

THE CRUCIAL NEED TO

Transform

THE METRA POLICE DEPARTMENT

A Comprehensive Assessment of the Department's
Mission, Leadership and Operations

HILLARD  HEINTZE®

Protecting What Matters®



August 28, 2013

Mr. Alex Wiggins
Deputy Executive Director
Metra
547 W. Jackson Boulevard
Chicago, Illinois 60661

Dear Mr. Wiggins:

I am pleased to submit to you the final Hillard Heintze report summarizing the results of our comprehensive assessment of the Metra Police Department and its mission, leadership and operations. As this report outlines in detail, Metra confronts serious challenges today in improving the Department's ability to ensure the security and safety of riders, staff, assets and infrastructure. The majority of our key findings identify deficits in program mission and leadership and their chronic impacts over time on nearly every facet of the MPD's operations.

Many of these findings emerged early in the assessment, which began on October 15, 2012. Although we had not completed our review, we immediately advised Metra's Executive Director in December that a number of these issues needed to be addressed immediately - issues related to deficiencies in areas such as mission, leadership, policies and procedures, staffing, investigations and internal affairs. While the Department evaluated these concerns, Hillard Heintze was asked to suspend assessment activities and concentrate on critical training in weapons qualifications - which we began immediately and completed in early January 2013. This report's submission brings the formal assessment process to a close.

Throughout this assessment, our interactions with Metra officers and staff - which numbered in the hundreds - have been very positive. We find the men and women of this Department, on the whole, deeply committed to providing security and safety services appropriate to Metra's role as the second-largest and one of the most complex commuter rail systems in the United States.

In summary, I urge you and the Metra Board to view the Metra Police Department as a program in crisis - one in need of major transformation - and to take action across the full breadth and depth of the findings and recommendations outlined throughout this report. We believe that if you do, the Metra Police Department will become an exemplary transit system law enforcement organization.

Sincerely,
HILLARD HEINTZE LLC



Arnette F. Heintze
Chief Executive Officer

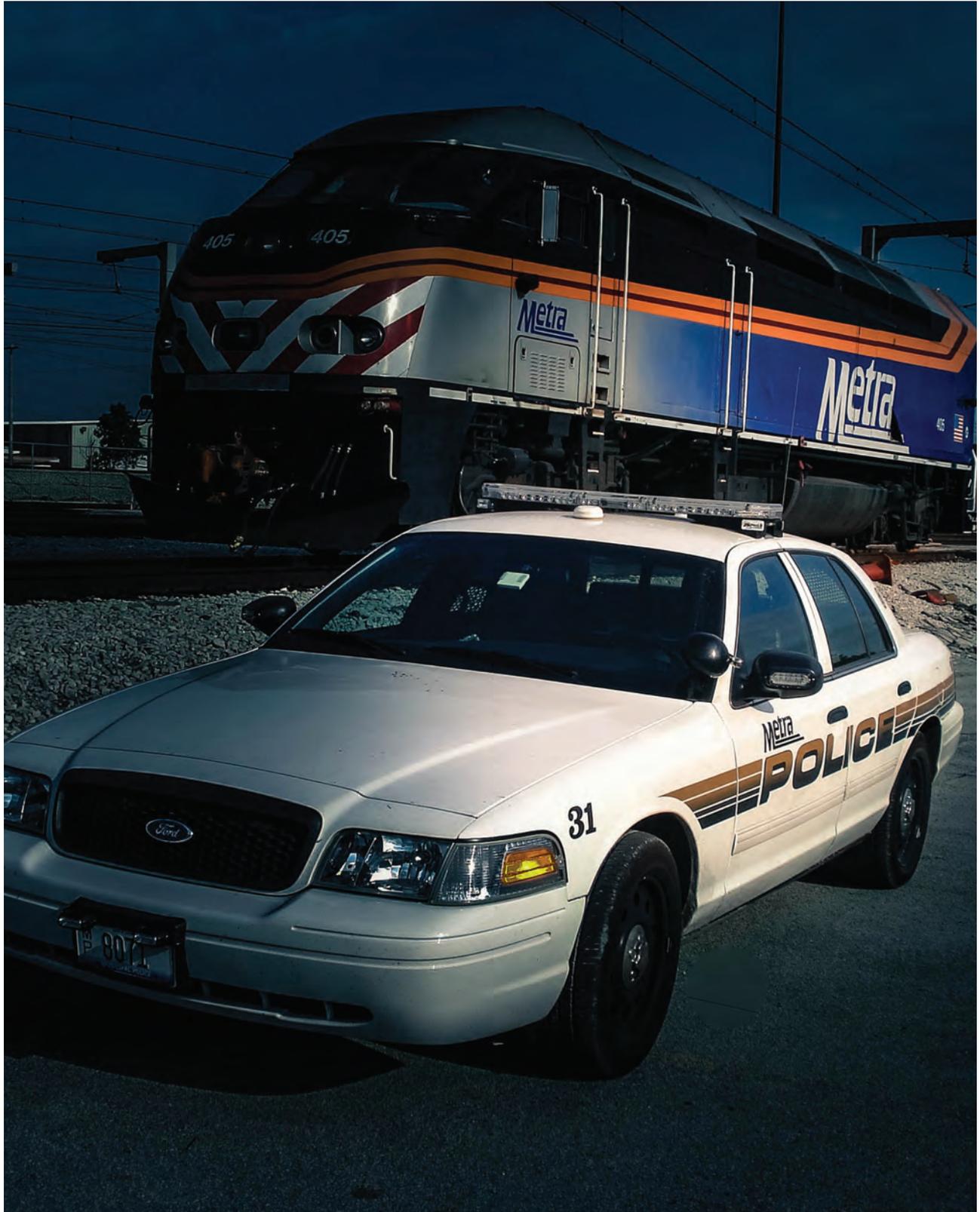


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EXECUTIVE SUMMARY

STRATEGIC CONTEXT: WHAT'S AT STAKE FOR THE METRA POLICE DEPARTMENT

Metra is the second-largest and one of the most complex commuter rail systems in the United States. Ensuring the security and safety of commuters, staff, assets and infrastructure is one of Metra's primary and most strategic responsibilities – for a number of reasons.





Taken individually and together, these factors and others make safety and security across the Metra system a strategic priority.

Size of Population Served

Metra serves a population base consisting of approximately eight million people. The transit system provides an estimated 81 million rides on an annual basis.

Infrastructure Size and Complexity

The Metra system operates over 1,100 miles of track and 800 bridges. More than 700 trains each weekday serve the system's 241 stations. In addition to 11 separate commuter lines radiating north, west and south of downtown Chicago, Metra's assets include more than 1,100 rolling stock, more than 2,000 signals, 24 rail yards and seven maintenance facilities.

