



OFFICE *of* INSPECTOR GENERAL
NATIONAL RAILROAD PASSENGER CORPORATION

SAFETY AND SECURITY:

Management of the Police Department Has Recently Improved, but Foundational Decisions Are Needed on its Role and Priorities

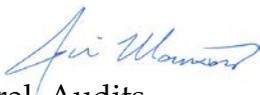
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Memorandum

To: DJ Stadtler
Executive Vice President/Chief Administrative Officer

From: Jim Morrison 
Assistant Inspector General, Audits

Date: July 1, 2020

Subject: *Safety and Security: Management of the Police Department Has Recently Improved, but Foundational Decisions Are Needed on its Role and Priorities (OIG-A-2020-012)*

Amtrak (the company) has identified safety and security as its top priority because providing a safe travel environment is a key component of the company's viability. The Amtrak Police Department (APD), with about 400 sworn officers,¹ is responsible for providing security for the company's 32.5 million annual passengers,² 19,000 employees, and key infrastructure across 46 states. Over the years, however, the company has wrestled with decisions about APD's size and activities. In 2015, we reported that APD needed better workforce planning and management practices to ensure that the company was using its workforce efficiently and effectively.³ In fall 2018, the company proposed a 20 percent reduction to APD's workforce, which generated questions from key stakeholders about the basis for this reduction and its possible impacts.

Given these continuing questions and concerns, our objective was to evaluate the extent to which the company employs key practices to ensure the efficiency and effectiveness of its police force. These practices include those used and supported by other rail organizations and supported by common program management standards. They apply to decisions about a police force's priorities, the size and composition of the workforce

¹ Under 49 U.S.C. § 28101(a), a sworn officer is an officer who is directly employed by a rail carrier and certified or commissioned as a police officer under the laws of a state and may enforce the laws of any jurisdiction in which the rail carrier owns property, to the extent of the authority certified or commissioned under that jurisdiction.

² The company projects significantly lower ridership in fiscal year 2020 as a result of the COVID-19 pandemic.

³ *Safety and Security: Opportunities to Improve Controls Over Police Department Workforce Planning* (OIG-A-2015-006), February 12, 2015.

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it needs to meet these priorities, how it allocates this workforce, and how it sets goals and metrics to measure its performance and relative return on investment.

There are no agreed-upon best practices for rail policing, and there is no list of the top performers in rail policing. Therefore, to identify these key practices, we reviewed and compiled information from a range of public- and private-sector sources. This included information from semi-structured interviews and site visits with 14 of the 16 largest rail organizations in the United States, which cover 90 percent of the nation's ridership.⁴ We also visited national rail police and security departments in Canada, France, Germany, Great Britain, and Italy. We chose these based on expert opinion about high-quality rail police departments and comparable track miles. We then combined the results of our research with commonly accepted management standards⁵ to develop the final key practices. For more details about our scope and methodology, see Appendix A. For a more detailed list of the key practices we identified, including analysis of additional information collected during our interviews with the domestic and international rail and police organizations, see Appendix C.

SUMMARY OF RESULTS

Over the past two years, the company has significantly improved its oversight and management of its police department but has not reached a consensus on the full scope of APD's role and priorities—a foundational decision from which all other policing decisions flow. Further, the company has not developed systematic processes to determine APD's optimum size or composition. As a result, the company does not have reasonable assurance that it is using its police department efficiently and effectively and could be exposed to unforeseen risks to its security, operations, finances, and brand. More specifically, we found the following:

- The company's decision to have its own police department—with its own sworn officers and specialized units—is consistent with other domestic rail organizations and countries we reviewed. These organizations cited significant benefits from this, including allowing them to maintain better control over

⁴ We selected the 16 rail organizations based on ridership to capture organizations with reasonably similar risks to Amtrak. We interviewed 14 police chiefs and 10 executives. Two of the 16 police chiefs did not respond to our request for an interview.

⁵ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014; and Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control—Integrated Framework*, May 2013.

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their policing activities. The company, however, has not fully determined how and where APD should focus its efforts and resources, such as the extent to which it should patrol in stations versus on trains, and what duties APD should cover versus relying on local police departments.

- Without a consensus on APD's role and priorities, the company cannot ensure that the department has the right number of people to meet its needs. Moreover, it does not have systematic, data-driven, risk-based processes for doing so, or easy access to the data necessary to support such analyses, as rail organizations with more sophisticated processes use. Instead, the company has significantly increased and decreased APD's size in recent years without a full assessment of needs and risks.
- In the absence of an assessment on the optimal size of the force, APD has developed a relatively sophisticated process compared to other organizations we reviewed for allocating the staff it already has.
- APD and company executives have developed some specific, measurable goals and metrics for APD covering basic policing issues such as crime and assaults. However, we identified additional metrics that some organizations use that could also be useful for APD.

To better ensure that APD is effectively and efficiently meeting the company's needs and addressing its risks, we recommend that the company and police department reach a consensus on the full scope of APD's role and priorities. Once it has done so, we recommend that the company develop data-driven, risk-based processes to determine the department's optimal size and staffing composition and ensure that those decisions—as well as decisions about allocation, goals, and metrics—align with APD's role and priorities. This will be particularly important as the company adjusts to the changes caused by the COVID-19 pandemic and eventually returns to its new normal state.

In commenting on a draft of this report, the Executive Vice President/Chief Administrative Officer agreed with our recommendations and identified specific actions the company plans to complete by July 1, 2021, to implement them. These include reaching a consensus on what APD should be doing; developing a data-driven, risk-based process to determine APD's optimal size; updating goals and performance metrics; and working with IT to produce better workload data to inform size

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and allocation decisions. When fully implemented, these actions will address our recommendations. For management's complete response, see Appendix B.

BACKGROUND

The Rail Passenger Service Act of 1970⁶ established the company's authority to have its own national police department. In 1976, after taking over the Northeast Corridor, the company created a police and security organization, which it later renamed the Amtrak Police Department.

APD has a budget of about \$80 million per year and has five units: patrol, special operations, national communications center, counter- and criminal-intelligence, and corporate security. Through these five units, APD provides uniformed patrols on trains and in stations; conducts undercover operations, criminal investigations, and counter-terrorism operations; gathers and analyzes intelligence information on threats to the system; and conducts canine operations, passenger screening,⁷ and counter-surveillance activities. As of April 2020, APD employed 397 sworn officers in 6 regions across the company's nationwide network.⁸ Figure 1 illustrates the location of sworn officers across the country.

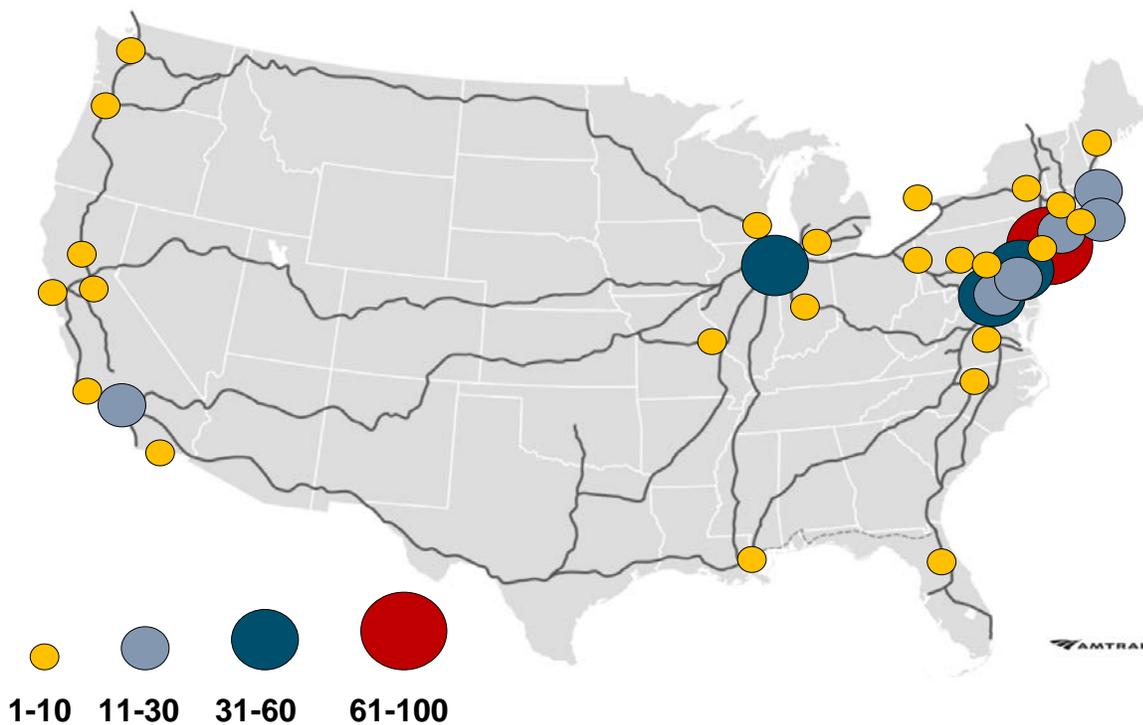
⁶ Rail Passenger Service Act of 1970, 49 U.S.C. § 24305(e).

