 98.93	$ 103.88	$ 4.95
Clerk Typist III	$ 48.00	$ 12.00	$ 60.00	$ 63.00	$ 3.00

Contract Modification No. 2 further states that in no case shall actual fully burdened hourly rate billed for each personnel be greater than the maximum fully burdened hourly rate set per labor classification for each applicable period. For the three sample invoices, Metro SSLE disallowed a total of $12,595.05 for the personnel whose fully burdened rates billed exceeded the maximum burdened rates shown on LBPD's list. Since the maximum burdened rates on LBPD's list contain math errors, the amount disallowed by Metro SSLE was understated. We recalculated the total overbilled amount to be $20,646.18, which is $8,051.13 more than the $12,595.05 disallowed by Metro SSLE (see table below for details).

PayPeriod	Job Class Title	Last Name	Total Hours Billed	Fully Burdened Rate Billed	Maximum Burdened Rate	Rate Difference	Overbilled Amount	Metro Adjustments	Net Overbilled Amount
1/26/2024	ADMIN ANALYST III	CARTER	84.560	$ 151.82	$ 98.93	$ 52.89	$ 4,472.12	$ (4,053.54)	$ 418.57
2/9/2024	ADMIN ANALYST III	CARTER	48.320	$ 132.59	$ 98.93	$ 33.66	$ 1,626.65	$ (1,387.47)	$ 239.18
2/9/2024	POLICE LIEUTENANT	YAP	33.824	$ 254.47	$ 221.77	$ 32.70	$ 1,105.95	$ (730.84)	$ 375.11
1/26/2024	POLICE OFFICER	CRANEY	100.400	$ 193.25	$ 167.89	$ 25.36	$ 2,546.03	$ (1,703.68)	$ 842.36
1/26/2024	POLICE OFFICER	MANUSSELIS	9.000	$ 225.74	$ 167.89	$ 57.85	$ 520.67	$ (445.16)	$ 75.51
1/26/2024	POLICE OFFICER	ORTIZ	5.000	$ 176.49	$ 167.89	$ 8.60	$ 42.99	$ (1.04)	$ 41.95
1/26/2024	POLICE OFFICER	PEREZ	30.000	$ 182.43	$ 167.89	$ 14.54	$ 436.29	$ (184.59)	$ 251.70
2/9/2024	POLICE OFFICER	LOBASCIO	10.000	$ 168.33	$ 167.89	$ 0.44	$ 4.36	$ -	$ 4.36
2/9/2024	POLICE OFFICER	PEREZ	56.908	$ 173.70	$ 167.89	$ 5.81	$ 330.82	$ -	$ 330.82
				Subtotal (Invoice No. 0580MTA-2405)			$ 11,085.87	$ (8,506.31)	$ 2,579.56
3/22/2024	POLICE LIEUTENANT	YAP	79.728	$ 228.63	$ 221.77	$ 6.86	$ 547.13	$ -	$ 547.13
2/23/2024	POLICE OFFICER	CONRAD	82.480	$ 177.39	$ 167.89	$ 9.50	$ 783.36	$ (91.35)	$ 692.01
3/8/2024	POLICE OFFICER	CRANEY	70.240	$ 176.49	$ 167.89	$ 8.60	$ 603.82	$ (14.51)	$ 589.31
3/8/2024	POLICE OFFICER	ORTIZ	5.000	$ 174.02	$ 167.89	$ 6.13	$ 30.63	$ -	$ 30.63
3/22/2024	POLICE OFFICER	CONRAD	94.560	$ 170.25	$ 167.89	$ 2.36	$ 222.81	$ -	$ 222.81
2/23/2024	POLICE SERGEANT	MESUN	48.320	$ 213.28	$ 191.61	$ 21.67	$ 1,046.99	$ (584.09)	$ 462.91
				Subtotal (Invoice No. 0580MTA-2406)			$ 3,234.74	$ (689.94)	$ 2,544.79
4/5/2024	POLICE LIEUTENANT	YAP	78.520	$ 229.76	$ 221.77	$ 7.99	$ 627.12	$ -	$ 627.12
4/5/2024	POLICE OFFICER	BANUELOS JR	74.160	$ 176.38	$ 167.89	$ 8.49	$ 629.72	$ (7.51)	$ 622.20
4/5/2024	POLICE OFFICER	PEREZ	43.240	$ 192.53	$ 167.89	$ 24.64	$ 1,065.37	$ (702.59)	$ 362.78
4/19/2024	POLICE OFFICER	PEREZ	54.240	$ 188.85	$ 167.89	$ 20.96	$ 1,137.06	$ (681.99)	$ 455.07
4/5/2024	POLICE SERGEANT	MESUN	55.568	$ 203.00	$ 191.61	$ 11.39	$ 632.67	$ (100.32)	$ 532.34
4/5/2024	POLICE SERGEANT	ORANTES	34.160	$ 257.00	$ 191.61	$ 65.39	$ 2,233.64	$ (1,906.39)	$ 327.25
				Subtotal (Invoice No. 0580MTA-2407)			$ 6,325.57	$ (3,398.80)	$ 2,926.77
						Total	$ 20,646.18	$ (12,595.05)	$ 8,051.13

Recommendation 9: We recommend that Metro obtain a refund of an additional $8,051.13 over the $12,595.05 disallowed from LBPD for the labor rates difference. Metro should also review the remaining invoices not tested to determine the extent of labor rates overbilling.

Finding 13: Other Direct Costs (ODC) billed were not adequately supported.

Under Contract Modification No. 2, LBPD was allowed to bill the actual cost of vehicles, equipment, supplies, including uniforms and other items needed by law enforcement personnel in the performance of the Statement of Work. For the sample invoices, LBPD billed a total of $39,364.97 for ODC, of which $2,818.35 was for inmate booking costs, $4,005.39 for body worn camera support and license, $4,042.28 was for supplies and equipment, and $28,498.95 for fleet services. Vendor invoices were provided to support the amount billed for supplies and equipment. For Inmate Booking Cost, LBPD billed a rate of $939.45 for each booking. For Body Worn Camera Support & License, LBPD billed a monthly rate of $1,335.13. This monthly rate and booking rate were not found in the contract agreement or contract modifications. Detailed cost schedules were provided to support the amount billed for inmate booking costs, body worn camera support and license, and fleet services. However, vendor invoices and/or other source documents were not provided to adequately support the amounts claimed on these detailed cost schedules. Thus, we are unable to verify the validity of these amounts.

The table below summarizes the amount billed for ODC and the unsupported cost of $35,322.69.

Description	Amount Billed (February 2024)	Amount Billed (March 2024)	Amount Billed (April 2024)	Total	Unsupported Cost
Inmate Booking Cost	$ 1,878.90	$ 939.45	$ -	$ 2,818.35	$ 2,818.35
Body Worn Camera Support & License	$ 1,335.13	$ 1,335.13	$ 1,335.13	$ 4,005.39	$ 4,005.39
Supplies and Equipment	$ 1,036.74	$ -	$ 3,005.54	$ 4,042.28	
Fleet Services	$ 3,530.26	$ 16,988.79	$ 7,979.90	$ 28,498.95	$ 28,498.95
Total	$ 7,781.03	$ 19,263.37	$ 12,320.57	$ 39,364.97	$ 35,322.69

Recommendation 10: LBPD should provide Metro with adequate documentation to support ODC billings included above. Supporting documentation should include third party invoices, CPA audit reports, or the City of Long Beach Cost Allocation Plan. Metro's SSLE Department should also ensure LBPD's ODC billings are adequately supported before approving the invoices for payment. If LBPD will not provide the supporting documentation, then Metro should seek a refund of that amount.

LBPD's Response

LBPD respectfully submits the following clarifications and supporting context regarding the support for Other Direct Costs (ODC) billed under the contract. At the outset of the agreement, LBPD engaged directly with Metro staff to confirm expectations regarding the format and content of backup documentation. In September 2020, Metro staff reviewed a draft of LBPD's documentation and responded affirmatively that the format met their requirements. This communication is attached for reference. While minor comments were provided on specific costs, Metro did not indicate that the overall documentation was inadequate or incomplete. Since that initial confirmation, LBPD has consistently used the same documentation format across all billing cycles, and no concerns were brought to our attention regarding its sufficiency until this audit. For Body Worn Camera (BWC) support, licensing, archiving, and redaction costs, LBPD maintains vendor invoices on file that directly substantiate the amounts billed to Metro. These invoices were maintained as part of our standard internal documentation procedures and were available to support the costs submitted to Metro. Regarding Fleet Services and Technology Costs, these services are provided by other City of Long Beach departments through established interdepartmental cost recovery processes. In accordance with our internal cost recovery procedures, we included detailed summary tables in each billing packet to reflect these costs associated with these internal services. These summaries were designed to provide clear and transparent support for the charges billed. Given this history of documented acceptance, the availability of supporting records, and our consistent application of approved practices, LBPD respectfully request that this finding be reconsidered.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
1	Metro should apply a credit amount of $1,897,301.28 for the January 2024, February 2024, and March 2024 invoice tested. Metro should review the remaining FY 2024 invoices not tested and calculate the additional credit amount owed by LASD to Metro.	Neutral	N/A	In response to the audit inquiry regarding the $1.8 million credit, SSLE-Compliance respectfully request that the OIG/Auditors provide a detailed, itemized breakdown of the calculations supporting this amount. SSLE-Compliance is unable to request repayment from our contractors without sufficient documentation and justification. Providing a comprehensive explanation not only ensures transparency and accountability but also allows SSLE-Compliance to review the methodology employed and identify any potential errors or discrepancies.	Requested documentation from OIG/Auditors that would support the proposed credit was not provided to DPS.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
2	LAPD depends on the Los Angeles City Finance Office to supply them with the correct CAP rates. If that Finance Office has not provided LAPD with current rates, then it should do so. Notwithstanding that, Metro should apply a credit for the overbilling amounts detailed above for $1,606,730.22. Metro should review the remaining FY 2024 invoices not tested and calculate the additional amount owed by LAPD to Metro.	Agree	Ongoing	**LA City CAP Rate Schedule** CAP 41 FY2020-21 CAP 42 FY2021-22 CAP 43 FY2022-23 CAP 45 FY2024-25 **LAPD CAP Rate Schedule** CAP 41 FY2021-22 CAP 41 v2 2/21 - 3/23 CAP 41 v3 4/23 - 6/24 CAP 42 7/24 - Present The Auditors applied a CAP Rate schedule obtained from the official website of the City of Los Angeles. This schedule adheres to an implementation timeline that differs from that utilized by the LAPD. Accordingly, SSLE-Compliance hereby requests that the OIG/Auditors furnish a detailed itemization and explanatory breakdown of the methodology and calculations used to determine the alleged overbilled amount.	After meeting with the OIG/Auditors it has been determined that the CAP Rates being provided by LAPD were not current. LAPD has verbally indicated that they are amenable to revising Exhibit B – Memorandum of Cost to modify the current CAP rate language from “federally approved CAP rates” to “published CAP rates”. Language in the contract - Exhibit B - Memorandum of Cost is being modified to reflect the following: Overtime Position Overhead Rate (for sworn personnel) Overtime Position Overhead Rate shall be computed as follows: = Hourly Direct Labor Rate x OT Overhead Rate The indirect overtime overhead rate of sworn personnel shall be based on the CAP overhead rate approved by the Federal Government applicable for each fiscal period. . Pending receipt of the federally approved CAP rate, the interim CAP rate issued by the Los Angeles City Controller’s Office shall apply.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
3	Metro should apply a credit of $230,272.82 for the overbilling amounts detailed above. Metro should review the remaining FY 2024 invoices not tested and calculate the additional amount owed by LBPD to Metro.	Neutral	N/A	In response to the audit inquiry regarding the $230,272.82 credit, SSLE-Compliance respectfully request that the OIG/Auditors provide a detailed, itemized breakdown of the calculations supporting this amount. SSLE-Compliance is unable to request repayment from our contractors without sufficient documentation and justification. Providing a comprehensive explanation not only ensures transparency and accountability but also allows SSLE-Compliance to review the methodology employed and identify any potential errors or discrepancies.	Requested documentation from OIG/Auditors that would support the proposed credit was not provided to DPS.
4	We recommend that Metro collaborate with LASD to review Fiscal Year 2024 invoices to ensure that all calculations align with the authorized service framework, particularly the variance between the target minutes used in the calculation of the credit amount and the purchased minutes approved on Form SH-AD 575. Also, since Metro's letter dated January 31, 2022, only confirmed approval of the revised deployment model for the period from April 3, 2022, through June 30, 2022, Metro's SSLE Department should obtain an updated Deployment Plan annually from LASD that reflects the same number of purchased patrol service minutes approved on Form SH-AD 575.	Agree	Ongoing	For billing purposes, LASD's deployment plan is fixed and does not change once the SH-AD 575 form is approved. Approval of the SH-AD 575 establishes the fixed service level for the entire fiscal year. In instances where amendments are required, LASD consistently notifies SSLE Command Staff. It is important to note that the SH-AD 575 differs from LASD's overall deployment model. The SH-AD 575 reflects only billable patrol-class personnel, whereas the deployment model encompasses all TSD staff, both billable and non-billable. As a result, the SH-AD 575 and the deployment plan will not align on a 1:1 basis: one is specific to billing, and the other represents comprehensive operational staffing. For fiscal year 2026, SSLE-Compliance will request an updated deployment plan to maintain alignment with audit and contractual oversight requirements.	DPS will ensure V/CM requests an updated copy of LASD's deployment plan to ensure alignment with audit and contractual oversight requirements.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
5	We recommend that Metro obtain a refund of $9,870.66 from LASD for the mathematical error found in the February 2024 invoice. We also recommend Metro review the remaining FY 2024 invoices not tested to ensure the credit amounts due to Metro were accurately calculated.	Neutral	N/A	SSLE-Compliance respectfully request that the OIG/Auditors provide a detailed mathematical breakdown illustrating the identified error. This will enable SSLE-Compliance to thoroughly review the calculations and allow LASD to clearly understand the specific point at which the discrepancy occurred. Providing such a breakdown ensures transparency, facilitates accurate assessment, and supports proper resolution in accordance with contractual and regulatory obligations.	Requested documentation from OIG/Auditors that would support the proposed credit was not provided to DPS.
6	Metro should enforce the contract requiring LAPD to submit annually the List of Maximum Fully Burdened Hourly Rates and all the required supporting documentation ninety (90) days prior to the start of each fiscal year, and any changes to the CAP rates during the fiscal year. Metro should also review the billing rates for all invoices not reviewed by BCA for FY2024 to determine the extent of overbillings for FY 2024.	Agree	Ongoing	SSLE-Compliance respectfully request that the OIG/Auditors provide a detailed mathematical breakdown illustrating the identified error. This will enable SSLE-Compliance to thoroughly review the calculations and allow LASD to clearly understand the specific point at which the discrepancy occurred. Providing such a breakdown ensures transparency, facilitates accurate assessment, and supports proper resolution in accordance with contractual and regulatory obligations.	During contract negotiations, DPS requires V/CM to obtain from LAPD the most current Maximum Fully Burdened Rates, reflecting any personnel changes or requests to add personnel within the preceding 90 days.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
7	For any additional labor classifications not identified in the Lists of Maximum Fully Burdened Hourly Rates for full-time (straight time) personnel and overtime personnel, LAPD should submit the revised lists to Metro for approval prior to incurring and billing the cost. Metro should continue to monitor LAPD's billings to ensure only the approved labor classifications are billed. Metro should also review the billing classifications for all invoices to determine the extent of overbillings for unapproved labor classifications.	Agree	Ongoing	LAPD currently furnishes LACMTA with updated Maximum Fully Burdened Rates to reflect any personnel changes, as well as any requests for the addition of classifications or VAR Codes.	There is no change to existing practices. During invoice review, when unauthorized VAR Codes or labor classifications are identified, LACMTA requires a detailed explanation for their use and will disallow such codes or classifications until formal approval is granted.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
8	LAPD should contact the CAP office to obtain clarification and any supporting documentation regarding whether the additional union benefits billed directly to the Metro contract were included in the calculation of the fringe benefits rates, and whether the fringe benefits rates should be adjusted if additional union benefits were directly billed to Metro. Metro should also review the explanation and any supporting documents from the CAP office to ensure that the union benefits were not billed twice. Metro should provide written notice on this clarification and any recalculation within 45 days.	Agree	Ongoing	SSLE-Compliance will forward the OIG/Auditor's recommendations to the LAPD for a response, after which SSLE-Compliance will review the explanations submitted by LAPD's CAP Office and provide a response as necessary.	LAPD has verbally indicated that they are amenable to revising Exhibit B – Memorandum of Cost to modify the current CAP rate language from "federally approved CAP rates" to "published CAP rates". Language in the contract - Exhibit B - Memorandum of Cost is being modified to reflect the following: Overtime Position Overhead Rate (for sworn personnel) Overtime Position Overhead Rate shall be computed as follows: = Hourly Direct Labor Rate x OT Overhead Rate The indirect overtime overhead rate of sworn personnel shall be based on the CAP overhead rate approved by the Federal Government applicable for each fiscal period. . Pending receipt of the federally approved CAP rate, the interim CAP rate issued by the Los Angeles City Controller's Office shall apply.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
9	LAPD should contact the CAP office to obtain the CAP rates for overtime and submit these documents to Metro within 45 days, together with the List of Maximum Fully Burdened Hourly Rates. Metro should continue to monitor LAPD's billings to ensure the overhead rates billed for overtime were adequately supported. Any revised billing based on that correction should be provided promptly following contact with the CAP office.	Agree	Ongoing	SSLE-Compliance will forward the OIG/Auditor's recommendations to LAPD. SSLE-Compliance will continue to monitor LAPD's billings to ensure that the overhead rates charged are supported by adequate documentation and will issue corrective action requests as necessary.	LAPD has verbally indicated that they are amenable to revising Exhibit B – Memorandum of Cost to modify the current CAP rate language from "federally approved CAP rates" to "published CAP rates". Language in the contract - Exhibit B - Memorandum of Cost is being modified to reflect the following: Overtime Position Overhead Rate (for sworn personnel) Overtime Position Overhead Rate shall be computed as follows: = Hourly Direct Labor Rate x OT Overhead Rate The indirect overtime overhead rate of sworn personnel shall be based on the CAP overhead rate approved by the Federal Government applicable for each fiscal period. Pending receipt of the federally approved CAP rate, the interim CAP rate issued by the Los Angeles City Controller's Office shall apply.
10	Metro's SSLE Department should document the acceptance of the Bi-Weekly Work Hour Detail Schedules as payroll data.	N/A	N/A	Effective April 1, 2025 the Long Beach Police Department no longer contracts with Metro.	Effective April 1, 2025 the Long Beach Police Department no longer contracts with Metro.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
11	LBPD should provide Metro with the Cost Allocation Plan to support the benefit rates of 64.014% and 57.883% included in the billing rates. If PTO is already included in the benefit rates, then Metro should disallow the costs billed for PTO hours of $186,899, since PTO costs are already recovered through the benefit rates and reflected in the hourly rate billed for each employee.	Disagree	N/A	The following represents relevant sections of LPBD's response to previous attempts to request a Cost Allocation Plan to further evaluate the application of benefit rates: *The LBPD Daily Metro Cost Reports were intended solely to provide a daily summary of hours worked by personnel working the Metro Detail and were not designed with the detail necessary to calculate actual labor costs. The benefit rates included should not be assumed to provide the most up to date rates, as they are not generated by the financial system.* *Regarding the auditors' request for a CPA Audit Report or Cost Allocation Plan, LBPD would like to reiterate that the labor costs in question are direct costs. As such, they are not included in, nor governed by a Cost Allocation Plan, which applies exclusively to indirect costs. Accordingly, there is no Cost Allocation Plan documentation that would be relevant to this request.* *Please note, LBPD does not have control over the payroll system, nor are we responsible for how the benefits rates are set or applied. Employee Benefit rates are developed and applied citywide by the City of Long Beach's Financial Management Department. To collect the appropriate benefit cost for each employee, the payroll system applies the rate based on hours worked each pay period, calculates and charges the appropriate cost on a monthly or bi-monthly basis, depending on the benefit. Thus, employee salary and benefit costs are calculated by the central payroll system, and LBPD uses that information to in turn bill for those costs.*	This response reaffirms LPBD's prior position and reflects no change. The LBPD Daily Metro Cost Reports are intended only to summarize hours worked by Metro Detail personnel and are not designed to calculate actual labor costs. Benefit rates shown in these reports may not reflect current rates, as they are not generated by the financial system. LPBD reiterates that the labor costs in question are direct costs and therefore are not subject to a Cost Allocation Plan, which applies solely to indirect costs. As a result, no Cost Allocation Plan or related documentation is applicable to this request. LPBD has stated they do not control the payroll system or the establishment of benefit rates. Benefit rates are developed and applied citywide by the City of Long Beach's Financial Management Department, with salary and benefit costs calculated through the central payroll system and used by LPBD for billing purposes.

