

# **An Audit of Milwaukee County Transit System's Security Contract With Wackenhut Corporation**

**March 2009**

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March 4, 2009

To the Honorable Chairman  
of the Board of Supervisors  
of the County of Milwaukee

We have completed an audit of the Milwaukee County Transit System's Security Contract With Wackenhut Corporation, in accordance with County Board Resolution (File No. 08-55).

Milwaukee Transport Services, Inc. (MTS) is a private not-for-profit corporation that manages day-to-day operations of the Milwaukee County Transit System. MTS contracts with Wackenhut for transit security services. The report identifies opportunities for improvement in the areas of security staff deployment, contract administration and bus operator training relative to bus security. We believe a recent modification in MTS' security approach to increase security officer presence on MCTS buses is a step in the right direction.

Our report includes recommendations addressing each of the issues identified in the audit. We would like to acknowledge the cooperation of management and staff at Wackenhut and at MTS during the course of this audit.

Please refer this report to the Committee on Finance and Audit.

Jerome J. Heer  
Director of Audits

JJH/cah

Attachment

cc: Milwaukee County Board of Supervisors  
Scott Walker, Milwaukee County Executive  
Cynthia Archer, Director, Department of Administrative Services  
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# An Audit of Milwaukee County Transit System’s Security Contract with Wackenhut Corporation

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## Summary

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The Department of Transportation and Public Works (DTPW) provides public transit services through the Milwaukee County Transit System (MCTS). DTPW contracts with Milwaukee Transport Services, Inc. (MTS), a private not-for-profit corporation, for direct management and operation of the transit system. MTS uses transit facilities and equipment owned by Milwaukee County. The Transportation Planning Division of DTPW provides County oversight of MTS administration. Since July 1, 1993, MTS has contracted with Wackenhut, Inc., a private security firm, to provide transit system security services. In its contract proposal in 2003, Wackenhut established a goal that 85% of a security officer's time should be spent riding on a bus or assisting with a situation at a bus stop. Despite clear documentation establishing the expectation of an MCTS security strategy emphasizing security officers riding buses, emphasis has instead been placed on deploying a mobile security force. MTS management has acknowledged that, despite language regarding an on-bus presence contained in its contract specifications and Wackenhut's contract proposal, a mobile response capability provided by deployment of Custom Protection Officers (CPOs) in vans is the strategic approach preferred and agreed upon by the parties. MTS management also noted its contract with Wackenhut provides MTS with the authority to modify deployment of security staff. According to MTS management, the 85% performance goal was not, and is not, its expectation. MTS management stated that deploying CPOs to spend such a significant amount of their time riding buses reduces the ability of those officers to respond to calls for assistance from bus operators.

Generally, teams of two CPOs spend about two-thirds of the workday in vans patrolling throughout the County. The remainder of the day is spent performing security-related activities, including responding to calls for assistance, performing security checks at selected Park & Ride locations and MCTS administrative buildings, following up on prior incidents, taking up five short bus rides, monitoring bus activity at selected intersections, and other administrative duties. Very little time is spent actually riding buses, and bus rides routinely taken by CPOs are generally short, typically only a few blocks in length.

These conclusions were based on a combination of reviewing documentation supporting CPOs' activities, review of a sample of work shifts documented by using a Global Positioning System (GPS) that tracks the movement of Wackenhut vans, our observations while accompanying CPOs in their vans, and interviews with CPOs and bus operators.

Our analysis of activities performed by Wackenhut security staff identified the following:

- The current strategy used by Wackenhut has resulted in most of a CPO's workday spent in a van. On the days reviewed, only 2.8% of CPO work time was spent riding buses. In October 2008, MTS modified its approach, directing Wackenhut to deploy one team of two CPOs to ride buses for one eight-hour shift per weekday. If sustained, this would increase average CPO work time devoted to riding buses from 2.8% to approximately 15%.
- Striking the proper balance between spending more time on buses and maintaining the capability to quickly respond to requests for assistance could be facilitated by deploying fewer CPOs in teams of two. The initial model described in the 2003 transit security RFP called for a CPO presence on buses, with supervisors in vans providing mobile response capabilities. Movement towards that deployment strategy would enhance the proactive nature of the MCTS security program.
- Our GPS review showed 7.5% of the CPOs' time was spent on security stops at six MCTS facility locations. All of these facilities have employees in attendance at the same times that the security stops were conducted. In addition, each of these locations has security cameras for monitoring activity. Data maintained by Wackenhut show there are few incidents at these locations. During the period February through April 2008, only 19 of 781 incidents (2.4%) occurred at the six MCTS facilities noted. MTS management stated that issues with vandalism and break-ins at some of its facilities, including a maintenance facility, justify the security checks.
- An opportunity for coordination and improved efficiency occurs in the area of follow-up reports generated by Wackenhut CPOs. Follow-up reports are initiated when bus operators report incidents for which a Wackenhut CPO team was unable to respond. Our review of the 781 incident reports for February through April 2008 showed that about 12% of these reports represented follow-ups to prior incidents in which CPOs did not respond to the incident at the time of its occurrence. While the practice of documenting the facts relating to each bus incident is important, the time and effort spent obtaining and recording information during this follow-up did not appear to provide any added value.
- Our analysis identified some apparent linkage between the more serious security incidents and subsequent CPO deployment schedules. However, we did not find this linkage to be strong. Further, it was difficult to determine whether or not the limited number and duration of bus rides taken by CPOs strengthened this linkage, because records maintained by CPOs at the time of our fieldwork did not identify the precise location of brief CPO bus rides.
- Wackenhut maintains an extensive database of information relating to all incidents. The database is used to generate a number of monthly reports, including a breakdown of all security incidents by type, by day of the week, by time of day, and by bus route. Statistics are also maintained summarizing the activities performed by CPOs, such as the number of bus rides taken, intersection monitoring, security checks, etc. However, logs of daily activities are destroyed prior to the end of the retention period mandated by contract, making it impossible to verify reported statistics for those time frames where logs are destroyed.
- Response times reported by Wackenhut are not independently calculated and include estimates. Average response times reported for March 2008 were about six and one-half minutes.
- Patrols by CPO teams are not generally monitored. Vans were often observed at MCTS' Downtown Transit Center for extended time periods, where few incidents occur. At times, more

than one van was present. Their presence was not in response to any calls for assistance, nor were security checks of the location performed.

- Weekly invoices submitted by Wackenhut routinely included three hours worked by an administrative assistant that is not billable per contract. According to the Wackenhut Project Manager, the assistant was working those times as a CPO assigned to a van. However, we found no documentation supporting this statement. MTS has initiated recovery of about \$14,400 for this individual since 2004.

### **Recent Improvements**

In October 2008, two additional improvements were made in MCTS security officer deployment. As previously noted, this was when MTS directed Wackenhut to deploy one team of two CPOs to ride buses for one eight-hour shift per weekday. A review of logs maintained by CPOs on these shifts showed that precise locations were identified for points of boarding and exiting buses.

We believe this modification is a step in the right direction, and that adherence to a strategy more closely resembling that which is outlined in Wackenhut's current contract proposal will have a positive effect on overall MCTS bus security.

In addition, the roll call information sheets were modified to include the location and times of the more recent, serious security incidents on the bus routes identified. This data is important for assisting CPOs in deciding where and when to provide a security presence as they perform both extended and limited bus rides.

There also is evidence of increased collaboration with the Milwaukee County Sheriff's Office. It appears that currently there is good communication between MTS, Wackenhut and the Sheriff's Office concerning bus security activities. According to MTS and the Sheriff's Office, the Sheriff's Office has been keeping Wackenhut staff informed of the bus routes it is focusing its attention on to avoid duplication of effort. This coordination needs to continue, with the Sheriff's Office continuing to focus on crime-related incident trends, and with Wackenhut CPOs focusing their bus riding efforts on bus routes with the highest behavior-related incident trends.

### **Contract Administration and Performance Measures**

The ability to measure contractors' performance is critical for determining not only to what extent a contractor is meeting expectations, but also how well the contractor's performance is meeting program objectives. Accountability for contracted services can be enhanced if the contracts include clearly defined performance measures that address the goals and objectives of the program. We noted a need for MTS management to establish meaningful, quantifiable security-related objectives in future contracts so that it can determine the extent to which those objectives are being attained.

The current contract includes some measurable goals, such as reducing the number of incidents. However, this does not take into consideration changes in the number of passengers or bus routes over time, rendering direct comparisons inaccurate.

For instance, we found that plotting the rate of security incidents, adjusted for passenger-miles, rather than the number of incidents, for the period 2000 through 2008 produced significantly different results.

This particular performance measure also provides a basis for comparing Wackenhut performance with other jurisdictions. Using information MCTS and other transit systems submit to the United States Department of Transportation (USDOT), we compared MCTS' incident rates for specific types of incidents with four other Midwest transit systems for the period 2003 through 2007. The results showed that MCTS had the highest incident rate for the last three years (2005 through 2007). Because the data includes only incidents resulting in criminal charges, a higher incidence rate could indicate a more aggressive security effort. In addition, because the numbers are self-reported, there may be differences in the diligence and/or accuracy of data submitted. Therefore, such comparisons should not be viewed exclusively, but rather in conjunction with other trend analyses, such as the internal Wackenhut incident rate data.

### **Context is Important**

Incident data must be viewed in the context of the enormous number of passengers served and miles traveled on MCTS buses. In 2008, MCTS served an estimated 50.8 million passengers, registering an estimated 152.8 million passenger-miles. This equates to approximately 1.35 million bus trips carrying an average busload of 38 passengers. For the entire system, there were 3,216 reported incidents. Stated another way, in 2008 there was a 99.76% chance of taking an MCTS bus trip without incident.

### **Other Issues**

In its request for this audit, the County Board expressed concern regarding the diversity of the Wackenhut staff deployed to MCTS buses and their skills in understanding cultural differences.

### **Cultural Diversity**

In its contract proposal, Wackenhut stated it will make a reasonable effort to recruit and select personnel who reflect the nature, character, ethnic and minority diversity of the service area. To determine the diversity of the service area, we obtained information for 2007 from the U. S. Census Bureau showing the racial breakdown of Milwaukee County residents. In addition, an estimate of

the racial composition of MCTS ridership was noted in a semi-annual report made by a firm contracted by MCTS to perform customer satisfaction surveys semiannually. Both comparisons show a need for Wackenhut to increase the number of minorities it employs to more closely align with the population of the service area.

#### Cultural Sensitivity

By all accounts, Wackenhut's CPOs have performed in accordance with their policy of handling themselves in a dignified manner, being courteous and responsive in dealings with all individuals, and being fair and consistent so that even people who do not agree with actions taken will feel they are being treated fairly and the rules are being equally applied to all parties. We found no issues relating to the manner in which CPOs handled cultural diversity issues while performing their duties. Reviews of complaint files, interviews with bus operators and route supervisors, and semi-annual survey results taken by a firm under contract with MTS all reflected positively on Wackenhut staff.

#### Bus Operator Training

Our interviews with 29 MCTS bus operators indicated a need to improve the training provided to handle passengers. A review of training records showed 200 bus operators have not had Passenger Interactive Program training in more than 10 years. This training, which includes conflict avoidance, is especially important because of the potentially high stress levels of both bus operators and passengers.

Our report includes recommendations addressing each of the issues identified in the audit. We would like to acknowledge the cooperation of management and staff at Wackenhut and at MTS during the course of this audit. A management response from MTS is included as **Exhibit 4**.

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## **Background**

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The Department of Transportation and Public Works (DTPW) provides public transit services through the Milwaukee County Transit System (MCTS). DTPW contracts with Milwaukee Transport Services, Inc. (MTS), a private not-for-profit corporation, for direct management and operation of the transit system. MTS uses transit facilities and equipment owned by Milwaukee County. The Transportation Planning Division of DTPW provides County oversight of MTS administration.

### **Transit Security Background**

Prior to July 1993, transit security had been provided by the Office of the Sheriff by Deputy Sheriffs assigned to the Patrol Division. This division also provided security for several other County operations, such as the Parks, General Mitchell International Airport, the Milwaukee Regional Medical Center, the former Milwaukee County Stadium, and the Interstate freeways within Milwaukee County. In 1991, the Sheriff's Office notified affected departments that its resources were stretched to the limit, raising concern that it might not be able to provide the level of service required for MCTS. Several alternative security options for MCTS were considered at the time, including:

- Maintaining the status quo;
- Establishing a separate transit police force with full arrest powers within MCTS;
- Developing a dedicated transit security squad at varying staffing levels within the Sheriff's Office; and
- Establishing an internal transit security force without arrest powers within MCTS.

In the 1993 Adopted Budget, MCTS was authorized to contract with a private firm to establish a dedicated transit security force, without arrest powers, effective July 1, 1993. The funding level of \$640,000 was based on maintaining the same cost for transit security as previously provided by the Sheriff's Office. However, by contracting with a private firm, the number of positions devoted to transit security nearly doubled, from nine to sixteen.

MTS records show that the Wackenhut Corporation (Wackenhut) was selected from three vendors that submitted proposals for the initial contract in 1993. Wackenhut security officers are uniformed, carry handcuffs, pepper spray and batons for defense, but do not have arrest powers. The contract has been up for competitive proposals on two other occasions, in 1998 and 2003. In each instance,

Wackenhut was the sole bidder for the contract. The current contract has been extended through June 30, 2010.