Criminal Activity and Accidents

Like any other metropolitan transportation system, Metra confronts different levels of crime - from petty theft, vandalism and harassment to violent crime - comparable to those occurring throughout the various jurisdictions it serves. The same observation holds true for the frequency per population of accidents, injuries and suicides.

Weather and Utility Outages

Metra also needs to be prepared to address the security- and safety-related implications of events that can impact large numbers of commuters or rail employees, such as major storms or tornados, large-scale utility interruptions or outages, service interruptions during periods of very high or very low temperatures and emergency preparedness and evacuation requirements for incidents ranging from fire to a major chemical spill.

Homeland Security and Counter-Terrorism

As the nation's second-largest commuter rail transportation system, Metra needs to ensure its passengers, rail lines and physical assets are protected from terrorism - particularly in light of recent terrorist incidents in London and Madrid. This requires a proactive role in collaborating with other federal, state, and local law enforcement and homeland security agencies in advancing security and public safety throughout the greater Chicago region.

Regulations and Compliance

The Metra Police Department draws its enforcement authority from the State of Illinois. As such, the Department's policies and procedures need to adhere to state requirements on many fronts to ensure legal compliance.

At stake for Metra and the Metra Police Department are the safety and security of the rail system's passengers, the integrity of its assets and infrastructure, the strength and viability of its fiscal strategies, the reliability of its transit services and their impact on the economy of Chicago and the reputation of the system as a whole among all its internal and external constituencies and stakeholders.

ASSIGNMENT: ASSESSMENT AND MID-PROJECT PRIORITIES

Initial Tasking

In August 2012, Metra Executive Director Alex Clifford requested that Hillard Heintze (1) conduct a comprehensive and independent assessment of the Metra Police Department's operations and (2) present Metra's management team with a final report outlining our analysis, key findings and recommendations on aligning the MPD's strategy and operations with best practices currently in use by leading policing agencies supporting suburban and metropolitan commuter rail systems.

Early Findings

In December 2012, having completed the on-site portion of the assessment, Hillard Heintze briefed Metra's executive leadership on our high-level findings - and particularly the assessment team's concerns regarding (1) the antiquated and unclear mission of the Department; (2) the ineffective and in many cases nonexistent policies and procedures; (3) the lack of rational staffing and patrol plans; (4) the excessive overtime expense incurred by the Department's personnel; and (5) the absence of training in critical areas including, most importantly, the failure of the Department to have undergone any firearm qualification training since 2010.

Mid-Project Priorities

Given the severity and significance of our findings, we were asked to temporarily refrain from completing the overall assessment and initiate and oversee (1) the immediate firearm qualification training for MPD officers that is required of all state law enforcement personnel and (2) the high-risk, high-liability policies, practices and procedures of the Department.

Project Completion

Once these priorities had been addressed, the Hillard Heintze team completed its assessment and presented this final report.



EXPERTS: THE HILLARD HEINTZE TEAM

This assessment was conducted by members of the Hillard Heintze Senior Leadership Council - an independent council of retired major city police chiefs dedicated exclusively to bringing national and international best practices to the pursuit of excellence in policing and public safety. Individually, Council members have been personally responsible for leading the significant transformation of major city police departments and law enforcement agencies for many of the largest municipalities across this nation. Appointed by Arnette Heintze and Terry Hillard, SLC members are select individuals with outstanding career-long records of leadership and achievement.



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Retired Colonel and Chief Information Officer, Illinois State Police; COO, Hillard Heintze



Robert L. Davis
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Robert Parker
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Dr. Alex Weiss
Former Director of the Northwestern University Center for Public Safety



PRIMARY OBJECTIVES: WHAT WE SET OUT TO ACHIEVE

This assessment focused on analysis and evaluation of the Department's key administrative, technical, operational and organizational policies, practices and performance. Its primary objectives have been to determine the Department's strengths and weaknesses and identify opportunities to:

1. Improve the efficiency and effectiveness of the MPD
2. Control cost without increasing risks to the Department personnel or Metra constituents
3. Advance community-focused policing in a specialized rail transportation environment
4. Strengthen the internal affairs function
5. Identify low-frequency, high-liability, high-risk duties and ensure they are appropriately managed to mitigate risk while providing the best possible service
6. Adopt proven, best practice-based strategies in policing and public safety currently in place or under development in leading police departments around the country