Recommendations and Proposed Actions (DPS) Updated Responses 1.28.26					
No.	**Recommendation**	**Agree Disagree Neutral**	**Completion Date Estimate**	**Response**	**January 2026 Updated Response**
12	We recommend that Metro obtain a refund of an additional $8,051.13 over the $12,595.05 disallowed from LBPD for the labor rates difference. Metro should also review the remaining invoices not tested to determine the extent of labor rates overbilling.	Agree	To be addressed during reconciliation meeting	SSLE-Compliance recognizes the mathematical error the auditors discovered in the maximum burdened rates and during contract "Close Out" will include this amount in LBPD's attempt for reconciliation. SSLE will forward the OIG/Auditors information to LBPD to provide a response.	Metro calculated an overbill of 12,295.27. This amount will be pursued in contract "Close Out" in LBPD's attempt for reconciliation.
13	LBPD should provide Metro with adequate documentation to support ODC billings included above. Supporting documentation should include third party invoices, CPA audit reports, or the City of Long Beach Cost Allocation Plan. Metro's SSLE Department should also ensure LBPD's ODC billings are adequately supported before approving the invoices for payment. If LBPD will not provide the supporting documentation, then Metro should seek a refund of that amount.	Disagree	N/A	LBPD provided a response to this matter in the initial audit, finding 22. Their response is as follows: LBPD has consistently used the same documentation format across all billing cycles, and no concerns were brought to our attention regarding its sufficiency until this audit. For Body Worn Camera (BWC) support, licensing, archiving, and redaction costs, LBPD maintains vendor invoices on file that directly substantiate the amounts billed to Metro. These invoices were maintained as part of our standard internal documentation procedures and were available to support the costs submitted to Metro. With regard to Fleet Services and Technology Costs, these services are provided by other City of Long Beach departments through established interdepartmental cost recovery processes. In accordance with our internal cost recovery procedures, we included detailed summary tables in each billing packet to reflect these costs associated with these internal services. These summaries were designed to provide clear and transparent support for the charges billed. Given that Metro did not dispute this position, Metro respectfully disagrees with OIG's assertion that the billed services are unsupported.	This response reaffirms LBPD's position as stated in the initial audit (Finding 22) and reflects no change. LBPD has consistently used the same documentation format across all billing cycles, and no concerns regarding its sufficiency were raised prior to this audit. For Body Worn Camera (BWC) support, licensing, archiving, and redaction costs, LBPD maintains vendor invoices on file that substantiate the amounts billed to Metro and were available in accordance with standard internal documentation procedures. Fleet Services and Technology costs are provided through established interdepartmental cost recovery processes with other City of Long Beach departments. Consistent with internal procedures, detailed summary tables were included in each billing packet to support these charges.

Office of the Inspector General
Metro Security Performance Audit
Supplemental Report for
Fiscal Year 2024 Billings

Metro Operations, Safety, and Customer Experience Committee
Karen Gorman, Inspector General
BCA Watson Rice, LLP

April 16, 2026

Metro

Background and Scope

- Metro contracts with LAPD, LASD, and LBPD for transit law enforcement services
- OIG conducts an annual performance audit to:
  - Evaluate transit security performance provided by Law enforcement agencies.
  - Evaluate Metro's System Security and Law Enforcement Department activities and oversight, and
  - Ensure that Metro is receiving the services it is paying for.

Metro

Audit Conclusions

There are continuing issues relating to contractor billings.

- Based on three months of sampled testing, there are instances of billings non-compliance across all three law enforcement agencies.
    - LASD: $1,897,301
    - LAPD: $1,606,730
    - LBPD: $230,272

Metro

Audit Conclusions

- The daily target minutes that LASD used in the calculation of monthly credit amounts did not meet the service levels required under contract.
- The Cost Allocation Plan rates used by LAPD to bill Metro were not current and resulted in an overbilling.
- The billing discrepancies identified for LBPD included Paid Time Off charges, mathematical errors in fully burdened hourly rates, and direct costs that were unsupported or not allowable under the contract.

Metro

Key Recommendations

The audit identified 13 findings and made 10 recommendations to improve the controls over billing, payments, and use of budgeted funds for each law enforcement contract:

- Apply identified credits and recover overpayments.
- Review remaining FY23 & FY24 invoices not tested.
- Strengthen contract language and oversight controls.

Metro

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2026-0258, **File Type:** Informational Report **Agenda Number:** 43.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE
APRIL 16, 2026

SUBJECT: EMBRACING NEURODIVERSITY IN TRANSPORTATION

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE the report of the Neurodiverse Rider Experience Survey & Engagement (Initiative) (Attachment A).

ISSUE

Metro is committed to providing a transportation system that is inclusive, accessible, and welcoming to all riders. In response to Board Motion #32.1, authored by Directors Mitchell, Yaroslavsky, Dupont-Walker, Butts, Sandoval, and Padilla (Attachment B), Metro initiated a comprehensive effort to gather feedback from neurodivergent individuals, including those with autism and other developmental disabilities, as well as their caregivers, on their experiences using public transit and opportunities for improvement. Through a systemwide survey, mystery rides, listening sessions, and peer agency research, Metro gathered input on barriers to using public transit and potential opportunities for improvement. The findings from this Initiative will help inform future service and customer experience enhancements.

BACKGROUND

Metro strives to provide a safe, clean, reliable, and welcoming transit system for all riders. Delivering an inclusive and accessible system has long been central to Metro's mission and extends beyond meeting the minimum requirements of the Americans with Disabilities Act, reflecting Metro's commitment to serving the diverse needs of Los Angeles County.

As Metro continues to advance accessibility across the system, there is growing recognition that riders with non-apparent disabilities, including those who are neurodiverse, may experience barriers that are less visible but still significant when using the Metro system. These barriers can include sensitivity to noise, smells, and crowding; challenges navigating complex or unclear information; and difficulty adapting to unexpected service disruptions, such as delays, reroutes, or mechanical issues.

To better understand these experiences and identify opportunities for improvement, Metro worked in partnership with community-based organizations to engage neurodiverse individuals and caregivers

and gather insight on how the Metro system can better support their needs. This partnership ensures the effort was informed by lived experience and grounded in the perspective of those most directly affected.

DISCUSSION

Metro undertook a comprehensive engagement effort to better understand the experiences of neurodiverse riders through mystery rides, a neurodiverse focused survey, listening sessions, and peer agency research. Collectively, these efforts provided both qualitative and quantitative insight into how neurodiverse riders interact with the transit system, where barriers exist, and where targeted improvements can have the greatest impact (attachment A). The Initiative engaged over 1,600 respondents, including both neurodiverse individuals and caregivers, and incorporated more than 200 mystery rides to capture real-world experiences with bus and rail service.

Across all engagement methods, findings were notably consistent. The most significant pain points identified by neurodiverse riders are smells, cleanliness, noise, crowding, personal safety, and unclear or unpredictable travel conditions. These pain points closely mirror those reported by Metro's broader rider population. This alignment underscores that improving core service conditions benefits all riders. However, for neurodiverse riders, these challenges can have a more pronounced impact, as heightened sensitivity to sensory conditions and difficulty adapting to unexpected changes can make navigating the system independently more challenging.

The findings support a three-part response: strengthening the core conditions of the transit experience that affect all riders; advancing targeted strategies that address the specific needs of neurodiverse riders and their caregivers; and promoting broader inclusion through partnerships and workforce opportunities, while recognizing that some recommendations identified in this report face practical limitations within the operational, safety, and resource constraints of a large public transit system.

RESPONSE TO SURVEY FINDINGS

First, Metro will continue to prioritize improvements to the core conditions most frequently identified through the survey, including safety, rider behavior, cleanliness, odors, crowding, and bus stop comfort. Participants identified increased staff and security presence as the most frequently suggested improvement, along with stronger enforcement of rider etiquette rules, improvements to bus stop infrastructure, and increased cleaning frequency. These findings reinforce that improvements to the fundamentals of the transit experience will benefit all riders, while also addressing issues that can have a more acute effect on neurodiverse riders due to sensory sensitivities and difficulty adapting to uncertainty.

Consistent with these findings, feedback on bus stop conditions, such as a lack of shade, seating, lighting, and overall comfort, reflects broader systemwide concerns. It is important to note that the majority of bus stops across Los Angeles County are owned and maintained by local jurisdictions, not Metro. However, Metro continues to play a leadership and convening role in advancing improvements. In Spring 2025, Metro hosted a Bus Stop Summit bringing together local partners to elevate the importance of bus stop infrastructure, and a follow-up summit is planned for 2026 to

continue this work. Metro has also secured federal grant funding to support bus stop improvements across the region, reinforcing its commitment to improving conditions in partnership with local agencies.

In recent years, Metro has made substantial investments in safety, security, and cleaning across the system. These efforts include increased uniformed presence, expanded ambassador and outreach programs, and enhanced cleaning protocols for vehicles, stations, and high-traffic areas. These investments directly address the top concerns identified through this initiative and are foundational to improving both real and perceived conditions within the system. Metro has significantly increased its investment in cleaning over the past several years, nearly doubling total funding from approximately $169 million in FY22 to over $310 million proposed for FY27. The most substantial increases occurred early in this period, with rapid year-over-year growth as Metro expanded cleaning resources and intensified efforts systemwide. Funding levels have continued to rise, reflecting a transition from rapid expansion to sustained, elevated investment. Overall, this sustained growth demonstrates a clear and ongoing commitment to improving system cleanliness, including addressing odors, and maintaining a higher standard of the rider environment over time.

Second, Metro will advance targeted strategies that improve predictability, confidence, and support for neurodiverse riders. The Initiative found that uncertainty, unclear or inaccurate trip information, and difficulty navigating the system can reduce comfort and confidence in independent transit use. Participants also identified clearer online and in-app information, more information at bus stops, more in-vehicle information, improved customer service training, and travel training as important strategies to improve the rider experience. In response, a key recommendation is the establishment of a Practice Transit Experience Program, designed to provide structured, low-pressure opportunities for riders and their caregivers to learn and rehearse using the transit system.

This program would include two complementary components. First, a simulation-based experience modeled after airline programs, in which participants are guided through a full transit journey, from trip planning to boarding and riding, in a controlled environment without the pressure of an active trip. This approach allows participants to build familiarity, reduce anxiety associated with uncertainty, and gain confidence through repetition. Second, is an expansion of Metro's existing travel training efforts through the On the Move Riders Program to provide real-world, guided transit experiences. This component would focus on hands-on learning in live service conditions, equipping participants with the skills needed to navigate the system independently over time. Peer agency research similarly identified customer travel training as an effective strategy for helping neurodiverse riders build confidence, understand trip planning, recognize stops, and navigate the system more independently.

In parallel, Metro will evaluate opportunities to enhance digital tools to better support neurodiverse riders. As part of the rollout of the new Metro Micro App and broader mobile platform improvements, staff will assess how app-based features can improve trip planning, predictability, and rider confidence. This includes analyzing the feasibility of providing real-time or approximate information on crowding levels on buses and trains, as well as other features that may reduce uncertainty and support more informed travel decisions

The Initiative also underscored the critical role of frontline staff in shaping the customer experience. Listening session participants identified staff behavior and the need for improved customer service

training as important issues, and peer agency research highlighted neurodiversity specific staff and operator training as a key component of a more inclusive transit environment. Metro will develop and implement specialized training for all frontline employees. This training will be developed in partnership with a community-based organization with expertise in neurodiversity and will focus on effective communication, de-escalation, and strategies to support riders experiencing sensory or cognitive challenges.

Metro also reviewed emerging best practices that support riders with non-apparent disabilities, including programs designed to provide a simple, voluntary way for individuals to communicate that they may need additional assistance while traveling. One widely adopted model is the Hidden Disabilities Sunflower Program, which allows individuals with non-visible disabilities to discreetly signal that they may need extra time, patience, or support. Participants typically wear a sunflower-branded lanyard, badge, or wristband that is recognized by trained staff across participating organizations, including airports, airlines, and transit providers worldwide. The program is voluntary and designed to empower riders to request support without requiring them to disclose personal medical information.

A complementary approach used by some transit agencies is the “I Need Help” card, which allows riders to present a simple, pre-written card indicating that they may need assistance with navigation, communication, or other aspects of their trip. These cards can be especially helpful for individuals who may have difficulty verbally communicating their needs in stressful or unfamiliar situations.

Together, these programs provide low-cost, easy-to-implement tools that can improve communication between riders and frontline staff, reduce anxiety, and support more positive interactions throughout the transit journey. Metro will explore the feasibility of implementing similar tools and programs tailored to Los Angeles County's needs. This will include evaluating how such programs could be integrated with staff training, customer experience efforts, and broader accessibility initiatives to ensure they are effective, culturally appropriate, and widely understood by both riders and employees.
Through this exploration, Metro aims to identify practical strategies that enhance dignity, independence, and ease of use for riders with non-apparent disabilities, while reinforcing a more inclusive and supportive transit environment for all.

In addition to the rider-focused recommendations, staff will also advance broader inclusion efforts through a pilot Neurodiverse Workforce Inclusion Program designed to create pathways for neurodiverse individuals to access employment opportunities within Metro. This effort will focus on partnerships with community-based organizations to support recruitment, job readiness, and long-term success, while ensuring Metro is prepared to effectively onboard and retain neurodiverse employees. Expanding neurodiversity within the workforce can help Metro strengthen its culture of inclusion, better reflect the communities it serves, and build greater organizational awareness of the diverse needs of its riders.

Additionally, Metro will expand partnerships with neurodiverse-serving organizations by incorporating them into station activation and placemaking efforts. This includes creating opportunities for participation as vendors, performers, and community partners, supporting both economic opportunity and a more welcoming, inclusive transit environment.

Taken as a whole, these efforts reflect a balanced approach: strengthening the core conditions of the transit experience that affect all riders, while advancing targeted strategies that support the specific needs of neurodiverse individuals. Through this work, Metro continues to move toward a more inclusive, accessible, and customer-focused transportation system.While the report identifies a range of thoughtful and aspirational recommendations, it is important to note that some may present practical limitations within the operational, safety, and resource constraints inherent to a large public transit system

EQUITY PLATFORM

Equity is at the core of Metro's mission, and this Initiative represents a critical step in ensuring that the transit system works for everyone, including those whose needs have historically been less visible in transportation planning. Neurodiverse individuals are an essential part of Los Angeles County's communities. Yet too often, their experiences navigating public transit have not been fully understood or intentionally addressed.

This Initiative reflects Metro's commitment to listen, learn, and act. By directly engaging neurodiverse riders and their caregivers through surveys, mystery rides, and listening sessions, Metro is elevating voices that are not always centered in traditional planning processes. The findings make clear that while many challenges are shared across all riders, the consequences can be more significant for neurodiverse individuals, impacting their independence, confidence, and ability to fully participate in daily life.
Designing and operating a transit system that works for neurodiverse riders ultimately creates a better system for everyone. Improvements in safety, cleanliness, clarity of information, and overall customer experience benefit all users, while targeted strategies, such as practice transit programs, specialized training for frontline staff, and inclusive workforce opportunities, help remove barriers that have limited access for this community.

Metro's commitment extends beyond compliance with the Americans with Disabilities Act and Title VI. This work is about advancing dignity, expanding opportunity, and ensuring that public transportation serves as a gateway, not a barrier, to education, employment, healthcare, and community life. By embedding neurodiverse perspectives into system design, operations, and customer experience, Metro is taking meaningful steps toward a more inclusive, responsive, and equitable transportation system for all.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

As part of these ongoing efforts, this item is expected to contribute to further reductions in VMT. This

item supports Metro's systemwide strategy to reduce VMT through customer experience activities that will improve and further encourage transit ridership, ridesharing, and active transportation. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports strategic plan goal #2, Deliver outstanding trip experiences for all users of the transportation system; and goal #3, Enhance communities and lives through mobility and access to opportunity. The service improvements to be made as a result of the feedback from the initiative will directly address and support these goals.

NEXT STEPS

Upon receipt of this report, staff will advance implementation of the strategies identified through the Neurodiverse Rider Experience Survey and Engagement Initiative. Efforts will focus on advancing targeted programs designed to support neurodiverse riders, including practice transit experiences, workforce initiatives, staff training, and expanded partnerships with community-based organizations.

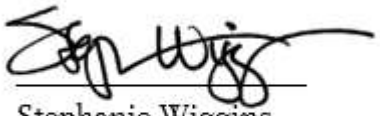
Metro will continue to coordinate with internal departments, local jurisdictions, and external partners to advance these efforts, and will report back on implementation progress, including near-, medium-, and long-term actions.

ATTACHMENTS

Attachment A - Neurodiverse Rider Experience Survey & Engagement Initiative Report
Attachment B - Motion #32.1 Embracing Autism and Neurodiversity in Transportation

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Stephanie Wiggins
Chief Executive Officer

ATTACHMENT A

Attachment A - Neurodiverse Rider Experience Survey & Engagement Initiative Report

Document Available Online at:

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Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

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**OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 17, 2025**

Motion by:

DIRECTORS MITCHELL, YAROSLAVSKY, DUPONT-WALKER, BUTTS, SANDOVAL, AND PADILLA

Embracing Autism and Neurodiversity in Transportation Motion

Related to Item 32: Monthly Update on Public Safety

For all to ride Metro safely and with autonomy, it requires designing the Metro system from neurodiverse perspectives, including people with autism and other developmental disabilities. Neurodiversity recognizes that people experience and interact with the world in different ways that impact differences in social preferences, ways of learning, communicating, or experiencing the environment that should be embraced and encouraged (https://www.nnlm.gov/reading-club/topic/331).

Several agency efforts exist to enhance transportation services and operations for persons with disabilities, such as the Coordinated Plan, Section 5310 Program, Metro's Office of Civil Rights management of ADA compliance, and community relations programming, among others. However, the agency has an opportunity to make a focused effort in building programs, policies, and infrastructure enhancements for people with autism and other development disabilities. As Metro continues to strive to deliver a world-class transportation system, it must reflect the spectrum of neurodiversity and developmental disabilities within our communities so that all can Go Metro.

SUBJECT: EMBRACING AUTISM AND NEURODIVERSITY IN TRANSPORTATION MOTION

RECOMMENDATION

APPROVE Motion by Mitchell, Yaroslavsky, Dupont-Walker, Butts, Sandoval, and Padilla that the Board direct the Chief Executive Officer to:

A. Develop and administer a survey no later than September 2025 that solicits feedback from individuals with autism and other developmental disabilities, including their families and caregivers, on how they ride public transit and ways to improve their transit experience. The survey should also solicit feedback from those who do not use public transit to understand barriers and opportunities. The survey should be developed and administered in consultation with

key stakeholder groups that directly represent or work with individuals with autism and other developmental disabilities, such as the Special Needs Network, The Wiley Center, and Aging and Disability Transportation Network.

B. Based on the survey, identify gaps, opportunities, and recommendations on changes or additions to policy, programming, and operational capital infrastructure that can be implemented in the short-, medium-, and long-term, and respective funding required. Recommendations may include modeling existing programs such as the On the Move Rider Program that increases awareness and confidence in public transportation for individuals with autism and other developmental disabilities. Report back on the survey results and recommendations by November 2025.

Neurodiverse Rider Experience Survey & Engagement Initiative

April 2026

Metro



Background

Neurodiversity Considerations

California contains approximately 200,000 individuals diagnosed with Autism Spectrum Disorder (ASD), approximately one-third of whom live in LA County.

Neurodiverse individuals experience the world differently.

There is a critical need to develop independence and skills to support pathways to career and workforce development.

Metro Board Motion
April 2025

Understand the system from neurodiverse perspectives.

Develop a survey to identify unique needs and perspectives from non-riders.

Pinpoint gaps, opportunities, and recommendations for short-, medium-, and long-term changes to policy, programming, and infrastructure.

External Factors

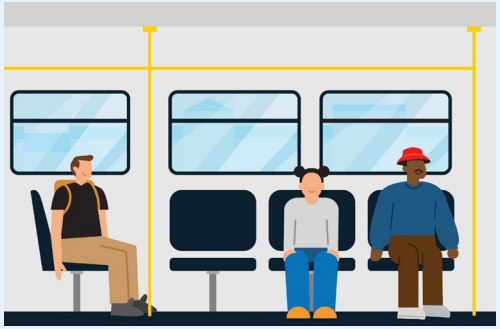
Metro seeks to remove barriers and create lasting legacy infrastructure projects and programs.

Los Angeles to host the Olympic Games in **2028.**

Methods – Mixed Methods Research Design

QUALITATIVE MEASURE 1

Mystery Riders



- **29** mystery riders
- **Over 200 rides** journaled: identified key topics for consideration
- Occurred across the Metro system on both bus and rail

QUALITATIVE MEASURE 2

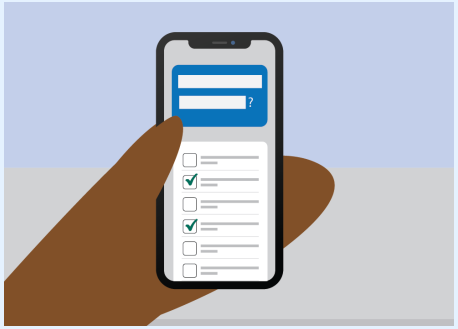
Listening Sessions



- **4 listening sessions** across LA County
- Small group guided discussion
- Feedback provided through pictures and words
- Comfortable community setting where services are delivered

QUANTITATIVE MEASURE 1

Countywide Survey



- Digitally powered social media based campaign
- Survey developed for and informed by ND individuals and caregivers throughout development process
- Open over a 5 week period
- **1,630** validated responses

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Myster Riders: Positives and Challenges

Mystery riders described their transit journeys using words like:



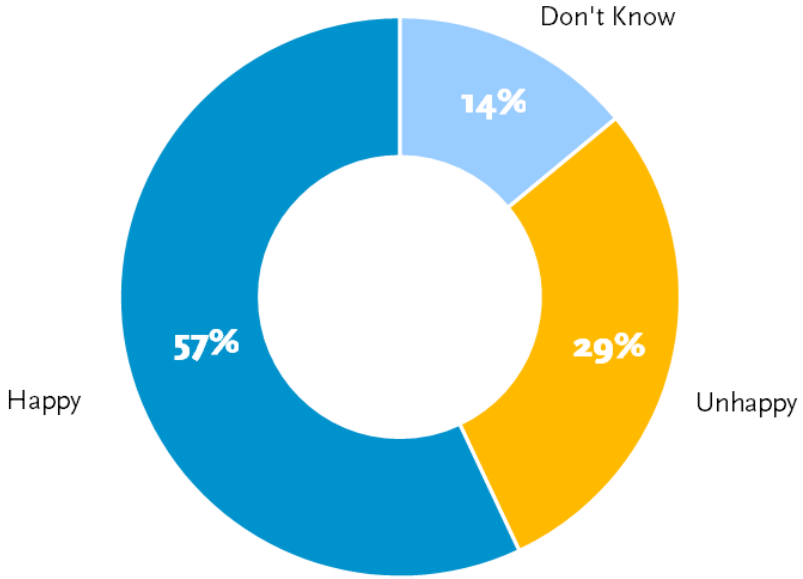
Mystery riders described their transit journeys using words like:



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Survey Findings: Overall Happiness (Satisfaction)

How happy or unhappy are you with your overall Metro experience?