⁷ APD screens passenger's baggage for security purposes.

⁸ As of April 2020, APD employed 459 personnel—397 sworn officers and 62 civilians.

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Figure 1. Locations of Sworn APD Officers, April 2020



Source: OIG Analysis of APD staffing report

BENEFITS OF A RAIL POLICE DEPARTMENT

Like the company, most domestic rail organizations we reviewed have their own police departments. Nine of the 14 domestic organizations have their own police departments with sworn officers and specialized units; none of these organizations' officials stated that they would prefer to contract out their entire departments.⁹ The remaining five organizations contract—in whole or part—with local departments for policing services. Notably, officials from two of these organizations told us they would prefer to have their own police department or a combination of their own officers and a contract

⁹ We included only domestic rail organizations in this analysis. Of the five countries whose rail organizations we reviewed, four relied on their national rail police rather than an organization-owned police department.

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with local police. In addition, all seven domestic Class I freight railroads have their own police departments, and at least two have had them since the 1800s.¹⁰

Moreover, the organizations noted that rail policing is unique compared to other types of policing, citing the following benefits of having their own police departments, as well as distinctive aspects of the rail environment:

- **Prioritizing the organization's interests.** Some departments told us that local police do not prioritize the types of lower-level crimes that impact rail organizations, such as cell phone theft, vandalism, and fare evasion. Some also noted that local police may respond to their own needs first in a serious incident.¹¹ For example, one international organization that relied on local police was unable to get police service during a significant terrorism event, which prompted it to create its own police department. Organizations with rail police departments also maintain better control and accountability over their policing activities than those that contract out their policing needs. These departments typically have specialized units—including detectives, special operations, canines, and intelligence units—which allows the rail organizations to better prevent and solve their own crimes; respond more quickly to emergencies or other security incidents; and make informed, data-driven decisions about how best to use their forces.
- **Focusing on customers.** Rail police have a particular focus on maintaining a customer-friendly environment, which is generally different than municipal police. Rail organizations place a premium on customer perceptions of safety because, if customers do not feel safe and the organization's reputation suffers, customers can switch to a different mode of transportation, which impacts ridership and revenue.
- **Keeping the trains moving.** Rail police recognize that train delays negatively impact operations, customer satisfaction, and revenue; therefore, they understand the importance of keeping the rail system moving after a security incident. According to other organizations, local police do not have the same considerations. For example, some chiefs of police told us it took local police

¹⁰ We did not interview Class I freight railroads but included this statement to provide additional context.

¹¹ This example includes one international rail organization.

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significantly longer to reopen train traffic when they were the first responders to a security incident, which can negatively impact rail organizations.

- **Ensuring knowledge of the rail system.** Rail police know how to operate safely and efficiently in a rail environment, including knowing how to handle security incidents on the tracks, on trains, in tunnels, and around electrified catenary lines. Without this specialized knowledge, police officers could inadvertently endanger themselves, passengers, and other responding officers. For example, one organization told us about an incident during which local police chased a suspect into a tunnel, putting their own lives at risk.
- **Overcoming challenges of policing an open system.** The rail environment generally does not have access controls to prevent or deter bad actors—for example, persons entering onto facilities with the purpose of doing harm. This is contrary to controls found in the airline industry, for example, and thereby poses an inherent security risk to rail passengers, employees, and infrastructure. Rail police officials acknowledge that the open system is one of their organizations' biggest security risks.

The organizations we reviewed also recognized some drawbacks of having a police department but did not think they outweighed the benefits. For example, officials from other organizations stated that owning a police department with specialized units creates an administrative burden, increases an organization's liability from factors such as officer misconduct, and can be expensive. Any cost calculation, however, depends on the organization's unique circumstances. For example, one rail organization that currently contracts with local police analyzed its model against other models and determined that obtaining its own department could cost less.

NO CLEAR CONSENSUS ON APD'S FOCUS

Over the past two years, the company has taken steps to better manage APD, but it is still unclear how and where APD should focus its efforts and resources because the company has not reached a consensus on the full scope of APD's role and priorities. In some instances, the company has established a priority for APD—like increasing visible presence on trains—but has not agreed on the relative level of effort and staff that APD should dedicate to this priority. In other instances, the company has not decided which duties APD should cover versus local police departments. These decisions are foundational because all other policing decisions flow from them.

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Without a clear consensus on APD's role and priorities and the level of effort it should bring to its priority areas, the company cannot ensure that it is using its police department efficiently and effectively.

The company recently began taking steps to provide APD with a clearer direction. In 2018, the company established an executive-level, security steering committee to develop and oversee a security risk management program. In September 2019, the steering committee approved a fiscal year (FY) 2020 security strategy that APD prepared for the entire company. This strategy discusses a broad range of topics, such as preventing terrorism, reducing crime, minimizing disruptions to service, and increasing confidence among customers and staff.

Nevertheless, the company's executive leadership and APD officials have had ongoing discussions about APD's areas of focus but have not resolved all issues, including the following:

- **Focusing on presence on trains, versus in stations and other facilities.**
The company has debated whether officers should focus on providing a visible presence on trains versus in stations. In June 2019, executive leadership decided to increase police presence on trains company-wide in response to an upward trend in onboard security incidents and to increase customers' perceptions that train travel is safe. An APD official stated that they implemented this change by moving patrol officers to trains, resulting in decreased visibility and less proactive policing in stations. APD leadership is not certain the change is effective, however, because data for onboard train incidents do not show an accompanying reduction in crime or an increase in customer satisfaction since the company implemented this initiative. APD officials noted that the initiative may provide more benefits if it is instituted on a more targeted basis, rather than across all routes company-wide.
- **Focusing on traditional policing activities versus customer service.**
The company has debated whether APD should focus more on traditional policing activities or improving the customer experience. For example, the Chief Administrative Officer told us the company needs to decide whether APD officers should spend time making arrests—a traditional policing function—or whether those duties should be the responsibility of the local police, leaving APD officers visible and available to directly interact with customers and ensure that they feel safe. But regardless of how activities are ultimately allocated,

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APD officials told us that their officers are compelled by law, as sworn police personnel, to act when a crime is committed in their presence.

- **Addressing vulnerable populations or acceding that role to local police.**

APD officials and company executives have also discussed whether APD should be responsible for addressing the needs of vulnerable people who frequent stations the company owns, including persons who are mentally ill, homeless, or battling drug addiction. Executive leadership and APD officials agree that vulnerable people can affect customers' experience and perceptions of safety. They disagree, however, on the extent to which these situations should be APD's responsibility as opposed to that of local police or other law enforcement.

Key practices show that clarifying a department's role and priorities is a key initial step because this drives all other management decisions, including (1) the number and types of resources it needs, (2) how it will deploy these resources, (3) the specific goals the department sets and holds itself accountable for achieving, and (4) how it will measure the difference this investment is making in terms of ensuring a safe railroad.

For example, one organization we reviewed determined that reducing fare evasion was its main policing priority because of the large revenue losses it was experiencing.

Accordingly, the organization increased the number of officers who have the authority to enforce fare violations while reducing its total number of security personnel.