SCOPE OF ASSESSMENT: CRITICAL AREAS OF FOCUS

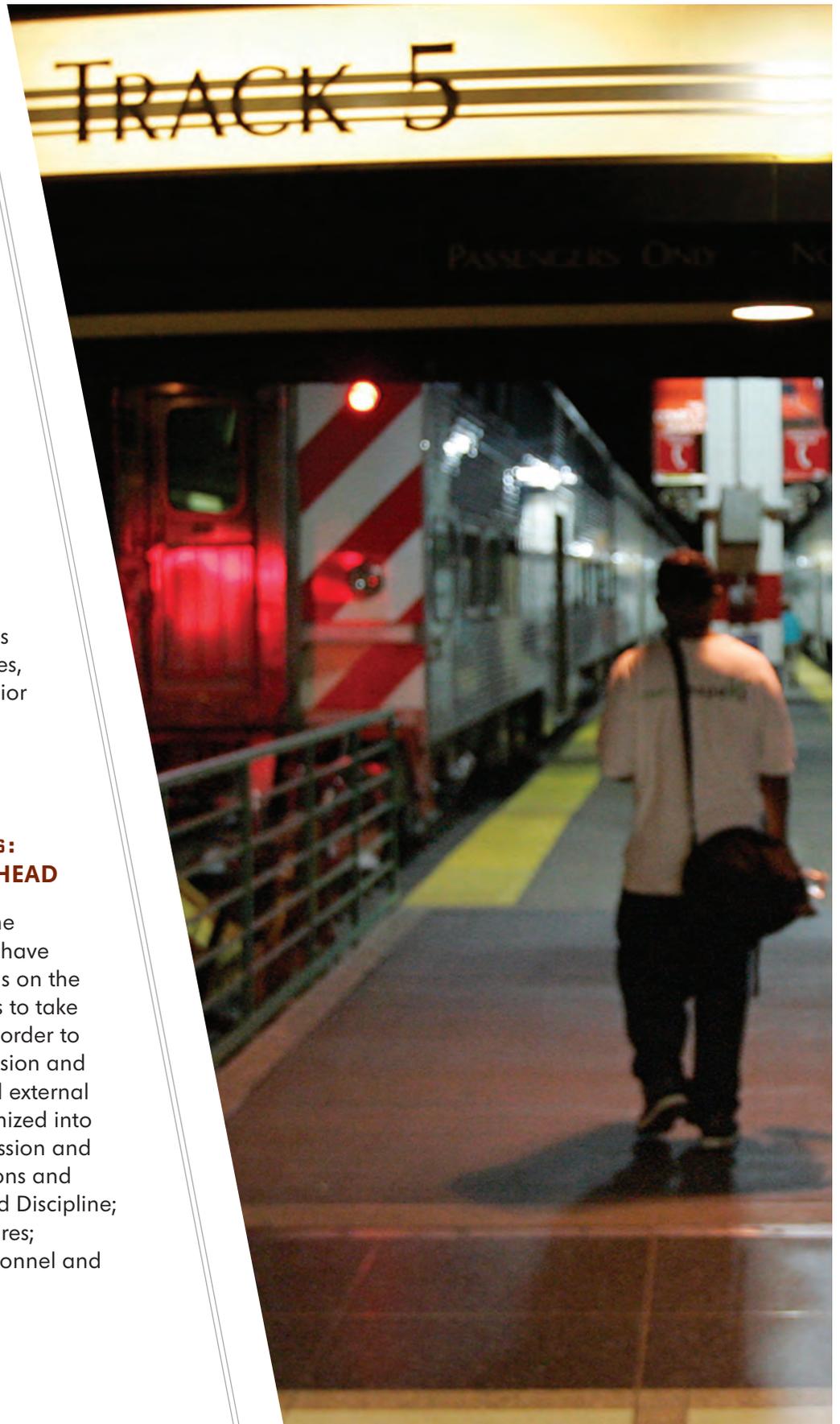
The scope of this assessment included the Department's mission and strategy; leadership and organization; operations, equipment and core processes; internal affairs and discipline; training policies and procedures; technology; and staffing allocation and resource optimization. Within these areas, key issues addressed included the Department's working environment, culture and morale as well as its approaches to employment and third-party resourcing; patrol operations; investigations; squad cars and equipment; overtime practices; inter-agency cooperation; weapons qualifications; use of force; arrest, search and seizure; pedestrian and vehicle stops; first aid and first responder protocols; vehicle pursuits; secondary employment and report writing.

**INTERVIEWS:
WHO WE TAPPED
FOR INSIGHTS AND
INFORMATION**

Our assessment included extensive interviews with dozens of personnel at every level of the Department, including the Senior Corporate Director of Police, Security and Emergency Preparedness, the Chief of Police, the Operations Commander and district commanders, as well as security coordinators, detectives, sergeants, lieutenants, the senior police coordinator, the court records keeper and the staff administrative assistant.

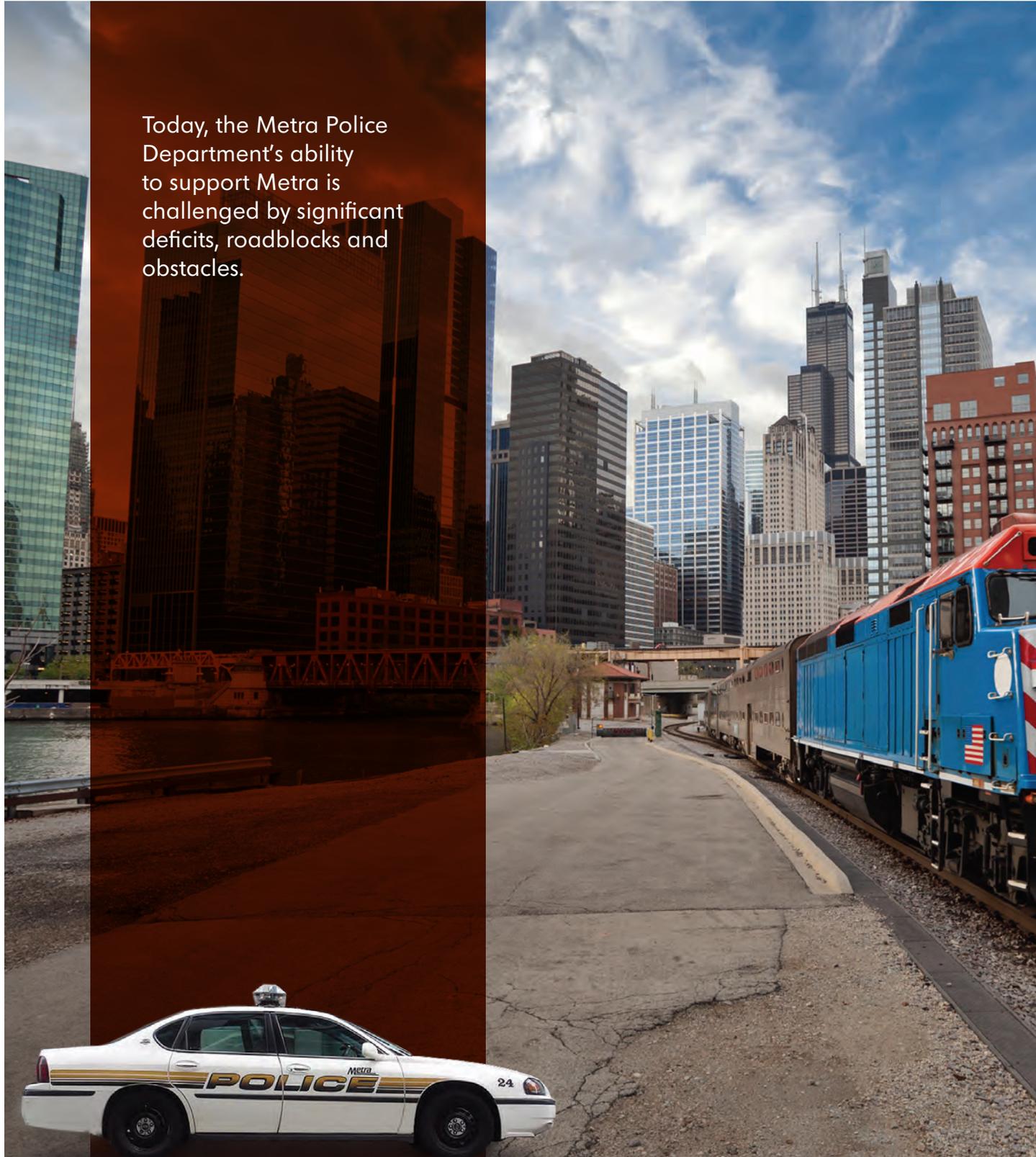
**RECOMMENDATIONS:
OUTLINING THE TRACK AHEAD**

Based on our assessment of the Metra Police Department, we have compiled 50 recommendations on the actions the Department needs to take immediately and over time in order to effectively support Metra’s mission and the Department’s internal and external stakeholders. These are organized into eight categories, including Mission and Strategy; Leadership; Operations and Equipment; Internal Affairs and Discipline; Training; Policies and Procedures; Technology; and Staffing, Personnel and Overtime.