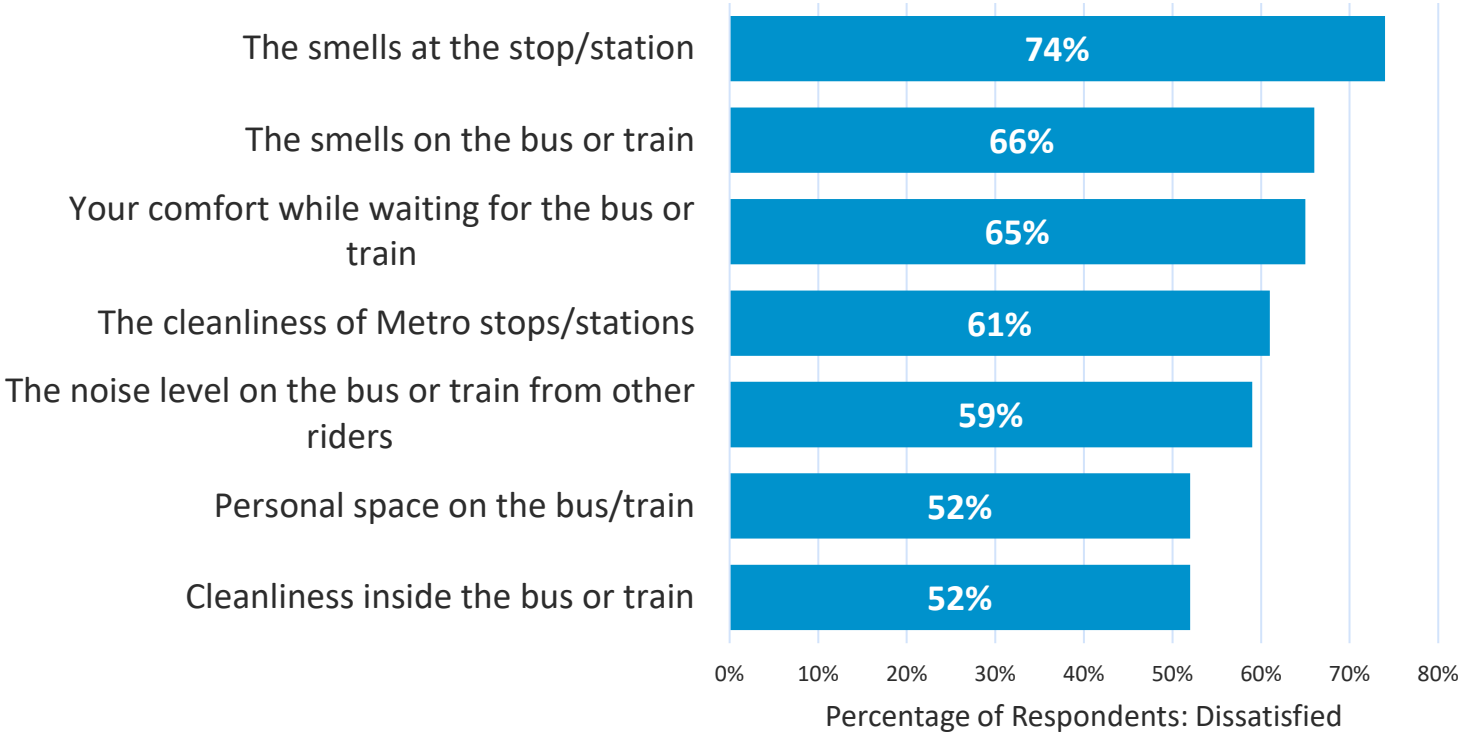


Majority of respondents are overall happy with their Metro experience

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Survey Findings: Pain Points

How happy or unhappy are you with…?

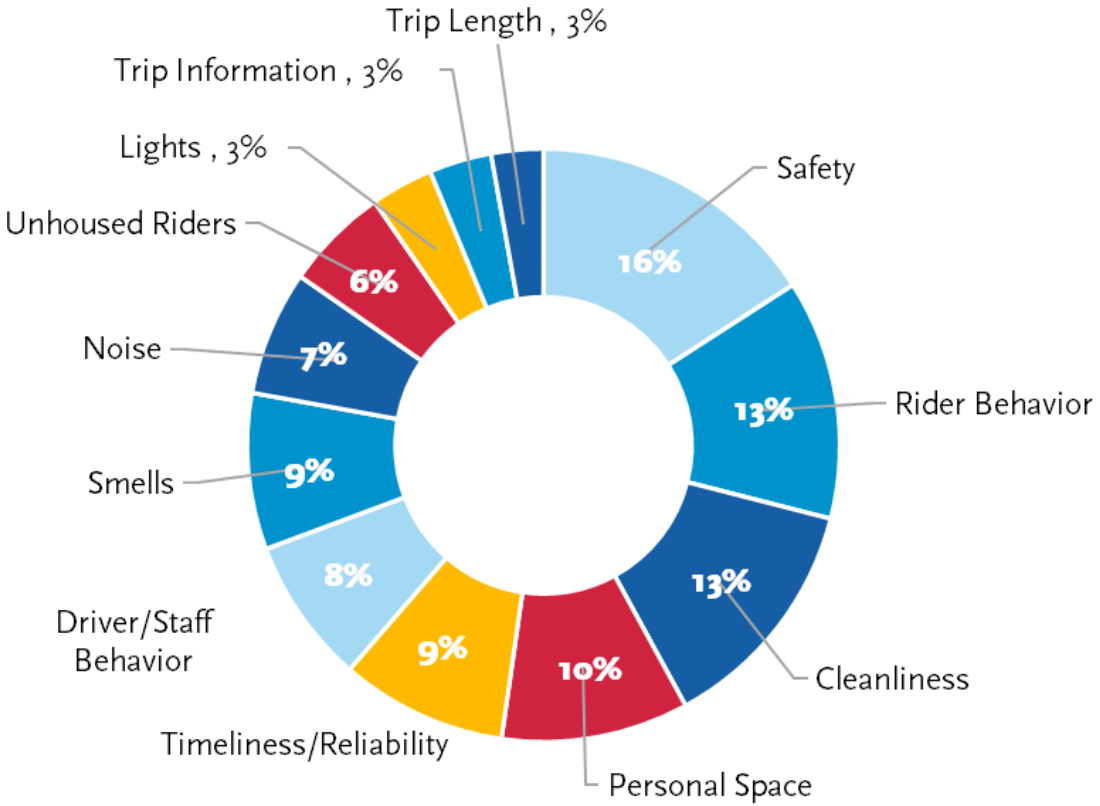


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Listening Sessions: Pain Points

The most frequently mentioned pain points included:

- **Safety**: Concerns about safety while riding transit or waiting at stops and stations
- **Rider Behavior**: Concerns about riders playing loud music, smoking, or disregarding other rules
- **Cleanliness**: Concerns about the level of cleanliness onboard vehicles and at stops and stations



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Recommendations

Continue to Strengthen Core Conditions

Metro will continue to prioritize improvements to the core conditions most frequently identified through the survey, including safety, rider behavior, cleanliness, odors, crowding, and bus stop comfort

- Metro has made substantial investments in safety, security, and cleaning across the system
- Metro investment in cleaning over the past several years has nearly doubled, total funding from approximately $169 million in FY22 to over $310 million proposed for FY27
- Expanded uniformed presence by Transit Security Officers, Ambassadors, and Homeless Outreach with Crisis Interventionists set to launch next fiscal year
- Bus stop summit and federal bus stop improvement grants
- Implementing calm spaces on the transit network (pilot World Cup)



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Recommendations

Expand Travel Training Programs

Introduce a two-pronged approach to build confidence and independence:

- Simulation-based training to reduce uncertainty
- Real-world guided transit experiences through existing programs

Implement Neurodiversity Training for Staff

- Provide targeted training for frontline staff to better recognize and support neurodiverse riders.
- Improve customer interactions and support
- Create a more welcoming and inclusive environment



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Recommendations

Establish a Workforce Development Pipeline

- Create pathways for neurodiverse individuals to join Metro's workforce
- Build life skills and increase representation

Station Activation Plans

- Expand partnerships with neurodiverse-serving organizations for station activation and placemaking efforts.
- Create opportunities for participation as vendors, performers, and community partners, supporting both economic opportunity and a more welcoming, inclusive transit environment.

Initiatives For Further Review

- Hidden Disabilities Sunflower Program or the "I Need Help" card
- Evaluate opportunities to enhance digital tools to better support neurodiverse riders



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Thank You!

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OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
APRIL 16, 2026

SUBJECT: NEXTGEN RIDERSHIP UPDATE - Q4 CY2025

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE status update on NextGen Bus Ridership.

ISSUE

This report provides an assessment of Metro's bus ridership for the fourth quarter (October, November, and December) of calendar year 2025, compared to Q4 CY2024 when ridership last peaked. Ridership changes are examined by day type (weekday, Saturday, Sunday), service area, across Equity Focus Communities (EFCs) and non-EFCs, time period, line/line group, as well as average passenger trip length.

BACKGROUND

- The Metro Board adopted the NextGen Bus Plan in October 2020.
- The NextGen Bus Plan was designed to create a fast, frequent, and reliable Metro bus system and was to be rolled out in two phases: "Reconnect" and "Transit First."
- "Reconnect" is the initial phase to restructure the existing network and was implemented over three dates: December 2020, June 2021, and December 2021.
- "Transit First" is an additional phase to maximize the plan's effectiveness through strategic, quick-build capital investments in improved bus speeds and direct revenue service hours (RSHs) saved on bus frequency improvements.
- After achieving full operator staffing in mid-2023, the increased operators required for additional service and challenges in recruiting new operators resulted in a 1-2% operator shortage existed from December 2023 to December 2024. Recruitment efforts were increased in response and cancelled service levels were kept at relatively low levels.
- Full operator staffing was again achieved by January 2025, with cancellation rates during the first three quarters of 2025 reduced to very low levels, generally under 1% on weekdays and Saturdays and below 2% on Sundays.
- After ridership peaked in late 2024/early 2025, since June 2025, ridership has shown a reduction compared to the previous year; this appears to be linked to federal immigration enforcement actions that began in that month

The NextGen Bus Plan Reconnect phase implementation established a set of service frequency tiers for Metro's 117 bus lines, summarized in Table 1. Tier 1 and 2 lines are all-day, high-frequency services designed to support ridership growth across the NextGen network and support ridership recovery after a decrease caused by the pandemic. Tier 3 and 4 lines ensure neighborhood connectivity and coverage throughout the service area.

Table 1: NextGen Frequency Tiers as of December 2024

Service Type	Peak Weekday	Midday Weekday	Evening	Daytime Weekend	Number of Lines
Core Network (Tier1)	5-10	5-10	10-15	7.5-15	29
Convenient Network (Tier 2)	10-12	10-12	20-30	15-30	26
Connectivity Network (Tier 3)	20-30	20-30	30-60	30-60	26
Community Network (Tier 4)	40-60	40-60	60	60	36

When fully implemented, the NextGen Bus Plan Transit First scenario was expected to achieve a 15-20% increase in ridership resulting from increased speed of service/reduced travel times after implementing items from the speed and reliability tool kit, including new bus lanes and expanded transit signal priority, with reinvestment of time savings for increased service frequencies. Progress on implementation of the NextGen Speed and Reliability program is included in this report.

DISCUSSION

Travel Market

Before reviewing bus system ridership, it is important to consider changes in the over travel market in the Metro service area. Overall travel demand is calculated from Location Based Services (LBS) cell phone data. In 2023, total overall travel demand remained about 8% below 2019 pre-NextGen levels, 7% below in 2024, and 2025 data shows it as around 5% below. See Charts 4 and 5 in Attachment E for this data by year in total and by time of day.

Travel volumes by time of day are mixed:

- AM peak travel volumes finally somewhat recovered in 2025 after remaining well below 2019 levels in 2023 and 2024, though the 6 AM and 7 AM hours have not fully recovered to 2019.
- Midday travel volumes exceeded 2019 levels in 2023, matched them in 2024, but in 2025, the midday travel showed a slight decline to below 2019 levels.
- After a surge in afternoon peak travel in 2022 exceeding 2019 levels in the 3 PM hour, demand appears to have leveled off to pre-2019 levels in 2023 and 2024, and slightly below 2019 levels for 2025. The same pattern is seen for evening hours.
- Late evening and overnight hours into the early AM appear to match 2019 levels.

Some of the slight decline in travel demand may relate to immigration enforcement actions as those impact not just transit ridership but overall travel demand. This slight decline in overall travel may also relate to expanded availability of online services and commerce (midday). Telecommuting (AM

and PM peaks) may be continuing at higher levels than in the past, but with some decline as more workers return to more days per week in the office. While federal workers returned to the office full time in 2025, their numbers were significantly reduced. The state has delayed its return to office requirements. These trends will continue to be monitored.

Weekday Ridership:

Q4 CY2025 average weekday ridership declined 5.8% compared to the high point of ridership in Q4 CY2024 and compared to Q3 CY2025 overall decline of 6.4%, so there was a slightly lower rate of decline in Q4. The peak months for Q4 CY 2025 were September 2025 (764,647 down 4.9%) and October 2025 (760,709, down 5.5%) versus 804,279 and 804,963 respectively in 2024. Overall weekday ridership trends are depicted by month in Chart 1 in Attachment E, which clearly shows average weekday ridership back at 2023 levels since June.

Saturday Ridership:

Average Saturday bus ridership has showed year over year declines beginning in June after several years of consistent growth. Though average Q4 Saturday bus ridership showed a 5.8% decline over the same quarter in 2024, it was reduced compared to Q3 CY2025 (6.8%). Monthly Saturday ridership trends are depicted in Chart 2 in Attachment E. Average Saturday ridership has declined to around 2023 levels.

Sunday Ridership:

Average Sunday bus ridership also showed declines beginning in June 2025, though smaller than weekday and Saturday, Q4 CY2025 average Sunday ridership showed a 3.8% decline over the same quarter in 2024, and a lesser decline than the 4.4% decline for Sunday Q3 CY2025. Sunday ridership trends by month are depicted in Chart 3 in Attachment E.

These results show slight overall reductions of the ridership decline seen in Q3 CY2025 but still significant compared to previous consistent ridership growth. The next sections discuss some factors besides immigration enforcement that may be impacting ridership. While overall travel demand has continued to increase in the years 2023 2025, bus system ridership only kept pace with travel demand growth in 2023 through May 2025, again pointing to impacts immigration enforcement may be having on bus ridership since beginning in June 2025. Results for Q4 CY2025 average daily ridership are summarized in Table 2 below.

Table 2: Average Ridership by Day Type Q4 CY2025 compared to Q4 CY2024 and Q3 CY2025

Day Type	Weekday	Saturday	Sunday
Q4 2024 Average Ridership	765,090	529,943	431,630
Q4 2025 Average Ridership	720,700	499,312	415,310
% Change Q4 2025 compared to Q4 2024	-5.8%	-5.8%	-3.8%
% Change Q3 2025 compared to Q3 2024	-6.4%	-6.8%	-4.4%

Service Reliability

Service reliability improved in 2025 versus 2024 with overall bus system on-time performance at 76.9%, up from 74.4% in the same quarter of 2024. This improvement should be supporting ridership retention and growth and should not be considered an overall cause for ridership decline in this quarter.

Ridership Impacts from Fare Programs

The introduction and expansion of new fare programs (e.g., GoPass for students and LIFE Program for low-income riders) has likely contributed to ridership growth and recovery in 2024 and 2025.

Table 3: Comparison of Average Daily GoPass Boardings by Day Type and Year

Date Range of Comparison by Day Type	Weekdays	Saturday	Sunday	Total
Calendar Year 2024	18,447,365	1,676,507	1,284,086	21,407,958
Calendar Year 2025	18,638,158	1,695,739	1,346,297	21,680,194
GoPass Year Over Year # Change	+190,793	+19,232	+62,211	+272,236
GoPass Year Over Year % Change	**1.03%**	**1.15%**	**4.84%**	**1.27%**

Table 4: Comparison of Average Daily LIFE Boardings by Day Type and Year

Date Range of Comparison by Day Type	Weekdays	Saturday	Sunday	Total
Calendar Year 2024	17,097,503	2,272,802	1,853,718	21,224,023
Calendar Year 2025	18,149,473	2,398,694	2,030,221	22,578,388
LIFE Program Year Over Year # Change	+1,051,970	+125,892	+176,503	+1,354,365
LIFE Program Year Over Year % Change	**6.15%**	**5.54%**	**9.52%**	**6.38%**

The overall growth in the LIFE Program and GoPass boardings continued throughout CY2025, even with the decline in ridership overall in the second half of CY2025. While some of the growth of these programs is due to new rider participation, much of it is from existing riders enrolling in these programs. Enrollment and use of these programs have slowed in growth, likely due to the impacts of immigration enforcement, though they may be helping offset lost ridership.

Ridership by Service Area:

Overall, Q4 weekday bus system ridership declined 5.8% compared to 6.4% in Q3. When looking area by area, there are some notable changes with larger rates of decline in two service areas but reduced rates of decline in three areas compared to Q3.

Average Q4 CY2025 weekday ridership in the San Fernando Valley area compared to Q4 CY2024 decreased by 5.8%, indicating that ridership has been impacted even this service area, noting in Q2 CY2025 it had still shown a year over year increase and was the only service area that showed growth in Q2 CY2025, though mildly impacted in Q3 CY2025 (down 0.8%). Immigration enforcement activities may have impacted this area more in Q4, and it had declines similar to the other four service areas.

Weekday ridership declined between 3.6%-9.0% in the other four service areas over Q4 CY 2024. The Gateway Cities service area did not show the largest decline (down 7.3%) as it did in Q3, with a reduced level of decline compared to Q3. In contrast, South Bay showed the largest Q4 weekday ridership decline of 9.0%. This changed pattern of ridership decline may suggest that the immigration actions have been significant during Q4 in the San Fernando Valley and South Bay.

Saturday system ridership decreased overall, down by 5.8% in Q4 CY2025 over Q4 CY2024, compared to 6.8% in CY2025 Q3. Saturday ridership decreased 6.3% for the San Fernando Valley over the same quarter in CY2024, versus a 0.6% decline in Q3 CY2025. The other four service areas decreased by 1.8%-8.8% in Q4 CY2025, with San Gabriel Valley, Gateway Cities, and Westside Central areas all showing lower ridership declines compared to Q3, while the South Bay area showed an increased rate of decline and the largest decline at 8.8% compared to Q3 CY2025. These patterns are similar to the weekday Q4 results.

Table 5: Percentage Change in Average Daily Ridership by Service Area and Day Type CY2025 compared to CY2024

Average Daily Ridership Change by Service Area CY2025 compared to CY2024 (Year over Year)	Weekday	Saturday	Sunday
Gateway Cities Q4 YOY	-7.3%	-8.1%	-5.8%
Gateway Cities Q3 YOY	-9.1%	-10.3%	-10.0%
San Fernando Valley Q4 YOY	-5.8%	-6.3%	-4.4%
San Fernando Valley Q3 YOY	-0.8%	-0.6%	0.5%
San Gabriel Valley Q4 YOY	-3.6%	-1.8%	-1.9%
San Gabriel Valley Q3 YOY	-4.7%	-5.0%	-5.6%
South Bay Cities Q4 YOY	-9.0%	-8.8%	-8.7%
South Bay Cities Q3 YOY	-5.8%	-7.9%	-7.3%
Westside Central Q4 YOY	-6.3%	-6.8%	-5.5%
Westside Central Q3 YOY	-6.9%	-7.7%	-4.5%

Sunday ridership in Q4 CY2025 declined overall, down 3.8% compared to Q4 CY2024 (less than the 4.4% decline in Q3). In two service areas, the rate of decline was less than that of Q3 (Gateway Cities, San Gabriel Valley), while the other three areas showed an increased decline. The rates of decline varied from between 1.9%-8.7%. Again, the Gateway Cities service area saw a lesser decline and the South Bay had the largest decline. Also notable was the San Fernando Valley (4.4% decline), where a small increase had occurred in Q3 year over year.

The ridership by service area declines were generally consistent for all day types, and it appears that South Bay and San Fernando Valley saw notably increased declines, while Gateway Cities and San Gabriel Valley service areas saw less decline. Again, this may be due to immigration enforcement actions, which may have been more active in the San Fernando Valley and the South Bay this quarter. Table 5 shows full details of the percentage change in average daily ridership by service area between Q4 and Q3 CY2025 and CY2024.

Map 1 in Attachment E shows a comparison of average weekday ridership for Q4 2025 as a

percentage of Q4 2024 ridership, illustrating by LA City neighborhood and other LA County cities the level of ridership decline. Noticeably, larger declines in ridership are still seen in Q4 CY2025 in the areas impacted by the January 2025 fires, though these areas are only a tiny portion of overall bus system ridership. Next largest declines were in parts of southeast and south LA and South Bay region as well San Fernando Valley (especially eastern areas around Sylmar/San Fernando/Sun Valley) where immigration raids may have been more common in Q4 CY2025.

Ridership in EFCs

For Q4 CY2025, EFC boardings as a proportion of total boardings were 0.6% higher than the same quarter of 2019 for weekdays (up just 0.1% in Q3 CY2025), down 0.5% for Saturday (down 0.9% in Q3 CY2025), and down 0.5% for Sunday (down 1.0% in Q3 CY2025) compared to pre-COVID levels. Compared to Q4 CY2024, this was a small drop for weekdays (0.1%), and a little more impacted Saturday (0.4%), and Sunday (0.5%) in Q4 CY2025.