**Table 1** shows total annual payments to Wackenhut during the period 2003 through 2008.

<u>Year</u>	<u>Amount</u>
2003	\$1,075,322
2004	\$1,050,167
2005	\$1,073,596
2006	\$1,107,659
2007	\$1,101,082
2008	\$1,125,703

Source: MTS, Inc.

Payments to Wackenhut are based on the number of hours worked by a staff of 30, including both full-time and part-time positions. Wackenhut staff includes one project manager, nine supervisors and 20 security officers, known as Custom Protection Officers (CPOs). **Table 2** provides a breakout of positions, billing rates and projected hours per week as specified in Wackenhut's current contract proposal, which was incorporated into the signed contract.

	<u>No. of Staff</u>		<u>Billing Rate</u>	<u>Projected Hours Per Week</u>
	<u>Full-Time</u>	<u>Part-Time</u>		
CPOs	10	10	\$22.05/hr.	624 hrs.
Supervisors:				176 hrs.
Lieutenant	1	3	\$22.99/hr.	
Captain	2	1	\$24.49/hr.	
Major	0	2	\$26.65/hr.	
Project Manager	<u>1</u>	<u>0</u>	\$41.05/hr.	<u>40 hrs.</u>
Totals	<u>14</u>	<u>16</u>		<u>840 hrs.</u>

Source: MTS, Inc. contractual documents for Wackenhut transit security services.

**Table 3** shows the basic weekly deployment schedule for Wackenhut security staff.

<b>Table 3</b>			
<b>Basic Weekly Deployment Schedule</b>			
<b>Number and Type of Staff</b>			
	<u>CPOs</u>	<u>Supervisors</u>	<u>Project Manager</u>
No. of Hours/Week	624 hrs.	176 hrs.	40 hrs.
No. of Staff:			
Monday	15	4	1
Tuesday	15	3	1
Wednesday	14	3	1
Thursday	14	3	1
Friday	15	4	1
Saturday	5	1	0
Sunday	5	1	0
<p>Note: Coverage is generally 7:00 am--1:00 am Weekdays; 4:00 pm to Midnight Saturdays and Sundays.</p> <p>Source: MTS, Inc. contractual documents for Wackenhut transit security services.</p>			

According to Wackenhut, the deployment is designed to provide maximum coverage during periods when most incidents occur on MCTS buses. Wackenhut also annually provides additional security assistance for the 11 days of Summerfest.

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## Section 1: MCTS' Security Strategy

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Milwaukee Transport Services, Inc. solicited competitive proposals for the provision of transit system security services with the issuance of a Request for Proposal (RFP) on February 14, 2003. Specifications contained in the RFP included the following language, in part:

“1.1a It is the intent of this RFP to describe the minimum requirements for Transit Police for the Milwaukee County Transit System operating area. All items or features not specifically mentioned which are necessary or which are normally furnished in order to provide a complete service, shall be furnished by the successful contractor as proposed and shall conform in quality to that usually provided by the standard practices in this RFP.

1.2a Transit Police shall be a visible security patrol on any and all Milwaukee County Transit System buses at the discretion of the MTS Contract Administrator. This service will require an on-bus presence, as well as vehicular support from transit security supervisors, all under the general supervision of the MTS Contract Administrator....”

**The Wackenhut Corporation is a private firm that has provided transit security services for the Milwaukee County Transit System since 1993.**

The Wackenhut Corporation, a private security firm that had been providing such services for the Milwaukee County Transit System since 1993, submitted the only proposal in response to the RFP.

### **Security Approach and Officer Deployment**

Wackenhut's proposal states, in part:

“In short, our operational objective is to place more officers on the buses and give the supervisors the ability to provide full service support. With more people on the buses and supervisors on the streets, Wackenhut can improve service and increase our ability to properly respond to any emergency.”

Similar language is contained in several other parts of the Wackenhut proposal. The same document goes on to establish the following operational performance goal:

“Eighty-five percent of an officer’s time should be spent riding on a bus or assisting with a situation at the bus stop....The goal of placing more officers on the buses is a reduction of security incidents, especially those involving personal threats or property damage. The act of officers riding on the bus should provide a deterrent to most criminal activity.”

**Using a private firm was intended to place more individuals on the buses as a deterrent to security-related incidents.**

Since the original contract awarded in 1993, official documents describe a strategic approach to transit security that emphasizes security officers riding buses. In March 1993, the Managing Director of MCTS, pointed out that contracting with a private firm for security services, rather than paying for higher-cost Sheriff’s Deputies, “would allow transit to place more individuals on the buses as a deterrent to security-related incidents.”

**Emphasis has been placed on deploying a mobile security force to respond to calls for assistance from bus operators.**

Despite clear documentation establishing the expectation of an MCTS security strategy emphasizing security officers riding buses, emphasis has instead been placed on deploying a mobile security force. According to the Wackenhut Project Manager, within about two years after the initial contract began in 1993, a strategy was implemented in which teams of two Custom Protection Officers (CPOs) were assigned to vans deployed throughout the County. The Project Manager told us it was determined that the deployment of officers in this manner is the best way to respond to calls for assistance by bus operators.

MTS management has acknowledged that, despite the language contained in its RFP and Wackenhut’s 2003 proposal, the mobile response capability provided by the deployment of CPOs in vans is the strategic approach preferred and agreed upon by the parties. MTS management also noted that the specifications of the RFP, which are incorporated as part of a binding contract between the parties, provide MTS with the authority to modify deployment of security staff:

“9.1a MTS...may at any time, by written instruction to the Contractor, make changes to existing service, including but not limited to scheduling changes, modifications in special equipment requirements, and increases or decreases in the amount or type of service. Additionally, posts or route assignments may be added to or deleted from this contract without restriction as required by MTS.”

Under the strategy emphasizing a mobile security force, in use today, daily CPO responsibilities include the following general security-related tasks:

- Patrolling specified security areas, such as MCTS facilities and Park & Ride locations.
- Monitoring designated intersections.
- Taking short bus rides.
- Responding to incidents called in by bus operators.
- Following up on previously reported incidents.

Statistics compiled by Wackenhut from daily reports submitted by CPOs showed the following averages for each of these activities, as shown in **Table 4**.

<u>CPO Activity</u>	<u>Annual Totals</u>	<u>Monthly Average</u>	<u>Daily Average</u>
Reports*	3,216	268	9
Station and Park & Ride Checks	11,884	990	33
Monitoring Intersections – Bus Operator Contacts	10,622	885	29
Bus Rides	6,878	573	19

\* Includes write-ups of responses to safety and security incidents (approximately 95%), as well as other assistance rendered, such as monitoring school bus boarding sites (approximately 5%).

Source: Wackenhut summary activity report for 2008.

**We quantified 10 shifts, totaling 150 staff hours, of CPO activity.**

We reviewed GPS tracking information and supporting CPO activity reports for 10 vans from selected dates in February and March 2008. In all but one instance, the van consisted of teams of two CPOs. Using this data, we were able to quantify 10 shifts, totaling 150 staff hours, of CPO activity. **Table 5** provides a breakout of the various activities performed by CPOs during these 10 shifts.

**Table 5  
Actual Time Spent by CPOs  
On Daily Activities  
Ten Shifts from February & March 2008**

<u>CPO Activity</u>	<u>Actual Hours:Minutes</u>	<u>Percentage Of Total</u>
Patrolling	97:52	65.2%
Responding to Incidents	23:49	15.9%
MCTS Station Checks	11:12	7.5%
Monitoring Intersections	6:00	4.0%
Administrative Activities	4:45	3.2%
Riding Buses	4:12	2.8%
Park & Ride Checks	<u>2:10</u>	<u>1.4%</u>
<b>Total Work Hours</b>	<b>150:00</b>	<b>100.0%</b>

Note: The 10 shifts selected were from February 29, March 1, March 6, March 11 and March 14, 2008.

Source: Department of Audit calculations using GPS tracking data.

CPOs generally code a small portion of their normal workday to administrative functions, such as roll call and training. We included the times coded, accounting for 3.2% of their workdays, as 'Administrative Activities' in **Table 5**. The rest of their work hours broke down into the following security-related functions.

**Patrolling**

As shown in **Table 5**, most of the CPOs' time (65.2%) was spent inside the vans, on patrol. Patrolling generally involves driving to various locations at which CPOs perform their assigned tasks, such as security checks at Park & Ride locations, and

intersection monitoring. The Patrolling category also includes time spent while the van is parked during the workday.

Patrols by CPO teams are not generally monitored. Vans were often observed for extended time periods at MCTS' Downtown Transit Center, where few incidents occur. At times, more than one van was present. Their presence was not in response to any calls for assistance, nor were security checks of the location performed. It should be noted that the location is equipped with security cameras, further reducing the need for the extra attention it received from CPO teams.

The data presented in **Table 5** are consistent with activities we observed while accompanying CPOs on four shifts. Thus, the current strategy used by Wackenhut has resulted in most of a CPO's workday spent in a van. On the days reviewed, only 2.8% of CPO work time was spent riding buses. An additional 15.9% of CPO work time was spent responding to calls for assistance from bus operators. This includes the time spent driving to the scene of the incident. Combined, this amounts to 18.7% of the work time reviewed, far below the 85% performance goal established in the Wackenhut contract proposal.

According to MTS management, the 85% performance goal was not, and is not, its expectation. MTS management stated that deploying CPOs to spend such a significant amount of their time riding buses reduces the ability of those officers to respond to calls for assistance from bus operators.

### **Bus Rides**

Consistent with MTS' deployment strategy, CPOs are generally instructed to perform five bus rides per eight-hour shift. A standard bus ride involves one CPO boarding a bus, while the partner follows in a van. The bus ride is generally short, typically

**Bus rides by security officers are generally short, typically only a few blocks in length.**

only a few blocks in length. At that point the CPO riding the bus disembarks and is picked up by the following van.

The short duration of the bus ride and the infrequent number of times buses are ridden during a shift explains the small percentage of CPO work time spent riding the bus. Prior to June 2008, the general standard for the number of bus rides per shift was four. For the 10 shifts we observed via GPS in February and March 2008, only 26 bus rides were taken, an average of 2.6 per shift. This is well below the four bus rides per shift, the general standard called for by Wackenhut management at that time. That current general standard that CPOs ride the bus five times per shift is a significant increase over years past. An internal Wackenhut memo in 2001 instructed CPOs to ride at least one bus route during their shift. An April 2004 memo increased the requirement to two bus rides per shift.

**In October 2008, MTS modified its security approach.**

In October 2008, MTS modified its approach, directing Wackenhut to deploy one team of two CPOs to ride buses for one eight-hour shift per weekday. If sustained, this would increase average CPO work time devoted to riding buses from 2.8% to approximately 15%.

### **Monitoring Intersections**

Another standard activity performed by CPOs each shift is to monitor assigned intersections. This activity took only 4.0% of CPO work time per our GPS analysis. According to Wackenhut management, CPOs are supposed to board buses at those locations, ask the bus operators about any problems they might be having, walk to the rear of the buses and exit through the back doors.

This practice provides some level of security by establishing a CPO presence that is visible to the bus riding public. According to MTS management, this deployment strategy is effective in that

it provides bus operators on multiple bus routes an access point to Wackenhut security officers.

**We question the value of intersection monitoring in terms of either intercepting or deterring disruptive behavior over the course of a bus route.**

We acknowledge there are benefits to the intersection monitoring activities. However, we question the value of placing such emphasis on this approach, which reduces available CPO time for either intercepting or deterring disruptive behavior over the course of a problematic bus route.

We also noted that CPOs do not always perform the minimum task required for monitoring intersections. According to bus operators we interviewed, and based on our own observations, CPOs sometimes merely wave to a bus operator, either as it is stationary at a bus stop or as it passes by the bus stop, without boarding the bus.

#### **Security Checks at MCTS Facilities**

**Wackenhut CPOs perform periodic security checks at six MCTS facilities.**

Wackenhut CPOs perform periodic security checks at six MCTS facilities. These include the MCTS administration and fleet maintenance building, the Downtown Transit Center and three main bus stations where buses are secured when not in use.

A detailed analysis of records for March 2008 showed 662 security checks at these locations. This averages about four stops per day for each building on weekdays, and about two stops each on weekends.

Our review of GPS information showed 7.5% of the CPOs' time was spent on security stops at these six locations. All of these facilities have employees in attendance at the same times that the security stops are conducted. In addition, each of these locations has security cameras for monitoring activity.

Further, data maintained by Wackenhut show there are few incidents at these locations. During the period February through April 2008, only 19 of 781 incidents (2.4%) occurred at the six

MCTS facilities noted. It is unknown which of the security features (cameras, staff or CPO security stops) contributes most to the low incident rate. However, the minimal number and small proportion of incidents that occur at the six MCTS buildings led us to question whether CPO time would be better spent riding buses, where incidents primarily occur.

MTS management stated that issues with vandalism and break-ins at some of its facilities, including a maintenance facility, justify the security checks.

### **Security Checks at Park & Ride Locations**

There are 14 Park & Ride locations within Milwaukee County that provide parking for MCTS patrons, seven of which are owned by the Wisconsin Department of Transportation. There have been 95 incidences at these sites during the past three years, including 32 incidents in 2008.