I. KEY FINDINGS

Today, the Metra Police Department's ability to support Metra is challenged by significant deficits, roadblocks and obstacles.





These challenges are evident in areas that range from mission, leadership and strategy to the organizational and operational controls and processes that define how the Department conducts its activities on a day-to-day basis.

During the interview phase of this assessment, it was clear that Metra's chronic failure to address these challenges over many years has fostered low morale among the Department's rank-and-file officers and a passive acceptance of the status quo at every level of the organization.

These deficits can be addressed principally with a focus - from this point forward - on each of the strategic areas that comprise this report's nine key findings.



FINDING 1 FROM MISSION TO STRATEGY: The Vital Need for Realignment and New Direction

The Hillard Heintze team's first and most important finding is that the MPD's mission is antiquated and very unclear – particularly with respect to the Department's insufficient prioritization of programs and practices to ensure the safety and security of Metra's transit passengers. Consequently, the Department's strategic and operational goals and objectives do not guide the departmental operations and resource allocations in the most effective ways to advance Metra's commitment to its stakeholders.

The mission needs to be refocused on passenger safety, crime prevention, infrastructure protection and protection of Metra property. Once these issues have been addressed, a formal, written MPD Strategic Plan should be drafted and ratified by the Board to guide the growth and development of the Department on a year-to-year basis. The Plan should ensure that the roles and responsibilities of MPD officers are tightly aligned with the Department's responsibility to ensure the safety and security of Metra commuters and the integrity of Metra's infrastructure. Particular attention needs to be given to identifying and eliminating unnecessary or redundant services, providing new services crucial to the Department's updated mission, and targeting the most attractive opportunities to reallocate and reposition staff and other resources in ways that will significantly improve the Department's effectiveness and efficiency.

FINDING 2 LEADERSHIP: Change Begins at the Top

The single greatest deficit in the Department is leadership. Across essentially all the Department's various operating units, the gaps and vulnerabilities we identified lead back, ultimately, to an absence of leadership. These include deficits in senior-level leadership experience, insight and vision; a lack of initiative in driving changes and improvements to MPD operations; and a corresponding lack of confidence in the Department's leaders among rank-and-file employees. Missing from day-to-day operations are attention to internal and external communications, championship of success and proactive interaction with Metra's management and Board. Also missing is a focus on factors that will determine the Department's relevance over the next decade and beyond – on issues such as technology, training and collaboration with other federal, state and local partners to ensure the security and safety of Metra's passengers, staff and infrastructure. The Department needs a proactive, professional and seasoned Police Chief to bring it into line with current best practices in policing and public safety.





**FINDING 3
STAFFING AND RESOURCE ALLOCATION:
Opportunities to Increase Efficiencies**

Staffing of the MPD patrols is not based on mission, strategy or data. The Department is not currently allocating its resources as effectively as it should. We determined that (1) the number of sworn personnel assigned to particular duties does not match up well with peak periods of demand for assistance; (2) positions are often filled to meet artificial minimum staffing requirements that have no justification or basis in strategy; (3) few, if any, sworn officers provide foot patrol services on the Metra trains, (4) the Department has sworn personnel in positions typically staffed by non-sworn personnel in most agencies; (5) the MPD overtime budget is extremely high for a department of its size; and (6) some current policies and procedures require higher-ranking officers to complete tasks that could be handled by first-line supervisors and lower-level command officers. Conducting a formal staffing analysis would help determine how to allocate human resources more effectively to address the mission and generate cost savings.

**FINDING 4
INVESTIGATIONS:
Marginalizing This Function
Disadvantages the Department**

The MPD has made organizational changes that have virtually eliminated trained detectives who can conduct criminal investigations on a regular basis, choosing instead to have personnel from Special Operations - a unit designed for tactical response - take on the investigative task when needed. While spreading the responsibility to conduct investigations to other units can be perceived as a positive effort to maximize resources, not having detectives whose primary responsibility is to interact with the State's Attorney's Office and the local courts puts the Department at a great disadvantage when it comes to collaborating effectively with other federal, state and local law enforcement agencies.



FINDING 5
INTER-AGENCY COOPERATION:
A Key Channel MPD Has Not Tapped

While the Metra Police Department has received federal grants and funds to staff some Special Operations personnel and install some security technologies, there is a pressing need for the Department to be more proactive in its inter-agency interactions with other federal, state and local agencies in the greater Chicago area – especially local agencies in the six counties Metra serves that are focused on providing counter-terrorism efforts specifically and anti-crime efforts generally. Serious consideration needs to be given to assigning MPD personnel full-time to these collaborative efforts currently underway in the region.