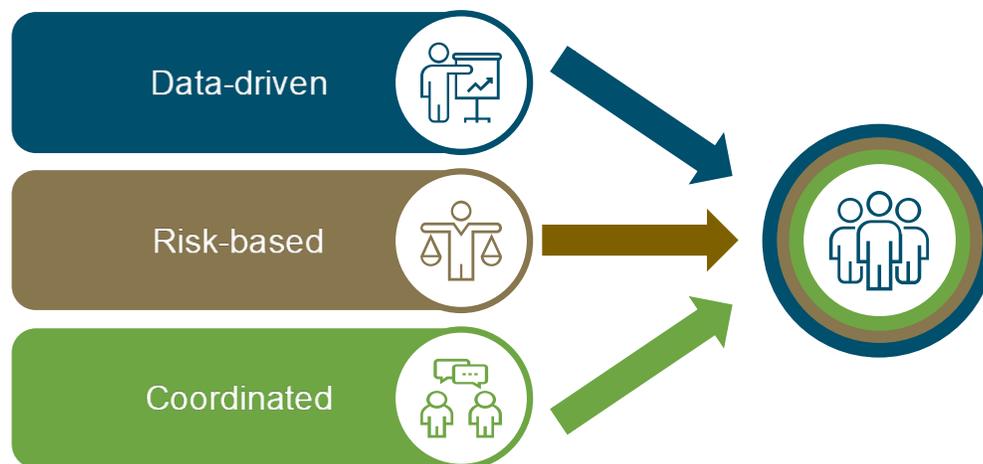
This department also developed a clear goal and metric around reducing fare evasion, which is used by executive leadership to assess how the police department is performing as a whole. We will discuss each of these areas—the size, allocation, staffing composition, goals, and metrics—in more detail in the following sections.

NO PROCESS TO DETERMINE APD'S OPTIMUM SIZE

Because the company has not come to a consensus on the full scope of APD's role and priorities, it cannot ensure that APD has the right number of people and skillsets to meet its needs. Moreover, it does not have a systematic process for doing so, which is not in line with key practices. As a result, the company may be exposed to unforeseen risks to its security, operations, finances, and brand. During our interviews with other organizations, we identified three elements in effective processes for determining workforce size, which are shown in Figure 2:

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Figure 2. Three Elements to Determine Workforce Size



Source: OIG analysis of interviews with other rail police departments

- **Data-driven.** Three quarters of the organizations we reviewed (16 of 21) had rational, systematic, data-driven processes for determining the optimum size of their police force. These organizations used data such as crime statistics, calls for service, and ridership to support their assessments, as shown in the following examples:
 - In one organization, executive leadership established a priority of maintaining a consistent, visible police presence on trains. With the assistance of a contractor, the organization conducted a comprehensive, systematic review of police data to determine how many officers it needed to meet this priority. These data included the number of trains in service by hour and day, as well as officer leave time—such as vacation, sick leave, compensatory time, family leave, and training. To assess staffing needs, the organization also used hourly and daily ridership by station and calculated the time that officers spent on other policing activities, such as responding to calls for service, and factored this into their analysis. Through this analysis, the organization discovered it was not consistently meeting its priority because other responsibilities were hindering officers' ability to ride trains. As a result, executive leadership increased funding so the department could increase its size and provide a visible presence on the trains.

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- Another organization, apparently satisfied that it was focusing on the correct policing areas, was concerned about its response times. It then conducted a size analysis to ensure that it had enough staff to respond to incidents within a targeted timeframe. This organization determined its police department's size from the bottom-up: it first determined its actual workload and then aligned the department's size to that workload. To do this, the organization assessed data like those described above, along with "unmet demand"—the time that neighboring law enforcement agencies spent responding to calls that the organization preferred to cover. This analysis provided the department with a detailed and well-supported estimate of the resources needed to meet its priorities, which it then used to justify its staffing needs in budget conversations with executive-level decision-makers.
- **Risk-based.** Many other organizations told us they did not have as many police as they wanted. Instead, some attempted to balance the size of their police departments against the risks they were willing to accept, consistent with common management standards. For example, executives from two rail organizations told us it was important to ensure that their organizations' decisions about police department size are reasonable—both in fact and in appearance—to guard against reputational damage in a serious security incident. If a serious security incident occurs, and if the public perceives the police department to be too small, this can negatively impact ridership and revenue. Another department noted that the long-term financial costs of a major terrorist attack or active shooter incident—in insurance deductibles, increased premiums, and decreased ridership—could outweigh the costs of adding more officers to deter or stop such an attack. Organizations therefore balance their decisions about size against those costs and risks.
- **Department and executive-level coordination on size.** Common management standards suggest that coordination among various levels of the organization is necessary to ensure that a rail police department is achieving the organization's objectives. At several rail organizations we reviewed, we found enhanced coordination between the police department and executive leadership to ensure that decisions about the total number of officers aligned with the organizations' security needs. For example, one police department worked with executives to develop a budget and to set priorities for the police department—including developing and maintaining a skilled workforce and determining the department's optimal size.

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In contrast, the company has not conducted this type of systematic analysis of data and acceptable levels of risk in coordination with executives to determine how big the department should be. Instead, in recent years the company has increased and decreased the department's size based on more informal and less analytically rigorous methods.

For example, in FY 2011, the company initiated a plan to increase staffing by 250 sworn officers without any analysis to support this decision, according to APD officials.¹² In addition, we reported in 2015 that APD did not have a workforce planning process to determine the number of officers needed.¹³ In response, APD hired a contractor to assess its workforce planning process. This assessment led to the formation of a working group to implement the contractor's recommendations, the creation of an Assistant Chief position, and other changes to the command structure. Executive leadership, however, was not fully involved to ensure that decisions about APD's size aligned with what it wanted APD to do, according to the Chief Administrative Officer. Moreover, an APD official told us the police department disbanded the working group after one year, and the consultant told us he never followed up to ensure that the company implemented all of the recommendations.

Figure 3. Important Actions Taken Surrounding APD's Size



Source: OIG analysis of documents provided by APD

¹² This statement came from interviews with APD officials during our 2015 audit. See *Safety and Security: Opportunities to Improve Controls Over Police Department Workforce Planning* (OIG-A-2015-006), February 12, 2015.

¹³ *Safety and Security: Opportunities to Improve Controls Over Police Department Workforce Planning* (OIG-A-2015-006), February 12, 2015.

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In fall 2018, the company proposed a 20 percent headcount reduction for the police department, again without basing this on any systematic, data-driven analysis that other organizations employ. In December 2019, in response to concerns among police unions, Congress took actions to address APD's size by mandating a minimum total staffing level¹⁴ and requiring the company to produce a detailed workforce analysis by March 2020.¹⁵ In response, on March 11, 2020, the company submitted a report to Congress providing a status update on staffing efforts, but in developing this update, the company did not apply a systematic process to fully inform future staffing decisions.

In January 2020, during our audit, APD hired a contractor to develop a strategic plan to help make staffing decisions. This is a positive step and an opportunity for executive leadership and the police department to coordinate on defining APD's focus areas, to make staffing decisions, and to ensure that resources are used efficiently. The scope of work for the contract, however, does not clearly state the steps, if any, that the company intends to take to determine the right size of the police force. According to APD officials, the planning process for developing the strategic plan will begin in late summer or early fall 2020.¹⁶ Nevertheless, without a systematic, data-driven process for determining APD's optimal size, the company still will not have reasonable assurance that it has the right number of people and skillsets to execute each of its policing functions consistent with company needs. This will be particularly important as the company adjusts to the changes caused by the COVID-19 pandemic and eventually returns to its new normal state.

SYSTEMATIC PROCESS IN PLACE TO ALLOCATE EXISTING STAFF

In fall 2018, APD developed a data-driven process to determine how to allocate the police officers it already has onboard that is relatively sophisticated compared to other rail organizations. Ideally, a department would conduct this analysis while it analyzes the number of officers needed and would use workload data to inform these analyses. In the absence of a systematic process to determine APD's optimum size,

¹⁴ Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, div. H (Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2020), title I, § 151, 133 Stat. 2534.

¹⁵ H. Comm. on Appropriations, 116th Cong., Explanatory Statement Regarding H.R. 1865, at 1185 (Comm. Print 2020).

¹⁶ This process was originally planned to begin in April 2020 but was delayed due to the COVID-19 pandemic.