**Since 2006, Park & Ride incidents accounted for less than 1% of all reported incidents.**

Since 2006, Park & Ride incidents accounted for less than 1% of all reported incidents, averaging less than three incidents per month. Almost 44% of all incidences have occurred at the Holt Park & Ride, just off I-94/43. Four other Park & Ride locations combined accounted nearly equally for another 35% of incidents. Most incidents are reports of vandalism.

Wackenhut performs security checks at just two of the 14 Park & Ride locations, both of which are state-owned. In addition to the Holt Park & Ride, Wackenhut performs security checks at the Loomis Park & Ride. Together, these two locations accounted for 52.6% of all Park & Ride incidents since 2006. As previously noted, our review of GPS data shows Wackenhut CPOs spend about 1.4% of their time on Park & Ride security checks, not including travel time to and from the cites, which we categorized as Patrolling.

As with any emergency situation within Milwaukee County, the Sheriff's Office responds to emergency calls for assistance, regardless of lot ownership. This policy was reinforced in a March 10, 2008 memo by the Sheriff's Office to the County Board, which further stated that all non-emergency incidents occurring at state-owned Park & Ride lots had been deferred to the Wisconsin State Patrol. MTS management noted that the Sheriff's Office does not conduct routine patrols of Park & Ride lots, leaving responsibility for the security checks to MTS.

**Security cameras currently are not used at Park & Ride locations.**

Security is important for customers leaving their vehicles for extended periods of time while using MCTS buses for transport. Security cameras currently are not used at Park & Ride locations serving MCTS patrons. Surveillance cameras could potentially be a cost-effective method of enhancing security at Park & Ride lots, while simultaneously freeing additional CPO time for bus security. However, installation, maintenance and monitoring expenses associated with the use of a sufficient number of cameras to be effective must be taken into consideration.

The Sheriff's Office has encouraged the State Patrol to consider the use of security cameras at state-owned Park & Ride locations, without success. A review by the United States Department of Transportation (USDOT) indicated an inconsistent use of security surveillance cameras at Park & Ride lots and other public areas.

#### **Responding to Incidents & Follow-up**

**We found that CPO time devoted to follow-up in some instances duplicates efforts of MCTS personnel.**

The amount of CPO time spent in response to incidents was 15.9% for the 10 shifts included in our review of GPS and CPO activity report data. This included the time spent driving to the incident, as recorded by CPOs on their incident reports. However, we found that CPO time devoted to this activity in some instances duplicates efforts of MCTS personnel.

### Dual Responses to Incidents

MCTS has route supervisors whose responsibilities include patrolling bus routes throughout the day. There are up to five route supervisors patrolling bus routes during the first shift, from 5:00 a.m. to 3:00 p.m. When bus operators call a dispatcher for assistance, a route supervisor will respond if they are available, often arriving at the scene of the incident before Wackenhut staff.

If both parties arrive at the scene of an incident, route supervisors have authority over CPOs, unless or until law enforcement arrives on the scene. Like CPOs, MCTS route supervisors write reports summarizing the facts of the incident. The MCTS reports contain essentially the same data contained in the reports written by the Wackenhut CPOs. The MCTS reports are primarily in checklist format, compared to predominantly narrative descriptions of details contained in CPO reports.

There are several distinctions between MCTS route supervisors and Wackenhut CPOs. Route supervisors have several areas of responsibility, including those related to maintaining safe, efficient adherence to bus schedules. If, for instance, a bus is involved in an accident, a route supervisor must assess the situation and determine if an alternate bus must be dispatched. Route supervisors do not receive the same level of security training as CPOs, nor do they carry the handcuffs, pepper spray and batons used by CPOs for defense purposes. Whereas CPOs generally patrol in pairs, route supervisors travel alone in their vehicles.

During February 2008, there were 237 security incidents recorded. Both an MCTS route supervisor and Wackenhut CPOs responded to calls for assistance in 54 of the 237 incidents. Of those 54 incidents, there was insufficient information to determine which party arrived first in 25 (46%).

Report documentation showed that an MCTS route supervisor arrived on the scene first in another 25 (46%) of the 54 incidents, while CPOs arrived first in the four remaining incidents (8%).

**Dual responses to security incidents may be warranted in cases of imminent danger.**

Dual responses to security incidents may be warranted in cases of imminent danger. In such cases, responses by Sheriff's Deputies or Milwaukee Police may also occur. However, there may be an opportunity to coordinate activities between MCTS route supervisors and Wackenhut CPOs to prevent simultaneous responses to non-threatening security incidents, or to communicate with one another when an incident is well in hand.

For example, in one incident we observed, a route supervisor had already removed a sleeping passenger from a bus and allowed the bus to continue on its route to minimize schedule disruptions. After talking with the passenger, it was learned that the sleeping was apparently caused by a reaction to some medication. The route supervisor then provided the passenger with a pass for the next bus. The CPOs responded after the fact, stopping the bus once again only to learn from the bus operator that the passenger had been removed by the route supervisor at a previous stop. The CPO team then proceeded back to where the passenger was removed, and asked him the same questions already posed by the route supervisor, and generated a duplicate incident report.

**If a route supervisor has already responded, it may be unnecessary for a CPO team to arrive and detail the same incident in a report.**

While the above example may be an anomaly, there are many instances in which Wackenhut responds to a request for assistance, and the instigator of the incident has already fled the scene. If a route supervisor has already responded in such an instance, it may be unnecessary for a CPO team to arrive and detail the same incident in a report.

#### Duplication of Incident Report Write-Ups

Another opportunity for coordination and improved efficiency occurs in the area of follow-up reports generated by Wackenhut

CPOs. Follow-up reports are initiated when bus operators report incidents for which a Wackenhut CPO team was unable to respond. Our review of the 781 incident reports for February through April 2008 showed that about 12% of these reports represented follow-ups to prior incidents in which CPOs did not respond to the incident at the time of its occurrence.

While the practice of documenting the facts relating to each bus incident is important, the time and effort spent obtaining and recording information during this follow-up did not appear to provide any added value. In some follow-up incident reports, the facts recorded by the CPOs are simply a restatement of information that had been supplied by the bus operator in a report previously prepared. It merely repeated information already known, resulting in a handwritten duplication from a new author citing the same facts. MTS management indicated a willingness to review its procedures to address this issue.

The 15.9% of CPO time we identified as devoted to responding to incidents does not include time spent writing follow-up incident reports. Our methodology did not provide a basis for determining the precise nature of CPO activity within the vans during the 10 shifts reviewed. However, based on our observations, incident reports were often written by CPOs while passengers in the vans.

For example, during one of our ride-alongs, we observed that about 60 minutes of one shift was spent in a parked van while one CPO recorded the results of a follow-up on an incident from a prior day. If this occurred on the days of our GPS reviews, such time would have been included in the category of Patrolling.

### **Deployment Issues**

As previously noted, Wackenhut's actual transit security strategy focuses on deploying CPOs, in teams of two, to patrol the transit system service area in vans provided by MCTS. For purposes of

**CPO teams are free to follow any path they choose as they patrol the transit service area.**

deployment, Wackenhut has established three geographic sectors: 'North,' 'South' and 'All City.' Deployment information provided to CPOs at the beginning of their shifts include specific intersections that the teams are required to monitor.

Generally, CPO teams are free to perform their intersection monitoring tasks any time during their shifts. Further, the teams are free to follow any path they choose as they patrol the transit service area. Regardless of its assigned deployment sector, a CPO team can respond to any call for assistance.

According to Wackenhut management, CPOs are deployed in response to previous incident patterns. In March and April 2008 there were 545 reported incidents. We reviewed deployment schedules following the dates of 20 of the more serious types of incidents, including assault and battery, as well as robbery. In each instance, we looked for CPO deployments within the next several days that were in close proximity to, and near the same time as, the incident selected. For the 20 incidents selected, we found:

- Six instances where CPO deployment occurred within the next few days that closely mirrored the location as well as the time of day of the reported incident.
- Six other instances where CPO deployments occurred within a few blocks of the reported incidents. However, the times of these deployments were not reasonably close to the times of the reported incidents (e.g., the incident occurred during the night shift, but CPO deployment was during the day shift).
- In the remaining eight instances, there were no CPO deployments that were based on the prior recent incidents.

Our analysis identified some apparent linkage between the more serious security incidents and subsequent CPO deployment schedules. However, we did not find this linkage to be strong. Further, it was difficult to determine whether or not the limited number and duration of bus rides taken by CPOs strengthened this linkage, because records maintained by CPOs at the time of

our fieldwork did not identify the precise location of brief CPO bus rides.

#### Recent Improvements

In July 2008, Wackenhut management began documenting on daily roll call sheets a number of points for CPOs to be aware of for the day. The roll calls address a variety of issues, such as information on recent serious incidents, reminders on when and how many Sheriff's Deputies are available for that day, and reminders concerning administrative issues. The information disseminated at daily roll calls also include which bus routes had the most incidents over the past month and a half.

**In October 2008, two additional improvements were made in MCTS security officer deployment.**

In October 2008, two additional improvements were made in MCTS security officer deployment. As previously noted, this was when MTS directed Wackenhut to deploy one team of two CPOs to ride buses for one eight-hour shift per weekday. A review of logs maintained by CPOs on these shifts showed that precise locations were identified for points of boarding and exiting buses.

In addition, the roll call information sheets were modified to include the location and times of the more recent, serious security incidents on the bus routes identified. This data is important for assisting CPOs in deciding where and when to provide a security presence as they perform both extended and limited bus rides.

#### **Statistical Data Issues**

**Wackenhut maintains an extensive database of information relating to all security incidents.**

Wackenhut maintains an extensive database of information relating to all incidents. The database is used to generate a number of monthly reports, including a breakdown of all security incidents by type, by day of the week, by time of day, and by bus route. Statistics are also maintained summarizing the activities performed by CPOs, such as the number of bus rides taken, intersection monitoring, security checks, etc.

The source data for these reports come primarily from the incident reports prepared by CPOs, as well as daily CPO log sheets that document the activities performed. The following issues were noted as we attempted to validate the data contained in reports created by Wackenhut.

- CPO teams record their activities on pro-forma log sheets, which are submitted to Wackenhut management at the end of each shift. The log sheets contain the details of security activities performed, such as the times and locations of security checks, the specific bus numbers of buses checked during intersection monitoring, and information identifying the buses boarded for brief rides. The log sheets are used to create daily, weekly and monthly summary activity reports.

However, the supporting log sheets are destroyed after a period of time, leaving only summary details of activity for the period. Without the detailed log sheets, the summary activity reports cannot be verified.

As a result, we could not verify the accuracy of CPO activities reported prior to 2008. The Wackenhut contract requires that all logbooks be maintained for at least one year beyond the expiration or termination of the agreement, including any contract renewals.

- The reported statistics on the number of bus rides include instances where a bus is not taken, resulting in an overstatement of bus ride activity. CPOs routinely record a bus ride when responding to an incident. For example, in one incident, a bus operator reported a fare dispute. By the time CPOs reached the bus, the passenger had exited and fled the scene. CPOs checked the area with negative results. Even though the CPOs never boarded the bus, this incident was recorded as a bus ride. It is difficult to determine the extent to which the number of bus rides taken by CPOs is overstated, since the practice described is typical, but does not occur in every instance.
- As previously noted, the number of contacts with bus operators is inflated for those instances when a CPO, while monitoring an intersection, does not actually board a bus, in accordance with established procedures. Of primary concern are those instances when CPOs never even spoke to the bus operator as the bus drove by without stopping. The amount of the overstatement is unknown, but bus operators we spoke with indicated this was a common occurrence.

## Conclusions and Recommendations

USDOT noted in a review of MTS operations that Wackenhut's role is primarily reactive, based on responding to incidents. The report stated that the MCTS security program should be a proactive program that is focused on prevention, rather than response. We concur with USDOT's assessment.

**The actual approach employed by Wackenhut is far removed from the type of security that was envisioned in its proposals.**

By all documented accounts, a proactive effort based on the deterrent effect of a visible security presence was the expectation of County decision makers when transit security was shifted to a private contractor in 1993. The current transit security approach employed by MCTS, reportedly beginning about two years after the initial contract was awarded in 1993, is far removed from the type of security that was detailed in Wackenhut's proposals. Instead of maintaining an ongoing presence on MCTS buses, the CPOs have instead been spending the bulk of their time inside vans on patrol, performing intersection checks of questionable value, and making security checks at locations which, in many instances, have security cameras and MCTS employees present.

Beginning in October 2008, MTS management has modified its mobile security force strategy somewhat by directing Wackenhut to deploy one CPO team to ride buses for one eight-hour shift, five days per week.

**We believe adherence to a strategy more closely resembling that which is outlined in Wackenhut's contract proposal will have a positive effect on overall MCTS bus security.**

We believe this modification is a step in the right direction, and that adherence to a strategy more closely resembling that which is outlined in Wackenhut's current contract proposal will have a positive effect on overall MCTS bus security. The presence of CPOs routinely riding buses should help prevent incidents from occurring, especially on the more troubled routes and times. It also should improve the public's perception of bus security. Striking the proper balance between spending more time on the buses and maintaining the capability to quickly respond to requests for assistance could be facilitated by deploying fewer

CPOs in teams of two. The initial model described in the 2003 transit security RFP called for a CPO presence on buses, with supervisors in vans providing mobile response capabilities. Movement towards that deployment strategy would enhance the proactive nature of the MCTS security program.