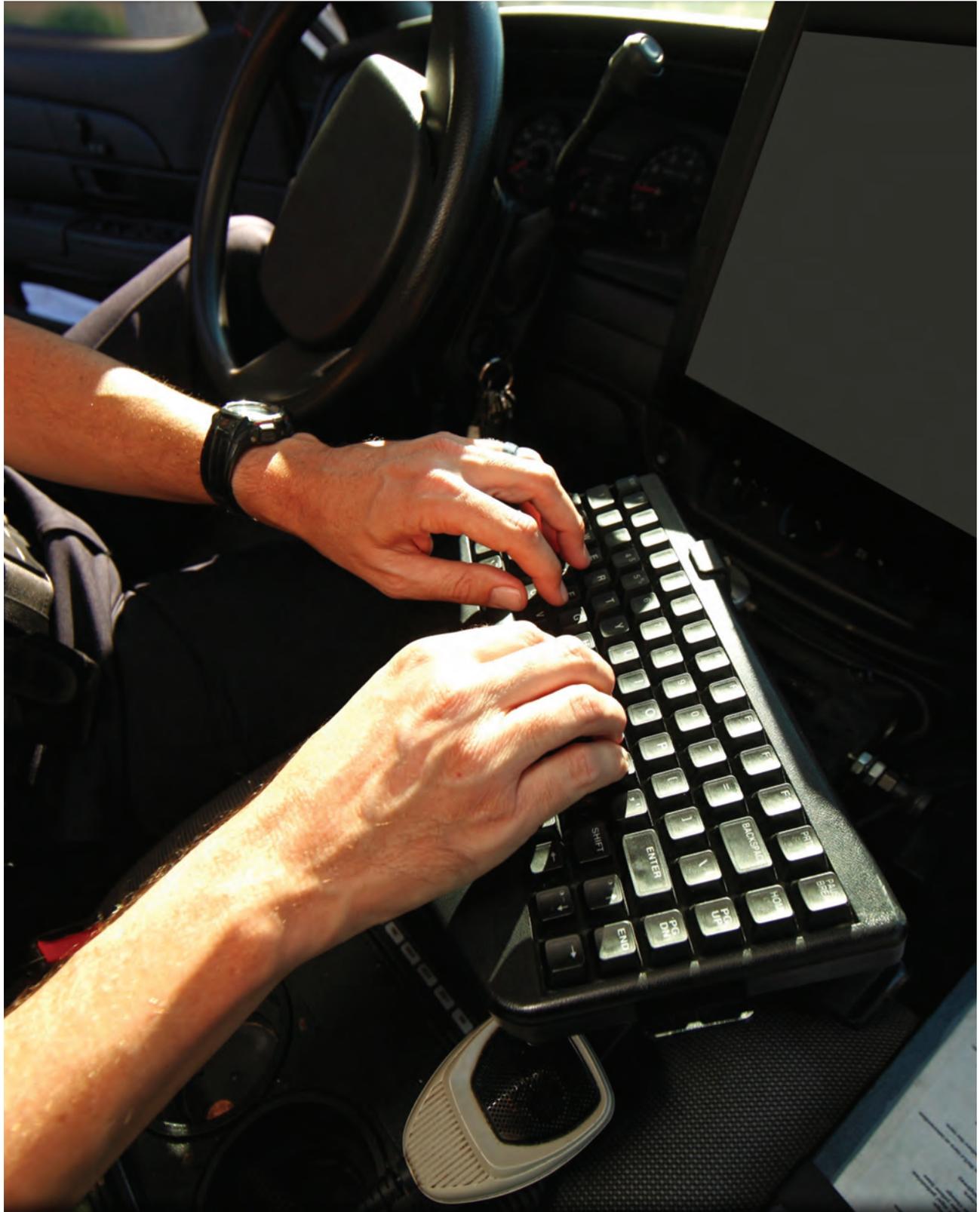
FINDING 6
INTERNAL AFFAIRS:
Robust Improvements Required

There are no personnel trained in this key area, nor are there adequate procedures to conduct internal investigations of police misconduct. The Department currently has a rudimentary system in place to investigate and implement disciplinary procedures, but it is not structured to allow the Chief of Police to take a leadership role in setting standards of conduct for MPD personnel or empower him or her with the authority to lead, control and direct the work of the Department. The Department and Metra need to collaborate in reviewing what improvements need to be made in this area.

FINDING 7
TRAINING:
Enhancing Job Performance
and Preventing Negative Outcomes

We found no apparent formalized training for MPD supervisors and command officers tailored to the Department's mission-specific roles and responsibilities. Additionally, fundamental ongoing training for police officers is poorly coordinated and often lacking in the basic requirements. There is a lack of training in use of force; weapons qualifications; First Aid and first responder training; laws of arrest, search and seizure; report writing; pedestrian and vehicle stops; departmental policies; operational and investigative procedures; and internal affairs. The MPD should conduct a needs assessment at all levels to ensure adequate training and recertification processes are met. This should include training for command officers, first-line supervisors and all other rank-and-file members, both sworn and non-sworn. For many reasons - including ensuring the professionalism of MPD personnel and reducing Metra's exposure to liability claims - this is an area that needs a great deal of attention.

7





FINDING 8
POLICIES AND PROCEDURES:
The Engine of Effective Transit Policing

The MPD does not currently have adequate written policies and procedures that reflect the most recent updates and innovations to suburban transit police operations. Policies are outdated and ineffective. Some key policies need to be either created or rewritten. Policy areas requiring attention include supervisor and command officer responsibilities; foot patrol strategies and tactics; investigations; report writing; internal affairs; use of force; weapons qualifications; vehicle pursuits; secondary employment; pedestrian and vehicle stops; inter-agency cooperation; and community policing.

FINDING 9
TECHNOLOGY AND DATA ANALYSIS:
The Need for Many Basic Systems

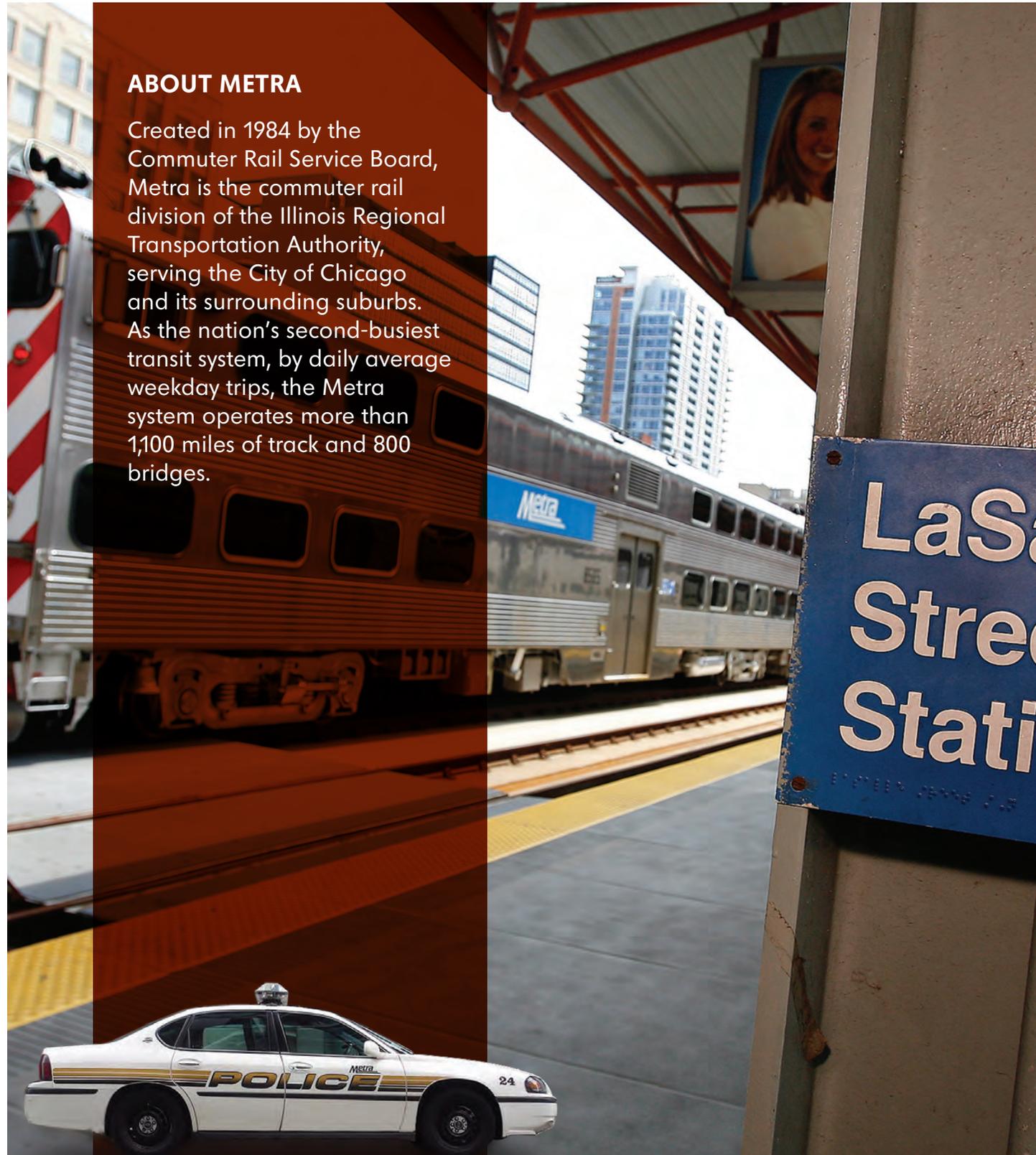
Our high-level assessment of the MPD's IT systems and processes confirmed the Department has very few fundamental IT support systems and capabilities in place - a deficit that significantly undermines the MPD's ability to meet its mission and protect both passengers and officers. In particular, the Department needs to focus on the following IT-related areas: information sharing; real-time crime statistics; case management and record management systems; computer-aided dispatch; mobile computing; and integrated video.