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the department moved forward to develop an allocation model in response to staffing cuts. The model uses a formula that allows the department to enter its current staffing numbers and then calculate how to most effectively allocate those officers across its six regional divisions. The allocation formula uses a weighted average¹⁷ to assign relative importance to several factors, including the following:

- the size of the ridership per location (highest weight)
- the amount of company-owned track per location
- the number of crimes across locations—such as assault, fraud, and trespassing incidents
- the number of calls for service that resulted in an APD response by location
- the number of non-criminal incidents that resulted in an APD response, such as medical responses (lowest weight)

APD has been using its formula and has already begun to identify opportunities to better allocate some staff. For example, as of March 2020, APD realized it needed only 47 of 55 sworn officers in 1 of its 6 regional divisions and could more efficiently use the remaining 8 officers in other locations.

One consideration that would affect the company's ability to reallocate APD officers is that they have the requisite authority to enforce the law in their newly assigned jurisdictions. Federal law and the accompanying regulations grant APD officers the authority to enforce laws to protect the railroad's property, personnel, passengers, and cargo wherever Amtrak owns property.¹⁸ The regulations also dictate, however, that officers must be commissioned by their state of legal residence or primary employment.¹⁹ Thus, if the company wanted to permanently reallocate an officer to a different state, that officer would have to apply to be commissioned in that state within one year after the transfer. Each state uses its own standards to commission officers; this process can be costly and time consuming—typically taking from 18 to 24 months. When making any decisions that would require it to reallocate officers, the company would have to balance these cost and time factors.

¹⁷ These factors are weighted based on APD's experience and judgment using a rolling average across four years of data.

¹⁸ 49 U.S.C. §§ 28101, 24305(e); 49 C.F.R. § 207.5.

¹⁹ 49 C.F.R. § 207.3.

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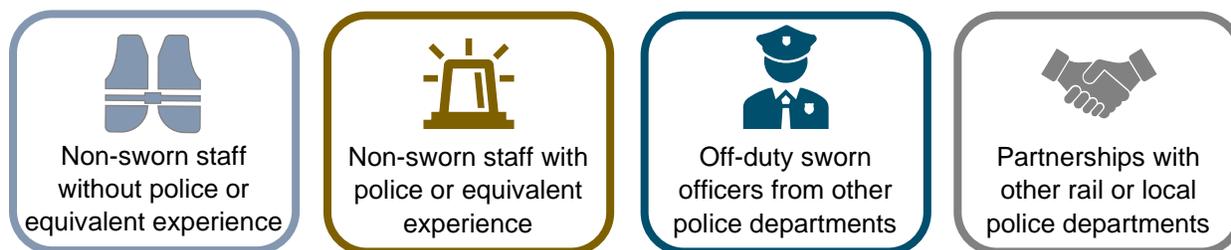
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NO SYSTEMATIC ANALYSIS TO DETERMINE APD'S APPROPRIATE COMPOSITION

Without a consensus on the full scope of APD's role and priorities, the company cannot ensure that APD has the appropriate composition of sworn officers and other staff, such as security guards. Moreover, it has not conducted a systematic analysis of its staffing, which is not in line with key practices. If APD conducts this analysis, however, it could face challenges. These include provisions in labor agreements that affect the company's ability to use alternative staff, and limited visibility over security contracts that other departments control.

To supplement their own sworn officers, other organizations use the following four staffing alternatives:²⁰

Figure 4. Alternative Staffing Options



Source: OIG analysis of interviews with other rail police departments

Other organizations we reviewed considered the extent to which they could use alternative staff to cost-effectively meet their needs. Eighteen of the 19 rail police departments used alternatives to sworn officers on a targeted basis as a cost-effective way to supplement their police force. For example, some police departments used staff without prior law enforcement experience to perform basic tasks like checking IDs or securing facilities rather than using a more expensive sworn officer. These departments told us, however, that each staffing alternative comes with benefits and drawbacks, as shown in Figure 5.

²⁰ Non-sworn staff can include permanent or contract staff.

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Figure 5. Benefits and Drawbacks to Alternative Staff

	Benefits	Drawbacks
 Non-sworn staff without police or equivalent experience	<ul style="list-style-type: none"> • More cost-effective way to increase visible presence and deter crime • Can perform tasks not requiring a sworn officer, such as protecting facilities and staffing guard booths • Can address low-level crimes, like fare evasion, and help address quality of life issues, such as homelessness • If contracted, can be easily removed or relocated, thus increasing flexibility 	<ul style="list-style-type: none"> • Limited law enforcement capabilities • Lower-quality training and standards of conduct than sworn officers • If contracted, can result in less control and accountability
 Non-sworn staff with police or equivalent experience	<ul style="list-style-type: none"> • Cost-effective way to increase visible presence and perceptions of safety and reduce the number of incidents on the system (For example, one organization used retired police to respond to crimes onboard trains at a lower cost.) 	<ul style="list-style-type: none"> • None identified by other rail police organizations
 Off-duty sworn officers from other police departments	<ul style="list-style-type: none"> • Cost-effective way to increase uniformed visible presence because the rail organization is not responsible for benefits • Promotes relationships with other police departments • Reduces liability from officer misconduct 	<ul style="list-style-type: none"> • Can result in less control over officers and officer activities • Are not as dedicated to the rail organization
 Partnerships with other rail or local police departments	<ul style="list-style-type: none"> • Enhances relationships and improves intelligence-sharing between departments • Allows rail police to prioritize larger stations (For example, one rail police organization relied on others to police smaller stations and to respond to crimes in rural areas.) 	<ul style="list-style-type: none"> • Can result in less control because police department cannot compel partners to act or respond to calls for assistance

Source: OIG analysis of interviews with other rail police departments

Another department also highlighted the importance of focusing on the priorities of the rail organization when determining its staffing composition. For example, one chief of police used staff without prior police or equivalent experience to cost-effectively achieve its rail organization's priority to maintain a visible presence.

APD currently uses permanent and contracted security guards at eight facilities but may have opportunities to use this type of staff at other facilities. For example, APD

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documents show that the department places permanent, sworn officers in security booths for their entire shifts around one major station. Other organizations used security guards in those situations to better leverage the full capabilities of their sworn officers in more appropriate circumstances, such as on patrol.

In 2015, we recommended that APD identify opportunities to use alternative staff.²¹ Although APD is in the early stages of examining locations where security guards could supplement sworn officers, it has not developed or conducted a systematic, department-wide staffing analysis. Instead, APD leadership is relying on its five deputy police chiefs to independently assess opportunities to use contract security within each of their divisions. These independent assessments do not, however, consider all alternative staffing options across the department. Without a systematic, department-wide analysis of the benefits and drawbacks of using alternative staff to supplement sworn officers, APD cannot ensure that it has the appropriate staffing composition to efficiently and effectively meet the company's security needs.

If APD conducts a systematic analysis and decides to use more alternative staff, it could face three potential challenges that would need to be addressed:

- **The company's labor agreement with the police union and common past practices could affect APD's ability to use some staffing alternatives.**
The police labor agreement states that the company can contract with other entities, including police agencies, even if doing so results in furloughs. However, the agreement prevents APD from hiring security officers to perform work that is not typically performed by sworn officers, such as guarding facilities and providing access controls, if this results in the furlough of an APD officer. In addition, according to Labor Relations officials, if the company chooses staffing options that are allowable under the labor agreement, but which deviate from past labor practices, it could encounter resistance from the police union. For example, the company can furlough an APD officer to contract with off-duty officers under secondary employment agreements, but it has not done so before and could raise concerns from the police union. The Labor Relations officials also explained that although the labor agreement does not mandate the use of sworn officers at company-owned stations, this has been the standard practice in the past. As a result, if the company pursues any staffing alternatives that deviate

²¹ *Safety and Security: Opportunities to Improve Controls Over Police Department Workforce Planning* (OIG-A-2015-006), February 12, 2015.

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from past practices, it will need to consider and balance the potential benefits and drawbacks.

- **APD does not have full visibility over contract security guards across the company because various operating departments separately contract for guards.** According to the Procurement department, the company does not have a centralized listing of all security contracts, which would help consider the staffing needs at each location. APD officials are in the process of reviewing security guard services across the company as part of their early assessment of alternative staffing options.
- **Current legislation setting a floor on the number of APD sworn officers could affect APD's ability to implement the most cost-effective force to meet company needs.** In December 2019, Congress passed the Further Consolidated Appropriations Act, which prevents the company from reducing its sworn police officers below the May 1, 2019 level of 431.²² This legislation is in effect for the remainder of FY 2020. Such a restriction, however, could constrain APD's ability to implement the results of a systematic analysis of its optimum composition or size if the results show that by using alternative staffing options, the company needs fewer than 431 sworn officers. In this case, reconciling these results with the current legislative restriction would be important.