**We direct specific audit recommendations to MTS, with the understanding that DTPW is responsible for ensuring contractor accountability.**

As previously noted, direct management and operation of Countywide bus service is provided by MTS under contract with the Department of Transportation and Public Works. Therefore, we direct specific audit recommendations to MTS, with the understanding that DTPW is responsible for ensuring contractor accountability.

To improve the efficiency and effectiveness of MCTS bus security, we recommend MTS management:

- 1. Expand its movement towards a more proactive transit security strategy by deploying more CPOs on specific MCTS buses during specific times with the most need for a security presence. This effort should include discontinuing or significantly curtailing the practice of deploying CPOs in teams of two, instead relying primarily on Wackenhut supervisors to provide mobile response capability.*
- 2. Continue to work with Wackenhut to coordinate the efforts of Wackenhut CPOs and MCTS route supervisors to ensure that all incidents are properly documented, with less duplication of effort.*
- 3. Enforce contract requirements relating to retention of documentation that support reports of CPO activity.*
- 4. Evaluate the cost effectiveness of installing security cameras for Park & Ride locations experiencing the greatest frequency of incidents.*

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## Section 2: MTS Contract Management

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### Contract Administration

**The use of clearly defined performance measures is an important element of all programs and activities.**

The use of clearly defined performance measures is an important element of all programs and activities. They provide the framework for assessing the extent to which goals and objectives of a program or activity are being reached. This holds true for administering contracts with outside vendors as well. Contracts that contain appropriate performance measures provide management with the ability to judge how well a contractor is fulfilling the requirements and associated objectives of the contract. They can also provide the basis for management decisions regarding contract continuation, or possible changes in the methodology required of the contractor to better achieve goals and objectives.

Equally important is for management to have a system in place to monitor the extent to which contracted performance measures are being reached. Performance should be monitored regularly to identify and address potential problems in a timely manner. The administrator responsible for contract oversight should understand and monitor key indicators, or outputs, that directly affect desired outcomes, as well as measure achievement of desired outcomes. In the case of the contract for transit security, indicators could include daily activities such as the number of bus rides, station checks, and other security-related activities. Examples of desired outcomes could include an expected or desired customer satisfaction rating, an expected response time to calls for assistance, a maximum number of incidents per month, and a maximum rate of incident occurrence.

**The contract with Wackenhut does not have clearly defined performance measures.**

The contract with Wackenhut does not have clearly defined performance measures that would allow MTS management to readily evaluate how well Wackenhut is doing with respect to MTS's security goals and objectives. The contract requires only

a specified number of hours to be worked monthly (inputs), without any requirement for productivity or program results.

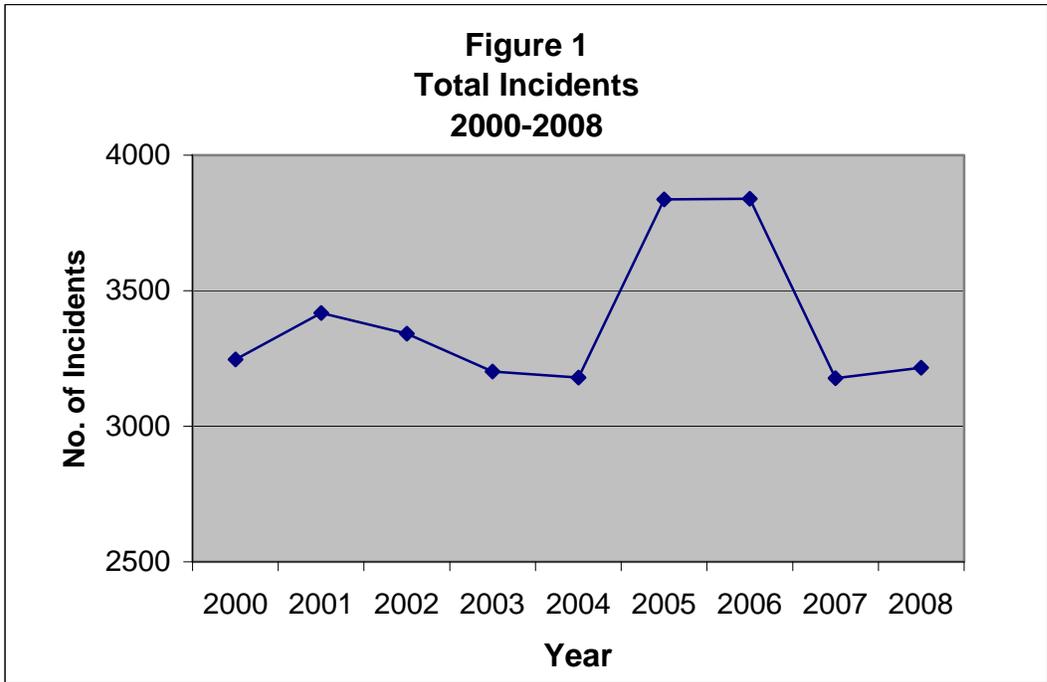
The absence of performance measures makes it difficult for MTS management to assess how well Wackenhut is doing its job on an ongoing basis. The current belief held by MTS management is that Wackenhut is doing a good job, and that the contractor is a valuable collaborator in addressing MCTS security needs. The addition of measurable performance objectives would assist MTS in objectively assessing and demonstrating Wackenhut's value.

### **Performance Indicators**

**Wackenhut does a very good job of generating statistical data on security incidents.**

An analysis of incident trends is one indicator that can provide some perspective on how well Wackenhut has done in providing security on MCTS buses. Wackenhut does a very good job of generating statistical data on security incidents. As previously noted, its database of incident information can generate a number of summary reports, such as the number of incidents per month, the types of incidents, the time of day that the incidents occurred as well as the day of week, and the bus routes involved. **Exhibit 2** summarizes the number and types of incidents that have occurred from 2000 to 2008.

Using this information, we can show incident trends over that time frame. Except for a spike in the number of incidents in 2005 and 2006, the total number of incidents has been relatively stable over the entire period. According to MTS management, the spike in incidents corresponds with a change in starting times for Milwaukee Public Schools, which resulted in an infusion of students into mainstream commuters. One response to the spike was additional attention from the Sheriff's Office. For 2008, the number of incidents was slightly lower than in 2000, as shown in **Figure 1**.



However, consideration needs to be given to the number of passenger-miles logged by MCTS buses over the same period. Reduced ridership and cutbacks on routes make it important to consider passenger-miles to provide for more meaningful year-to-year comparisons. **Table 6** shows the change in the number of passenger miles since 2000.

**Table 6  
Passenger Miles  
Reported to USDOT  
2000 – 2008**

<u>Year</u>	<u>Passenger Miles</u>	<u>% Change From Prior Year</u>
2000	195,917,450	N/A
2001	198,470,800	1.30%
2002	164,543,398	-17.09%
2003	154,131,176	-6.33%
2004	154,727,467	0.39%
2005	134,876,722	-12.83%
2006	130,904,772	-2.94%
2007	129,172,613	-1.32%
2008	152,830,622 <sup>1</sup>	18.32%
Net Decrease 2000–2008		-21.99%

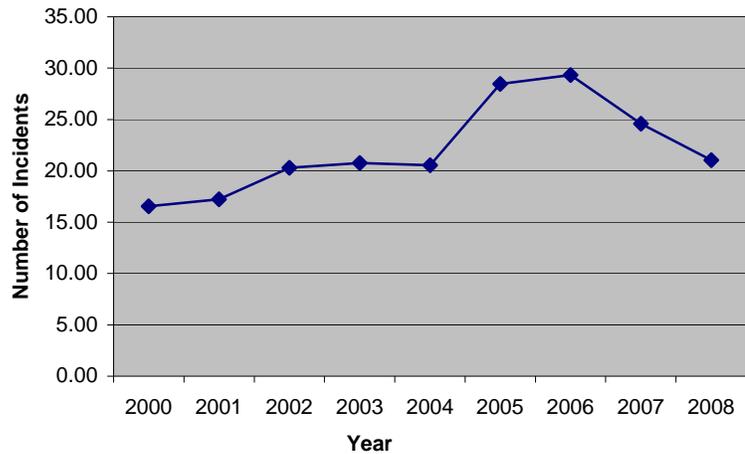
Note <sup>1</sup> – The passenger miles for 2008 have not yet been reported to USDOT, thus subject to change.

Source: Reports by MCTS to USDOT

**Except for 2008, passenger-miles have been generally decreasing over the last several years.**

As the data show, except for 2008, passenger-miles have generally decreased over the last several years. Using this information, we calculated the rate of incidents per million-passenger miles over the period, shown in **Figure 2**.

**Figure 2  
Incident Rate Per  
Million Passenger Miles**



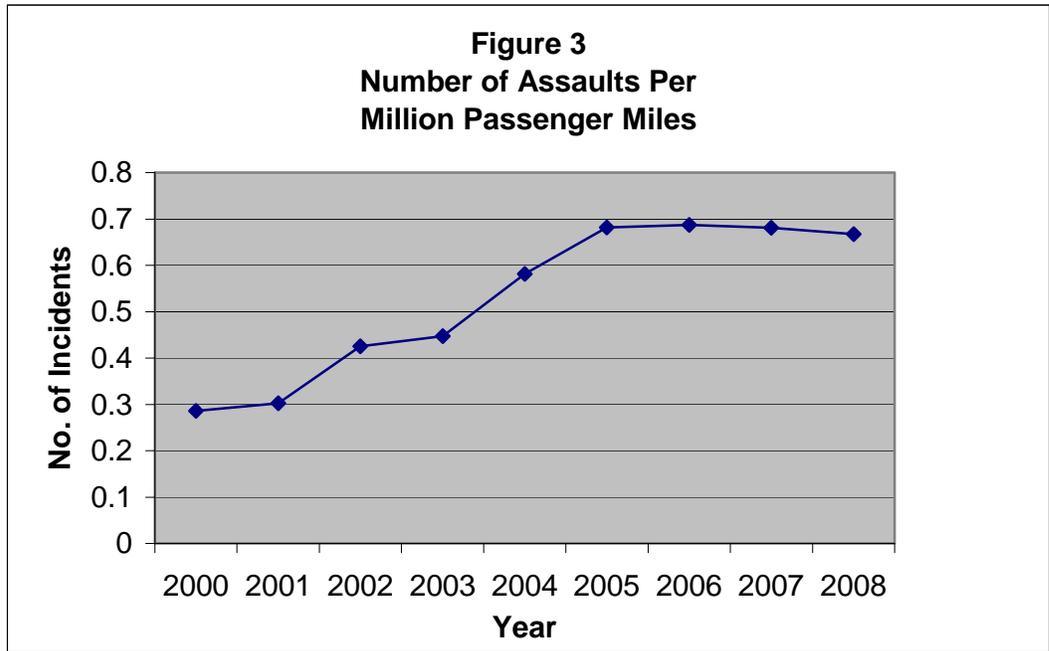
**While declining for the second consecutive year, the rate of incidents in 2008 was higher than in 2000.**

Adjusting the data for passenger-miles paints a significantly different picture with regard to the trend in incidents over the period 2000–2008, as compared to the number of incidents alone. Similar to the raw number of incidents, the rate of incidents spiked in 2005 and 2006. However, unlike the raw numbers, the rate of incidents, adjusted for passenger-miles, increased fairly steadily from 2000 through 2004. While declining for the second consecutive year, the rate of incidents in 2008 was higher than in 2000. For 2008, the rate of security incidents was 21.0 incidents per million passenger-miles, compared to 16.6 incidents per million passenger-miles in 2000, an increase of 27%.