II. OVERVIEW OF THE METRA POLICE DEPARTMENT

ABOUT METRA

Created in 1984 by the Commuter Rail Service Board, Metra is the commuter rail division of the Illinois Regional Transportation Authority, serving the City of Chicago and its surrounding suburbs. As the nation's second-busiest transit system, by daily average weekday trips, the Metra system operates more than 1,100 miles of track and 800 bridges.





More than 700 trains each weekday serve the system's 241 stations. In addition to 11 separate commuter lines radiating north, west and south of downtown Chicago, Metra's assets include more than 1,100 pieces of rolling stock, more than 2,000 signals, 24 rail yards and seven maintenance facilities. The following table (**Figure 1**) illustrates how the Metra system is divided among the participating railways.

Nearly 40 percent of the system miles (200 miles) are operated by UP and BNSF Railroads and, as such, are not in the jurisdiction of the Metra Police. In 2012, approximately 54 percent of Metra passengers used the UP and BNSF lines.¹

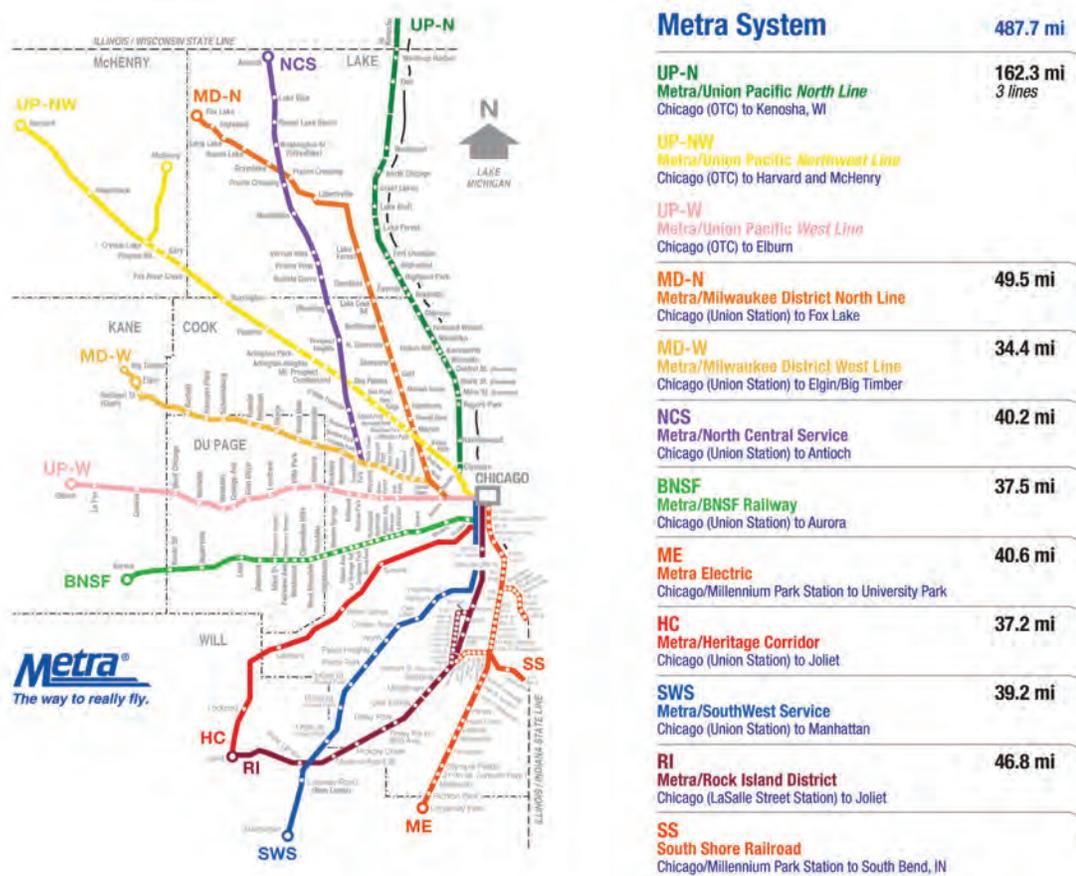


FIGURE 1: PARTICIPATING RAILWAYS IN METRA SYSTEM

1 "Commuter Rail Ridership Trends Annual - 2012." Metra. Retrieved from http://metrarail.com/content/dam/metra/documents/ridership_reports/2012%20ANNUAL%20REPORT%20-%20WEBSITE.pdf

ABOUT THE METRA POLICE DEPARTMENT

When the Regional Transportation Authority (RTA) was reorganized in 1983, the Illinois State Legislature empowered all the sub-units of the RTA to establish and maintain police forces, and subsequently the Metra Police Department was created. The RTA Act states that these police departments have the same authority of municipal police departments. Metra police officers are authorized to enforce all criminal law violations of the State of Illinois and all traffic laws of the Illinois Vehicle Code. All Metra police officers are fully certified police officers. The MPD's main jurisdictions are the six counties serviced by Metra: Cook, DuPage, Kane, Lake, McHenry and Will.