LIMITED ACCESS TO OFFICERS' WORKLOAD DATA

APD does not have easy access to the data necessary to support its staffing analysis. Organizations with the most sophisticated processes regularly collect and analyze police workload data to better understand how to efficiently meet security demands and make informed staffing and allocation decisions. In 2015, however, we reported that APD did not collect or analyze workload data to make staffing decisions because of Information Technology (IT) system limitations and concerns with data quality.²³

At the beginning of this audit, we found that APD continued to face similar challenges. Specifically, APD maintains a record management system that collects data on incident reports and calls for service, but for about 20 percent of calls, this system does not

²² Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, div. H (Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2020), title I, § 151, 133 Stat. 2534.

²³ *Safety and Security: Opportunities to Improve Controls Over Police Department Workforce Planning* (OIG-A-2015-006), February 12, 2015.

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accurately report on incident locations. This happens because of an error that occurs when the system sends the location data it collects to the part of the system that uses this data to generate reports. In addition, APD's record management system is not integrated with the scheduling system it uses to collect information on officer's leave, training, work shifts, and assigned posts. These limitations hindered APD's ability to access data on officers' day-to-day activities and, therefore, impeded its ability to easily obtain a clear picture of the department's actual workload.

In April 2020, APD began implementing manual workarounds for its IT limitations. An APD official provided us a copy of the department's first workload analysis and told us it will serve as the foundation for improving APD's analytics. This would provide a better understanding of the company's security needs; however, manual workarounds are not an ideal solution for obtaining these data because they require significant labor, which can be costly, and they can also introduce more risk of human error. The company has not conducted an analysis to determine whether it is better to obtain these data manually or to mitigate APD's IT system limitations to obtain this information directly from its automated systems—including which method is more cost-effective and provides the quality of data needed. Until it conducts such analyses, weighs the costs and benefits, and confirms that its data are accurate, reliable, and sufficiently timely for its purposes, the company will not have a consistent evidence base for making decisions about the optimal size of the police department, its allocation, or its staffing composition.

BASIC GOALS AND METRICS ARE IN PLACE, BUT ADDITIONAL METRICS COULD BE USEFUL

Similar to its initiative to develop an allocation model, the department and executive leadership have taken the initiative to develop security goals and metrics for FY 2020, even without a consensus on the full scope of APD's role and priorities. We identified additional metrics that some police departments use that could also be useful for APD to adopt.

Over the past year, as part of an enterprise-wide security strategy, APD and company executives developed a set of specific and measurable formal goals for APD, covering basic policing issues such as crime and assaults. They also developed metrics to track progress attaining these goals, which professional police organizations noted is inherently challenging in the rail industry. In September 2019, the Board of Directors approved the following goals and metrics, as shown in Figure 6.

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Figure 6. APD's Goals and Metrics, FY 2020

Baseline Goals and Metrics
<ol style="list-style-type: none"> 1. Reduce crimes against persons by 3 percent 2. Reduce crimes against property by 3 percent 3. Reduce onboard train incidents by 3 percent 4. Reduce workplace violence incidents by 5 percent 5. Reduce security access control incidents by 5 percent
Supporting Goals and Metrics ^{a, b}
<ol style="list-style-type: none"> 1. Increase self-initiated activity by 5 percent 2. Increase number of random passenger and baggage screenings by 5 percent 3. Decrease delays attributed to security incidents by 5 percent 4. Increase fraud identification by 3 percent

Source: OIG analysis of documents provided by APD

Notes:

^a Supporting goals and metrics are intended to drive improvement in the baseline goals and metrics.

^b APD also captures data to evaluate the number of suspicious activity reports captured by APD and partner agencies.

Nevertheless, we identified the following four additional metrics that some police organizations use that could be useful for APD:

Figure 7. Additional Metrics to Consider



Source: OIG analysis of interviews with other rail police departments

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Customers' perceptions of safety. The company's security strategy identifies increasing passengers' perceptions of safety as a key focus area, but they have not established a specific metric to address it. Other organizations surveyed their passengers or monitored customer feedback from sources such as a customer service complaint system. The organizations that used customer surveys to collect this information asked general questions about customer perceptions of safety or more specific questions about their perceptions of the police department's role and activities. Other police departments cited this type of information as a key source of information, allowing them to better respond to customer needs and justify the value the police department provides for the money it receives. Since we initiated our review, APD has started developing security-oriented questions to add to the company's customer satisfaction survey, but these questions are still in draft and are not specific to the police department. In addition, the company has not articulated the relative priority that APD should give to customer perceptions of safety versus more traditional law enforcement activities.

Visible presence for customers. Other organizations measured the extent to which their police forces are visibly present to customers—an indicator of their police department's ability to deter terrorism, crime, and other disruptive behavior. For example, one police department counted the number of train rides their officers took per shift and another surveyed passengers to ask if they had seen an officer during their journey. In June 2019, the company began shifting officers from stations to trains to increase visible presence but does not have a goal or related way to measure efforts to be more visible.

Employees' perceptions of safety. The company's security strategy identifies the importance of increasing employees' perception of safety. Other rail organizations measured this by monitoring employee feedback, such as including relevant questions in employee surveys or by using employee focus groups. They cited employee feedback as a key source of information that enabled them to better respond to employee needs and justify the police department's value for dollar. For example, one department used employee feedback to adjust where it places its officers. The company does not use employee perspectives as a performance measure, but police department officials told us they plan to discuss this possibility during a strategic planning session in late summer or early fall 2020.

Customer impacts from vulnerable populations. If the company comes to a consensus on the extent to which APD will aid the vulnerable people who frequent the stations,

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other organizations had strategies and metrics the company could use to address this priority. For example, other organizations have partnered with local public health officials to provide services to vulnerable populations. Funneling these individuals toward relevant social services can help them and also move them away from stations, which can improve customers' perceptions of safety. Other police departments have established metrics to measure their progress in aiding vulnerable populations and the impact they have on customer perceptions of safety. For example, two used feedback from customer surveys, and others calculated the number of vulnerable people who received a social service such as housing and rehabilitation.

The departments with the clearest goals and metrics ensured that they measured what is most important to the rail organization and used those metrics to demonstrate to decision-makers the value the police department adds. For example, one organization's priority was to quickly reopen train traffic after a security-oriented delay. This organization had a goal for the number of minutes it took the police department to safely address the security issue and allow trains to begin moving again. This organization also calculated the dollar amount the company saved by meeting that target and reported this return-on-investment information to decision-makers. Likewise, APD reports monthly to executive leadership and the Board of Directors on the status of the current goals and metrics it has in place. The company may have opportunities to assess a broader range of police activities, however, if it chooses to incorporate additional performance metrics that other rail organizations use.

CONCLUSIONS

Providing a safe and secure travel environment is an important component of the company's viability. The choices it makes about how to use APD will fundamentally center on the company's priorities, as well as on the risks the company is willing to accept. Although the company has made significant progress improving the police department's management and oversight, addressing the challenges we identified will help further this progress. In particular, ensuring that executive and police leadership agree on how and where APD should focus its efforts and resources would help them make decisions about staffing, goals, and performance metrics. Once they agree, conducting systematic analyses to determine the department's optimal size and staffing composition, and aligning goals and metrics to the department's focus areas would help ensure that APD is efficiently and effectively meeting the company's security needs and addressing its risks.

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RECOMMENDATIONS

To ensure that the police department is efficiently and effectively meeting the company's needs and addressing its risks, we recommend that the Chief Administrative Officer coordinate with the Executive Leadership Team—which also represents the Chief Executive Officer's input—the security steering committee, and APD leadership to take the following actions:

1. Prior to completing APD's strategic plan, reach a consensus on the full scope of APD's role and priorities, and then formalize those decisions.
2. Ensure that decisions about APD's size, allocation, staffing composition, goals, and metrics align with APD's established role and priorities by taking the following actions:
 - a. Develop a data-driven, risk-based process to determine APD's optimal size.
 - b. Conduct a systematic, department-wide analysis of the potential use of alternative staff on a targeted basis to determine the appropriate staffing composition.
 - c. If the company's analysis concludes that its optimum size and composition requires fewer sworn officers than allowed by law, work with Congress in an attempt to resolve any legal barriers to reaching APD's optimum number of officers.
 - d. Reevaluate current goals and metrics to ensure that they align with APD's established role and priorities and measure what is most important to the company. In the process, incorporate additional performance metrics that other rail organizations use, as appropriate, such as surveying passengers and employees to measure their perceptions of the security APD provides.
3. Work with the IT department to determine how best to obtain accurate and reliable officer workload data and begin using it as a basis for making decisions about APD's size, allocation, and staffing composition.

