SAFETY AND SECURITY: Opportunities to Improve Controls Over Police Department Workforce Planning

Memorandum

To: Polly L. Hanson  
   Senior Vice President and Chief of Police

   Susan K. Reinertson  
   Vice President Emergency Management and Corporate Security

From: David R. Warren  
   Assistant Inspector General, Audits

Date: February 12, 2015


The mission of the Amtrak Police department (APD) is to ensure the safety and security of infrastructure, passengers, and employees. As of October 1, 2014, the department had 484 police officers and civilian personnel at more than 30 locations. The department’s expenditures in fiscal year (FY) 2014 were reported at approximately $69 million, of which about $62 million (90 percent) were for personnel.

The objective of this audit was to make a comparative analysis of APD’s workforce planning practices and best practices to determine whether there were opportunities for improvement. We identified the best practices through interviews with senior officials from six rail transit police departments and organizations that conduct police department staffing studies. For a detailed discussion of our scope and methodology, see Appendix A.
OPPORTUNITIES EXIST TO IMPROVE WORKFORCE PLANNING PRACTICES AND RELATED SAFETY AND SECURITY PROGRAMS

We identified opportunities to improve management controls over APD’s workforce planning practices. APD does not have a formal workforce planning process to determine the number and type of police officers needed to support its mission. APD uses a variety of practices to address workforce planning, such as the number of passengers that transit a site, the types of crime at a location, the number of calls for service, and the risk of terrorist attacks. At the same time, company-wide processes related to security risk assessments and the use of video surveillance systems have not been optimally coordinated to achieve the safety and security goals. These limitations could hinder the department from optimally using resources to achieve its mission. The Chief of Police is aware of these weaknesses and has taken a number of actions and also plans other actions to address them.

When comparing APD’s workforce planning practices to the best practices of other rail transit police departments, we identified opportunities for improvement. In addition to developing a formal workforce planning process, we identified six additional best practices that could be incorporated into a workforce planning process. See Figure 1.
Figure 1. Opportunities for Improvement

<table>
<thead>
<tr>
<th>Best Practices</th>
<th>Observed APD Practices/Opportunity for Improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Workforce Planning.</strong> Use a formal workforce planning process that incorporates strategic workforce planning principles.</td>
<td>Uses various elements of workforce planning principles but does not have a formal workforce planning process.</td>
</tr>
<tr>
<td><strong>Goals and Performance Measures.</strong> Clearly identify specific goals and results-oriented performance measures to achieve the department’s mission.</td>
<td>Identifies performance goals and measures that are linked to the missions of the department and the company.</td>
</tr>
<tr>
<td><strong>Risk Assessments.</strong> Conduct risk assessments to identify risks and allocate resources to address them.</td>
<td>Limited use of risk assessments to identify security needs and allocate resources.</td>
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<tr>
<td><strong>Data Analysis.</strong> Collect and analyze crime and workload data to inform decisions on workforce planning.</td>
<td>Uses crime data to allocate resources but does not use workload data to allocate resources.</td>
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<tr>
<td><strong>Surveillance Systems.</strong> Use video surveillance systems as a force multiplier to mitigate risk.</td>
<td>Limited access to video surveillance systems.</td>
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<tr>
<td><strong>Alternate Staffing Option.</strong> Use security guards to supplement or reduce staffing.</td>
<td>Limited use of security guards to supplement its staff.</td>
</tr>
<tr>
<td><strong>Reviewing Process Results.</strong> Monitor and evaluate results of workforce planning efforts.</td>
<td>Does not have a formal process to monitor and evaluate workforce planning efforts.</td>
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</tbody>
</table>

Source: The best practices were identified primarily through interviews with senior officials from the Metropolitan Transportation Authority, New Jersey Transit, Massachusetts Bay Area Transit Authority, Washington Metropolitan Area Transit Authority, Metropolitan Atlanta Rapid Transit Authority, and Dallas Area Rapid Transit.