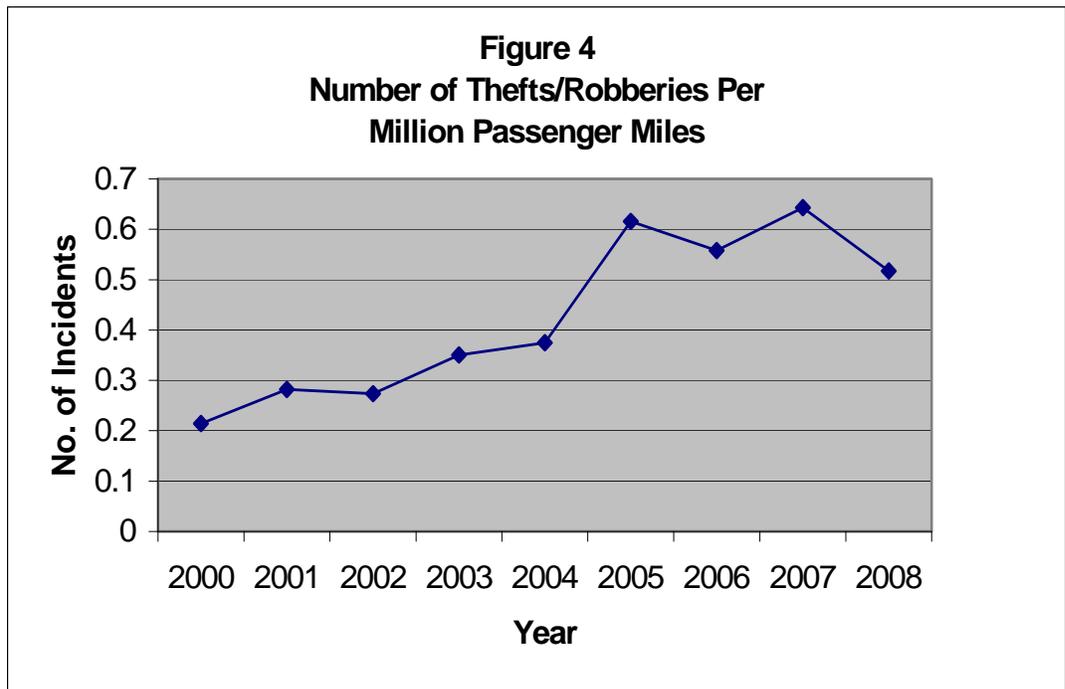
**Incident data must be viewed in context of the number of passengers served and miles traveled. In 2008, there was a 99.76% chance of taking an MCTS bus trip without incident.**

Despite a relatively large percentage increase in the rate of incidents for 2008 compared to 2000, incident data must be viewed in the context of the enormous number of passengers served and miles traveled on MCTS buses. For 2008 there were 3,216 reported incidents for a bus system that provided approximately 1.35 million bus trips carrying an average busload of 38 passengers. Stated another way, in 2008 there was a 99.76% chance of taking an MCTS bus trip without incident.

The information on reported incidents also can be analyzed by type of incident. For example, **Figure 3** shows the trend for the rate of assaults over the same period.



**Figure 4** shows the trend for robberies and thefts.



In both cases, the rate per million passenger-miles generally increased over the first several years reviewed, but showed improvement in recent years.

### **Comparison With Other Transit Systems**

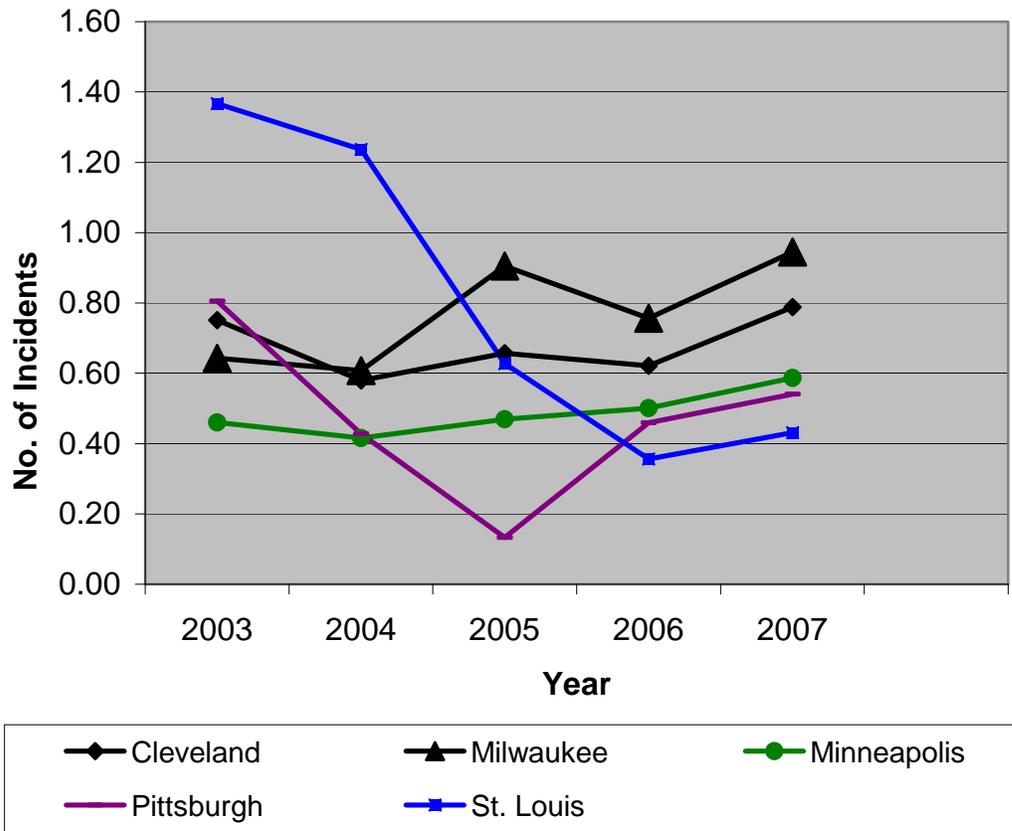
All transit systems report information to USDOT on certain types of security incidents, in addition to reporting passenger-miles. Not all incidents documented by Wackenhut are included for USDOT reporting purposes. One of the major differences is that USDOT records only those incidents resulting in actual criminal charges filed against the perpetrators. As a result, the number of incidents reported to USDOT is much lower, since only a small percentage of incidents included in Wackenhut's statistics result in the perpetrator being caught and charged.

Because the data includes only incidents resulting in criminal charges, a higher incidence rate could indicate a more aggressive security effort. In addition, because the numbers are self-reported, there may be differences in the diligence and/or accuracy of data submitted. Therefore, such comparisons should not be viewed exclusively, but rather in conjunction with other trend analyses, such as the internal Wackenhut incident rate data.

**We surveyed six Midwest transit systems.**

We surveyed six Midwest transit systems to obtain general information on the manner in which they provide transit security. Information from USDOT and the National Transportation Database (NTD) concerning reported incidents and passenger-miles was available for four of the six transit systems for the period 2003–2007. We used this data to calculate incident rates for comparison purposes, shown in **Figure 5**.

**Figure 5  
Total Incidents Per  
Million Passenger Miles**



The comparison showed MCTS had the highest incident rates for the past three years.

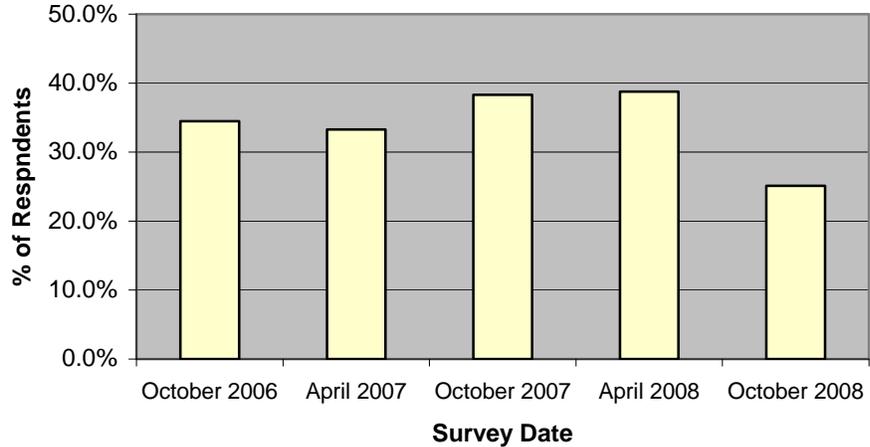
**Results of Customer Surveys**

MTS has contracted with an outside vendor to survey customers' satisfaction with various aspects of bus service. Generally, 400 customers are surveyed every six months, with the results summarized in a report to MTS management. We reviewed the results of the last five semi-annual reports (from October 2006 – October 2008) to identify trends related to customer safety and security.

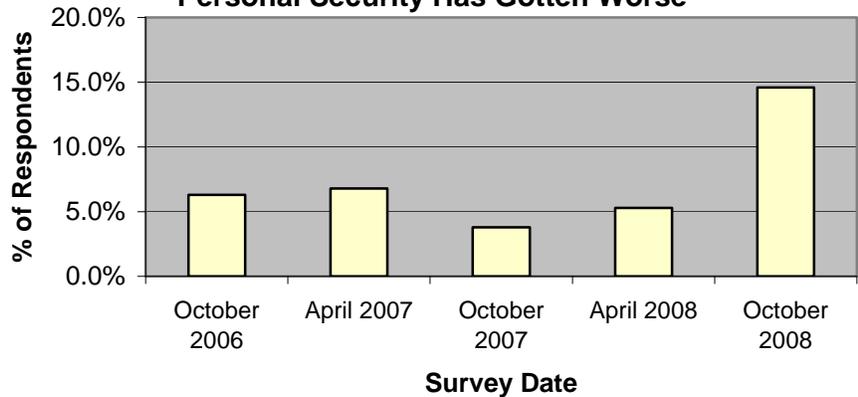
**Personal Security** – The percentage of customers surveyed who believed that personal security improved from the prior six

months ranged from 25.1% to 38.8%. The responses were trending upward until the most recent survey (see **Figure 6**). Conversely, the percentage of customers surveyed who believed that personal security got worse from the prior six months ranged from 3.8% to 14.6%, with a significant increase in the October 2008 survey (see **Figure 7**).

**Figure 6**  
**Respondents Believing**  
**Personal Security Improved**

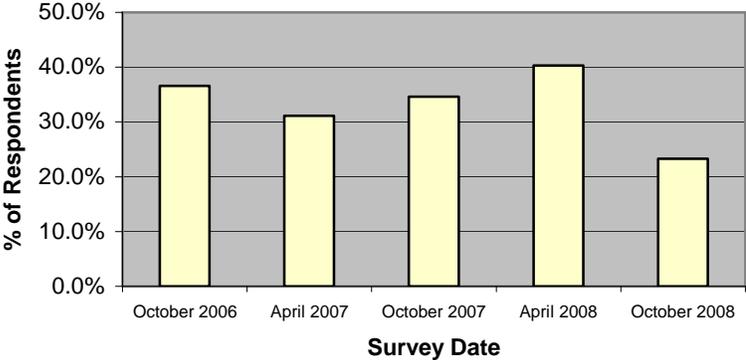


**Figure 7**  
**Respondents Believing**  
**Personal Security Has Gotten Worse**

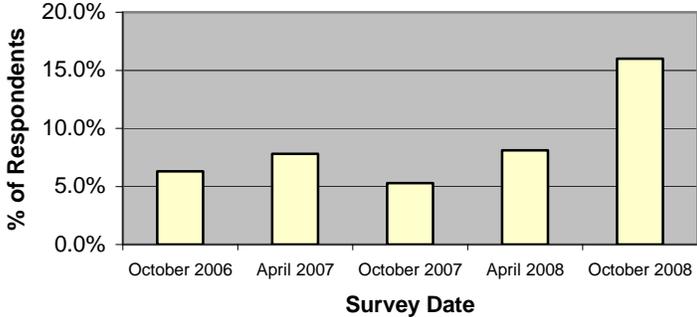


**Personal Safety** – The percentage of customers surveyed who felt the buses were safer than they were compared to the prior year ranged from 23.3% to 40.3%. The responses were trending upward until the most recent survey (see **Figure 8**). Conversely, the percentage of customers surveyed who felt the buses were less safe compared to the prior year ranged from 5.3% to 16.0%, again with a significant increase in the October 2008 survey (see **Figure 9**).

**Figure 8  
Respondents Believing  
Buses Are Safer**

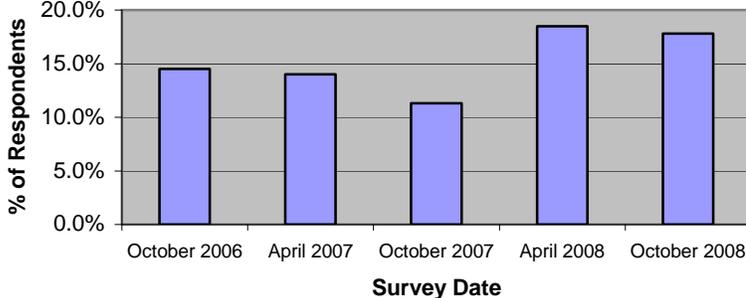


**Figure 9  
Respondents Believing  
Buses Are Less Safe**



**Concern for Personal Safety/Security** – The percentage of customers surveyed who witnessed an event during the prior six months that made them concerned about their own safety ranged from 11.3% to 17.8%, with the trend increasing in the two most recent surveys in 2008 (see **Figure 10**).

**Figure 10  
Respondents Expressing Concern For  
Personal Safety**



**Customer responses within the last year indicate heightened concerns relating to safety and security on MCTS buses.**

**Reason for Safety/Security Concern** – Riders listed a number of types of incidents that caused their concerns. The top three types of incidents were the use of loud profane language (averaging 55.8%), uncooperative passengers (averaging 35.7%), and fighting (averaging 30.8%).

Overall, it is clear that customer responses within the last year indicate heightened concerns relating to safety and security issues on MCTS buses.

**Response Times to Calls for Assistance**

The length of time it takes Wackenhut security staff to respond to requests for assistance by bus operators, as well as by law enforcement when the situation calls for it, is important from the standpoint of public safety. Quick responses can improve the ability for apprehending perpetrators, which in turn can help deter incidents from occurring. It can also enhance the public's perception of a safe bus experience.

Wackenhut generates statistics on the amount of time it takes for CPOs and law enforcement agencies to respond to requests for assistance. The information is obtained from incident reports prepared by CPOs, who record the dispatch times and arrival times.