Ridership by Time Period

When comparing Q4 CY2025 with Q4 CY2024, weekday early AM and AM peak period ridership showed the largest year-over-year declines of 11.7% and 9.6%, respectively, with the PM peak next most impacted at 7.1% year over year decline. While still a relatively large decline, midday weekday was the least impacted for the daytime periods on weekdays at down 6.4%. This data suggests travel for work may be the most impacted on weekdays. Weekday evenings showed the lowest decline in all time periods at 2.8%, with late evening and Owl period ridership on weekdays growing by 0.4% and 2.0%, respectively.

Saturday and Sunday ridership showed the largest declines year over year for Q4 CY2025, with AM Peak showing the largest declines (12.3% and -9.1% respectively on Saturday and Sunday). Midday and PM peak were the next most impacted on Saturday and Sunday, 9.5% and 7.6% Saturday, with 7.9% and 7.5% on Sunday, respectively. Least impacted for the daytime were early AM and evening periods (6.3% and 2.0% Saturday, with 3.3% and 1.7% Sunday). As with weekdays, both Saturday and Sunday late evening and Owl periods increased ridership (1.2% and 0.4% Saturday, with 1.0% and 1.4% Sunday, respectively). Sunday was the least impacted compared to Saturday, but both Saturday and in some cases, Sunday were more impacted for AM peak, midday, and PM peak than weekdays. It appears the work travel impacts occur later in the day on weekends than on weekdays.

Table 6: Average Ridership by Day Type and Time Period Q4 CY2025 versus CY2024

Time Period	Weekday CY2024 Q4	Weekday CY2025 Q4	Weekday % Change	Saturday CY2024 Q4	Saturday CY2025 Q4	Saturday % Change	Sunday CY2024 Q4	Sunday CY2025 Q4	Sunday % Change
Early AM (4a-6a)	24,880	22,271	-11.7%	11,480	10,801	-6.3%	8,702	8,420	-3.3%
AM Peak (6a-9a)	151,334	138,118	-9.6%	71,822	63,960	-12.3%	54,517	49,985	-9.1%
Midday (9a-3p)	295,932	278,228	-6.4%	227,576	207,769	-9.5%	195,525	181,250	-7.9%
PM Peak (3p-6p)	243,254	227,071	-7.1%	144,816	134,549	-7.6%	123,700	115,101	-7.5%
Evening (6p-9p)	48,963	47,616	-2.8%	43,971	43,123	-2.0%	37,967	37,334	-1.7%
Late Evening (9p-12a)	14,500	14,560	0.4%	15,208	15,386	1.2%	12,850	12,977	1.0%
Owl (12a-4a)	8,585	8,763	2.0%	9,692	9,731	0.4%	7,900	8,010	1.4%

Average Trip Length

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Weekday and Saturday were at 3.3 miles and Sunday was at 3.4 miles average passenger trip length when most recently measured in Q3 CY2025. Trip lengths have remained very stable since 2022 (compared to 4.2-4.3 miles pre-NextGen). This may in part be attributable to the NextGen Bus Plan's focus on increasing market share for transit among shorter distance trips through more frequent local bus service. Even with the recent declines in ridership likely due to immigration enforcement activity, average trip length was relatively stable.

Ridership by Line

Average daily line ridership for Q4 CY2025 versus Q4 CY2024 is compared for each day type (weekday, Saturday, Sunday) and provides an overview of lines showing various levels of line ridership increase or decline year over year.

Overall ridership declines of 5.8% weekday, 5.8% Saturday, and 3.8% Sunday were recorded for Q4 CY2025 compared to Q4 CY2024. Table 7 shows the distribution of line ridership results. For weekdays, 74% of the 108 weekday bus lines had ridership in Q4 CY2025 at between 90-99% of Q4 CY2024 ridership levels, with 56% of Saturday lines and 55% of Sunday lines at this level, which was the largest share of lines.

Even with the overall system-level trend of reduced ridership in Q4 CY2025, there were 17 weekday lines (16% of total), 29 Saturday lines (28% of total), and 36 Sunday lines (35% of total) that saw ridership growth over Q4 CY2024. Interestingly, many were lower frequency, lower ridership Tier 3 and Tier 4 lines rather than the higher frequency and ridership Tier 1 and Tier 2 lines.

Table 7: Average Daily Ridership by Line Q4 CY2025 versus CY2024

CY2025 vs CY2024 Q4	Weekday	Saturday	Sunday
120%+	1	2	3
110-119%	2	4	4
100-109%	14	23	29
90-99%	80	58	57
80-89%	7	12	7
70-79%	1	2	2
60-69%	2	1	0
50-59%	0	1	1
40-49%	1	0	0
Total	108	103	103

A few lines with increased ridership were associated with service changes, such as Line 665 on weekdays where a weekday frequency improvement took place (35 minutes increased from every 50 minutes), Line 296 with a restructure focused on Lincoln Cypress A Line Station, and Lines 180/217 with the extension of Line 217 to Eagle Rock. Other lines with increased ridership did not have any recent frequency or routing improvements. These lines were distributed across the service area, thought the San Fernando Valley again shows the most significant ridership growth among these lines.

- San Fernando Valley 9 weekday, 15 Saturday, 14 Sunday lines

- San Gabriel Valley 1 weekday, 2 Saturday, 7 Sunday lines
- Gateway Cities 2 weekday, 4 Saturday, 5 Sunday lines
- South Bay Cities 2 weekday, 2 Saturday, 1 Sunday lines
- Westside Central 2 weekday, 4 Saturday, 9 Sunday lines

Common to all day types were four bus lines with significant ridership decline; these are linked to impacts from the Altadena or Palisades fires of January 2025. Line 602 serving Pacific Palisades was the most impacted line, with ridership in Q4 CY2025 at 46.6% weekday, 52.8% Saturday, and 56.0% Sunday of Q4 CY2024 levels. With the exception of five miles of closed bus stops on PCH south of Malibu, the other three lines have gone back to normal, but the population has not all returned yet, so results for these lines will remain lower than 2024.

Besides the fire-impacted lines, the largest ridership drop for a line was at 84.6% weekday, 86.5% Saturday, and 85.3% Sunday. Lines with significant drops included the Van Nuys corridor Lines 233 (Local) and 761 (Rapid) which are being impacted by East San Fernando Valley Rail construction, and G Line BRT construction of grade separation at Van Nuys is impacting the service due to detours.

Bus Line Productivity

It is also important to determine if the scheduled service hours are being productively utilized. The measure of passenger boardings per revenue service hour is an industry standard measure of productivity. The NextGen Bus Plan implemented in 2020-2021 held annual bus service hours at a constant 7 million, and that remains the same in CY2025, so productivity varies mostly in line with ridership changes.

Table 8 compares the ten highest and ten lowest productivity bus lines based on weekday Q4 CY2024, while also providing the same data for Q4 CY 2025 for weekdays as well as the same data for those lines for weekends.

Table 8: 10 Highest and Lowest Productivity Bus Lines

Line	Name	Weekday Q4 2024 Productivity	Weekday Q4 2025 Productivity	Saturday Q4 2024 Productivity	Saturday Q4 2025 Productivity	Sunday Q4 2024 Productivity	Sunday Q4 2025 Productivity	Level
204	Vermont Av Local	66.7	64.5	67.9	65.8	57.1	55.4	Highest
754	Vermont Av Rapid	61.1	56.5	66.1	58.8	55	50.4	Highest
207	Western Av	58.5	56	65	63.4	53.4	51.6	Highest
18	Whittier Bl/W 6th St	52.6	49.1	46.6	43.1	38.4	37	Highest
233	Van Nuys Bl Local	49.4	43.6	45.9	40.2	38.8	34.8	Highest
16	W 3rd St	47.6	46	52.8	51.2	42.1	42.6	Highest
66	E. Olympic Bl/W 8th St	47.4	44.7	51.1	46.6	39.3	38.1	Highest
901	G Line BRT	47.1	37.9	40	32.1	32.8	27.1	Highest
45	Broadway	45	40.5	40.1	35.9	32.3	30.2	Highest
206	Normandie Av	45	43.4	44.1	41.9	38.5	38.5	Highest
211/215	Prairie Av/Inglewood Av	15.6	14.6	N/A	N/A	N/A	N/A	Lowest
179	Huntington Dr	14.1	14	17.3	16.4			Lowest
222	Burbank - Hollywood	14.1	14.1	13	13.7			Lowest
577	El Monte - Long Beach Exp	14.1	14.1	N/A	N/A	N/A	N/A	Lowest
268	Baldwin Av/Sierra Madre Bl	14	13	16.7	15.2			Lowest
617	Beverly Dr/Robertson Bl	13.1	13.5	9.3	10.5			Lowest
209	Arlington/Van Ness	13	11.7	N/A	N/A	N/A	N/A	Lowest
296	Riverside Dr	12	14.1	13.7	16.9			Lowest
601	Warner Center Shuttle	10.2	10.2	7.2	8.9			Lowest
202	Willowbrook Av	9.4	9.5	N/A	N/A	N/A	N/A	Lowest

Not surprisingly, bus lines serving some of the LA region's busiest corridors, such as Vermont Av and Western Av continue to have the highest productivity, while those with the lowest productivity are often at the outer edge of the system and on less busy corridors, and in one case, an express service with limited stops.

Below is data comparing bus system productivity (passenger boardings per revenue service hour) Q4 CY2025 and Q4 CY2024:

- Weekday: 33.8 passenger boardings per revenue service hour (2025) versus 36.2 (2024)
- Saturday: 33.6 passenger boardings per revenue service hour (2025) versus 35.5 (2024)
- Sunday: 28.6 passenger boardings per revenue service hour (2025) versus 29.3 (2024)

The weekday productivity change between Q4 CY2025 and Q4 CY2024 is explained by a 1.0% increase in service hours versus a much larger 5.6% decline in ridership. On Saturday, service was almost unchanged (down 0.1%) while ridership was again down by a much larger 5.6%. Lastly, Sunday service hours were down 1.3% while ridership was down a larger 3.6%. This means ridership has declined more than any percentage change in service hours, resulting in reduced productivity for the system overall and for many individual lines, especially the more frequent Tier 1 and Tier 2. However, improved productivity was seen in Q4 CY2025 compared to Q4 CY2024 for 14 of 108 weekday lines, 27 of 103 Saturday lines, and 38 of 103 Sunday lines. Improved performance is more common on weekends. In some cases, recent service improvements had been made; in others, ridership grew even without service improvements. Line-level ridership details are in the Attachments A, B, and C data tables. Ridership and productivity results will continue to be tracked and reported as further investments in NextGen bus speed and reliability improvements occur, and the results above re-enforce the value of improving service

Speed and Reliability

Beyond the initial Reconnect phase of the NextGen Bus Plan with route restructuring and establishment of frequency tiers, the NextGen Transit First scenario is designed to increase ridership based on the increased speed of service/reduced travel times by implementing items from the speed and reliability toolkit. These items include new bus lanes, expanded transit signal priority, stop optimization, and reinvestment of time savings to increase service frequencies.

Progress on such speed and reliability implementations include 71.9 lane-miles of new bus priority lanes implemented at the end of CY2025 across Metro's service area. The Florence Av bus lane project is the latest to be installed, with portions being completed in Fall 2025. The remainder of this project will be completed by Spring 2026. Updates on upcoming and recent projects are listed below:

- **Sunset Bl Bus Priority Lanes (Metro Line 2):** Metro began outreach on the Sunset Bl Bus Priority Lane project in Summer 2025. This 8.4 lane-mile project on Sunset Bl between Vermont Av and Havenhurst Dr will improve bus speed and reliability for the over 19,000 daily weekday Metro Line 2 riders. The project proposes to convert existing peak-hour parking lanes on Sunset Bl to peak-hour bus priority lanes. This project will complement the Alvarado St bus priority lanes that were installed in 2021 and 2023, which also serve Metro Line 2.

- **Florence Av Bus Priority Lanes (Metro Line 111):** By May 2026, construction of this peak-hour bus lane project in the City of LA and Unincorporated LA County will be complete. This project will provide 9.6 lane-miles of peak-period bus priority lanes in both directions on Florence Av between West Bl and the Florence A Line Station. These bus lanes will bring improved speed and reliability to Metro Line 111 riders.

- **Vermont Av Bus Priority Lanes (Metro Lines 204 & 754):** Metro will deliver quick-build bus priority lanes to key corridor segments ahead of the larger BRT project as part of the Vermont Transit Corridor project. This will improve the speed and reliability for over 36,000 daily weekday riders ahead of the larger project. The Bus Speed Working Group identified a 5-lane-mile northern segment of Vermont Av between Sunset Bl and Wilshire Bl, as well as a 7.5-lane -mile southern segment of Vermont Av between Gage Av and Vermont/Athens C Line Station, for quick-build bus lane projects that could be delivered ahead of the BRT improvements on Vermont Av. The proposed bus lanes would be in service full-time along the southern segment and weekday peak periods along the northern segment.

Metro Community Relations staff and Community-Based Organization partners have completed briefings and presentations to interested stakeholders, community groups, and neighborhood councils, as well as outreach to businesses along Vermont Av for the overall BRT project and the quick-build bus lanes.

Construction was expected to begin on the northern segment in Summer 2025 but has been delayed to later in 2026 to further coordinate this complex project and ensure that feedback received during the outreach process is incorporated into the design.

Bus Lane Enforcement (BLE)

Metro continues partnering with LADOT to have dedicated parking enforcement details patrol and enforce bus lanes in the City of LA. Enforcing the no-parking regulations in the bus lanes helps riders arrive at their destinations faster and more reliably.

There are now 100 vehicles equipped with photo/video capabilities capturing vehicles stopped or parked on bus lanes during posted operating hours, as well as at bus stops along the affected routes. A bus lane enforcement expansion program is proposed for funding in the FY27 capital budget program cycle. The intent of the expansion would be to establish bus lane enforcement on all existing and planned bus lanes.

Metro is also partnering with the City of West Hollywood to extend the BLE violation and citation process on the existing BLE routes within its city limits at the City's request. Full operation (post 60-day outreach/warning period) began in July 2025.

EQUITY PLATFORM

The NextGen Bus Plan was developed with an equity methodology, placing more service in Equity Focus Communities, which have historically been more transit dependent. A central goal of the NextGen Bus Plan is to provide improved transit service frequencies, travel times, and reliability improvements for Metro system riders. Eight in 10 Metro riders are Black, Indigenous, and/or other People of Color (BIPOC); nearly 9 in 10 live in households with total annual earnings below $50,000, and almost 6 in 10 are below the poverty line.

Improvements such as greater off-peak frequencies have helped essential workers and other riders make essential trips, with an increased share of off-peak ridership noted during the height of the pandemic.

This analysis shows that a subsequently greater proportion of increased ridership has occurred among EFC residents since the NextGen changes were implemented, with increased frequency of service and speed and reliability enhancements that continue to be implemented. Although, as of 2025, this is only true for weekdays. By providing a fast, frequent, reliable network designed through the NextGen process, there is a significant focus on serving EFCs to provide these communities with reduced wait times, shorter travel times, and improved access to key destinations. However, the impact of immigration enforcement in keeping people away from the Metro bus system is negating the potential of the NextGen Bus Plan for increasing ridership. These impacts will be monitored closely.

Staff will continue to monitor ridership in EFC and non-EFC areas to ensure NextGen benefits for marginalized groups are achieved, ensuring that enough service capacity is provided based on ridership, and that all planned NextGen speed and reliability initiatives are implemented with the intended benefits achieved. Staff will also continue to gather rider feedback through the various sources used to gather public input regarding bus services and related adjustments, such as comments received via Metro's social media channels, Customer Care, and Service Council meetings. These channels provide valuable insight into riders' key customer experience concerns.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT to ensure continued progress.

This item supports Metro's systemwide strategy to reduce VMT through planning and operational activities that will improve and further encourage transit ridership, ridesharing, and active transportation. Metro's Board-adopted VMT reduction targets were designed to build on the success of existing investments, and this item aligns with those objectives.

While this item does not directly encourage taking transit, sharing a ride, or using active transportation, it is a vital part of Metro operations, as it assesses Metro bus ridership trends. Because the Metro Board has adopted an agency-wide VMT Reduction Target, and this item supports the overall function of the agency, this item is consistent with the goals of reducing VMT.

*Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports strategic plan goals:

Goal #1: Provide high-quality mobility options that enable people to spend less time traveling. Improving the speed and reliability of the bus network will reduce transit travel times and improve competitiveness with other transportation options.

Goal #2: Deliver outstanding trip experiences for all transportation system users. These initiatives help to move more people within the same street capacity, where currently transit users suffer service delays and reliability issues because of single-occupant drivers.

Goal #3: Enhance communities and lives through mobility and access to opportunity. With faster transit service and improved reliability, residents have increased access to education and employment, with greater confidence that they will reach their destination on time.

NEXT STEPS

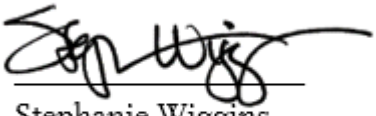
The NextGen Bus Plan network ridership will continue to be monitored into 2026 as Metro continues to deliver full service based on the NextGen Bus Plan. The agency will continue to hire new bus operators to remain fully staffed and to reliably deliver full service daily. Metro will also continue implementing bus speed and reliability improvements in 2026, such as new bus lanes and transit signal priority. Meanwhile, only an end to the immigration enforcement activities may give many riders the confidence to return to riding the Metro system. Another update is planned for the Board in July 2026, covering Q1 CY2026 (January through March 2026) versus Q1 CY2025.

ATTACHMENTS

Attachment A - Weekday Ridership Recovery Comparison by Line and Line Group
Attachment B - Saturday Ridership Recovery Comparison by Line and Line Group
Attachment C - Sunday Ridership Recovery Comparison by Line and Line Group
Attachment D - NextGen Service Tier Changes
Attachment E - NextGen Ridership Review Supporting Data Charts

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Stephanie Wiggins
Chief Executive Officer

ATTACHMENT A

Weekday Ridership and Productivity Comparison by Line – Q4 2025 versus Q4 2024

Line	Line Description	Avg Weekday Boardings 2024 Q4	Avg Weekday Boardings 2025 Q4	Weekday Ridership 2025 versus 2024	Weekday RSH 2024	Weekday RSH 2025	% RSH 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
665	CSULA - City Terrace Shuttle	622	806	129.6%	33.0	45.5	137.9%	18.9	17.7	94.0%
154	Burbank Bl Oxnard St	574	668	116.5%	35.7	35.4	99.2%	16.1	18.9	117.5%
96/296	Riverside Dr	572	665	116.2%	47.6	47.2	99.2%	12.0	14.1	117.2%
501	North Hollywood - Pasadena Express	1,322	1,419	107.3%	81.8	82.7	101.1%	16.2	17.2	106.2%
155	Riverside Dr	1,171	1,247	106.5%	62.0	61.8	99.7%	18.9	20.2	106.8%
158	Plummer St, Woodman Av	1,818	1,934	106.3%	73.3	73.8	100.7%	24.8	26.2	105.6%
267	El Monte - Pasadena via Temple City Bl and Del Mar Bl	1,874	1,944	103.8%	88.3	88.5	100.2%	21.2	22.0	103.5%
150	Ventura Bl Local	3,168	3,264	103.0%	114.7	116.2	101.3%	27.6	28.1	101.7%
617	Robertson Bl - Beverwil Dr	644	662	102.8%	49.1	49.1	100.0%	13.1	13.5	102.8%
202	Willowbrook Av	252	256	101.7%	26.9	26.9	100.0%	9.4	9.5	101.7%
601	Warner Center Shuttle	347	353	101.6%	33.9	34.5	101.8%	10.2	10.2	99.9%
222	Hollywood Way	1,116	1,126	100.9%	79.3	79.7	100.5%	14.1	14.1	100.4%
235/236	Balboa Bl	1,970	1,985	100.8%	81.2	81.2	100.0%	24.3	24.4	100.8%
164	Victory Bl	6,394	6,443	100.8%	200.5	200.6	100.0%	31.9	32.1	100.7%
218	Studio City - Beverly Hills	628	629	100.2%	32.5	32.4	99.7%	19.3	19.4	100.5%
460	Downtown LA - Norwalk - Disneyland	4,284	4,286	100.1%	179.3	181.4	101.2%	23.9	23.6	98.9%
487/489	Downtown LA - San Gabriel Bl (487) - Rosemead Bl (489)	1,412	1,412	100.0%	75.1	76.5	101.9%	18.8	18.5	98.2%
92	Downtown LA - Glenoaks Bl - Sylmar	5,927	5,924	99.9%	238.0	237.6	99.8%	24.9	24.9	100.1%
182	Silver Lake - East Hollywood	2,939	2,932	99.8%	99.6	99.9	100.3%	29.5	29.4	99.5%
179	Rose Hill - Arcadia via Huntington Dr	912	909	99.7%	64.8	64.8	100.0%	14.1	14.0	99.7%
237	Whiteoak Av, Woodley Av	1,853	1,841	99.4%	71.0	70.8	99.7%	26.1	26.0	99.7%
287	Mission Dr (176)/Arcadia - Santa Anita Av - El Monte (287)	975	966	99.1%	60.5	60.6	100.2%	16.1	15.9	98.9%
180	Hollywood - Pasadena	7,793	7,721	99.1%	286.2	285.7	99.8%	27.2	27.0	99.2%
76	Valley Bl	6,153	6,063	98.5%	211.2	214.4	101.5%	29.1	28.3	97.1%
102	La Tijera Bl, Exposition Bl	1,490	1,467	98.4%	68.6	68.4	99.7%	21.7	21.4	98.7%
577	El Monte - Long Beach VA Express	1,068	1,048	98.1%	76.5	76.5	100.0%	14.0	13.7	98.1%
217	Hollywood Bl Fairfax Bl	10,912	10,702	98.1%	330.6	329.3	99.6%	33.0	32.5	98.5%
120	Imperial Hwy	3,080	3,018	98.0%	131.8	135.1	102.5%	23.4	22.3	95.6%