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MANAGEMENT COMMENTS AND OIG ANALYSIS

In commenting on a draft of this report, the company's Executive Vice President/Chief Administrative Officer agreed with our recommendations and described the company's actions and plans to address them, which we summarize below.

- **Recommendation 1:** Management agreed with our recommendation and stated that APD will facilitate discussions with the Executive Leadership Team and the Board of Directors to reach a consensus on what APD should be doing. Management stated that the results of those discussions will inform the mission and objectives of the department and it will incorporate them into its strategic plan. In addition, it will task the Executive Safety and Security Council with ensuring that APD appropriately executes its strategic plan and ensures that it is incorporated into the company's integrated Safety and Security Policy. The target completion date is December 1, 2020.
- **Recommendation 2:** Management agreed with our recommendation and stated the following:
 - Management is reviewing staffing models from partner agencies and best practice guidelines from police research organizations to develop a data-driven, risk-based process to recommend an optimal size for APD. The department expects to have a proposal to senior leadership during the first quarter of FY 2021.
 - APD leadership will use the results of a recently commissioned audit of the contract security services the company uses to develop proposals on alternative staffing options. APD intends to maximize agreements the company has in place and reallocate resources accordingly, to more effectively supplement APD sworn officers. APD leadership will forward the audit results and its related recommendations to the Executive Leadership Team for consideration and action.
 - APD is in the process of evaluating its current goals and metrics as part of the APD Security Management System annual review process. APD will present any new and updated metrics and performance measures to the Board of Directors in September 2020 for formal approval for the FY 2021 performance period.

The target completion date is March 31, 2021.

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- **Recommendation 3:** Management agreed with our recommendation and stated that Amtrak IT is working to remediate identified weaknesses with the Computer Aided Dispatch system and optimize several of the current IT platforms to improve workload data. Management stated that APD will use the improved workload data to inform decisions it makes about the size and allocation of its staff. In addition, IT will work with APD to determine the best reports and metrics it needs to inform its decisions about staff composition and allocation, and train APD staff on the use of any resulting dashboards and reporting tools it generates. The target completion date is July 1, 2021.

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APPENDIX A

Objective, Scope, and Methodology

This report provides the results of our audit of APD. Our objective was to evaluate the extent to which the company employs key practices to ensure the efficiency and effectiveness of its police force. To identify these key practices, we reviewed and compiled information from a range of public- and private-sector sources. These practices include those that other domestic and international rail and police organizations follow to develop goals and metrics, and to determine their optimum size, composition, and resource allocation. We then combined the results of our research with commonly accepted management standards²⁴ to develop the final key practices. Our scope of work included 14 of the 16 largest domestic rail organizations by ridership and 5 countries with dedicated rail police departments in North America and Europe. We conducted our work from April 2019 to June 2020 in Washington, D.C., and several other cities listed below.

To identify the rail organizations for our semi-structured interview, we selected the 16 largest rail organizations, covering 93 percent of the nation's reported ridership. The audit team conducted semi-structured interviews with chiefs of police or chief-equivalents at 14 of the 16 rail organizations. The remaining two did not respond to our request for an interview. Of the 14 rail organizations, the audit team also conducted semi-structured interviews with 10 additional executives with budgetary and oversight responsibility of the police department.²⁵

To establish our criteria and develop a consolidated list of key rail policing practices, we interviewed officials from the following 14 rail organizations, which covered 90 percent of the nation's reported ridership:²⁶

1. Metropolitan Transportation Authority—New York City Transit, Long Island Railroad, Metro-North Railroad, Staten Island Railway
2. Massachusetts Bay Transportation Authority (Boston, Massachusetts)

²⁴ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014; and Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control—Integrated Framework*, May 2013.

²⁵ Four executives did not respond to our requests for an interview.

²⁶ To design the semi-structured interviews to identify common practices across domestic rail organizations, we worked with a consultant with expertise designing audit methodologies.

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3. Chicago Transit Authority
4. Washington Metropolitan Area Transit Authority (Washington, D.C.)
5. Southeastern Pennsylvania Transportation Authority (Philadelphia, Pennsylvania)
6. San Francisco Bay Area Rapid Transit District
7. Los Angeles County Metropolitan Transportation Authority
8. New Jersey Transit Corporation (Newark, New Jersey)
9. Port Authority of New York and New Jersey—Port Authority Trans-Hudson Corporation (Jersey City, New Jersey)
10. Metra Rail (Chicago, Illinois)
11. Tri-County Metropolitan Transportation District of Oregon (Portland, Oregon)
12. San Diego Metropolitan Transit System
13. Dallas Area Rapid Transit
14. Denver Regional Transportation District

To obtain more detailed examples and information, the audit team then conducted follow-up site visits at New Jersey Transit Corporation, San Francisco Bay Area Rapid Transit District, Los Angeles County Metropolitan Transportation Authority, and Denver Regional Transportation District. We selected these organizations to capture a variety of policing approaches, such as owning a police department with sworn officers and specialized units, contracting out, and using a hybrid model. We also observed a mature model for determining a department's optimal size.

To capture a broad array of practices, the audit team also conducted site visits and in-person interviews with officials from the following international rail organizations and federal rail police departments in five countries:²⁷

1. Via Rail Canada
2. Le service national de police ferroviaire (France)
3. Société nationale des chemins de fer français, SNCF (France)

²⁷ We visited two organizations in France and two organizations in Italy because each organization was responsible for a portion of the railroad's security.

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4. Bahnpolizei (Germany)
5. British Transport Police (Great Britain)
6. Ferrovie dello Stato Italiane (Italy)
7. Polizia Ferroveria (Italy)

We selected these countries based on four factors: 1) membership in the Organization for Economic Cooperation and Development because these countries are more directly comparable to the United States, 2) presence of a dedicated rail police force either within the rail organization itself or as part of a federal rail police force, 3) comparable track miles to the company, and 4) recommendation by law enforcement professional organizations, chiefs of police, and APD officials.

To inform our understanding of rail policing and common rail policing practices, the audit team also conducted interviews with the following relevant professional organizations and researchers:

- RAILPOL—European Association of Railway Police Forces
- Commission on Accreditation for Law Enforcement Agencies
- Police Executive Research Forum
- Mineta Transportation Institute
- Dr. Eric Fritsch, Professor, University of North Texas, Criminal Justice Department

To identify the company's processes used to develop APD's priorities, goals, metrics, size, composition, and resource allocation, we interviewed the following:

- the Executive Vice President/Chief Administrative Officer because APD reports to this executive
- the former Executive Vice President/Chief Safety Officer to obtain a company-level perspective on corporate security and the APD
- APD senior managers and other APD employees who had the requisite expertise to address the areas included in our review
- key officials in the Procurement department and Labor Relations because of their knowledge about APD's use of alternative staffing options

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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 objective.

Internal Controls

We reviewed the management controls relevant to overseeing and structuring a department. In particular, we assessed the company's effectiveness in establishing and communicating clear roles for APD, determining optimal size and an appropriate staffing mix, and monitoring officer activity. In evaluating the company's internal controls, we reviewed internal control guidance from the Government Accountability Office and the Committee of Sponsoring Organizations of the Treadway Commission. The team took audit steps to ensure that the data were reliable for our purposes in the context of the audit objectives.

Computer-Processed Data

We relied on computer-processed data from the Federal Transit Administration (FTA) to identify the 16 largest domestic rail organizations by ridership as of May 2019. To validate the data, the audit team compared the FTA data to ridership numbers reported in the American Public Transportation Association Ridership Report for the same time period. Based on this analysis, we concluded that the data from the FTA's May 2019 database were sufficiently reliable for the purposes of selecting organizations for the semi-structured interview.