Wackenhut's statistics for March 2008 showed that CPO response times for 58 incidents was 6:37 (minutes:seconds). Response times by municipal law enforcement agencies for 35 incidents, primarily by the Milwaukee Police Department, was 10:39. Response times by the Sheriff's Office, as calculated by Wackenhut for 23 incidents, was 12:28.

However, we noted problems with the compilation of the dispatch and arrival times used by Wackenhut to compile these statistics, which impacts the accuracy of the above noted response times. For example, the times used to compute response times for law

enforcement is an estimate for instances when it arrives on the scene before the CPOs.

Also, the dispatch time for law enforcement does not take into account the time it takes for the MTS dispatcher to contact the applicable law enforcement agency. In such cases, longer response times can actually be due to the inability for the dispatcher to communicate the request to the local police dispatcher.

We reviewed dispatch information for incidents from March 2008 and noted the following problems that directly affected the calculated response times:

- Law enforcement arrived on the scene before Wackenhut in 18 of 57 incidents;
- The response times for CPOs did not include two incidents;
- Response times include 20 instances in which law enforcement and/or Wackenhut were already at the scene. These 'zero' response times provide an average that is less than the true average response time to calls for assistance;
- One response time for the Sheriff's Office was improperly computed since the initial dispatch was to a municipal law enforcement agency that ultimately could not respond. Although the Sheriff's Office was contacted with a second call, the response time calculated by Wackenhut used the initial dispatch call.

**The accuracy of calculating response times could be enhanced.**

The accuracy of calculating response times could be enhanced by using MTS' computer system to record dispatch and arrival times. This would also provide an independent source for the calculations. The importance of someone other than the transit security vendor performing this function increases if response times are used as an ongoing performance measure in future contracts. Discussions with MTS information technology staff indicated the potential for minor software changes that would provide separate fields for various law enforcement and CPO dispatch and arrival times.

Once again, we direct specific audit recommendations to MTS management, with the understanding that DTPW is responsible for ensuring contractor accountability.

To improve the accuracy and independence of response time calculations, we recommend MTS management:

5. *Explore options for independently calculating response times of contracted security firms and other responding law enforcement agencies.*

### **Contract Monitoring and Other Issues**

General oversight of the contract with Wackenhut is provided by the MTS Director of Operations. Responsibility for monitoring day-to-day activities rests with the MTS Manager of Street Operations, a position that has been vacant since January 2007.

**Routine checking of contractor performance would have identified issues that should have been questioned much earlier.**

The extended vacancy and familiarity with Wackenhut management and its operations has led to an acceptance of information provided without independent verification. This audit report contains examples where routine checking of contractor performance would have identified issues that should have been questioned much earlier.

One example, previously noted, was Wackenhut's regular destruction of detailed CPO log sheets that supported summary activity reports submitted to MTS.

Another example we identified was routine payment of weekly invoices submitted by Wackenhut that included three hours worked by an administrative assistant that is not billable under the contract. MTS management was informed by the Wackenhut Project Manager that this person was working those times as a CPO assigned to a van. However, we found no documentation supporting this statement. The Project Manager confirmed that this should not have been billed. MTS has paid Wackenhut about \$14,400 for this individual since 2004.

After being informed of this issue, MTS management has informed Wackenhut of the oversight and has initiated recovery of all funds paid for the administrative assistant. In addition, MTS management indicated that responsibility for day-to-day oversight of the Wackenhut contract has recently been assigned to an MTS Transit Security Coordinator.

### **Contract Expiration**

The current contract extension with Wackenhut is set to expire on June 30, 2010. We encourage MTS to articulate a proactive transit security strategy, and identify realistic performance measures, for inclusion in the Request for Proposal requirements developed for its next solicitation of transit security proposals.

The Performance Audit Committee of the National State Auditors Association issued a report titled *Best Practices in Contracting for Services*. This report was developed as a tool for government agencies to use in identifying and evaluating best practices in contracting for services, to provide an efficient, effective and accountable service procurement process.

The report contains many helpful concepts that can be used when entering into a service contract. In particular, the report discusses improving vendor accountability by establishing performance requirements in the contract.

To improve accountability for contracted transit security services, we recommend MTS management:

6. *Establish clearly defined, reasonable performance measures for its transit security contract that relate directly to the achievement of security goals and objectives, along with a system to monitor their achievement on an ongoing basis.*

**Between 16 and 24 Sheriff's Deputies have been assigned to assist MTS with bus security the past two years.**

### **Coordination With Sheriff's Office**

According to the Sheriff's Office, between 16 and 24 Sheriff's Deputies have been assigned to assist MTS with bus security the past two years. The number of deputies varies based on availability of staff. As of January 20, 2009, 18 deputies were assigned to this function, with six deputies available between the hours of 10:00 a.m. and 6:00 p.m., and 10 more deputies between 2:00 p.m. and 10:00 p.m. According to MTS management, deployment of Sheriff's Deputies fluctuates in response to other Sheriff's Office priorities.

Each day MTS e-mails a report to the Sheriff's Office that provides details of incidents that had been reported over the previous seven days. MTS highlights incidents that occurred the previous day to help better identify the changes from the previous day's report. Incidents are sorted by bus route number, with a brief explanation of the details of each incident.

In October 2008, MTS began providing the Sheriff's Office with computerized data on incidents from 2006 forward that the Sheriff's Office is using in its crime mapping software. This is used by the Sheriff's Office for deploying its deputies in response to trends relating to criminal activity on MCTS buses.

This is similar to the statistical data used by Wackenhut in its reports that identify routes and times of incidents. The advantage to the collaborative approach used by MTS and the Sheriff's Office is that it also identifies specific locations on the routes with the highest incident trends, rather than just noting the bus route involved. It also considers the time of the incidents for assisting in deploying Deputy Sheriffs to problem routes.

For illustrative purposes, we have plotted all incidents that occurred in March and April 2008 (see **Exhibit 3**) against bus routes.

**The Sheriff's Office expectation is for Deputy Sheriffs to ride several complete runs of selected bus routes each day.**

An advantage of the Sheriff's Office deployment approach is that it emphasizes spending more time riding buses. According to Sheriff's Office management, the expectation is for Deputy Sheriffs to ride several complete runs of selected bus routes each day. According to MTS management, Sheriff's Deputies began regularly riding MCTS buses in September 2008. Reviews of Sheriff's Office deployment for October and November 2008 showed an average of 26 bus runs performed on days when Deputy Sheriffs were assigned to the buses. This averaged to 2.3 runs per person per shift. Since a bus run can take up to 50 minutes to complete, this indicates significantly more time spent riding buses than Wackenhut CPOs.

It appears that currently there is good communication between MTS, Wackenhut and the Sheriff's Office concerning bus security activities. According to MTS and the Sheriff's Office, the Sheriff's Office has been keeping Wackenhut staff informed of the bus routes it is focusing its attention on to avoid duplication of effort. This coordination needs to continue, with the Sheriff's Office continuing to focus on crime-related incident trends, and with Wackenhut CPOs focusing their bus riding efforts on bus routes with the highest behavior-related incident trends.

As MTS increases Wackenhut's bus ride efforts and brings them more in conformity with the Sheriff's Office's deployment approach, data relating to both security efforts should be reflected so that the entire bus ride effort can be reported and analyzed for efficiency and effectiveness.

We recommend that MTS management:

- 7. Work with Wackenhut and the Sheriff's Office to create statistical reports reflecting all security-related bus ride activity.*

## Section 3: Other Issues

### Cultural Diversity

In its request for this audit, the County Board expressed concern regarding the diversity of the Wackenhut staff deployed to MCTS buses and their skills in understanding cultural differences.

From a cultural diversity standpoint, Wackenhut's workforce of 16 full-time and 14 part-time employees as of year-end 2008 consisted of seven minority staff (four African-American, three Hispanic) and 23 with a non-minority heritage. **Table 7** breaks down this data.

	<u>Full-Time</u>		<u>Part-Time</u>		<u>Total Staff</u>	
	<u>No.</u>	<u>%</u>	<u>No.</u>	<u>%</u>	<u>No.</u>	<u>%</u>
Minority staff:						
African American	1	6.3%	3	21.4%	4	13.3%
Hispanic	1	6.2%	2	14.3%	3	10.0%
Total Minority	2	12.5%	5	35.7%	7	23.3%
White Staff	14	87.5%	9	64.3%	23	76.7%
Total	16	100.0%	14	100.0%	30	100%

Source: Wackenhut personnel records as of December 2008

**We obtained information for 2007 from the U.S. Census Bureau showing the racial breakdown of Milwaukee County residents.**

In its contract proposal, Wackenhut stated it will make a reasonable effort to recruit and select personnel who reflect the nature, character, ethnic and minority diversity of the service area. To determine the diversity of the service area, we obtained information for 2007 from the U. S. Census Bureau showing the racial breakdown of Milwaukee County residents. In addition, an estimate of the racial composition of MCTS ridership was noted in a semi-annual report made by a firm contracted by MCTS to

perform customer satisfaction surveys. The results are noted in the following table.

	Total Wackenhut <u>Staff</u>	U. S. Census <u>Bureau</u>	Ridership Per Survey <u>Estimates</u>
Minority	23.3%	41.9%	52%
White	76.7%	58.1%	48%

Source: 2007 U.S. Census Bureau statistics, ridership projections from most recent vendor survey report (October 2008) and Wackenhut personnel file information.

**Wackenhut needs to increase the number of minorities it employs to more closely align with the population of the service area.**

Both comparisons show a need for Wackenhut to increase the number of minorities it employs to more closely align with the population of the service area. According to Wackenhut management, the education and experience requirements and relatively low pay have made it difficult to hire more minorities, though attempts to fill vacancies with minorities continue.

By all accounts, Wackenhut's CPOs have performed in accordance with their policy of handling themselves in a dignified manner, being courteous and responsive in dealings with all individuals, and being fair and consistent so that even people who do not agree with actions taken will feel they are being treated fairly and the rules are being equally applied to all parties. We found no issues relating to the manner in which CPOs handled cultural diversity issues while performing their duties. Reviews of complaint files, interviews with bus operators and route supervisors, and semi-annual survey results taken by a firm under contract with MTS all reflected positively on Wackenhut staff.

We also reviewed the extent of diversity training provided to Wackenhut staff. This topic is taught to all new staff in both the

40-hour classroom training curriculum and the 40-hour on-the-job training. The diversity training provided emphasizes interpersonal, multi-cultural interaction that CPOs are likely to experience on MTS buses with patrons and bus operators. This includes a video on cultural diversity given by an instructor from the Milwaukee Area Technical College. Other training modules also cover sexual and workplace harassment. According to Wackenhut management, the subject is also discussed annually during roll call.

### **Bus Operator Training**

Bus operators have to deal with several occupational stresses such as traffic congestion, inclement weather conditions, maintaining time schedules, irregular work hours, bus overcrowding, disorderly passengers, unruly students and violence on the buses. MTS management noted that several types of training classes are offered to bus operators to handle these types of situations. Brief descriptions of these classes are as follows:

- **Passenger Interaction Program (PIP)** – Mandatory for all operators. The class time typically runs eight hours. During PIP class, bus operators are allowed to vent and discuss likes and dislikes. The instructor will try to offer remedies that might help the bus operator deal with certain situations. Some of the concerns could relate to running times, situations on routes, etc. In addition, PIP classes review situations that were not handled well by the bus operators, such as fare disputes and disorderly passengers. Other topics include conflict avoidance, stress recognition, stress reduction, customer service, dealing with various situations involving school children, and finding alternative ways out of confrontations.
- **Terrorist Training** – This class was started in 2007, and is offered through a grant from Department of Homeland Security to bus operators. Classes typically run three hours. The course is designed to help the bus operator's awareness of activities on and around the bus, and how to report unattended or suspicious items left on the bus.
- **New Bus Operator Classes** – Every new bus operator goes through this class, which is a 20-day course for eight hours a day, 40 hours per week. During this class bus

operators are taught defensive driving techniques, and how to prepare for the Commercial Driver's License (CDL) examination. Class participants work with platform instructors who provide hands-on experience with buses.

- **One-On-One Training** – Is required whenever a bus operator has two preventable accidents within a one-year period or when bus operators are having problems with customers. During this class bus operators would go over what caused accidents or review how to handle customers better.
- **Security Awareness Classes** – The bus operators review a short videotape related to security awareness.

The ability to diffuse tense situations and provide good customer service are qualities of a good bus operator. Given the right skill set, bus operators can change a negative situation into a positive outcome. Conversely, a lack of ongoing training could add fuel to an existing fire.

Our interviews with 29 bus operators indicated a need to improve the training provided to handle passengers. As a group, they averaged 11 years of service, ranging from three first-year operators to one with 30 years of experience. Twenty operators (69%) had only one PIP class since they started with MCTS. For one operator, that was 17 years ago. The remaining nine bus operators (31%) have had two PIP classes. The average amount of years between PIP classes for this group was seven years. A review of training records showed 200 bus operators have not had PIP training in more than 10 years.

**A review of training records showed 200 bus operators have not had PIP training in more than 10 years.**

We also interviewed the author of the workbook and training materials used by MCTS in the PIP training classes. Currently the consultant works as a transit organizational training and development consultant and as a Triennial Reviewer for USDOT's Federal Transit Administration. His credentials include working in the field of transportation for 30 years, and six years as a Deputy Sheriff.