*Line 96 was renamed Line 296 in December 2024. No other changes were made to the route.
RSH = Revenue Service Hours

Line	Line Description	Avg Weekday Boardings 2024 Q4	Avg Weekday Boardings 2025 Q4	Weekday Ridership 2025 versus 2024	Weekday RSH 2024	Weekday RSH 2025	% RSH 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
78	Downtown LA - South Arcadia via Huntington Dr/Las Tunas Dr	7,031	6,888	98.0%	243.3	247.9	101.9%	28.9	27.8	96.1%
550	San Pedro - Harbor Gateway Transit Center - USC	459	450	98.0%	26.8	26.8	100.0%	17.1	16.8	98.0%
14/37	Beverly Bl - W Adams Bl	12,188	11,903	97.7%	280.0	282.3	100.8%	43.5	42.2	96.9%
258	Fremont Av - Eastern Av - Garfield Av	2,254	2,199	97.6%	104.3	105	100.7%	21.6	20.9	96.9%
55	Compton Av	7,746	7,547	97.4%	200.7	200.9	100.1%	38.6	37.6	97.3%
108	Slauson Av	14,655	14,265	97.3%	372.3	380.4	102.2%	39.4	37.5	95.3%
20	Wilshire Bl Local	8,962	8,711	97.2%	321.3	321.7	100.1%	27.9	27.1	97.1%
230	Laurel Canyon Bl	3,240	3,149	97.2%	90.0	91	101.1%	36.0	34.6	96.1%
125	Rosecrans Av	5,194	5,036	97.0%	178.1	178.3	100.1%	29.2	28.2	96.8%
206	Normandie Av	9,120	8,839	96.9%	202.5	203.5	100.5%	45.0	43.4	96.4%
207	Western Av Local	25,457	24,674	96.9%	435.4	440.6	101.2%	58.5	56.0	95.8%
204	Vermont Av Local	22,317	21,618	96.9%	334.8	335	100.1%	66.7	64.5	96.8%
53	Central Av	11,722	11,351	96.8%	291.1	291.2	100.0%	40.3	39.0	96.8%
266	Rosemead Bl	5,432	5,248	96.6%	191.8	191.8	100.0%	28.3	27.4	96.6%
240	Reseda Bl/Ventura Bl Local	12210	11,770	96.4%	341.2	343	100.5%	35.8	34.3	95.9%
10/48	Melrose Av/Main St/San Pedro St	7,325	7,059	96.4%	216.2	220.2	101.9%	33.9	32.1	94.6%
210	Crenshaw Bl Local	13,433	12,935	96.3%	346.7	350.7	101.2%	38.7	36.9	95.2%
4	Santa Monica Bl Local	23,704	22,826	96.3%	633.4	631.6	99.7%	37.4	36.1	96.6%
28	Olympic Bl Local	10,506	10,111	96.2%	309.1	310.1	100.3%	34.0	32.6	95.9%
90	Downtown LA - Foothill Bl	6,072	5,841	96.2%	218.6	218.3	99.9%	27.8	26.8	96.3%
605	LAC USC Medical Center Shuttle	2,408	2,315	96.1%	64.3	65.7	102.2%	37.4	35.2	94.1%
62	Telegraph Rd	3,211	3,081	96.0%	127.0	127.8	100.6%	25.3	24.1	95.4%
242/243	Tampa Av & Winnetka Av	1,933	1,855	96.0%	62.5	62.6	100.2%	30.9	29.6	95.8%
244	Topanga Canyon Bl (245); De Soto Av (244)	1,828	1,747	95.6%	48.4	48.7	100.6%	37.8	35.9	95.0%
260	Artesia - Pasadena via Atlantic Bl and Fair Oaks Av	10,987	10,492	95.5%	329.3	298.4	90.6%	33.4	35.2	105.4%
166	Nordhoff St	6,550	6,255	95.5%	154.6	155.9	100.8%	42.4	40.1	94.7%
205	San Pedro - Willowbrook via Vermont Av, Wilmington Av	3,146	3,004	95.5%	154.7	154.7	100.0%	20.3	19.4	95.5%
2	Sunset Bl (became Sunset Bl - Alvarado St)	19,328	18,429	95.4%	472.2	473.5	100.3%	40.9	38.9	95.1%
35/38	Washington Bl/W Jefferson Bl	5,276	5,022	95.2%	149.4	150.1	100.5%	35.3	33.5	94.8%
169	Saticoy St	2,085	1,984	95.2%	83.1	83.8	100.8%	25.1	23.7	94.4%
110	Gage Av	8,036	7,647	95.2%	227.8	228.8	100.4%	35.3	33.4	94.7%

Line	Line Description	Avg Weekday Boardings 2024 Q4	Avg Weekday Boardings 2025 Q4	Weekday Ridership 2025 versus 2024	Weekday RSH 2024	Weekday RSH 2025	% RSH 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
212	La Brea Av	9,631	9,145	95.0%	300.1	292	97.3%	32.1	31.3	97.6%
152	Roscoe Bl	10,685	10,131	94.8%	242.0	243.3	100.5%	44.2	41.6	94.3%
232	LAX - Long Beach via Sepulveda Bl, Pacific Coast Hwy	4,541	4,305	94.8%	198.5	199.8	100.7%	22.9	21.5	94.2%
690	Foothill Bl	1145	1,085	94.7%	50.6	50.1	99.0%	22.6	21.7	95.7%
66	E Olympic Bl/W 8th St	12,807	12,130	94.7%	270.0	271.1	100.4%	47.4	44.7	94.3%
127	Compton Bl, Somerset Bl	1,987	1,881	94.7%	91.5	91.5	100.0%	21.7	20.6	94.7%
94	Downtown LA - San Fernando Rd - North Hollywood	7,042	6,665	94.6%	232.6	404.8	174.0%	30.3	16.5	54.4%
18	Whitter Bl W 6th St	20,443	19,233	94.1%	388.7	391.4	100.7%	52.6	49.1	93.4%
117	Century Bl	9,204	8,642	93.9%	233.2	233.9	100.3%	39.5	36.9	93.6%
70	Downtown LA - City Terrace - CSULA	15,697	14,728	93.8%	413.8	421.8	101.9%	37.9	34.9	92.0%
234	Sepulveda Bl Local	9,102	8,530	93.7%	241.5	239.1	99.0%	37.7	35.7	94.7%
246	San Pedro - Harbor Gateway Transit Center via Avalon Bl	3,182	2,980	93.6%	108.8	108.9	100.1%	29.2	27.4	93.6%
211/215	Prairie Av/Inglewood Av	390	365	93.6%	25.0	25.1	100.4%	15.6	14.6	93.2%
165	Vanowen St	8,544	7,990	93.5%	225.1	219.1	97.3%	38.0	36.5	96.1%
910/950	J Line BRT - El Monte - Downtown LA - Harbor Transitway - San Pedro	16,662	15,549	93.3%	389.0	388.1	99.8%	42.8	40.1	93.5%
344	Hawthorne Bl, Rancho Palos Verdes	1,431	1,335	93.3%	65.3	65.2	99.8%	21.9	20.5	93.4%
16	3rd St	20,643	19,255	93.3%	434.0	418.8	96.5%	47.6	46.0	96.7%
105	Vernon Av, La Cienega Bl	14,734	13,727	93.2%	348.5	351.7	100.9%	42.3	39.0	92.3%
720	Wilshire Bl Rapid	20,017	18,637	93.1%	582.9	582.8	100.0%	34.3	32.0	93.1%
33	Venice Bl Local	16,902	15,724	93.0%	500.4	506.3	101.2%	33.8	31.1	92.0%
115	Manchester Av - Firestone Bl	12,328	11,458	92.9%	291.6	291.6	100.0%	42.3	39.3	92.9%
268	El Monte - Pasadena via Baldwin Av	775	718	92.7%	55.5	55.1	99.3%	14.0	13.0	93.3%
754	Vermont Av Rapid	14,165	13,093	92.4%	231.7	231.7	100.0%	61.1	56.5	92.4%
51	Avalon Bl, W 7th St	18,510	17,109	92.4%	431.3	430	99.7%	42.9	39.8	92.7%
761	Van Nuys Bl - Westside Rapid (788); new Van Nuys Bl Westside Rapid (761)	7,390	6,822	92.3%	265.9	265.2	99.7%	27.8	25.7	92.6%
81	Figueroa St	10,089	9,291	92.1%	259.0	262	101.2%	39.0	35.5	91.0%
162	Sherman Way	10,313	9,490	92.0%	244.5	246	100.6%	42.2	38.6	91.5%
224	Lankershim Bl	6,751	6,211	92.0%	194.6	196	100.7%	34.7	31.7	91.3%
30	Pico Bl	8,492	7,784	91.7%	206.8	206.8	100.0%	41.1	37.6	91.7%
111	Florence Av	15,007	13,744	91.6%	348.2	346.8	99.6%	43.1	39.6	91.9%

Line	Line Description	Avg Weekday Boardings 2024 Q4	Avg Weekday Boardings 2025 Q4	Weekday Ridership 2025 versus 2024	Weekday RSH 2024	Weekday RSH 2025	% RSH 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
167	Coldwater Canyon Av - Devonshire St	1,540	1,408	91.4%	69.5	68.8	99.0%	22.2	20.5	92.4%
106	Montebello - Downtown LA - Monterey Park via Cesar Chavez Av & City Terrace	4,371	3,996	91.4%	170.9	169.8	99.4%	25.6	23.5	92.0%
265	Paramount Bl	1,325	1,210	91.3%	60.8	61	100.3%	21.8	19.8	91.0%
603	Hoover St	7,909	7,179	90.8%	234.7	234.2	99.8%	33.7	30.7	91.0%
161	Canoga Station - Thousand Oaks	804	730	90.8%	50.4	50.4	100.0%	16.0	14.5	90.8%
128	Alondra Bl	1,201	1,088	90.6%	43.6	43.6	100.0%	27.5	24.9	90.6%
251	Soto St	14,888	13,473	90.5%	358.9	360.1	100.3%	41.5	37.4	90.2%
45	Broadway Local	13,615	12,273	90.1%	302.5	303.3	100.3%	45.0	40.5	89.9%
40	MLK - Hawthorne Bl	14,111	12,691	89.9%	431.4	425.9	98.7%	32.7	29.8	91.1%
209	Van Ness Av/Arlington Av	410	367	89.7%	31.4	31.4	100.0%	13.0	11.7	89.7%
294	San Fernando Rd Rapid (794)/Burbank - Sylmar San Fernando Rd (294)	1,383	1,237	89.4%	73.7	75	101.8%	18.8	16.5	87.9%
901	G Line BRT - North Hollywood - Canoga Park - Chatsworth	13,995	12,464	89.1%	296.9	328.9	110.8%	47.1	37.9	80.4%
60	Downtown LA - Artesia via Long Beach Bl	14,598	12,975	88.9%	426.8	424.2	99.4%	34.2	30.6	89.4%
233	Van Nuys Bl Local	13,354	11,728	87.8%	270.4	269.3	99.6%	49.4	43.6	88.2%
611	Huntington Park Shuttle	1,396	1,181	84.6%	50.1	49.7	99.2%	27.9	23.8	85.3%
134	Santa Monica - Malibu via Pacific Coast Hwy	1,089	813	74.7%	59.9	60.6	101.2%	18.2	13.4	73.8%
662	Pasadena - Altadena via Lake Av, Lincoln Av	2129	1,354	63.6%	85.2	84.4	99.1%	25.0	16.0	64.2%
660	Atlantic Bl Rapid (762)/Altadena - Pasadena (660)	805	512	63.5%	37.2	36.9	99.2%	21.6	13.9	64.0%
602	Westwood - Pacific Palisades	1,052	490	46.6%	54.3	42.4	78.1%	19.4	11.6	59.6%
256	Pasadena - Highland Park - Eastern Av	464	0	Transferred to Municipal Agency	46.4	0	N/A	10.0	N/A	N/A
177	Caltech - Pasadena - Jet Propulsion Laboratory	171	0	Transferred to Municipal Agency	14.1	0	N/A	12.1	N/A	N/A

ATTACHMENT B

Saturday Ridership and Productivity Comparison by Line – Q4 2025 versus Q4 2024

Line	Line Description	Avg Saturday Boardings 2024 Q4	Avg Saturday Boardings Q4-2025	Saturday Ridership 2025 versus 2024	Saturday RSH 2024	Saturday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
601	Warner Center Shuttle	245	302	123.6%	33.9	33.8	99.7%	7.2	8.9	124%
96/296*	Riverside Dr	434	530	122.1%	31.6	31.4	99.4%	13.7	16.9	123%
487	Downtown LA - San Gabriel Bl	475	566	119.3%	44.1	44	99.8%	10.8	12.9	120%
258	Fremont Av - Eastern Av - Garfield Av	1,015	1,165	114.8%	55.9	55.9	100.0%	18.1	20.8	115%
154	Burbank Bl Oxnard St	461	525	113.8%	34.9	34.9	100.0%	13.2	15.0	114%
617	Robertson Bl - Beverwil Dr	314	356	113.5%	33.9	33.9	100.0%	9.3	10.5	113%
501	North Hollywood - Pasadena Express	778	847	108.9%	60.2	55.1	91.5%	12.9	15.4	119%
155	Riverside Dr	954	1,037	108.7%	59.5	58.3	98.0%	16.0	17.8	111%
665	CSULA - City Terrace Shuttle	367	391	106.7%	29.1	29.1	100.0%	12.6	13.4	107%
242/243	Tampa Av & Winnetka Av	1,124	1,197	106.5%	55	55	100.0%	20.4	21.8	106%
182	Downtown LA - Eagle Rock via York Bl	1,858	1,965	105.8%	88.9	89	100.1%	20.9	22.1	106%
222	Hollywood Way	738	775	105.0%	56.6	56.6	100.0%	13.0	13.7	105%
217	Hollywood Bl Fairfax Bl	8,318	8,667	104.2%	259.3	258.7	99.8%	32.1	33.5	104%
150	Ventura Bl	1,924	1,997	103.8%	82.4	86.3	104.7%	23.3	23.1	99%
267	El Monte - Pasadena via Temple City Bl and Del Mar Bl	800	829	103.7%	46.2	46.3	100.2%	17.3	17.9	103%
120	Imperial Hwy	1,797	1,862	103.6%	87.7	94.8	108.1%	20.5	19.6	96%
237	Whiteoak Av, Woodley Av	1,154	1,195	103.6%	68.7	69	100.4%	16.8	17.3	103%
180	Hollywood - Pasadena	6,367	6,566	103.1%	230.6	231.7	100.5%	27.6	28.3	103%
205	San Pedro - Willowbrook via Vermont Av, Wilmington Av	1,491	1,536	103.0%	86	86	100.0%	17.3	17.9	103%
164	Victory Bl	3,527	3,613	102.4%	109.3	107.3	98.2%	32.3	33.7	104%
690	Foothill Bl	631	645	102.3%	46.4	46.5	100.2%	13.6	13.9	102%
169	Saticoy St	1,201	1,227	102.2%	66	65.6	99.4%	18.2	18.7	103%
240	Topanga Canyon Bl (245); Reseda/Ventura (240)	7,989	8,064	100.9%	237.4	236.3	99.5%	33.7	34.1	101%
125	Rosecrans Av	2,836	2,858	100.8%	106.4	106.3	99.9%	26.7	26.9	101%
158	Plummer St, Woodman Av	963	970	100.7%	43.2	43.4	100.5%	22.3	22.4	100%
244	Reseda Bl - Ventura Bl - Van Nuys Bl Rapid (744)/De Soto Av (244)	872	877	100.7%	45.6	45.5	99.8%	19.1	19.3	101%
53	Central Av	7,688	7,711	100.3%	204.6	204.5	100.0%	37.6	37.7	100%
460	Downtown LA - Norwalk - Disneyland	3,345	3,351	100.2%	150.9	153.7	101.9%	22.2	21.8	98%

*Line 96 was renamed Line 296 in December 2024. No other changes were made to the route.
RSH = Revenue Service Hours

Line	Line Description	Avg Saturday Boardings 2024 Q4	Avg Saturday Boardings Q4-2025	Saturday Ridership 2025 versus 2024	Saturday RSH 2024	Saturday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
92	Downtown LA - Glenoaks Bl - Sylmar	4,168	4,171	100.1%	159	156.4	98.4%	26.2	26.7	102%
108	Slauson Av	9,080	8,986	99.0%	225.4	224.3	99.5%	40.3	40.1	99%
20	Wilshire Bl Local	6,669	6,599	99.0%	247.7	248.9	100.5%	26.9	26.5	98%
102	La Tijera Bl, Exposition Bl	1,227	1,208	98.4%	66.8	66.5	99.6%	18.4	18.2	99%
236	Balboa Bl	731	717	98.0%	45.5	45.5	100.0%	16.1	15.7	98%
94	Downtown LA - San Fernando Rd - North Hollywood	5,367	5,257	97.9%	167.3	163.1	97.5%	32.1	32.2	100%
62	Telegraph Rd	2,433	2,374	97.6%	87.5	94.2	107.7%	27.8	25.2	91%
603	Hoover St	6,126	5,972	97.5%	203.1	204.2	100.5%	30.2	29.2	97%
212	La Brea Av	6,685	6,514	97.4%	187	188	100.5%	35.7	34.6	97%
260	Artesia - Pasadena via Atlantic Bl and Fair Oaks Av	6,735	6,559	97.4%	176.2	187.2	106.2%	38.2	35.0	92%
204	Vermont Av Local	17,522	17,015	97.1%	258.2	258.7	100.2%	67.9	65.8	97%
78	Downtown LA - South Arcadia via Huntington Dr/Las Tunas Dr	4,549	4,417	97.1%	139.7	139.7	100.0%	32.6	31.6	97%
246	San Pedro - Harbor Gateway Transit Center via Avalon Bl	2,445	2,374	97.1%	109.9	108.5	98.7%	22.3	21.9	98%
266	Rosemead Bl	3,941	3,821	97.0%	126.4	126.5	100.1%	31.2	30.2	97%
207	Western Av Local	19,548	18,948	96.9%	300.6	299	99.5%	65.0	63.4	97%
218	Studio City - Beverly Hills	548	530	96.8%	32.4	32.4	100.0%	16.9	16.4	97%
28	Olympic Bl Local	7,282	7,047	96.8%	208.6	208.9	100.1%	34.9	33.7	97%
14/37	Beverly Bl - W Adams Bl	7,560	7,307	96.6%	209.4	209.1	99.9%	36.1	34.9	97%
4	Santa Monica Bl Local	19,875	19,169	96.4%	464.9	470.4	101.2%	42.8	40.8	95%
232	LAX - Long Beach via Sepulveda Bl, Pacific Coast Hwy	3,279	3,147	96.0%	134.5	135.2	100.5%	24.4	23.3	95%
127	Compton Bl, Somerset Bl	1,139	1,092	95.9%	77.3	77.3	100.0%	14.7	14.1	96%
161	Canoga Station - Thousand Oaks	580	553	95.4%	40.8	40.7	99.8%	14.2	13.6	96%
152	Roscoe Bl	7,126	6,787	95.3%	170.7	169.8	99.5%	41.7	40.0	96%
206	Normandie Av	6,105	5,811	95.2%	138.3	138.6	100.2%	44.1	41.9	95%
210	Crenshaw Bl Local	10,377	9,865	95.1%	316.7	318.2	100.5%	32.8	31.0	95%
230	Laurel Canyon Bl	1,850	1,754	94.8%	62.3	61.5	98.7%	29.7	28.5	96%
76	Valley Bl	4,862	4,608	94.8%	152.8	152.8	100.0%	31.8	30.2	95%
10/48	Melrose Av/Main St/San Pedro St	4,364	4,121	94.4%	144.6	148.4	102.6%	30.2	27.8	92%
2	Sunset Bl (became Sunset Bl - Alvarado St)	14,960	14,121	94.4%	379.6	379.2	99.9%	39.4	37.2	94%
179	Rose Hill - Arcadia via Huntington Dr	847	800	94.4%	48.9	48.8	99.8%	17.3	16.4	95%