Workforce Planning Can be Improved

Best practices show that successful organizations use strategic, formal processes for workforce planning to help meet current and future mission requirements, make staffing decisions, and ensure that resources are used efficiently. Although processes vary from organization to organization, best practices show that six key principles should be addressed:
1. Align workforce planning with strategic planning and budget formulation, and consider staffing when developing a budget.

2. Involve managers, employees, and other stakeholders in planning.

3. Identify critical occupations, skills, and competencies; analyze workforce gaps.

4. Develop strategies to address workforce gaps.

5. Build capacity to support workforce strategies.


APD’s workforce planning practices incorporate various aspects of these principles. As discussed in this report, opportunities exist to improve the department’s practices related to the following:

- workforce planning
- goals and performance metrics
- identifying risks and allocating resources to mitigate them
- using crime and workload data to allocate resources
- using video surveillance systems to supplement the existing workforce
- assessing the use of alternative staffing options
- monitoring and evaluating the department’s progress in workforce planning

Developing Specific Goals and Performance Measures to Support the Mission

Best practices show that transit police departments can measure the effectiveness of their police activities when they establish a clear strategic mission, goals, and performance measures. Best practices also show that goals and performance measures should be clear, specific, reasonable, and results-oriented to help officers fulfill the missions of the department and the company. For example, one transit police department closely aligns its mission and goals for improving service delivery with company-wide efforts to improve customer service; their performance measures for this goal include reducing crimes against people and property by 2 percent compared to the previous year. Officials from this department told us that these performance measures allow them to evaluate the results of their decisions about allocating resources and the corresponding police activities.
APD aligns its performance goals with the company’s strategic goals of safety and security, customer focus, and financial excellence. For example, the company’s safety and security goal is to “set the standard for safety and security in the transportation industry to ensure that every passenger and employee goes home injury-free every day.” In FY 2015, the Chief of Police established specific goals and performance measures for her deputies. For example, the Chief’s goal to use a new technology to track crime and hold crime-tracking meetings was reflected in her deputies’ goal to use the new crime-tracking technology to help reduce crime at a specific station by 5 percent.

**Using Risk Assessments to Identify Risks and Allocate Resources**

All six transit police departments use risk assessments to identify high-risk locations, identify gaps in existing security countermeasures, and assess needs to address security risks. To make sites more secure, they use several options, including installing video surveillance systems, making other infrastructure improvements, and allocating additional staff to understaffed locations. Some transit department officials stated that they also use risk assessment results to allocate more staff to sites with the greatest risks and fewer or no staff to lower-risk sites.

The Office of Emergency Management and Corporate Security (EMCS)\(^1\) is responsible for developing a company-wide security risk assessment. EMCS conducts this assessment approximately every three years to examine the impact of natural disasters and terrorist attacks and to identify potential countermeasures to address risk by location. The April 2014 risk assessment noted that installing video surveillance systems and making infrastructure improvements at sites to control access points would offer greater returns on investment, in terms of reducing risk, than increasing law enforcement staff.

APD has made limited use of risk assessments to identify security needs and allocate resources. APD officials said they received the risk assessment in September 2014 but have not used the results to determine whether the department has adequate resources at each site to address potential risks or whether the level of risk would justify reallocating staff. APD and EMCS officials have met to discuss the risk assessment and plan to use it as a tool to coordinate, select, and fund security projects funded by

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\(^1\) The Office of Emergency Management and Corporate Security was established in 2012 to improve security and safety across the company.
Department of Homeland Security grants, such as video surveillance systems and infrastructure projects.2

**Using Workload and Crime Data to Help Allocate Resources**

All six transit police departments use workload and crime data to determine the effectiveness of resource allocations. One department uses a computer-based staffing model that uses “calls for service” and crime statistics to help allocate staff. These calculations are based on measurable objectives, such as how much time should be spent responding to incidents and patrolling trains, stations, and operations and maintenance facilities. Using this data allows officials to allocate police resources more effectively.

To make staffing decisions, the Chief of Police uses crime statistics, but not workload data. She said the current reporting system does not allow for meaningful reporting or analysis, and the reliability of the data is questionable. The Chief plans to have a new reporting system operational by September 2016 that would allow management to better assess its staffing needs, identify gaps in coverage, and target high-risk areas.