It is important to point out that the Metra Police Department does not have policing responsibilities for the entire Metra system. Trains operated by the Union Pacific (UP) and the Burlington Northern Santa Fe (BNSF) provide their own police services. In fact, Metra pays these railroads to provide these services. Offenses and incidents that occur on UP or BNSF trains, or at the stations on those lines, are handled by the individual railroad police department or local jurisdiction.

The Department has five major divisions, including three geographical districts (**Figure 2**), one communications center and one special operations section. The chart opposite (**Figure 3**) illustrates the MPD organizational structure and the three senior-level positions in the Department: (1) Senior Corporate Director of Police, Security and Emergency Preparedness, (2) Chief of Police and (3) Operations Commander. A commander manages each geographical command; however, two of the three commander positions are currently vacant.

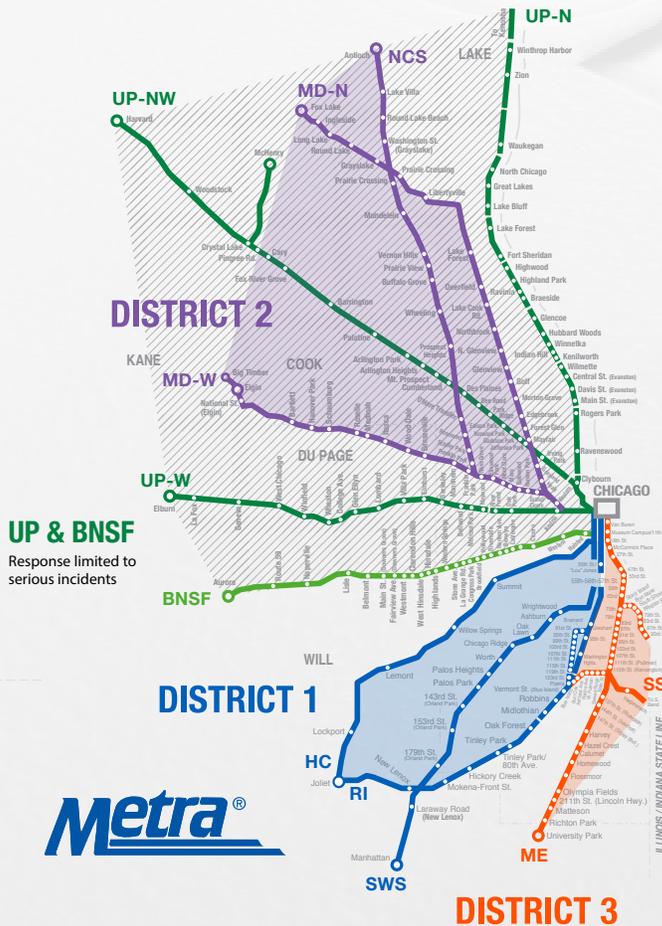


FIGURE 2: MPD GEOGRAPHICAL DISTRICTS

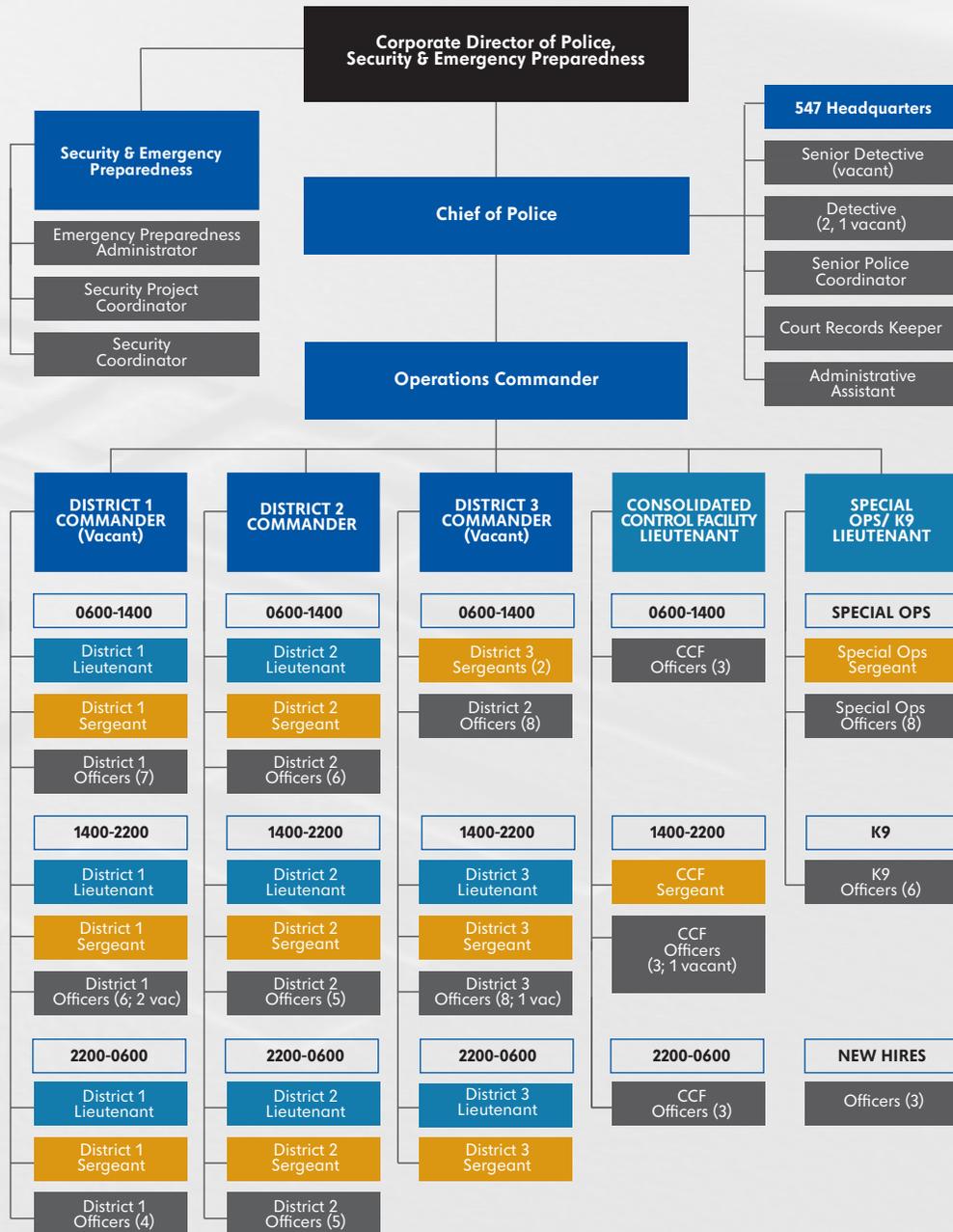


FIGURE 3: MPD ORGANIZATIONAL STRUCTURE



SPECIAL JURISDICTION POLICE AGENCIES: A NATIONAL PERSPECTIVE

One of the unique characteristics of the American policing system is its high degree of fragmentation.