Prior Report

In conducting our analysis, we reviewed and used information from the following Amtrak OIG report:

- *Safety and Security: Opportunities to Improve Controls Over Police Department Workforce Planning* (OIG-A-2015-006), February 12, 2015

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APPENDIX B

Management Comments

NATIONAL RAILROAD PASSENGER CORPORATION

Memo



Date	June 26, 2020	From	DJ Stadtler, EVP
To	Jim Morrison, Assistant Inspector General, Audits	Departments	Administration
		cc	Eleanor Acheson, EVP General Counsel Sam Dotson, Assistant Chief of Police Stephen Gardner, Sr. EVP Carol Hanna, VP Controller Roger Harris, EVP Scot Naparstek, EVP COO Dennis Newman, EVP Steven Predmore, EVP Mark Richards, Sr Director Amtrak Risk & Controls Neil Trugman, APD Chief Tracie Winbigler, EVP CFO Christian Zacariassen, EVP CIO

Subject Management Response to *SAFETY AND SECURITY: Management of the Police Department Has Recently Improved, but Foundational Decisions Are Needed on its Role and Priorities* (Draft Audit Report for Project No. 010-2019)

This memorandum provides Amtrak's response to the draft audit report entitled, "*SAFETY AND SECURITY: Management of the Police Department Has Recently Improved, but Foundational Decisions Are Needed on its Role and Priorities*". Management appreciates the opportunity to respond to the OIG recommendations. As indicated in our responses, we agree with each of the OIG recommendations and will initiate actions to address each in a timely manner.

Recommendations:

To ensure that the police department is efficiently and effectively meeting the company's needs and addressing its risks, we recommend that the Chief Administrative Officer coordinate with the executive leadership team-which also represents the Chief Executive Officer's input-the security steering committee, and APD leadership to take the following actions:

1. Prior to completing APD's strategic plan, reach a consensus on the full scope of APD's role and priorities, and then formalize those decisions.

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Management Response/Action Plan: We agree with the recommendations and are taking the following actions:

- At the onset of the strategic planning process APD will facilitate discussions with the Executive Leadership Team (ELT) and the Board of Directors to reach a consensus as to what the company's perspective is on what APD should be doing. The result of those discussions will inform the mission and objectives of the department and will be incorporated into the strategic plan.
- The Executive Safety and Security Council will be tasked with ensuring that the APD's strategic plan is appropriately executed and incorporated into the company's integrated Safety and Security Policy.

Responsible Amtrak Official(s): EVP DJ Stadler, Assistant Chief of Police Sam Dotson, Inspector Jim Cook

Target Completion Date: 12/1/2020

2. Ensure that decisions about APD's size, allocation, staffing composition, goals, and metrics align with APD's established role and priorities by taking the following actions:
 - a. Develop a data-driven, risk-based process to determine APD's optimal size.
 - b. Conduct a systematic, department-wide analysis of the potential use of alternative staff on a targeted basis to determine the appropriate staffing composition.
 - c. If the company's analysis concludes that its optimum size and composition requires fewer sworn officers than allowed by law, work with Congress in an attempt to resolve any legal barriers to reaching APD's optimum number of officers.
 - d. Reevaluate current goals and metrics to ensure that they align with APD's established role and priorities and measure what is most important to the company. In the process, incorporate additional performance metrics that other rail organizations use, as appropriate, such as surveying passengers and employees to measure their perceptions of the security APD provides.

Management Response/Action Plan: We agree with the recommendations and are taking the following actions:

- Management is currently reviewing staffing models from partner agencies, as well as best practice guidelines from police research organizations throughout the world to develop a data-driven, risk-based process to recommend an optimal size for APD. APD expects to have a proposal to senior leadership during the first quarter of FY2021. The proposal will include guidance from the Federal Transit Administration's transit policing model, developed in 2008, and relied upon by many local transit police agencies.

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- During the first quarter of calendar year 2020 APD commissioned an internal audit of contracted security services within the company in order to determine the current scope of alternative staffing options. The completed audit will provide APD leadership the opportunity to develop proposals related to alternative staffing by maximizing agreements currently in place and reallocating resources to more effectively supplement APD staffing. The audit along with recommendations will be forwarded to the ELT for consideration and action.
- APD is in the process of evaluating current goals and metrics as part of the APD Security Management System (SeMS) annual review and alignment process. New and updated metrics and performance measures will be presented to the Board of Directors in September 2020 for formal approval for the FY2021 performance period.

Responsible Amtrak Official(s): EVP DJ Stadler, Assistant Chief of Police Sam Dotson, Inspector Jim Cook

Target Completion Date: 3/31/2021

3. Work with the IT department to determine how best to obtain accurate and reliable officer workload data and begin using it as a basis for making decisions about APD's size, allocation, and staffing composition.

Management Response/Action Plan: Amtrak IT has identified weaknesses in the location/address data and integration with the Amtrak Police Department (APD) software platforms. IT is currently working with our Computer Aided Dispatch (CAD) vendor to remediate the location/address issue.

Additionally, Amtrak IT will optimize several of the current platforms by integrating the scheduling software with both the CAD system and the Records Management System (RMS). These two (2) integrations will be the first of several to improve data flow and consistency between platforms allowing for better workload data. The improved workload data will be utilized by APD to inform decisions related to staffing size and allocation.

Lastly, IT will work with APD to determine the best Business Intelligence reports and metrics needed for allocation and staffing composition, and train APD command staff on the use of dashboards and reporting tools.

Responsible Amtrak Official(s): AVP IT Corporate and Ops Technologies Judith Apshago, Assistant Chief of Police Sam Dotson, Inspector Jim Cook

Target Completion Date: 7/1/2021

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APPENDIX C

Key Practices for Rail Police Management

In working with 21 domestic and international rail and police organizations, we identified the following key practices. We also used public- and private-sector management control standards.²⁸

1. Key Practice: Use a policing model that aligns with organization’s security needs. In doing so, consider the specialized units needed.

All 14 domestic rail organizations used the following three policing models:

- *9 had their own police department*, allowing them to prioritize their own interests and maintain better control over police and security operations. This approach, however, increases costs, liability, and administrative burden.
- *4 contracted out all functions*, resulting in less or no liability from officer injuries or risky behavior and enhanced relationships with local authorities. Challenges included less control over contracted officers and a limited ability for the organization to investigate its own crimes.
- *1 had a hybrid model*,²⁹ resulting in less or no officer liability, enhanced relationships with local authorities, and increased flexibility and visible presence, but less control over contracted officers.

In addition to patrol units, 9 of the 14 domestic rail organizations’ police departments maintained 3 specialized functions, which allowed them to prioritize their own needs and respond more quickly than if they relied on other police departments. These departments cited significant benefits and, other than increased costs, cited few or no drawbacks in maintaining these functions:

- *Detectives* allowed them to prioritize their own crimes and respond faster.
- *A special operations unit* resulted in faster response times and flexibility to move the officers around the system.

²⁸ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014; and Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control—Integrated Framework*, May 2013.

²⁹ An organization with a hybrid model has a contingent of its own sworn officers and a contract with at least one other police department to provide additional policing services.

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- *An intelligence unit* provided access to transit-specific information and conducted analysis that helped them make informed, data-driven decisions.

Twenty of the 21 domestic and international rail and police organizations agreed that rail policing is challenging and unique compared to other types of policing. Common challenges and unique aspects of the rail environment included the following:

- *Policing an open system.* The open stations and railway make securing the system challenging.
- *Focusing on customers and managing perceptions of safety.* Rail police and security staff recognize that customers are paying for the rail service and that security issues on trains can impact customer perceptions of safety, and thus ridership.
- *Developing technical rail knowledge within the police force.* Rail police and security staff develop a specialized knowledge of the system that allows them to better protect passengers and employees and work safely in the rail environment.
- *Keeping the system moving.* Rail police and security staff understand the safety and financial importance of keeping the trains moving.
- *Hiring rail police officers.* Rail police departments face challenges competing with municipal police forces for new officers because of pay, the type of policing, and other factors.

2. Key Practice: Coordinate between executive and police leadership to establish the department's priorities in providing police and security services for the organization and use these priorities to inform all other policing decisions—including decisions about model, size, allocation, staffing composition, goals, and metrics.

Twelve of the 21 domestic and international rail and police organizations aligned organizational priorities and policing priorities—for example, focusing on visible presence or fare evasion. These organizations made decisions about the police department's goals and metrics, model, size, staffing, and resource allocation that aligned with their organizational priorities.

- All 12 had goals that aligned the police department with the organization's priorities for reducing delays, fare evasion, visible presence, vulnerable populations, counterterrorism, customer service, and customer perceptions of safety.