We used data from APD’s current Computer Aided Dispatch System to determine the amount of time patrol officers spend responding to calls for service. This analysis shows that during calendar year 2013, patrol officers spent about 16 percent of their time responding to calls for service. The Chief of Police stated that the remaining portion of the officers’ time includes providing a visible police presence, assisting passengers with directions and lost items, and medical situations. Knowing how much time is spent responding to calls for service allows management to assign police officers to address other department goals, such as presence on trains or patrolling certain areas.

**Using Video Surveillance Systems to Supplement Staffing**

The six transit police departments said they use video surveillance systems to supplement staffing, augment investigations, and respond quickly to incidents. One department monitors its video surveillance systems to identify incidents or crimes in progress and then dispatches officers to the area. Other transit departments use video surveillance systems to supplement police officers in low-risk areas. One department

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2 In 2014, the Department of Homeland Security awarded Amtrak a Transit Security Program grant of $10 million. Of this amount, ECMS received $5.5 million, and APD received $4.5 million.
told us that by using video surveillance systems and limiting access through infrastructure improvements, they were able to supplement staffing by using security guards rather than more expensive police officers.

APD’s deputy chiefs have been recently granted access to the company’s video surveillance systems. Obtaining access has been limited by several factors. First, Amtrak does not have a comprehensive inventory of its video surveillance systems. Since 2012, EMCS has been responsible for installing, operating, and maintaining the company’s video surveillance system. EMCS is working to compile a complete inventory of video equipment and recently installed a new video system in a large, company-owned station. Prior to EMCS, many station officials installed their own video equipment, according to EMCS officials. Second, other railroads have installed and operate video surveillance systems at larger stations where Amtrak is collocated. APD must request video feeds from these transit police departments after an incident has occurred, which can be a time-consuming process, according to APD officials. These factors limit APD’s ability to utilize technology to increase efficiency and supplement staffing.

**Using Alternate Staffing Options at Low-Risk Facilities**

Four of the transit police departments use security guards at low-risk facilities to supplement their sworn staff. Transit authority officials for one metropolitan area stated that security guards make up more than 30 percent of its 719-member security workforce. They use security guards to protect their headquarters and rail and bus facilities. Another transit police department uses security guards at low-risk facilities such as administrative buildings and maintenance facilities, which saves money and allows them to assign police officers to higher-risk facilities.

APD has used security guards to supplement staffing at several low-risk locations. There were nine security guard positions at three maintenance facilities and Amtrak headquarters in Washington, D.C., as of September 30, 2014.³ APD has requested funding for new security guard positions at three additional facilities in FY 2015. Department officials estimate that the cost of adding security guards to these locations will be $621,000; the cost of providing similar coverage by sworn police officers would be more than $1.4 million. They also note that using security guards provides flexibility if staffing requirements change.

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³ The three maintenance facilities are Beech Grove, Indiana; New Orleans, Louisiana; and Ivy City, Washington, D.C.
Monitoring and Evaluating Workforce Planning Efforts

Best practices show that successful organizations routinely monitor and evaluate their workforce planning efforts to determine if they are effective. Five of the six transit police departments regularly review their workforce planning efforts to assess staffing needs and to identify gaps and opportunities to address these needs. They also assess the extent to which staffing allocations have helped to achieve the organization’s mission.

APD does not have a formal process to monitor and evaluate its workforce planning. The Chief of Police noted that the division chiefs are responsible for monitoring and evaluating resource allocations in their divisions. They assess risk and crime data for their regions, and they make staffing adjustments as needed with the resources they have.

CONCLUSIONS AND RECOMMENDATIONS

APD’s workforce planning includes various elements of the best practices we identified, but APD could improve its management controls in several areas. Most significant is the absence of a formal process for workforce planning that could help ensure a more effective and efficient use of APD resources. Further, company-wide processes related to security risk assessments and the use of video surveillance systems could be better coordinated to achieve department goals. These limitations could keep APD from optimizing its resources to achieve the department’s mission and the company’s strategic safety and security goal. APD is aware of these weaknesses and has taken a number of actions and also plans other actions to address them.