Line	Line Description	Avg Saturday Boardings 2024 Q4	Avg Saturday Boardings Q4-2025	Saturday Ridership 2025 versus 2024	Saturday RSH 2024	Saturday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
35/38	Washington Bl/W Jefferson Bl	3,154	2,971	94.2%	101.7	105.3	103.5%	31.0	28.2	91%
166	Nordhoff St	3,435	3,237	94.2%	80	80.2	100.3%	42.9	40.4	94%
105	Vernon Av, La Cienega Bl	9,826	9,252	94.2%	223.6	226.4	101.3%	43.9	40.9	93%
55	Compton Av	4,690	4,401	93.8%	124.2	124.4	100.2%	37.8	35.4	94%
70	Montebello - Downtown LA via Cesar Chavez Av	11,164	10,464	93.7%	292	292.7	100.2%	38.2	35.7	94%
33	Venice Bl Local	13,226	12,386	93.6%	351.2	361.2	102.8%	37.7	34.3	91%
90	Downtown LA - Foothill Bl	4,094	3,830	93.5%	144.1	139.3	96.7%	28.4	27.5	97%
16	3rd St	15,548	14,537	93.5%	294.5	284	96.4%	52.8	51.2	97%
224	Lankershim Bl	4,687	4,381	93.5%	154.5	153	99.0%	30.3	28.6	94%
910/950	J Line BRT - El Monte - Downtown LA - Harbor Transitway - San Pedro	9,228	8,612	93.3%	201.8	205.8	102.0%	45.7	41.8	92%
81	Figueroa St	7,309	6,813	93.2%	203.2	202.9	99.9%	36.0	33.6	93%
165	Vanowen St	4,715	4,387	93.1%	112.9	111.8	99.0%	41.8	39.2	94%
115	Manchester Av - Firestone Bl	8,173	7,569	92.6%	185.4	186.5	100.6%	44.1	40.6	92%
162	Sherman Way	6,924	6,402	92.5%	172.4	170.2	98.7%	40.2	37.6	94%
18	Whitter Bl W 6th St	16,040	14,830	92.5%	344.5	344.1	99.9%	46.6	43.1	93%
720	Wilshire Bl Rapid	14,407	13,308	92.4%	400.3	400.6	100.1%	36.0	33.2	92%
344	Hawthorne Bl, Rancho Palos Verdes	1,017	939	92.4%	44.6	44.6	100.0%	22.8	21.1	92%
234	Sepulveda Bl Local	5,897	5,435	92.2%	175.9	167.9	95.5%	33.5	32.4	97%
287	Arcadia - Santa Anita Av - El Monte	309	284	92.1%	15.8	15.8	100.0%	19.5	18.0	92%
117	Century Bl	5,955	5,467	91.8%	125	125.3	100.2%	47.6	43.6	92%
611	Huntington Park Shuttle	1,001	919	91.7%	46.7	46.8	100.2%	21.4	19.6	92%
294	Burbank - Sylmar San Fernando Rd	1,183	1,081	91.3%	72.8	71.5	98.2%	16.3	15.1	93%
265	Paramount Bl	654	597	91.3%	37.5	37.5	100.0%	17.4	15.9	91%
66	E Olympic Bl/W 8th St	9,656	8,803	91.2%	188.8	188.8	100.0%	51.1	46.6	91%
40	MLK - Hawthorne Bl	10,465	9,521	91.0%	348.1	348.4	100.1%	30.1	27.3	91%
268	El Monte - Pasadena via Baldwin Av	497	452	90.8%	29.8	29.8	100.0%	16.7	15.2	91%
60	Downtown LA - Artesia via Long Beach Bl	9,868	8,950	90.7%	318.6	321.1	100.8%	31.0	27.9	90%
761	Sepulveda Bl - Westside Rapid (734); Van Nuys Bl Westside Rapid (761)	4,268	3,869	90.7%	139.5	139.3	99.9%	30.6	27.8	91%
106	Montebello - Downtown LA - Monterey Park via Cesar Chavez Av & City Terrace	2,318	2,085	90.0%	98.3	96.9	98.6%	23.6	21.5	91%
45	Broadway Local	10,379	9,333	89.9%	258.6	260.2	100.6%	40.1	35.9	89%

Line	Line Description	Avg Saturday Boardings 2024 Q4	Avg Saturday Boardings Q4-2025	Saturday Ridership 2025 versus 2024	Saturday RSH 2024	Saturday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
251	Soto St	8,628	7,709	89.4%	234.6	234.4	99.9%	36.8	32.9	89%
754	Vermont Av Rapid	9,531	8,516	89.4%	144.3	144.8	100.3%	66.1	58.8	89%
605	LAC USC Medical Center Shuttle	1,359	1,209	89.0%	46.5	46.5	100.0%	29.2	26.0	89%
51	Avalon Bl, W 7th St	14,804	13,156	88.9%	348.9	349.9	100.3%	42.4	37.6	89%
167	Coldwater Canyon Av - Devonshire St	1,049	930	88.7%	68.8	67.2	97.7%	15.3	13.8	91%
111	Florence Av	10,527	9,317	88.5%	227.8	227.5	99.9%	46.2	41.0	89%
30	Pico Bl	6,587	5,818	88.3%	138.3	138.1	99.9%	47.6	42.1	88%
110	Gage Av	4,525	3,976	87.9%	111.4	112.1	100.6%	40.6	35.5	87%
901	G Line BRT - North Hollywood - Canoga Park - Chatsworth	9,306	8,153	87.6%	232.9	254.1	109.1%	40.0	32.1	80%
233	Van Nuys Bl Local	10,110	8,850	87.5%	220.2	220.0	99.9%	45.9	40.2	88%
128	Alondra Bl	730	632	86.5%	43.7	43.7	100.0%	16.7	14.5	87%
660	Pasadena - Altadena via Fair Oaks Av	812	645	79.4%	35.5	35.3	99.4%	22.9	18.3	80%
134	Santa Monica - Malibu via Pacific Coast Hwy	934	720	77.1%	51.1	52.4	102.5%	18.3	13.7	75%
662	Pasadena - Altadena via Lake Av, Lincoln Av	1,575	1,014	64.4%	74.1	73.5	99.2%	21.3	13.8	65%
602	Westwood - Pacific Palisades	638	337	52.8%	49.7	31.5	63.4%	12.8	10.7	83%
256	Pasadena - Highland Park - Eastern Av	416	0	Transferred to Municipal Agency	44.3	0	0.0%	9.4	N/A	N/A

ATTACHMENT C

Sunday Ridership and Productivity Comparison by Line – Q4 2025 versus Q4 2024

Line	Line Description	Avg Sunday Boardings 2024 Q4	Avg Sunday Boardings Q4 2025	Sunday Ridership 2025 versus 2024	Sunday RSH 2024	Sunday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
96/296*	Riverside Dr	366	461	125.9%	31.6	31.4	99.4%	11.6	14.7	127%
665	CSULA - City Terrace Shuttle	269	328	121.7%	29.1	29.1	100.0%	9.3	11.3	122%
154	Burbank Bl Oxnard St	367	446	121.6%	34.9	34.9	100.0%	10.5	12.8	122%
182	East Hollywood - Highland Park - Rose Hill	1,359	1,528	112.5%	88.9	88.9	100.0%	15.3	17.2	112%
501	North Hollywood - Pasadena Express	656	734	111.9%	60.4	56.2	93.0%	10.9	13.1	120%
155	Riverside Dr	763	849	111.3%	59.9	58.7	98.0%	12.7	14.5	114%
150	Ventura Bl	1,605	1,780	110.9%	82.4	86.5	105.0%	19.5	20.6	106%
217	Hollywood Bl Fairfax Bl	6,794	7,397	108.9%	259.3	258.7	99.8%	26.2	28.6	109%
158	Plummer St, Woodman Av	736	800	108.6%	43	43.1	100.2%	17.1	18.6	108%
487	Downtown LA - San Gabriel Bl	438	474	108.3%	44.1	44	99.8%	9.9	10.8	109%
242/243	Tampa Av & Winnetka Av	930	1,002	107.7%	55	55	100.0%	16.9	18.2	108%
205	San Pedro - Willowbrook via Vermont Av, Wilmington Av	1,227	1,318	107.4%	86	86	100.0%	14.3	15.3	107%
237	Whiteoak Av, Woodley Av	973	1,041	107.0%	68.9	69	100.1%	14.1	15.1	107%
617	Robertson Bl - Beverwil Dr	300	320	106.4%	33.9	33.9	100.0%	8.9	9.4	106%
605	LAC USC Medical Center Shuttle	1,019	1,080	106.0%	46.4	46.4	100.0%	22.0	23.3	106%
169	Saticoy St	957	1012	105.7%	66	65.6	99.4%	14.5	15.4	106%
601	Warner Center Shuttle	209	221	105.7%	33.9	33.8	99.7%	6.2	6.5	106%
258	Fremont Av - Eastern Av - Garfield Av	863	900	104.3%	55.9	55.9	100.0%	15.4	16.1	104%
180	Hollywood - Pasadena	5,353	5,560	103.9%	230.4	230.5	100.0%	23.2	24.1	104%
108	Slauson Av	6,732	6,941	103.1%	215.7	210.9	97.8%	31.2	32.9	105%
690	Foothill Bl	500	514	102.8%	46.4	46.5	100.2%	10.8	11.1	103%
164	Victory Bl	2,703	2,772	102.5%	109.3	106.8	97.7%	24.7	26.0	105%
20	Wilshire Bl Local	5,483	5,602	102.2%	247.7	248.5	100.3%	22.1	22.5	102%
222	Hollywood Way	605	616	101.9%	56.6	56.6	100.0%	10.7	10.9	102%
62	Telegraph Rd	1,901	1,936	101.9%	86.2	86.4	100.2%	22.1	22.4	102%
244	Topanga Canyon Bl	701	714	101.7%	45.6	45.5	99.8%	15.4	15.7	102%
460	Downtown LA - Norwalk - Disneyland	2,849	2,893	101.5%	151.1	150.8	99.8%	18.9	19.2	102%
267	El Monte - Pasadena via Temple City Bl and Del Mar Bl	651	658	101.1%	46.2	46.3	100.2%	14.1	14.2	101%
76	Valley Bl	3,847	3,886	101.0%	152.8	152.8	100.0%	25.2	25.4	101%

*Line 96 was renamed Line 296 in December 2024. No other changes were made to the route.
RSH = Revenue Service Hours

Line	Line Description	Avg Sunday Boardings 2024 Q4	Avg Sunday Boardings Q4 2025	Sunday Ridership 2025 versus 2024	Sunday RSH 2024	Sunday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
53	Central Av	6,187	6,239	100.8%	202	201.8	99.9%	30.6	30.9	101%
14/37	Beverly Bl - W Adams Bl	6,189	6,235	100.7%	209.4	208.9	99.8%	29.6	29.8	101%
165	Vanowen St	3,669	3,689	100.5%	112.9	111.1	98.4%	32.5	33.2	102%
78	Downtown LA - South Arcadia via Huntington Dr/Las Tunas Dr	3,738	3,748	100.3%	139.7	139.7	100.0%	26.8	26.8	100%
218	Studio City - Beverly Hills	440	441	100.1%	32.4	32.4	100.0%	13.6	13.6	100%
55	Compton Av	3,609	3,610	100.0%	117.5	121.3	103.2%	30.7	29.8	97%
260	Artesia - Pasadena via Atlantic Bl and Fair Oaks Av	5,406	5,405	100.0%	176.2	187.2	106.2%	30.7	28.9	94%
206	Normandie Av	5,167	5,161	99.9%	134.2	134.2	100.0%	38.5	38.5	100%
236	Balboa Bl	556	555	99.7%	45.5	45.5	100.0%	12.2	12.2	100%
28	Olympic Bl Local	5,957	5,930	99.6%	208.6	208.9	100.1%	28.6	28.4	99%
166	Nordhoff St	2,656	2,642	99.5%	79.9	80.1	100.3%	33.2	33.0	99%
232	LAX - Long Beach via Sepulveda Bl, Pacific Coast Hwy	2,812	2,796	99.4%	134.5	135.2	100.5%	20.9	20.7	99%
212	La Brea Av	5,393	5,361	99.4%	187.5	187.6	100.1%	28.8	28.6	99%
92	Downtown LA - Glenoaks Bl - Sylmar	3,508	3,480	99.2%	159	156.7	98.6%	22.1	22.2	101%
127	Compton Bl, Somerset Bl	971	962	99.1%	77.3	77.3	100.0%	12.6	12.4	99%
120	Imperial Hwy	1,657	1,634	98.6%	87.7	87.7	100.0%	18.9	18.6	99%
94	Downtown LA - San Fernando Rd - North Hollywood	4,396	4,317	98.2%	165.4	163.5	98.9%	26.6	26.4	99%
230	Laurel Canyon Bl	1,475	1,445	98.0%	56.4	55.9	99.1%	26.2	25.9	99%
266	Rosemead Bl	3,321	3,242	97.6%	126.4	126.4	100.0%	26.3	25.6	98%
344	Hawthorne Bl, Rancho Palos Verdes	835	815	97.5%	44.5	44.5	100.0%	18.8	18.3	98%
16	3rd St	12,387	12,083	97.5%	294.5	283.8	96.4%	42.1	42.6	101%
179	Rose Hill - Arcadia via Huntington Dr	650	633	97.3%	48.9	48.8	99.8%	13.3	13.0	98%
204	Vermont Av Local	14,586	14,154	97.0%	255.3	255.3	100.0%	57.1	55.4	97%
240	Reseda Bl - Ventura Bl - Van Nuys Bl Rapid	6,703	6,497	96.9%	233	231.1	99.2%	28.8	28.1	98%
66	E Olympic Bl/W 8th St	7,126	6,907	96.9%	181.1	181.3	100.1%	39.3	38.1	97%
152	Roscoe Bl	5,846	5,663	96.9%	170.2	168.6	99.1%	34.3	33.6	98%
603	Hoover St	4,642	4,492	96.8%	160.3	161.3	100.6%	29.0	27.8	96%
4	Santa Monica Bl Local	17,180	16,617	96.7%	464.9	470.4	101.2%	37.0	35.3	96%
207	Western Av Local	15,972	15,442	96.7%	299	299.4	100.1%	53.4	51.6	97%
110	Gage Av	3,421	3,307	96.7%	111.4	112.1	100.6%	30.7	29.5	96%
2	Sunset Bl (became Sunset Bl - Alvarado St)	12,755	12,326	96.6%	379.6	379.2	99.9%	33.6	32.5	97%

Line	Line Description	Avg Sunday Boardings 2024 Q4	Avg Sunday Boardings Q4 2025	Sunday Ridership 2025 versus 2024	Sunday RSH 2024	Sunday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
246	San Pedro - Harbor Gateway Transit Center via Avalon Bl	2,119	2,045	96.5%	108.8	108.8	100.0%	19.5	18.8	97%
18	Whitter Bl W 6th St	13,241	12,777	96.5%	345	344.9	100.0%	38.4	37.0	97%
90	Downtown LA - Foothill Bl	3,369	3,247	96.4%	144.1	139	96.5%	23.4	23.4	100%
210	Crenshaw Bl	8,840	8,519	96.4%	308	308	100.0%	28.7	27.7	96%
10/48	Melrose Av/Main St/San Pedro St	3,619	3,485	96.3%	144.6	148	102.4%	25.0	23.5	94%
910/950	J Line BRT - El Monte - Downtown LA - Harbor Transitway - San Pedro	7,306	7,025	96.2%	201.8	205.8	102.0%	36.2	34.1	94%
106	Montebello - Downtown LA - Monterey Park via Cesar Chavez Av & City Terrace	1,839	1,764	95.9%	98.3	96.9	98.6%	18.7	18.2	97%
251	Soto St	6,584	6,309	95.8%	229.3	229.3	100.0%	28.7	27.5	96%
105	Vernon Av, La Cienega Bl	8,193	7,838	95.7%	220.3	221.3	100.5%	37.2	35.4	95%
033	Venice Bl Local	10,659	10,192	95.6%	349.5	359.9	103.0%	30.5	28.3	93%
162	Sherman Way	5,176	4,928	95.2%	132.8	131.7	99.2%	39.0	37.4	96%
125	Rosecrans Av	2,511	2,390	95.2%	106.4	106.3	99.9%	23.6	22.5	95%
224	Lankershim Bl	3,800	3,616	95.1%	154.5	153	99.0%	24.6	23.6	96%
167	Coldwater Canyon Av - Devonshire St	909	862	94.8%	68.8	67.2	97.7%	13.2	12.8	97%
720	Wilshire Bl Rapid	11,661	11,053	94.8%	400.3	400.6	100.1%	29.1	27.6	95%
35/38	Washington Bl/W Jefferson Bl	2,432	2,299	94.5%	100.2	100.3	100.1%	24.3	22.9	94%
234	Sepulveda Bl	4,833	4,560	94.4%	175.9	167.9	95.5%	27.5	27.2	99%
45	Broadway Local	8,265	7,772	94.0%	255.7	257.2	100.6%	32.3	30.2	93%
60	Downtown LA - Artesia via Long Beach Bl	7,847	7,328	93.4%	304.8	306.4	100.5%	25.7	23.9	93%
611	Huntington Park Shuttle	853	796	93.2%	46.7	46.7	100.0%	18.3	17.0	93%
265	Paramount Bl	561	522	93.2%	37.5	37.5	100.0%	15.0	13.9	93%
70	El Monte - Downtown LA via Garvey Av and Cesar Chavez Av	9,505	8,798	92.6%	292	291.9	100.0%	32.6	30.1	93%
30	Pico Bl	5,715	5,271	92.2%	138.3	138.3	100.0%	41.3	38.1	92%
294	Burbank - Sylmar San Fernando Rd	930	857	92.1%	72.8	72	98.9%	12.8	11.9	93%
111	Florence Av	8,469	7,787	91.9%	214.3	213.7	99.7%	39.5	36.4	92%
754	Vermont Av Rapid	7,734	7,087	91.6%	140.7	140.7	100.0%	55.0	50.4	92%
115	Manchester Av - Firestone Bl	6,799	6,220	91.5%	168.4	168.4	100.0%	40.4	36.9	91%
761	Sepulveda Bl - Westside Rapid	3,463	3,164	91.3%	139.5	139.3	99.9%	24.8	22.7	91%
102	La Tijera Bl, Exposition Bl	1,073	977	91.1%	66.8	66.5	99.6%	16.1	14.7	91%
81	Figueroa St	5,961	5,428	91.1%	202.9	202.5	99.8%	29.4	26.8	91%

Line	Line Description	Avg Sunday Boardings 2024 Q4	Avg Sunday Boardings Q4 2025	Sunday Ridership 2025 versus 2024	Sunday RSH 2024	Sunday RSH 2025	RSH % 2025 over 2024	Productivity Boardings/ RSH 2024	Productivity Boardings/ RSH 2025	Productivity % 2025 over 2024
40	MLK - Hawthorne Bl	8,198	7,450	90.9%	298	298	100.0%	27.5	25.0	91%
901	G Line BRT - North Hollywood - Canoga Park - Chatsworth	7,645	6,890	90.1%	232.9	254.1	109.1%	32.8	27.1	83%
51	Avalon Bl, W 7th St	11,553	10,408	90.1%	262.8	263	100.1%	44.0	39.6	90%
233	Van Nuys Bl Local	8,539	7,665	89.8%	220.2	220.2	100.0%	38.8	34.8	90%
161	Canoga Station - Thousand Oaks	468	419	89.6%	40.8	40.7	99.8%	11.5	10.3	90%
117	Century Bl	5,037	4,514	89.6%	122.1	122.1	100.0%	41.3	37.0	90%
287	Arcadia - Santa Anita Av - El Monte	239	213	89.1%	15.8	15.8	100.0%	15.1	13.5	89%
128	Alondra Bl	575	512	88.9%	43.7	43.7	100.0%	13.2	11.7	89%
268	El Monte - Pasadena via Baldwin Av	428	365	85.3%	29.8	29.8	100.0%	14.4	12.2	85%
134	Santa Monica - Malibu via Pacific Coast Hwy	766	616	80.4%	51.1	52.4	102.5%	15.0	11.7	78%
660	Pasadena - Altadena via Fair Oaks Av	726	574	79.1%	35.5	35.3	99.4%	20.5	16.3	80%
662	Pasadena - Altadena via Lake Av, Lincoln Av	1,269	981	77.3%	73.1	72.5	99.2%	17.4	13.5	78%
602	Westwood - Pacific Palisades	511	286	56.0%	49.7	31.5	63.4%	10.3	9.1	88%
256	Pasadena - Highland Park - Eastern Av	308	0	Transferred to Municipal Agency	44.2	0	N/A	7.0	N/A	N/A

ATTACHMENT D

Summary of NextGen Frequency Changes

NextGen Bus Plan service frequency improvements were implemented through the service changes that occurred between December 2020 through December 2022.

Gateway Cities

Weekday frequency change highlights in the Gateway Cities service area include:

- **Tier 1**: five local lines had frequency improvements:
  - Line 53 increased from every 15 to every 10 minutes midday
  - Line 60 increased from every 18 to every 10 minutes midday
  - Line 105 increased from every 18-20 to every 10 minutes peak and midday
  - Line 108 increased from every 10 to every 7.5 minutes peak and from every 15 to every 10 minutes midday
  - Line 251 increased from every 22 to every 10 minutes midday
- **Tier 2**: Line 55 increased from every 15 to every 12 minutes peak and from every 20 to every 15 minutes midday
- **Tier 4**: changes consisted of:
  - Line 127 added new 60-minutes peak and midday service
  - Line 130 east of Artesia A Line Station was transferred to Long Beach Transit

Weekend frequency change highlights in the Gateway Cities service area include:

- **Tier 1**: Four lines had frequency improved:
  - Line 53 increased from every 20 to every 15 minutes Sunday
  - Line 60 increased from every 12-15 to every 10 minutes Saturday and Sunday
  - Lines 105 and 108 increased from every 20 to every 15 minutes Sunday
- **Tier 4**: Changes were made to four lines:
  - Line 127 added new 30-60 minute Saturday and Sunday service
  - Lines 128 and 258 added new 60-minute Sunday service
  - Line 130 east of Artesia A Line Station was transferred to Long Beach Transit

San Gabriel Valley

Weekday frequency change highlights in the San Gabriel Valley service area include:

- **Tier 1:** three local lines had frequency improvements:
  - Line 70 increased from every 15 to every 7.5 minutes peak and midday
  - Line 78 increased from every 20 to every 10 minutes midday
- **Tier 2**: Line 260 increased from every 12-15 to every 12 minutes peak periods and from every 20 to every 15 minutes midday

- **Tier 3**: Line 266 increased from every 24 to every 20 minutes peak and from every 33 to every 20 minutes midday
- Tier 4: part of Line 256 (CSULA – Commerce) transferred to Commerce Municipal Bus Lines and as of December 2024 Lines 177 (Pasadena – Jet Propulsion Laboratory) and 256 (Highland Park – Pasadena) transferred to Pasadena Transit

Weekend frequency change highlights in the San Gabriel Valley service area include:

- **Tier 1**: Line 70 increased from every 15-20 to every 10 minutes Saturday and Sunday midday periods
- **Tier 3**: Line 266 increased from every 45 to every 30 minutes Saturday and Sunday
- **Tier 4**: part of Line 256 (CSULA – Commerce) transferred to Commerce Municipal Bus Lines.