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- 2 used policing models that aligned the police department with the organization's priority for visible presence.
- 5 made size and resource allocation decisions that aligned the police department with the organization's priorities for fare evasion, visible presence, and counterterrorism.
- 8 used performance metrics that aligned the police department with the organization's priorities for reducing delays, fare evasion, vulnerable populations, visible presence, and customer perceptions of safety.

3. Key Practice: Use a data-driven, risk-based, decision-making process to determine the police department's optimal size. In the process, balance the benefits, costs, and risks—including security, financial, operational, and brand risks.

Sixteen of the 21 domestic and international rail and police organizations used a data-driven decision-making process to determine the police department's optimal size. These organizations considered several factors in the process, including time spent on calls for service, paid time off, ridership by station, vulnerability assessments, response time, the command structure, visible presence, and the budget. The level of sophistication of each process to analyze optimal size varied as follows:³⁰

- *Highly sophisticated*: 3 of the 16 had a highly sophisticated process to determine the optimal size of the police force, using a sophisticated data model that considered various factors such as crime, calls for service, and paid time off.
- *Moderately sophisticated*: 6 of the 16 had a moderately sophisticated process to determine the optimal size of the police force, not using a fully developed model, but using more than two factors such as crime and calls for service.
- *Least sophisticated*: 7 of the 16 had a less sophisticated process to determine the optimal size of the police force, using only one or two factors, such as ridership and calls for service.

³⁰ Highly sophisticated processes used a wide variety of metrics and a data model that considered a variety of factors to make optimal size and allocation decisions. Moderately sophisticated processes used more than two data sets or basic assessments but did not use a fully developed model to make optimal size and allocation decisions. The least sophisticated processes only used one or two data sets to make optimal size and allocation decisions.

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For example, two domestic rail organizations with a highly sophisticated process relied on a Strategic Patrol Staffing Plan to determine the police department's optimal size. Their plans considered factors such as (1) the number of calls for service and the time spent on calls for service by type and priority level, (2) the average response time, (3) crime by station, and (4) the number of trains on the system.

4. Key Practice: Use a data-driven, risk-based, decision-making process to geographically allocate resources efficiently and effectively. In the process, balance the benefits, costs, and risks—including security, financial, operational, and brand risks.

Eighteen of the 21 domestic and international rail and police organizations used a data-driven decision-making process to allocate resources, including crime, ridership, calls for service, availability rates, vulnerable populations, special events, response time, vulnerability assessments, threat level, and train schedules. The level of sophistication of each resource allocation process varied as follows:

- *Highly sophisticated*: 4 of the 18 had a highly sophisticated process to allocate resources, using a sophisticated data model that considered a variety of factors such as crime, calls for service, and stations.
- *Moderately sophisticated*: 10 of the 18 had a somewhat sophisticated process to allocate resources, not using a fully developed model, but using more than two factors such as crime, threats, ridership, and calls for service.
- *Least sophisticated*: 4 of the 18 had a less sophisticated process to allocate resources, using only 1 or 2 factors such as crime and number of stations.

The two domestic rail police organizations that relied on a Strategic Patrol Staffing Plan to determine optimal size also used the plan to determine resource allocation. Their plans considered factors such as (1) the number of calls for service by station, (2) the number of back-up unit responses, (3) the amount of time spent on officer-initiated activities, and (4) paid time off.

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5. Key Practice: Identify targeted opportunities to use alternatives to sworn officers and partner with local law enforcement agencies as a more cost-effective way to achieve the organization's security needs. In the process, balance the benefits, costs, and risks of the options it considers—including security, financial, operational, and brand risks.

Eighteen of the 19 domestic and international rail and police organizations with dedicated rail police used alternatives to their own, sworn officers as a cost-effective way to supplement their police force in targeted instances but acknowledged the benefits and drawbacks of each.³¹

- 15 of the 19 used personnel without prior police or equivalent experience
 - Benefits: more cost-effective for circumstances not requiring a sworn officer, such as standing guard at an entrance; can help increase the visible presence and deter crime; can enforce low-level crime; offers increased flexibility
 - Drawbacks: limited capabilities, training, and control
- 2 of the 19 used personnel with prior police or equivalent experience
 - Benefits: cost-effective way to reduce the number of incidents, increase the visible presence, and improve employee perceptions of safety
 - Drawbacks: none mentioned
- 2 of the 19 used officers from other police departments under secondary employment
 - Benefits: cost-effective, reduces organizational liability and bolsters relationships with local police departments
 - Drawbacks: can be difficult to manage, and officers tend to respond more quickly to officers from their home department
- 6 of the 19 use partnerships with other police departments
 - Benefits: supplements the transit police force, bolsters relationships with local police departments, and improves intelligence-sharing
 - Drawbacks: transit organization cannot compel partners to cooperate

³¹ Five organizations used at least two types of alternative staff and are represented in multiple staffing categories.

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6. Key Practice: Collect and analyze detailed data on officers' daily activities to identify actual workload and establish an evidence base to help make size and allocation decisions.

Six of 21 domestic and international rail and police organizations collected detailed data on officers' activities, such as calls for services, self-initiated calls, and other incident information.

- Collecting detailed data on officer's daily activities allowed the organizations to:
 - better understand how to efficiently meet security demands and allocate their limited resources
 - produce reports that helped stakeholders understand the police department's value
- One organization collected detailed daily activity reports and minute-by-minute data of all incidents, arrests, and stops. This data allowed the organization to justify the value of their rail security department.
- One organization collected detailed data on officers' daily activities to develop a comprehensive size and allocation model. The daily data included factors such as crime, calls for service, and events.

7. Key Practice: Coordinate between executive and police leadership to develop clear and measurable goals that align with, and ensure achievement of, the organization's priorities.

Eighteen of the 21 domestic and international rail and police organizations had clear goals.

- 11 of the 21 had documented goals.
- 7 of the 21 had undocumented goals.
- Common goals included the following:
 - *Maintaining a secure and safe environment for passengers and employees*, including providing a visible presence, reducing crime, and preventing terrorism
 - *Maintaining a customer-oriented focus*, ensuring that passengers feel safe and reducing quality-of-life issues, such as homelessness
 - *Ensuring that employees work in a safe environment*, including reducing employee injuries, protecting employees, and reducing assaults

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- *Ensuring efficiency of operations*, including reducing train delays and disruptions and staying within budget
- *Protecting the infrastructure*, including facilities and property

8. Key Practice: Establish performance metrics to measure what the department is accomplishing (return on investment) and the extent to which it is meeting the goals and priorities the organization set for the department.

Eighteen of the 21 domestic and international rail and police organizations used metrics to evaluate performance.

- Commonly used metrics included the following:
 - *Crime*: 14 of the 21 used crime statistics.
 - *Customer and employee perceptions of safety* (surveys or town halls): 13 of the 14 domestic rail organizations' police departments used customer or employee perceptions of safety.
 - *Calls for service*: 9 of the 14 domestic rail organizations' police departments used the number of calls for service.
- Eight domestic and international organizations ensured that their rail police or security departments measured what was most important to the organization, such as fare evasion, delays, and visible presence.
- One rail police department had dozens of metrics under each of its strategic objectives, including:
 - *Protecting the public*, measured against response time, visible presence, the number of crimes, and customer satisfaction
 - *Reducing delays*, measured against police-related delays, response time, the number of life-saving interventions, and the number of trespass incidents resulting in delays
 - *Value of the police department*, measured against the cost of service, response time, visible presence, officer availability rates, and percent of budget spent on frontline resources
 - *Building a skilled workforce*, measured against staff turnover, employee surveys, workforce diversity, and rates of customer complaints against staff

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- Five domestic rail organizations' police departments used customer surveys and customer perceptions of safety to measure value for dollar.
- One executive measured value for dollar by validating the percentage of the budget dedicated to the police department through risk and threat assessments.

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APPENDIX D

Abbreviations

APD	Amtrak Police Department
FTA	Federal Transit Administration
FY	fiscal year
GAO	Government Accountability Office
IT	Information technology
OIG	Amtrak Office of Inspector General
the company	Amtrak

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APPENDIX E

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OIG MISSION AND CONTACT INFORMATION

Mission

The Amtrak OIG's mission is to provide independent, objective oversight of Amtrak's programs and operations through audits 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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