To complement and facilitate APD’s actions to improve its workforce planning, we recommend that the Chief of Police:

1. Develop a formal process for workforce planning that incorporates the six principles discussed in this report. Use the workforce planning process to develop strategies to accomplish the following:
   • Clearly identify specific goals and performance measures that support the department’s mission.
   • Use risk assessments and workload data to identify security needs and allocate resources to achieve department goals.
• Identify opportunities to supplement staffing, such as using security guards as cost-effective alternatives to police officers.
• Monitor and evaluate the effectiveness of the workforce planning process.

We also recommend that the Chief of Police and the Vice President for the Office of Emergency Management and Corporate Security:

2. Establish a joint working group to develop a collaborative risk assessment process and ensure the optimal use of security risk assessments and selection of cost-effective options to reduce security risk.

MANAGEMENT COMMENTS AND OIG ANALYSIS

In commenting on the draft report, the company generally agreed with our recommendations. The actions cited in management comments address the intent of our recommendations. Appendix B contains management’s complete letter of comment. Presented below is a summary of the company’s comments to the recommendations.

• The company agreed with recommendation 1 to develop a process for workforce planning that incorporates the best practice principles discussed in this report. The Chief of Police identified several initiatives that are currently underway to address workforce planning issues as well as plans to hire a qualified professional police planner to identify APD’s security needs and develop a workforce planning model by the end of FY 2015.

• In response to recommendation 2 that APD work collaboratively with EMCS on security issues the company generally agreed stating that within 60 days APD and EMCS to discuss the creation of a joint working group to leverage Amtrak’s risk assessments to optimize the effectiveness and efficiency of security risk management.
Appendix A

SCOPE AND METHODOLOGY

This report provides the results of our review to assess APD’s workforce planning practices and determine whether the current practices could be improved by applying best practices of other transit police departments. Our scope included audit work conducted from May to November 2014 in Washington, D.C.; Philadelphia, Pennsylvania; Chicago, Illinois; New York City, New York; and Newark, New Jersey. We also conducted interviews with transit police officials in Boston, Massachusetts; Dallas, Texas; and Atlanta, Georgia. Our work in the company focused primarily on APD; we also did limited work in the Office of Emergency Management and Corporate Security (EMCS).

Our methodology to assess APD’s workforce planning practices included interviewing the Chief of Police, the Deputy Chief of Police at New York’s Penn Station, the Director of Police Administration and Public Affairs, and the leaders of Special Operations and Canine Divisions. The interviews focused on the process used to determine the number of police officers required, the mission of APD, and its involvement in the risk assessment conducted by EMCS. We also analyzed APD budget and staffing data to identify the number of sworn and non-sworn staff by locations. Finally, we obtained and analyzed data from the Computer Aided Dispatch System to determine the percent of time that company police officers spend responding to calls for service.

Our methodology to identify best practices in workforce planning used by transit police departments, interviewing the following:

- Chief of Police and the Assistant Chief of Police for the Metropolitan Transportation Authority
- Chief of Police, Chief of Staff and Director of Operations for New Jersey Transit
- Chief of Police, Massachusetts Bay Area Transit Authority
- Deputy Chief of Police, Washington Metropolitan Area Transit Authority
- Deputy Chief of Police, Metropolitan Atlanta Rapid Transit Authority
- Manager of Special Services, Dallas Area Rapid Transit

We selected these organizations because they are large transit police departments, and the Amtrak Chief of Police said they would represent a fair comparison to the work of APD. We also interviewed officials from the International Association of Chiefs of
Police, International City/County Management Association, Police Executive Research Foundation, and Alexander Weiss Consulting LLC; these organizations are involved in conducting staffing studies for community police departments. We also met with officials of the Commission on Accreditation of Law Enforcement Agencies to discuss their standards for workforce planning. We compared the company’s policies and practices to the best practices we identified for determining police department staffing.

Using the above information, we compared APD practices and the best practices we identified. We used that analysis to identify the opportunities to improve APD’s workforce planning management controls.