San Fernando Valley

Key route restructurings focused on more direct connections to North Hollywood (Lines 90 and 94). A total of 19 San Fernando Valley lines gained improved weekday midday frequencies through revenue service hours investment as follows:

- **Tier 1**: three local lines increased from every 14 to 33 minutes to every 10 minutes (Lines 233, 234, 240)
- **Tier 2**: seven local lines increased from every 19 to 30 minutes to every 15 minutes (Lines 94, 152, 162, 164, 165, 166, 224)
- **Tier 3**: four local lines increased from every 25 to 49 minutes to every 20 minutes (Lines 90, 92, 150, 230) and three lines increased from every 49 to 61 minutes to every 30 minutes (Lines 235/236, 244, 690)
- **Tier 4**: two lines increased from every 60 to every 40 minutes (Lines 242, 243)

Saturday service frequency increases were also significant and appear to support growing regional ridership.

- **Tier 1**: two local lines increased from every 16 to 30 minutes to every 12 to 15 minutes (Lines 234, 240)
- **Tier 2**: three local lines increased from every 24 to 30 minutes to every 20 minutes (Lines 152, 162, 224)
- **Tier 3**: two local lines increased from every 50 to every 30 minutes (Lines 230 and 690)
- **Tier 4**: Lines 242 and 243 increased from every 60 to every 40 minutes
- Three lines that previously had no weekend service gained Saturday service: Oxnard/Burbank Line 154, Saticoy Line 169, and White Oak on Line 237 (formerly Line 239). Lines 90 and 94 were refocused on North Hollywood Saturdays (same change as weekdays) in line with key regional travel patterns.

San Fernando Valley Sunday service frequency increases were also significant and are likely supporting ridership growth:

- **Tier 1**: two local lines increased from every 19 to 30 minutes to every 12 to 15 minutes (Lines 234 and 240)
- **Tier 2**: one local line increased from every 32 to every 20 minutes (Line 152)
- **Tier 3**: two local lines increased from every 50 to every 30 minutes (Lines 230 and 690)
- Five lines that previously had no weekend service gained Sunday service: Oxnard/Burbank Line 154, Saticoy Line 169, Tampa and Winnetka Lines 242 and 243, and White Oak Line 237 (formerly Line 239). The same refocus of two lines on North Hollywood weekdays and Saturdays was made on Sundays (Lines 90, 94).

South Bay Cities

Weekday frequency change highlights in the South Bay Cities service area include:

- **Tier 1**: Eight local lines had frequency improved:
  - Line 40 increased from every 15 to every 7.5-10 minutes peak and from every 20 to every 10 minutes midday
  - Line 45 increased from every 15 to every 10 minutes midday
  - Line 51 increased from every 12 to 7.5 minutes midday
  - Line 111 increased from every 12-15 minutes to every 10 minutes peak and midday
  - Line 204 increased from every 12-15 to every 7.5 minutes weekday peak and midday
  - Line 207 increased from every 15 to every 6-7.5 minutes peak and from every 18 to every 7.5 minutes midday
  - Line 210 increased from every 20 to every 10 minutes peak and midday
  - Line 212 increased from every 12-15 to every 10 minutes peak and midday
  - J Line Express service increased from every 15 minutes to every 10 minutes during midday
- **Tier 2**: three local lines had improved frequencies:
  - Line 110 increased from every 24 to every 15 minutes midday
  - Line 117 increased from every 18-20 to every 15 minutes peak and midday
  - Line 206 increased from every 20 to 15 minutes midday
- **Tier 3**: three local lines had improved frequencies:
  - Line 125 increased from every 25-35 to every 20 minutes peak and midday
  - Line 232 increased from every 22 to every 15 minutes peak
  - Line 246 increased from every 60 to every 30 minutes midday

- **Tier 4**: had two changes
  - Line 202 added new 60-minute midday service
  - Line 130 west of Artesia A Line Station was transferred to Torrance Transit

Weekend frequency change highlights in the South Bay Cities service area include:

- **Tier 1**: Seven local lines had frequency improvements
  - Line 40 increased from every 20 to every 12 minutes Sunday and from every 20 to every 15 minutes Sunday
  - Line 45 increased from every 15 to every 10 minutes Sunday
  - Line 51 increased from every 10 to every 7.5 minutes Saturday and from every 12 to every 10 minutes Sunday
  - Line 204 increased from every 20 to every 12 minutes Saturday and Sunday
  - Line 207 increased from every 15 to every 10 minutes Saturday and Sunday
  - Line 210 increased from every 20 to every 10 minutes Saturday and Sunday
  - Line 212 increased from every 18 to every 15 minutes Saturday and from every 23 to 15 minutes Sunday
- **Tier 3**: Two local lines had frequency improved:
  - Line 125 increased from every 40 to every 30 minutes Sunday
  - Line 246 increased from every 40 to every 30 minutes Saturday and from every 60 to every 30 minutes Sunday
- **Tier 4**: Line 130 west of Artesia A Line Station was transferred to Torrance Transit.

Westside Central

Weekday frequency change highlights in the Westside Central service area include:

- **Tier 1**: Nine local lines had frequencies improved:
  - Line 2 increased from every 10 to every 7.5 minutes peak periods and from every 12-15 to every 10 minutes midday (Sunset – Alvarado)
  - Line 4 increased from every 15 to every 7.5 minutes peak and midday periods (Santa Monica Bl)
  - Line 18 increased from every 10 to 7.5 minutes weekday midday (6th – Whittier)
  - Line 20 increased from every 15 to every 12 minutes peak periods (Wilshire – 6th St)
  - Line 28 increased from every 18 to every 7.5-10 minutes peak periods and from every 27 to every 10 minutes midday (Olympic Bl)
  - Line 30 increased from every 12 to 10 minutes midday (Pico Bl)
  - Line 33 increased from every 17-18 to 7.5 minutes peak hours and midday (Venice Bl)

    - Line 66 increased from every 12-15 to every 10 minutes peak periods and from every 18 to every 10 minutes midday (Olympic BI)
    - Line 217 increased from every 12-15 to every 10 minutes peak and midday periods (subsequently adjusted to 12 minutes with an extension to Glendale and Eagle Rock Plaza in June 2024 with service coordinated with Line 180, also at 12-minute headways for maximum frequency between Hollywood/Vine, East Hollywood, Los Feliz, Glendale, and Eagle Rock Plaza)
- **Tier 2**: Three local lines had frequency improved:
    - Line 10 increased from every 20 to 15 minutes midday
    - Line 603 increased from every 15 to every 12 minutes weekday peak periods and from every 20 to every 12 minutes weekday midday
    - Line 605 increased from every 23 to every 15 minutes midday
- **Tier 4**: Line 617 (formerly Line 17) increased from every 60 to every 45 minutes peak and midday

Weekend frequency change highlights in the Westside Central service area include:

- **Tier 1**: Nine local lines had improvements made:
    - Line 2 increased from every 12-15 to every 10 minutes Saturday and from every 15-20 to every 10 minutes Sunday
    - Line 4 increased from every 15 to every 10 minutes Saturday and Sunday
    - Line 18 increased from every 10 to 7.5 minutes Saturday and from every 15 to every 7.5 minutes Sunday
    - Line 20 increased from every 15 to every 12 minutes Saturday and from every 20 to every 12 minutes Sunday
    - Line 28 increased from every 15 to every 12 minutes Saturday and from every 18 to every 12 minutes Sunday
    - Line 30 increased from every 12 to 10 minutes Saturday and Sunday
    - Line 33 increased from every 20 to 10 minutes peak hours and midday
    - Line 66 increased from every 20 to every 15 minutes Sunday
- **Tier 2** improvements consisted of:
    - Line 14/37 increased from every 20 to 15 minutes Saturday and Sunday
    - Line 603 increased from every 18 to every 12 minutes Saturday and from every 18 to every 15 minutes Sunday
    - Line 605 increased from every 35 to every 20 minutes midday
- **Tier 4**: Line 617 (formerly Line 17) had new 60-minute Saturday and Sunday service added.

ATTACHMENT E

NextGen Ridership Review Supporting Data Charts
Q42026

Chart 1: Average Weekday Ridership by Month, 2019-2025

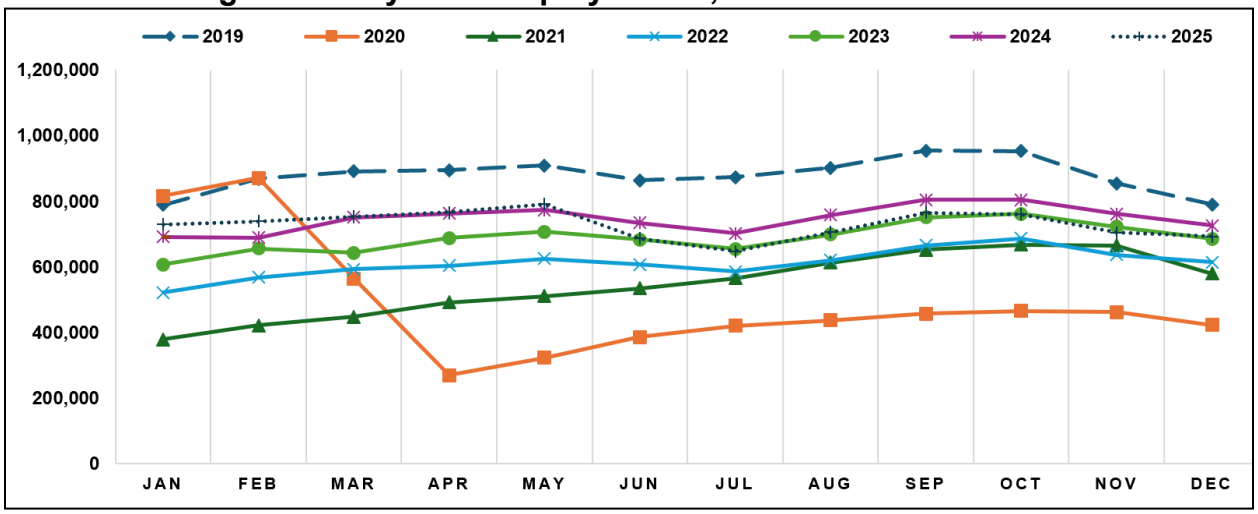


Chart 2: Average Saturday Ridership by Month, 2019-2025

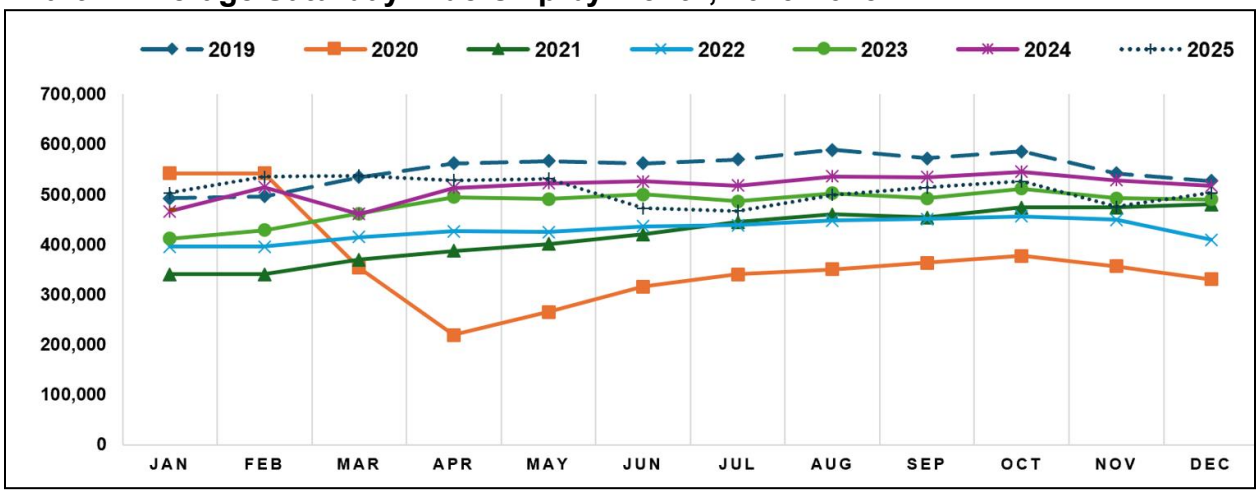


Chart 3: Average Sunday Ridership by Month, 2019-2025

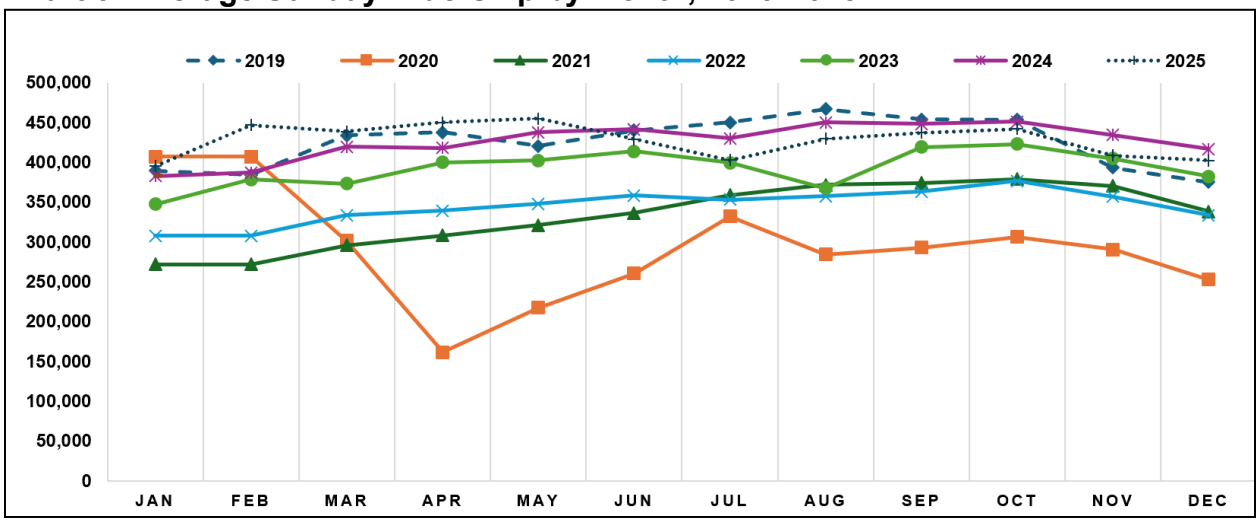


Chart 4: Percentage difference of LA County Total Daily Trips compared to 2019, 2019-2025

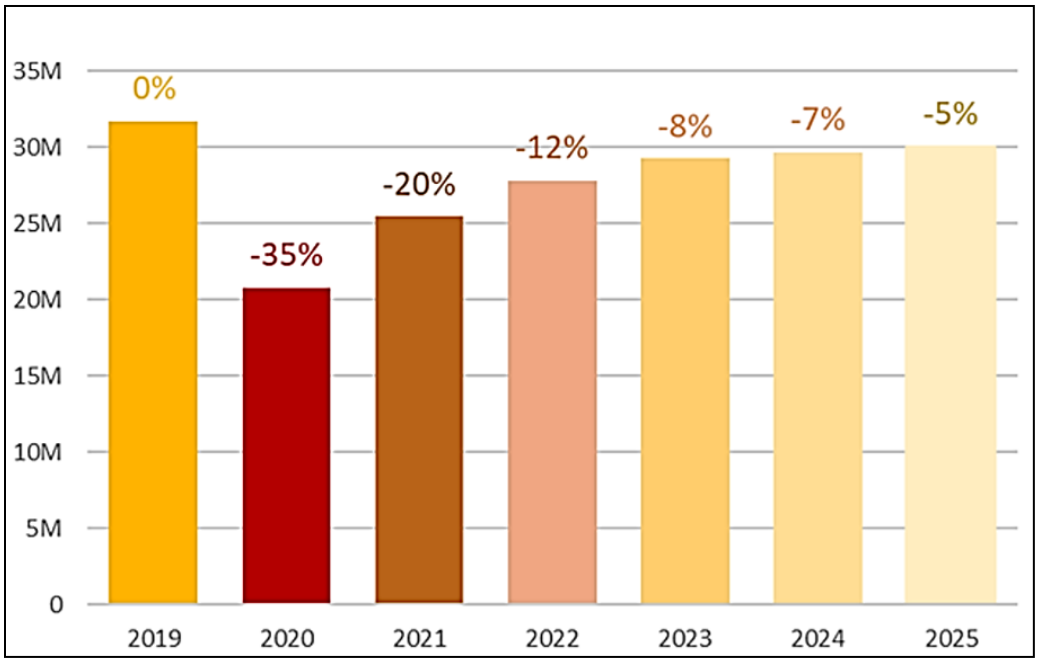
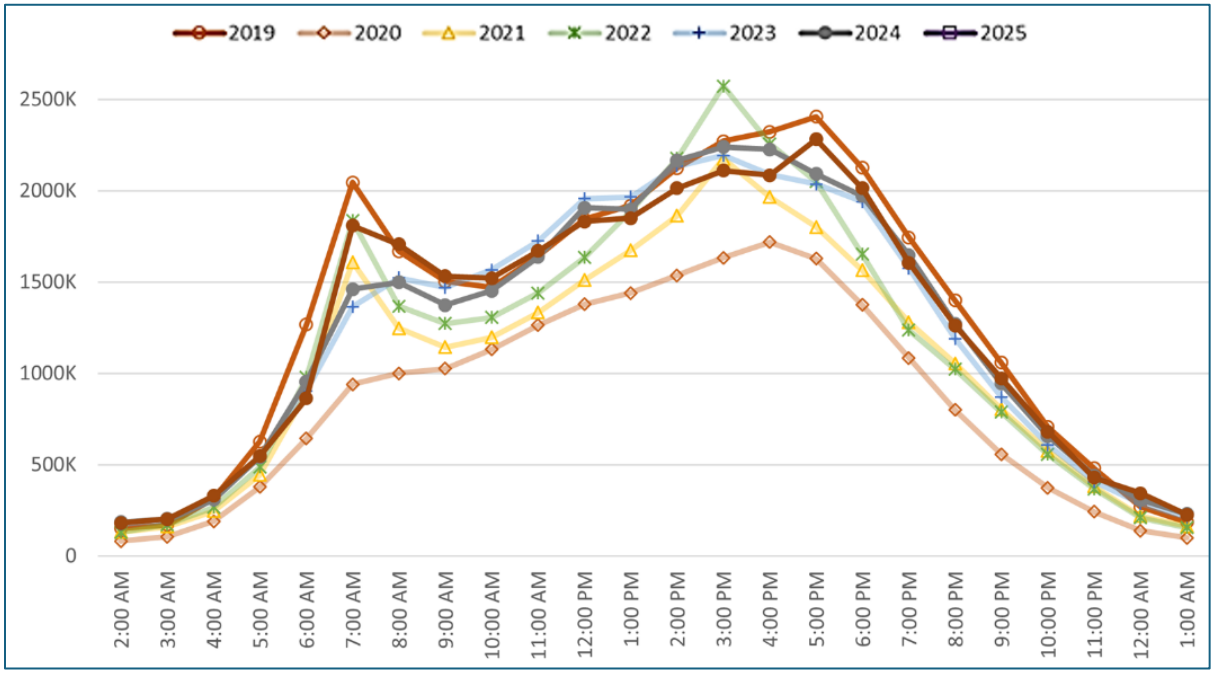
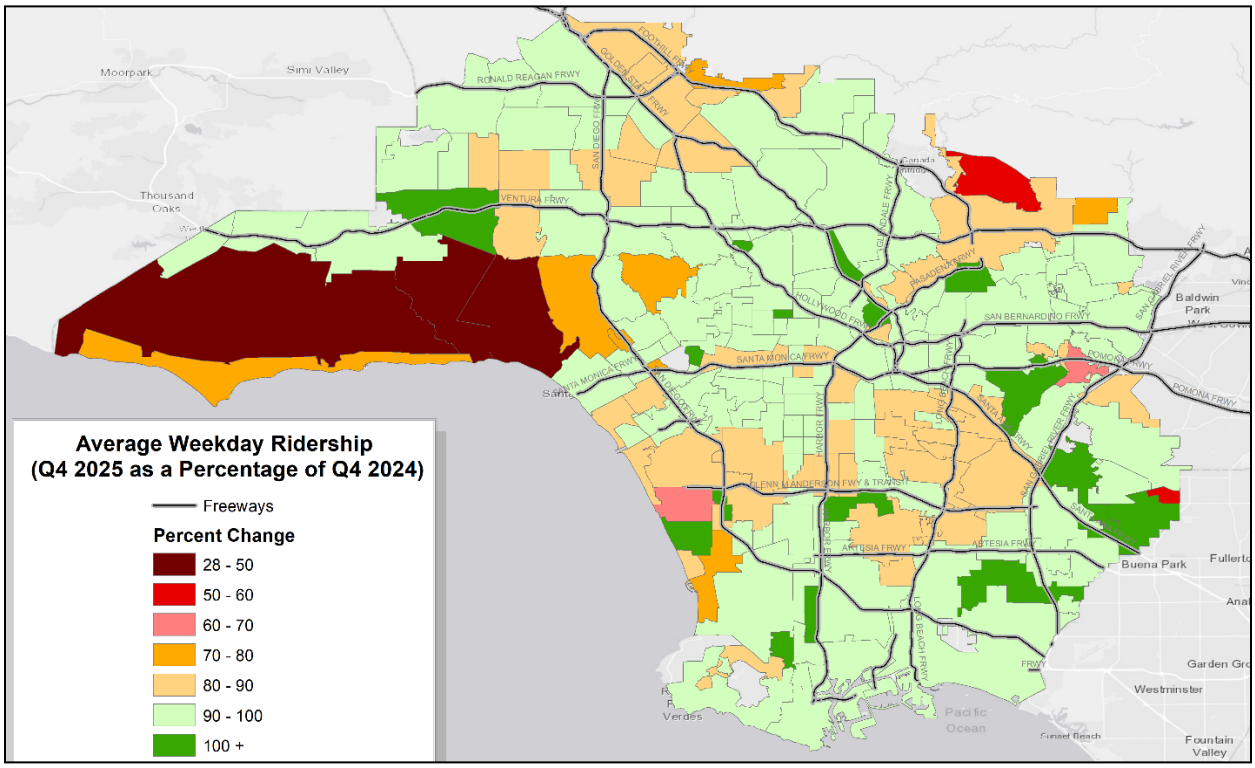