**Any amount of recurring training would help minimize the potential for conflicts.**

The consultant stated that PIP training teaches bus operators a variety of skills, from conflict avoidance up to techniques used for defending oneself when passengers strike out at bus operators. He stated that his training materials *Conflict Avoidance, The Art of Maintaining Control*, were developed in the 1990's and has been continually revised.

To his knowledge there are no guidelines, outside of the American with Disabilities Act (ADA) sensitivity training, requiring bus operators to have specific training, or the frequency it is to be given. He indicated that any amount of recurring training would help minimize the potential for conflicts. His research has shown that customer complaints are often higher among bus operators that have been on the job from seven to 12 years. Bus operators appear to have burnout factors during that period of service. In addition, 40% of all bus accidents tend to occur during the first three years of an operator's career, according to the consultant.

Conflict avoidance training is especially important because of the potentially high stress levels of both bus operators and passengers. When a bus operator encounters another person with a high stress level there could be problems. As a paid professional, the bus operator must be trained to assert leadership in patience and tolerance.

To help provide better customer service to passengers and help bus operators avoid potential safety and security incidents, we recommend MTS management:

8. *Offer periodic refresher training classes to all bus operators, with emphasis on dealing with safety and security incidents.*

### **Security Shields and Pepper Spray**

Serious attacks on bus operators have led to consideration of additional security measures, such as installation of security shields for bus operators and providing operators with pepper

spray. We contacted six other transit systems concerning their use of these tools to protect bus operators. None of the transit systems contacted have installed protective shields in their buses. Also, only the Minneapolis transit system has issued pepper spray to its operators.

**The Milwaukee County Board has approved a pilot program to equip 25 to 30 buses with protective security shields.**

The Milwaukee County Board has approved a pilot program to equip 25 to 30 buses with protective security shields, at an estimated cost of approximately \$75,000.

To provide some context to this issue, we obtained data on the worker compensation costs incurred by MCTS during the three-year period 2006 through 2008. Specifically, we identified only those costs, both medical and non-medical, associated with physical assaults on bus operators. The information is summarized in **Table 9**.

<u>Expense Type</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>
Non-Medical	\$105,808	\$241,219	\$268,816
Medical	<u>89,357</u>	<u>75,202</u>	<u>87,652</u>
Total	\$195,165	\$316,421	\$356,468
Source: Milwaukee County Transit System.			

Based on the data shown in **Table 9**, financial losses associated with the bus operator assaults have averaged nearly \$290,000 per year over the past three years.

Results of the pilot program for installation of protective security shields will need to be assessed and evaluated for effectiveness, in both financial terms and in reduction of assaults on bus operators, before any recommendations can be made in this area.

## Audit Scope

A County Board Resolution (File No. 08-55) directed the Director of Audits to perform an audit of security services on Milwaukee County Transit System buses provided by the Wackenhut Corporation. The County Board further directed that the audit include, among other things, a review of the diversity of the Wackenhut staff deployed to MCTS buses and their skills in understanding cultural differences. This audit was conducted under the standards set forth in the United States Government Accountability Office *Government Auditing Standards (2007 Revision)*. We limited our review to the areas specified in this Scope Section. During the course of the audit, we:

- Reviewed contract information between Milwaukee Transit System, Inc. (MTS) and Wackenhut, Inc., including request for proposals and bid responses.
- Interviewed management and staff from both MTS and Wackenhut.
- Reviewed policy and procedures manuals for Wackenhut CPOs, MCTS Street Operations (for route supervisors and dispatchers), and bus operators.
- Reviewed historical data on bus incidents from 2000–2008.
- Performed detailed tests of support for claimed security-related activities for February – April 2008, including number of bus rides, contacts with operators when monitoring intersections, security checks at MCTS stations and Park & Ride locations.
- Analyzed incident reports prepared by Wackenhut for February – April 2008.
- Plotted incidents on to County map to identify high incident rate locations for March & April 2008.
- Reviewed procedures relating to calculating response times to incidents for Wackenhut CPOs and other law enforcement agencies.
- Accompanied and interviewed CPOs and route supervisors on their work shifts to observe how they performed their duties.
- Reviewed GPS tracking files for selected dates to calculate actual amounts of time spent on security-related activities, for comparison with reported activity to identify inconsistencies.
- Reviewed training provided to Wackenhut staff on dealing with cultural issues.
- Researched available literature on performance measures for transit security operations.
- Obtained statistical data from the U.S. Department of Transportation on incidents reported by other transit systems for purposes of developing performance measures and comparing MCTS to other systems.

- Obtained U. S. Census Bureau data related to Milwaukee County's demographics.
- Contacted local police departments concerning the extent of their active patrols of Park & Ride locations within their jurisdictions.
- Obtained financial information relating to bus operator workers compensation claims resulting from bus incidents.
- Reviewed Wackenhut claims for reimbursement for consistency with contract provisions.
- Interviewed 29 MTS bus operators concerning their interaction with Wackenhut staff, and their training relating to handling and preventing bus incidents.
- Surveyed six other transit systems (Detroit, MI; Minneapolis/St. Paul, MN; St. Louis, MO; Cincinnati, OH; Cleveland, OH; and Pittsburgh, PA) to gain their perspective on how bus security is provided for those transit systems.

**Summary of Types of Incidents  
Reported by Wackenhut  
2000—2008**

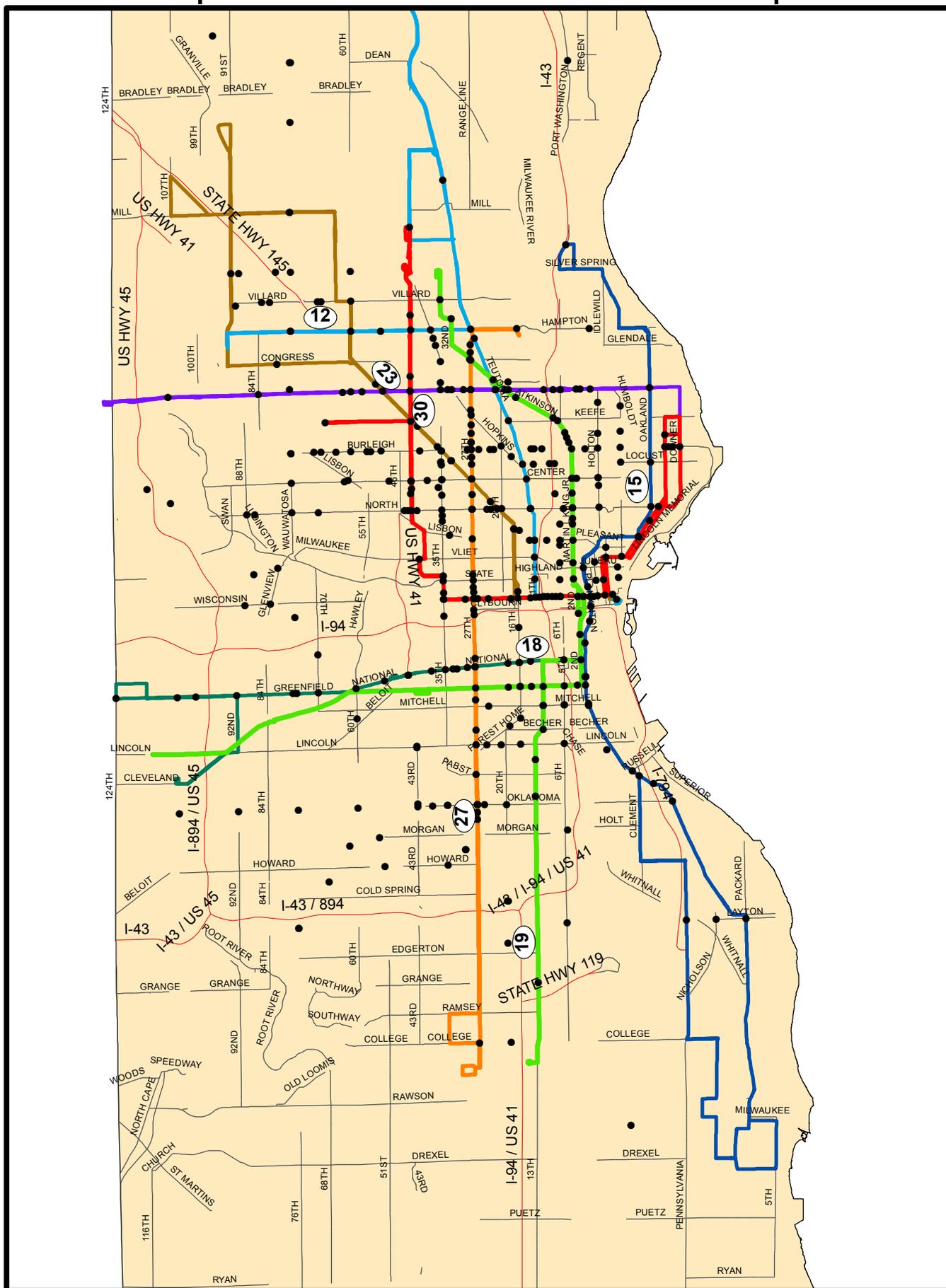
*The following data should be viewed in context of the estimated 50.8 million passengers and 152.8 million passenger-miles provided by the Milwaukee County Transit System in 2008. For 2008 there were 3,216 incidents reported and approximately 1.35 million bus trips carrying an average busload of 38 passengers. Stated another way, in 2008 there was a 99.76% chance of taking an MCTS bus trip without incident.*

Type of Incident:	2000 <sup>1</sup>	2001	2002	2003	2004	2005	2006	2007	2008
Accident	5	3	4	6	7	4	5	9	3
Arson	0	1	0	2	2	0	0	0	0
Assault & Battery	37	38	52	69	88	87	84	75	100
Assault & Battery of Employee	17	21	15	0	0	2	4	3	0
Bomb Threat	0	0	0	2	0	0	0	0	2
Larceny/Burglary/Theft	28	45	39	39	32	64	63	61	55
Theft -Employee	7	2	3	0	0	0	0	0	0
Carry Concealed Weapon	4	1	1	3	3	2	8	5	5
Criminal Damage to Property	58	59	50	24	15	15	12	21	22
Disorderly Conduct	1,365	1,057	1,053	989	1,010	1,153	1,149	1,115	1,229
Disorderly Conduct - Objects Thrown at Operator	31	24	35	28	38	44	40	40	31
Fare Dispute	309	269	211	352	392	426	324	289	274
Homicide	0	0	0	0	0	1	0	0	0
Intoxicated Persons	152	200	181	184	168	238	269	303	297
Lewd and Lascivious Acts	24	14	13	8	11	3	9	8	23
Loitering	2	57	72	32	51	78	220	32	13
MCTS Ordinance Violation	75	85	91	55	84	212	346	140	59
Object Thrown at Bus	288	262	229	265	212	277	276	252	207
Panhandling	16	23	18	12	6	24	27	23	17
Possession of Controlled Substance	3	1	1	0	2	4	0	2	3
Recklessly Endangering Safety	1	2	6	2	7	7	5	4	5
Request for Assistance	0	3	171	317	266	331	265	241	315
Robbery	7	9	3	15	26	19	10	22	24
School Bus Monitoring	43	513	512	84	29	30	50	37	51
Selling of Bus Tickets/Transfers	10	15	21	23	7	33	25	11	17
Sexual Assault	2	1	3	0	2	3	2	10	2
Silent Alarm	170	193	94	97	99	92	54	54	80
Sleeper	290	239	284	309	288	361	271	152	143
Smell of Marijuana	4	11	11	21	20	15	29	18	20
Suicide or Attempted Suicide	0	0	0	1	0	2	3	0	0
Suspicious Vehicle	9	10	16	14	8	3	6	23	12
Trespass on MCTS Property	27	14	19	33	38	40	67	40	34
Vandalism	109	114	87	205	250	249	200	171	152
Passenger Illness or Injury	27	24	11	0	0	0	0	0	0
Other	<u>126</u>	<u>108</u>	<u>37</u>	<u>11</u>	<u>16</u>	<u>20</u>	<u>14</u>	<u>15</u>	<u>21</u>
<b>Total</b>	<b>3,247</b>	<b>3,418</b>	<b>3,343</b>	<b>3,202</b>	<b>3,177</b>	<b>3,839</b>	<b>3,838</b>	<b>3,176</b>	<b>3,216</b>

Note <sup>1</sup> – Data for incidents for October 2000 could not be located, so we projected the statistics for comparison purposes.

Source: Wackenhut Monthly Incident Reports.

# MCTS Reported Incidents: March and April 2008



Source: Wackenhut Incident Reports

**MILWAUKEE COUNTY TRANSIT SYSTEM**  
**Inter-Office Communication**

To: Jerome J. Heer, Director of Audits

From: Anita Gulotta-Connelly, Managing Director, MCTS

Subject: Response to Recommendations of Audit of MCTS's Security Contract with Wackenhut Corporation

Date: March 3, 2009

Thank you for the opportunity to offer additional thoughts on the Milwaukee County Department of Audit report entitled: *An Audit of Milwaukee County Transit System's Security Contract with Wackenhut Corporation*. MCTS appreciates the professional manner in which this audit was conducted, and we find your report to be a helpful and thoughtful analysis that offers us several opportunities to evaluate and enhance our already aggressive security effort. The recommendations of your staff provide an additional perspective that adds value to MCTS's ongoing efforts to foster a safe riding environment for passengers and visitors alike.