We conducted this performance audit 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 conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

**Internal Controls**

We reviewed the management controls used by APD to make decisions on workforce planning. Our detailed control work focused on plans, processes, and procedures for activities related to workforce plans, workforce metrics safety and security risk assessments, use of crime data analysis video surveillance systems, alternative staffing options, and monitoring and evaluating goal achievement.

For EMCS, we did a limited review of management controls related to safety and security, security risk assessments, and the use of video surveillance equipment. We did not review APD’s or EMCS’s overall management control environment or company-wide workforce planning processes.

**Computer-Processed Data**

We used computer-processed data from the department’s Computer Aided Dispatch System and SAP for the limited purpose of determining the amount of time that patrol officers spent responding to calls for service. APD officials raised questions about the reliability and limitations of the reporting system and noted that the department is in the process of procuring a new system. We did not verify the accuracy of the data, but
we worked to improve data reliability by identifying and excluding duplicate records and alarm calls for service that were opened and closed at the same time. These changes represented less than two percent of the reported calls for service during calendar year 2013. Based on these adjustments, we concluded that the data are sufficiently reliable to identify the amount of time an officer spends responding to calls for service.
This memo is in response to the Office of Inspector General’s (OIG) draft report entitled Safety and Security: Opportunities to Improve Controls over Police Department Workforce Planning Audit Report #011-2014.

The draft report describes how the OIG performed a comparative analysis of APD’s workforce planning practices and best practices with transit agencies to determine whether there were opportunities for improvement. The report notes that all six transit agencies interviewed use workload and crime data to determine the effectiveness of resource allocations which is different than having a staffing model. Originally OIG staff indicated the focus of this audit was whether the Amtrak Police had a staffing formula. The APD developed an authorized staffing report that documents existing vacancies and filled positions by region and reporting location as a tool. Additionally, resource allocation opportunities are discussed routinely. During the development of the APD budget, such detailed information allowed the APD to advocate for and receive additional personnel positions in FY 15 as well as funding for additional security personnel.

The OIG report states that there is a lack of utilization of surveillance systems to supplement staffing and highlights the use of these systems by the transit police systems surveyed. The surveillance system at Amtrak is under the EMCS umbrella; APD is one of many customers. Many transit systems have staffed viewing centers which allow them to view crimes or incidents after they have occurred. Although Amtrak has deployed cameras and has numerous locations where cameras may be monitored, Amtrak does not have a camera viewing center staffed solely for that purpose.

The report also notes that APD has made “limited” use of risk assessments to identify security needs and allocate resources. A risk assessment looks at threat, vulnerability, and consequence data to evaluate risk to determine mitigation strategies to drive down the risk and is not intended to be used as a tool to determine staffing but as a resource to consider when deploying resources. Amtrak uses monies from the FEMA Intercity Passenger Rail grant for these mitigation efforts. APD uses the majority of its grant
money for personnel and canine deployment as well as screening. Threat and vulnerability are considerations for the deployment of these resources.

APD shared with the OIG staff that many changes are underway within the APD that involve a more strategic approach to the collection, analysis and utilization of crime data, the use of technology and methodologies to enable a more focused approach to preventing crime and deploying personnel. Additionally, documentation was provided to OIG staff that outlines the specific goals all non-agreement personnel have and the documents used to track those goals. It was also conveyed that efforts are underway with HC to develop metrics to measure the performance of agreement personnel in support of the department’s mission. As noted in the report, the Amtrak Police Department already includes various elements of the best practices identified by the OIG in their survey of six transit agencies.

**Recommendation 1:**
Develop a formal process for workforce planning that incorporates the six principles discussed in this report. Use the workforce planning process to develop strategies to accomplish the following:

- Clearly identify specific goals and performance measures that support the department’s mission.
- Use risk assessments and workload data to identify security needs and allocate resources to achieve department goals.
- Identify opportunities to supplement staffing, such as using security guards as cost-effective alternatives to police officers.
- Monitor and evaluate the effectiveness of the workforce planning process.

**Management Response/Action Plan:**
Management agrees that Amtrak may benefit from a workforce plan and APD has already had preliminary discussions with a police planner, to explore such an effort.