Chart 5: LA County Total Daily Trips By Year and Hour, 2019-2025



Map 1: Q4 2025 Average Weekday Ridership as a Percentage of Q4 2024 Average Weekday Ridership



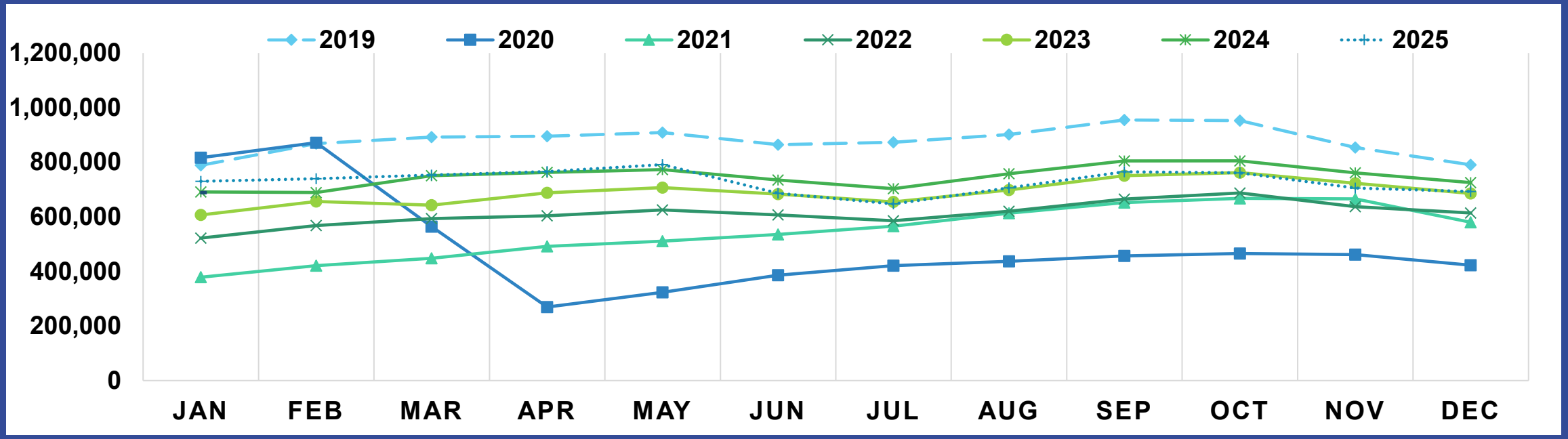
NextGen Ridership Update
Quarter 4, Calendar Year 2025

Operations, Safety, and Customer Experience Committee

April 16, 2026

Metro

Average Weekday Ridership 2019-2025



- Average weekday Q4 CY2025 ridership versus Q4 CY2024 declined 5.8%, a lesser decline than 6.4% in Q3.
- The downward trend to CY2023 levels seen first in June 2025 and continuing in Q3 CY2025 (July -7.9%, August -6.8%, September -4.9%), continued in Q4 CY2025 (October -5.5%, November -7.4%, and December -4.5%) as immigration enforcement actions likely continued to impact Metro bus system ridership.
- Average Saturday Q4 CY2025 ridership versus Q4 CY2024 declined 5.8%, a lesser decline than 6.8% in Q3.
- Average Sunday Q4 CY2025 ridership versus Q4 CY2024 declined 3.8%, a lesser decline than 4.6% in Q3.
- While all day types showed smaller year over year ridership declines in Q4 than Q3, the reductions were small.

Metro

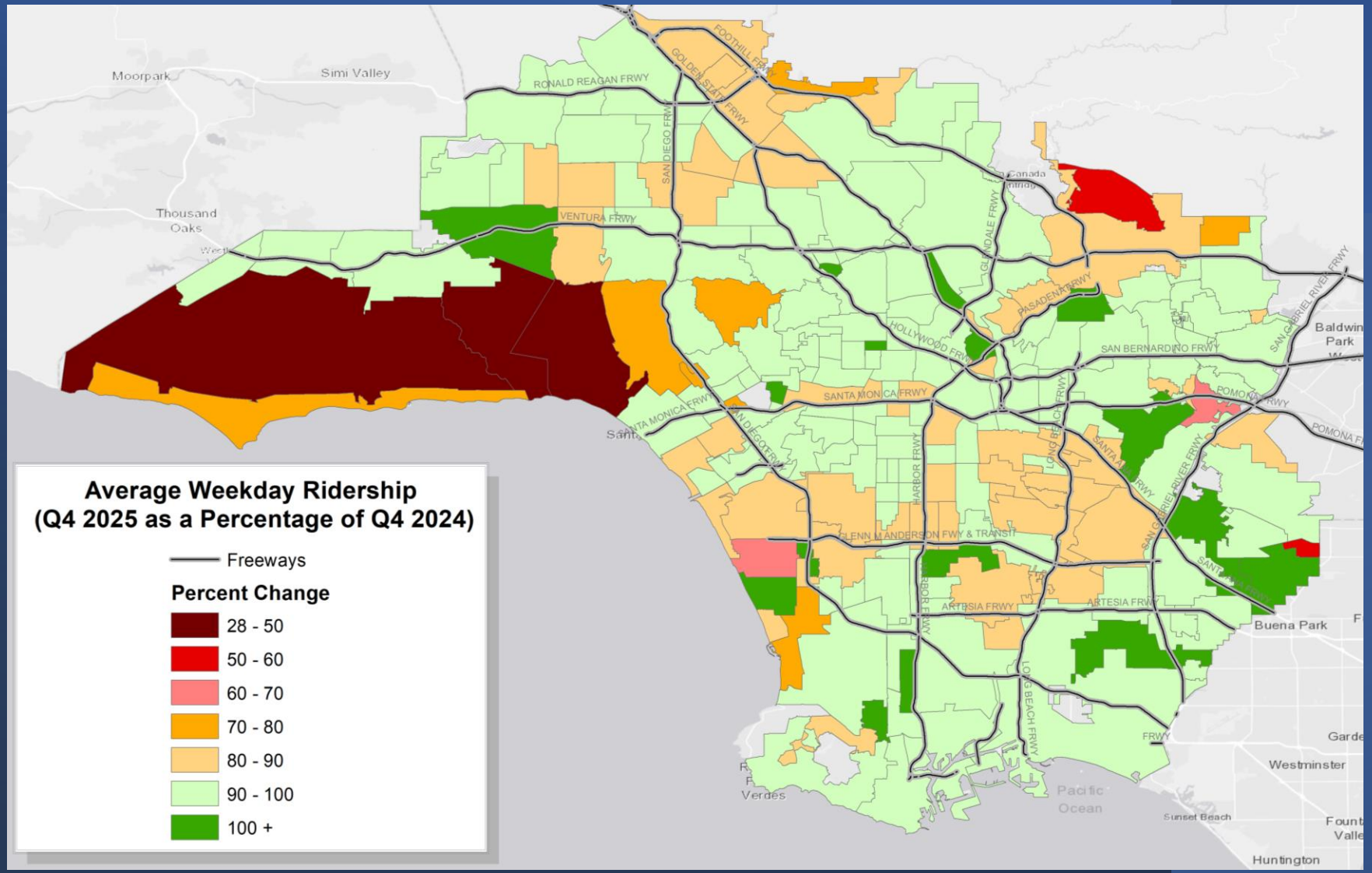
Average Weekday Ridership by Service Area

- Year over year ridership declines by service area first seen in Q3 CY2025 were still present in Q4 CY2025.
- Rates of ridership decline, while still significant, were less in Q4 for Gateway Cities which saw highest Q3 declines. San Gabriel Valley and Westside Central areas also saw reduced rates of decline in Q4.
- The opposite was true for South Bay Cities which saw the largest year over year ridership declines in Q4 CY2025. Also notable was a significant increase in rate of decline of ridership in San Fernando Valley in Q4 compared to much lower declines in Q3.
- These results may suggest an intensification of immigration enforcement actions in Q4 in both South Bay Cities and San Fernando Valley regions.
- EFC Ridership in Q4 CY2025 exceeded Q3 CY2024 by 0.5% weekdays and weekends, so it appears the immigration enforcement actions had less impact in EFCs in Q4 2025.

Change in Average Daily Ridership by Service Area Year over Year (YOY) CY2025 versus CY2024, Q4 and Q3	Weekday	Saturday	Sunday
Gateway Cities Q4 YOY	-7.3%	-8.1%	-5.8%
Gateway Cities Q3 YOY	-9.1%	-10.3%	-10.0%
San Fernando Valley Q4 YOY	-5.8%	-6.3%	-4.4%
San Fernando Valley Q3 YOY	-0.8%	-0.6%	0.5%
San Gabriel Valley Q4 YOY	-3.6%	-1.8%	-1.9%
San Gabriel Valley Q3 YOY	-4.7%	-5.0%	-5.6%
South Bay Cities Q4 YOY	-9.0%	-8.8%	-8.7%
South Bay Cities Q3 YOY	-5.8%	-7.9%	-7.3%
Westside Central Q4 YOY	-6.3%	-6.8%	-5.5%
Westside Central Q3 YOY	-6.9%	-7.7%	-4.5%

EFC Ridership Percentage	Weekday	Saturday	Sunday
CY2019 Q4	78.0%	79.5%	79.3%
CY2020 Q4	80.0%	81.1%	80.6%
CY2021 Q4	79.6%	80.1%	80.5%
CY2022 Q4	79.0%	79.8%	79.9%
CY2023 Q4	78.9%	79.7%	79.8%
CY2024 Q4	78.7%	79.4%	79.3%
CY2025 Q4	78.6%	79.0%	78.8%

Q4 2025 Average Weekday Ridership as Percentage of Q4 2024



Largest declines are still seen in areas impacted by the January 2025 fires. Southeast LA where immigration actions had been most common also shows a larger decline, and impacts have expanded to South LA, South Bay, and parts of San Fernando Valley.

Ridership by Time Period
Q4 CY2025 versus Q4 CY2024

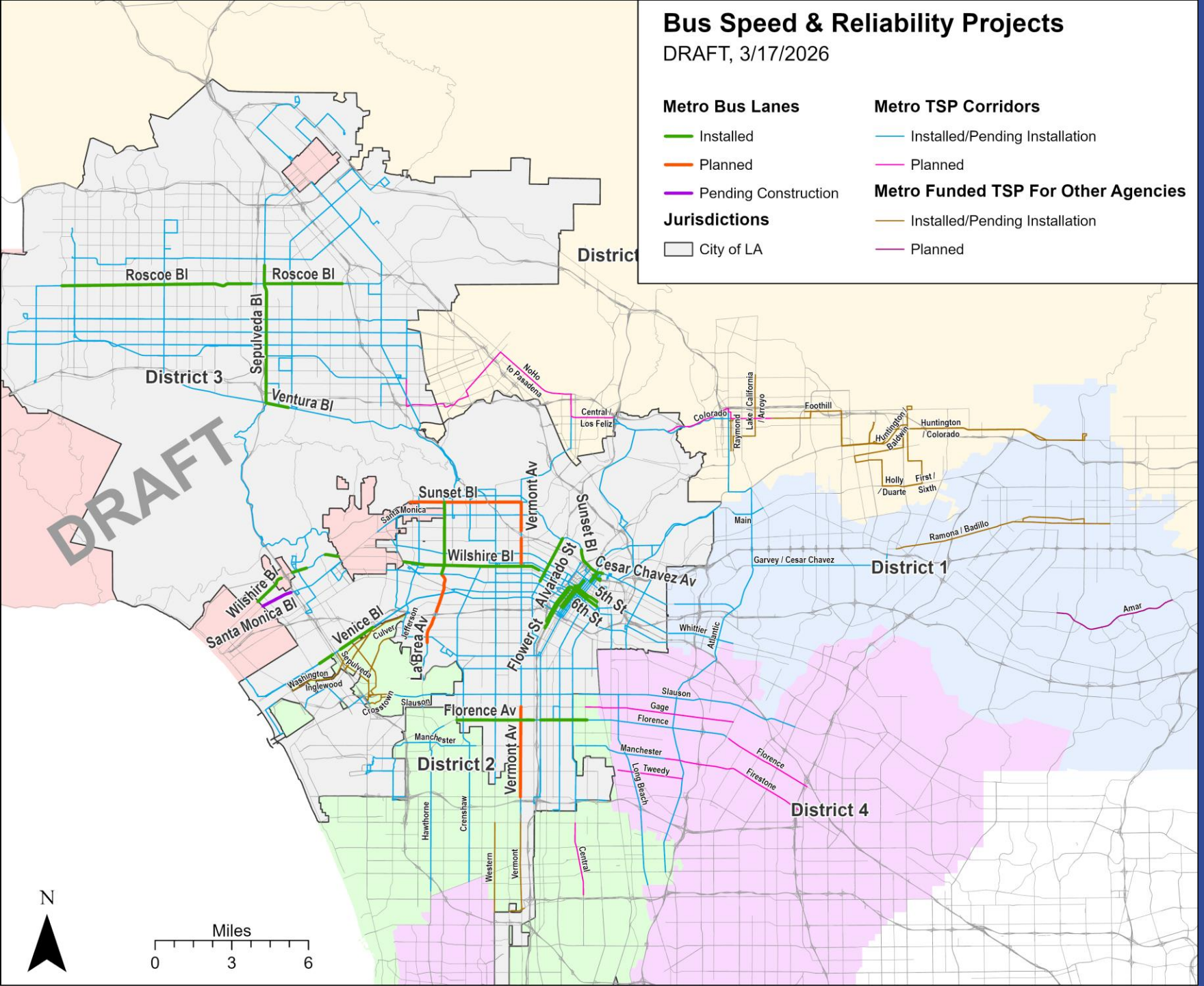
Time Period	Weekday CY2024 Q4	Weekday CY2025 Q4	Weekday % Change	Saturday CY2024 Q4	Saturday CY2025 Q4	Saturday % Change	Sunday CY2024 Q4	Sunday CY2025 Q4	Sunday % Change
Early AM (4a-6a)	24,880	22,271	-11.7%	11,480	10,801	-6.3%	8,702	8,420	-3.3%
AM Peak (6a-9a)	151,334	138,118	-9.6%	71,822	63,960	-12.3%	54,517	49,985	-9.1%
Midday (9a-3p)	295,932	278,228	-6.4%	227,576	207,769	-9.5%	195,525	181,250	-7.9%
PM Peak (3p-6p)	243,254	227,071	-7.1%	144,816	134,549	-7.6%	123,700	115,101	-7.5%
Evening (6p-9p)	48,963	47,616	-2.8%	43,971	43,123	-2.0%	37,967	37,334	-1.7%
Late Evening (9p-12a)	14,500	14,560	0.4%	15,208	15,386	1.2%	12,850	12,977	1.0%
Owl (12a-4a)	8,585	8,763	2.0%	9,692	9,731	0.4%	7,900	8,010	1.4%

- Early AM and AM peak showed largest time period ridership year over year declines especially weekdays. This is likely partly due to ridership moving away from office workers to service workers that may travel more in the midday period, though declines due to immigration enforcement are likely present.
- Midday and PM peak in Q4 CY2025 have lesser year over year declines than Early AM & AM peak. These periods have a more broad-based ridership from both office and service workers benefitting from NextGen Bus Plan with improved midday service frequencies. However, declines due to immigration enforcement are also likely present in these two time periods.
- Evening ridership declines were small in Q4, while Late Evening and Owl ridership actually increased in Q4.

Q4 CY2025 versus Q4 CY2024 Line Ridership Changes

- In Q4 CY2025, while bus system ridership declined overall, 17 of 108 weekday, 29 of 103 Saturday, and 36 of 103 Sunday lines increased ridership over Q4 CY2024.
  - Some of these lines had NextGen route and/or frequency improvements. Many others were less frequent Tier 3 & 4 lines operating where immigration enforcement may be less common.
  - Four lines in Q4 CY2025 with largest year over year ridership declines to below 80.0% of Q4 CY2024 ridership were January 2025 Eaton and Palisades fire impacted lines. Other lines were generally not less than 85% of Q4 CY2024 levels, with most above 90.0%.
- Ridership declines were widespread in Q4 CY2025, but impacted frequent, higher ridership NextGen Tier 1 and 2 lines where more immigration enforcement actions may be occurring.
- Productivity (boardings/revenue service hour) in Q4 CY2025 is also down year over year at system level, though lines with increased ridership have generally also improved productivity.

CY2025 vs CY2024 Q4	Weekday	Saturday	Sunday
120%+	1	2	3
110-119%	2	4	4
100-109%	14	23	29
90-99%	80	58	57
80-89%	7	12	7
70-79%	1	2	2
60-69%	2	1	0
50-59%	0	1	1
40-49%	1	0	0
Total	108	103	103



Speed & Reliability Updates

Bus lane progress

- 80.5 lane-miles complete
- 2.5 lane-miles pending installation
- 25.2 lane-miles planned

Florence Av

- Project complete in 5/2026

Sunset Bl

- 8.4 lane-miles planned between Vermont Av and Havenhurst Dr

Recent on-board rider bus lane survey

- 71% reported faster travel times
- 69% reported improved reliability

Transit Signal Priority (TSP)

- Upgrading 2,000 TSP signals to cloud-based technology with 500 new TSP signals. Complete by end of 2026.

Bus stop consolidation

- 318 stops consolidated to balance speed and accessibility on Metro's busiest lines.

Headway Based Operation Pilot

- Pilot completed for Line 16

Bus Lane Enforcement (BLE) Program February 2026 Update

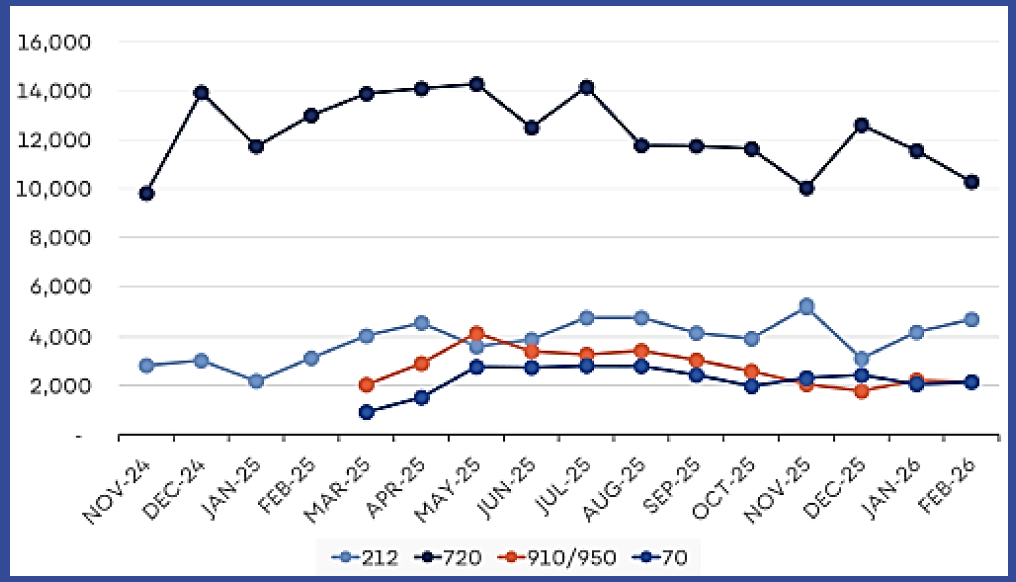
February 2026 Events per Route

- 212: 3,858
- 910/950: 1,229
- 720: 9,379
- 70: 249
- 68% (158) of bus stops with 10+ events
- 176 bus stops with at least one event

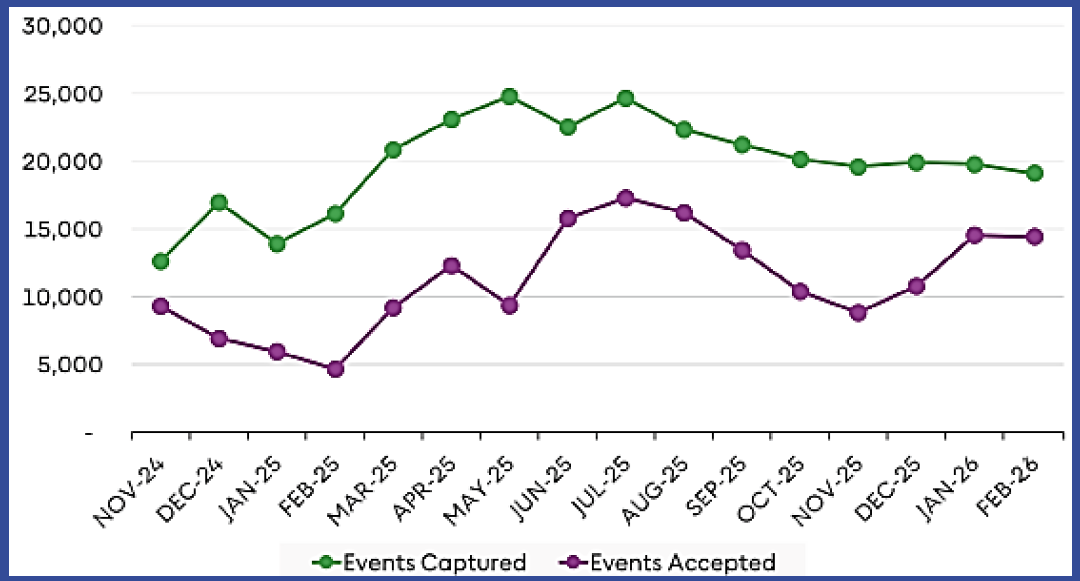
February 2026 Enforcement

- Bus lane events: 14,715 / 649 events per mile
- 54% (95) of all bus lane locations with 10+ events
- 16,638 unique violators; 1,484 repeat offenders
- 9% of vehicles with multiple violations

Events Captured By Route



Events Captured v Accepted



Impacts of enforcement on individual line performance to be reviewed

Metro