It is encouraging to our team that you were able to document the fact that 99.76% of all riders of MCTS have a positive experience. We have, however, adopted a zero tolerance policy for on-bus incidents and your recommendations can play an important role in how we proceed in both the short and long term.

MCTS is a multi-faceted operation serving the mobility needs of nearly 150,000 riders each weekday across a span of area covering 241 square miles. MCTS operators make 4,279 one-way trips traveling 51,274 vehicle miles each weekday. There are on average 388 buses operated during peak weekday service hours.

Coupled with the large size of MCTS operations, the public transit environment is very dynamic which necessitates flexibility to adjust to a changing environment. Prior to 1993, MCTS's security program consisted solely of reaction to security related incidents, relying on response from law enforcement for its security needs. A timely response was not always available due to other law enforcement priorities and changing community and economic circumstances.

In 1993, MCTS management, with the support of the Milwaukee County Board, began contracting with a private security force to provide both pro-active and reactive security support. Following a competitive bidding process, the Wackenhut Corporation was contracted to provide a visible security element to help deter inappropriate behavior on public transit buses and to rapidly respond to incidents as they occurred. This worked well for a number of years.

In 2005, an unexpected change in public school hours resulted in a strain on MCTS's ability to meet the travel needs of students and the work force simultaneously. As a result, many peak

hour trips are filled to capacity. Wackenhut resources have been focused on being able to rapidly respond to the resulting incidents. In addition, in Spring 2008, it became necessary for MCTS to have its security personnel provide a security presence at Park & Ride lots to deter vandalism. While these are only a few examples, clearly, the spectrum of security needs at the transit system have both changed and increased.

In further recognition of the changing environment in which transit operates, Milwaukee County has invested substantial dollars for the installation and maintenance of security surveillance cameras on the entire bus fleet. We have been increasing our efforts to share data and coordinate patrol activities with the Milwaukee County Sheriff's Office. Also, at this time, MCTS is working to procure protective driver safety shields to conduct a pilot test of their usefulness. These examples and initiatives demonstrate some of what has changed at MCTS in response to its ongoing security needs. We also realize more could be done, and the audit is helpful in achieving that objective.

What has not changed, however, is the number of security personnel available to MCTS. Transit services have been funded at the level of 840 hours per week since 2003. This compares to 320,500 vehicle-miles traveled weekly, 26,500 hours of fixed route bus service weekly and a growing need for the presence or response of security personnel in other areas of transit. Nevertheless, MTS management is working hard to be responsive to the security needs of MCTS. We recognize that the general public, customers and policymakers deserve and expect a safe and secure riding environment. Everything we do is aimed at achieving that goal, and while more than 99% of our riders have a positive experience, we continue to pursue a zero tolerance policy.

To that end of furthering operational excellence and enhanced safety, we welcome and appreciate the perspective of the Milwaukee County Department of Audit.

#### **General Comments:**

As the Audit points out, most of the observations and GPS readings used to create the tables in this Audit were conducted in March of 2008. Significant changes have been made in the MCTS security program and Wackenhut deployment since that time. Those changes are not reflected in the tables. Several of the tables are also based on a very limited number of observations. As such, they do not necessarily present a total, overall picture of Wackenhut activities.

In addition, in the Fall of 2008, MCTS began a strong collaborative effort with the Milwaukee County Sheriff's Office to share information, coordinate deployment and maximize the use of resources. We have also begun a coordinated public education effort with the Sheriff to let the community know that disruptive behavior will not be tolerated on MCTS buses and to offer rewards for information leading to the arrest and conviction of perpetrators of on-bus incidents. (See security campaign at [www.ridemcts.com](http://www.ridemcts.com)).

We strongly agree with Sheriff David Clarke's philosophy that assertively handling minor incidents is an important component in discouraging other incidents. To that end, MCTS is also working with the Milwaukee County District Attorney John Chisholm. District Attorney Chisholm met with bus operators' at all three stations in January to assure them that his office is committed to fully prosecuting individuals who commit on-bus crimes. MCTS is also working with the District Attorney's office on a prevention initiative to develop draft legislation that will enhance penalties for on-bus misdemeanors.

We believe that these efforts, in conjunction with the recommendations identified by this audit, will help make MCTS' overall security program stronger and more effective. We appreciate and value the perspective your team offered.

To help identify follow-up action steps, we have reviewed each recommendation.

- 1. Expand its movement towards a more proactive transit security strategy by deploying more CPOs on specific MCTS buses during specific times with the most need for a security presence. This effort should include discontinuing or significantly curtailing the practice of deploying CPOs in teams of two, instead relying primarily on Wackenhut supervisors to provide mobile response capability.*

**Response:** MCTS concurs with the recommendation that deploying more CPOs on specific buses would add value to the security program. Bus riding by CPOs, however, is not the only approach that is "proactive" and valuable. Other security steps help as well. Coordinated efforts are needed in a number of areas to ensure that the riding public and bus operators remain safe. As your report points out, 99.76% of our bus rides are without incident. This number would be higher still if many minor incidents such as a request to remove a sleeping passenger from the bus or incidents at MCTS facilities were not included.

As the audit report notes, MCTS has already begun exploring ways to put more Wackenhut resources on the bus while continuing to maintain a strong ability to respond to incidents. 80 additional on-bus hours per week were added in September of 2008. An additional 112 hours per week of CPO time were switched to on-bus patrols earlier this week. This has increased dedicated CPO on-bus time to 30% of their weekly hours. Wackenhut has committed to working with MCTS to identify other ways to redistribute overall deployment for a better balance between on-board patrols and rapid response teams. We are also working with the Sheriff to coordinate Wackenhut and law enforcement riding and response.

MCTS takes a multi-pronged approach to security. While on-bus time is certainly valuable, there are only 14 - 15 CPOs available daily to cover over 4,200 bus trips. Given this, there is also value in proactive intersection checks, which provide operators with a point of contact with CPOs. They also allow CPOs to be highly visible at locations where large numbers of students transfer or problems are more likely to occur. In addition, one team of CPOs can have contact with a significant number of operators within a short period of time by monitoring key intersections or taking relatively short bus rides.

While CPOs riding on the buses can potentially deter incidents from occurring, it is also as important to have CPOs patrolling and available to rapidly respond to incidents which do occur or to follow up on operator reports of specific problems. Each year there are hundreds of instances where Wackenhut is able to respond, apprehend and detain an individual until law enforcement arrives to deal with that individual. This would not be possible without patrolling in vehicles. Apprehending individuals certainly has a deterrent effect on inappropriate on-bus behavior. It is also particularly important in the summer months when the Sheriff patrols are focusing their efforts on our parks.

The USDOT review of MCTS' security program, cited by the Audit Department was highly complimentary to MCTS' security program. The federal audit noted that the security program was professionally run and highly effective. It also noted the strong relationships and coordination between Wackenhut and local law enforcement. This Audit by Milwaukee County also noted that Wackenhut CPOs receive extensive training and that they have handled themselves in a very professional manner with all individuals; "being fair and consistent so that even individuals who do not agree with actions taken feel they are being treated fairly..." Wackenhut is certainly to be commended for this. MCTS and Wackenhut are also committed to providing a diversified staff that reflects the community that we serve.

Early in 2009, MCTS hired an individual to function as Transit Security Coordinator. This individual has a very extensive safety and security background. This person will be responsible for direct monitoring of the Wackenhut contract, along with other general security responsibilities. MCTS was able to fund this position, at no cost to Milwaukee County, with a three-year grant from the Department of Homeland Security.

MCTS will continue to review ways to maximize the benefits of security deployment as recommended in the Audit.

Team Leaders: Deputy Director, Director of Operations and Transit Security Coordinator

Time Frame: Immediate and on-going

- 2. Continue to work with Wackenhut to coordinate the efforts of Wackenhut CPOs and MCTS route supervisors to ensure that all incidents are properly documented, with less duplication of effort.*

**Response:** As the report points out, Route Supervisors and Wackenhut CPOs responded to the same incidents less than 23% of the time. Also mentioned in the report, the Route Supervisors and CPOs have different responsibilities when responding to these incidents. Wackenhut's primary role is to defuse the incident and apprehend and retain perpetrators for law enforcement. Route Supervisors assist passengers and operators; handle traffic issues and ensure that service is appropriately resumed. In instances where both respond, it is appropriate to have reports from both entities to document their separate activities at the scene. MCTS will review our processes and the reports generated to see if there are opportunities to reduce any duplication of effort, while still maintaining appropriate documentation.

Team Leader: Director of Operations and Transit Security Coordinator

Time Frame: One month

3. *Enforce contract requirements relating to retention of documentation that support reports of CPO activity.*

**Response:** As the Audit report notes, Wackenhut maintains an extensive database of information relating to incidents and CPO activities. The numerous reports which are produced from this database are used to monitor activities and focus CPO efforts. The audit identified one source document, the daily log of CPO activities, which is summarized into a weekly report that was being retained by Wackenhut for only six months. MCTS concurs that the source documentation should be retained beyond six months. Wackenhut has already agreed to retain this documentation as specified by Audit.

Team Leader: Director of Materials Management and Director of Operations

Time Frame: Immediate and on-going

4. *Evaluate the cost effectiveness of installing security cameras for Park & Ride locations experiencing the greatest frequency of incidents.*

**Response:** MCTS neither has jurisdiction nor control of Park & Ride lot security. Security at the Park & Ride lots is the responsibility of the Milwaukee County Sheriff's Office and the State DOT. However, we were asked by the County Board to have Wackenhut patrol these lots after some incidents in 2007. Wackenhut CPOs patrol through the lots as they have time available when they are on duty. This is an effective use of their patrol time when they are between calls. As the report points out, installation, maintenance and monitoring expenses associated with the use of sufficient cameras at Park and Ride Lots to be effective must be taken into consideration. MTS will discuss this recommendation with the Milwaukee County Department of Transportation and Public Works and work with them to evaluate the cost effectiveness of security cameras at those locations.

Team Leader: Managing Director/Director of Transportation and Public Works

Time Frame: 6 months

5. *Explore options for independently calculating response times of contracted security firms and other responding law enforcement agencies.*

**Response:** If response times are to be used for evaluating Wackenhut performance, MCTS will explore options for independently calculating response times.

Team Leader: Transit Security Coordinator

Time Frame: 6 months

- 6. Establish clearly defined, reasonable performance measures for its transit security contract that relate directly to the achievement of security goals and objectives, along with a system to monitor their achievement on an ongoing basis.*

**Response:** The Milwaukee County Department of Audit mentioned that it is focusing on appropriate performance measures for all contracts throughout Milwaukee County. While the contract does not have a list of formal performance measures, MCTS does monitor Wackenhut performance and effectiveness. MCTS concurs with the recommendation that formal performance measures be developed for this contract. We want to make sure, however, that the measures chosen reflect factors that are actually within the control of the contractor. Buses and security do not operate in a vacuum. Many factors, such as overcrowding; higher community crime rates; difficult economic times and reporting methods, can all influence data and generally render comparisons between systems ineffectual. By the same token, public perception of security can be influenced by many other factors totally unrelated to the effectiveness of the security force. MCTS will review approaches taken by other transit systems and will work to determine appropriate performance measures for this contract.

Team Leader: Deputy Director, Director of Operations and Transit Security Coordinator

Time Frame: 6 months

- 7. Work with Wackenhut and the Sheriff's Office to create statistical reports reflecting all security-related bus ride activity.*

**Response:** MCTS and Sheriff's Office are currently sharing data to produce coordinated reports in a number of areas. MCTS will take steps to enhance the tracking of bus ride activities by our security personnel. We will discuss reporting of all security-related bus ride activity with the Sheriff's Office to determine if complete bus ride activity reports can be produced as well.

Team Leader: Director of Operations and Transit Security Coordinator

Time Frame: 4 months

- 8. Offer periodic refresher training classes to all bus operators, with emphasis on dealing with safety and security incidents.*

**Response:** The audit report focuses on operators who have not recently had refresher training through the Passenger Interaction Program (PIP). While we concur that PIP training is important, MCTS has offered a broad training program with numerous other security related seminars for operators over the years. From 1994 to 2004, MCTS offered a new program each year that dealt with various aspects of passenger interaction. In 2008/9, we also are providing all operators with training in identifying and handling various transit related security issues. We also offer one-on-one refresher training for bus operators to improve their passenger interaction skills, as needed.

MCTS concurs that the recommendation should be applied on an individual or group basis as circumstances deem necessary.

Team Leader: Director of Transportation

Time Frame: Ongoing

NOTE: This response was prepared by MTS, Inc. and has been reviewed by the Department of Transportation and Public Works.

A handwritten signature in black ink, reading "Anita Lubatka-Counelly". The signature is written in a cursive style with a large, looping initial 'A'.

Cc: Douglas C. Jenkins, Deputy Director of Audits  
Jack Takerian, Interim Director, Department of Transportation and Public Works  
Brian Dranzik, Budget and Policy Administrator, Department of Transportation and Public Works