To date, we have also undertaken the following initiatives to improve workforce deployments to address crime, terrorism and security and safety goals:

- Replacement of current record management system to improve data collection, reliability and analysis
- Institution of divisional crime, calls for service and staffing reviews based on daily data (APD’s version of the highly successfully and well recognized police “Comstat” program used in major cities to address crime, quality of life and resource allocation)
- Continue to use Master Security Guard contract effectively and efficiently
- Stresses importance of CCTV systems as a technological security measure to improve overall policing efforts and uses technology products to improve policing efforts (ex. Mass Transit Test-bed, TSA MOA for passive millimeter waving screening)
- Goals Aligned with the Amtrak Strategic Plan were developed and a monthly report of these measures which support the APD mission are obtained
APD will work with Amtrak Procurement to execute a contract with a qualified professional police planner, within 60 days of the date of this response.

The scope of work covered by this contract will include the identification security needs and enable Amtrak to:

- Allocate resources to achieve department goals;
- Clearly identify specific goals and performance measures that support the department’s mission;
- Use risk assessments and workload data to identify opportunities to supplement staffing; and
- Continuously monitor, evaluate and improve the effectiveness of the workforce planning process, and the workforce plan.

APD will work with the approved contractor to develop a workforce planning model by the end of FY15 and plan for full implementation of the workforce model at the beginning of the second quarter, FY16.

**Recommendation 2:**
Establish a joint working group to develop a collaborative risk assessment process and ensure the optimal use of security risk assessments and selection of cost-effective options to reduce security risk.

**Management Response/Action Plan:**
Management appreciates the recommendation. Based upon the work of the OIG in examining the organization of the six transit agencies for best practices, it was understood that Amtrak appears to be unique in sharing the challenging roles of police and security by bifurcating them between two separate and distinct Departments. Benchmarking to determine best practices in police and security program alignment would seem to be a logical next step to review and consider and should be completed in FY15.

Management agrees that risk assessments, collaboration and cross-functional input are essential to reduce security risks. APD works collaboratively on security issues with EMCS. This collaboration continues to include developing and delivering training to employees, focused security messaging campaigns for employees and passengers, and coordination of security projects, grant development and preparedness planning. There are regular joint "meetings" (telephone conferences or face to face meetings) between the Departments. EMCS will work with APD to develop a video surveillance Standard Operating Procedure and continue to provide access to video surveillance systems as well as risk assessment tools and data.

The APD was created by an act of Congress in 1976 to allow Amtrak to have railroad police responsible for providing security to passengers, employees and Amtrak property. EMCS was created in April 2012 to improve Amtrak’s security and safety posture in support of the Amtrak Strategic Plan. Within 60 days, EMCS and APD will meet to discuss the creation of a joint working group to leverage Amtrak risk assessments to optimize the effectiveness and efficiency of security risk management.
Appendix C

ABBREVIATIONS

APD  Amtrak Police Department
EMCS  Emergency Management and Corporate Security
FY  Fiscal Year
Appendix D

OIG TEAM MEMBERS

Michael Kennedy, Senior Director
John Marzullo, Senior Audit Manager
Jodi Prosser, Senior Audit Manager
Joshua Moses, Senior Auditor
John Borrelli, Consultant
Jing Huang, Consultant
Juan Morales, Consultant
OIG MISSION AND CONTACT INFORMATION

**Amtrak OIG’s Mission**
The Amtrak OIG’s mission is to provide independent, objective oversight of Amtrak’s programs and operations through audits, inspections, evaluations, and investigations focused on recommending improvements to Amtrak’s economy, efficiency, and effectiveness; preventing and detecting fraud, waste, and abuse; and providing Congress, Amtrak management, and Amtrak’s Board of Directors with timely information about problems and deficiencies relating to Amtrak’s programs and operations.

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Phone: 800-468-5469

**Contact Information**
David R. Warren
Assistant Inspector General, Audits and Evaluations

Mail: Amtrak OIG
10 G Street, NE, 3W-300
Washington, D.C. 20002-4285
Phone: 202-906-4600
Email: david.warren@amtrakaoig.gov