18,000

There are about 18,000 state, county, local and special jurisdiction police agencies in this country.

10%

About 10 percent of these agencies are classified as special jurisdiction agencies performing police services for universities, natural resource organizations and transportation authorities as well as specialized criminal investigation and enforcement missions.

11,000

Agencies tasked with safeguarding transportation systems and facilities employ more than 11,000 full-time, sworn personnel.

“Railroad police have evolved over time and have become a part of professional and well-trained police agencies. They take their place alongside federal, state and local police and perform a critical role in protecting the United States’ rail transportation systems. Their interstate jurisdiction is defined by both federal and state laws and regulations. Like all law enforcement agencies, railroad police exist to serve and protect and keep the public out of harm’s way.”

“Authority of the Railroad Police,” Dave Domzalski,
Associate General Counsel and Director, Legal Services,
Amtrak Police Department, Philadelphia, Pennsylvania



III. SEVEN AREAS CRITICAL TO MPD PERFORMANCE

Now and over time, the Metra Police Department needs to realign (1) its mission with Metra's broader mission as a whole, and (2) its resources and operations with more strategic goals and objectives.





MISSION AND STRATEGY: DEFINING THE PATH FOR THE FUTURE

The Department's mission is antiquated and very unclear – particularly with respect to its insufficient prioritization of programs and practices to ensure the safety and security of Metra's transit passengers. Consequently, the Department's strategic and operational goals and objectives do not guide the departmental operations and resource allocations in the most effective ways to advance Metra's commitment to its stakeholders. The mission needs to be refocused on passenger safety, crime prevention, infrastructure protection and protection of Metra property.

Passenger Security as the Top Priority

The MPD mission states that the "... primary responsibility of all Metra Police Officers [is] to protect train movements and provide for the protection of Metra employees and commuters." Referencing the responsibility to protect physical facilities first implies that protecting Metra commuters is a lower priority.

We saw ample evidence of this in practice. The Department's focus on passenger security is largely restricted to vehicle and foot patrols at Metra's numerous stations. Metra officers are rarely assigned to ride the trains. It is unusual for a police department serving a commuter rail system as large as Metra's not to ensure a regular police presence on the trains.

KEY MESSAGE

The Track Ahead

Change Will Require Commitment and Hard Work

Making passenger safety the Department's highest priority runs contrary to many of the Department's actual day-to-day operational policies, procedures and practices.

It will be difficult to move forward with many of the recommendations in this report without updating the MPD's mission statement, goals and objectives.



The Importance of Homeland Security

Terror threats represent a significant issue for urban commuter rail systems, especially in major cities. Since the 9/11 attacks, Metra has acknowledged this issue and in many areas worked to implement initiatives to improve its ability to prevent, detect and respond to a major terror event. In light of the 2005 London subway bombing and the temporary closure of Boston's transportation systems following the April 2013 Boston Marathon bombing, however, Metra needs to do more to address deficits in areas such as intelligence collection, training, and coordination with critical third-party agencies.

This focus should begin with the MPD mission, which needs to emphasize the responsibility of the Department to work collaboratively with other law enforcement agencies to ensure Metra is an active participant in federal, state and local counter-terror activities. While Metra does have some connections to law enforcement coordination in the greater Chicago area to prevent and detect acts of terror, our assessment revealed that these groups do not readily consider Metra's efforts or participation to be as proactive or meaningful as they could be.

Staffing and Resource Allocation

Updating the MPD mission statement will impact current operations. In particular, staffing and available resources should focus on new or different approaches to policing that address new priorities – and ensure the right personnel are assigned to the right areas at the right times. Current staffing of the MPD patrols is not based on mission, strategy or data. The Department is not allocating its resources as effectively as it should.

We determined the following:

1. The number of sworn personnel assigned particular duties does not match up well with peak periods of demand for assistance.
2. Positions are often filled to meet artificial minimum staffing requirements that have no justification or basis in strategy.
3. Few, if any, sworn officers provide foot patrol services on the Metra trains while they are en route.
4. The Department has sworn personnel in positions typically staffed by non-sworn personnel in most agencies.
5. The MPD overtime budget is extremely high for an agency of its size.
6. Some current policies and procedures require higher-ranking officers to complete tasks that could be handled by first-line supervisors and lower-level command officers.

Conducting a formal staffing analysis would help determine how to allocate the Department's human resources more effectively to address the Department's mission and also to generate cost savings.

Based upon our preliminary staffing analysis, it does not appear that changes to the focus of the MPD's core operations would require additional personnel. Instead, we anticipate that the analysis would result in recommendations for a reorganization and reassignment of sworn personnel, along with the civilianization of some current positions. The Department's main challenge will likely be managing organizational changes resulting from a revision of its core operational focus.



OPPORTUNITY SPOTLIGHT

Staffing Analysis and Optimization

Why Are So Many Sworn Personnel Mapped To a Special Operations Unit?

Current State: Approximately 20 percent of the entire Department is currently assigned to a Special Operations Unit, including six K-9 officers. While the work of the K-9 officers can be very valuable, especially in terms of providing high-visibility patrol and bomb-detection services, it is unclear whether their current work outcomes, when combined with those of nine additional Special Operations Unit personnel, are aligned with the overall day-to-day public safety needs of Metra commuters and the need for infrastructure protection. Taking into account only sergeants and officers working in the field, the Special Operations Unit accounts for 25 percent of the workforce. Even more surprising is the fact that there is only one individual assigned to handle criminal investigations for the entire Department.

Strategic Issue: Is there a need to have so many sworn personnel assigned to the Special Operations Unit? It may be that having that number of personnel specially trained to handle some specific operations or tactical efforts is beneficial. But it may also make sense to assign some of these personnel to basic patrol functions where they could serve in a collateral capacity, responding to special needs operations when necessary but assisting in other efforts during the vast majority of the time when a specialized unit is not required.

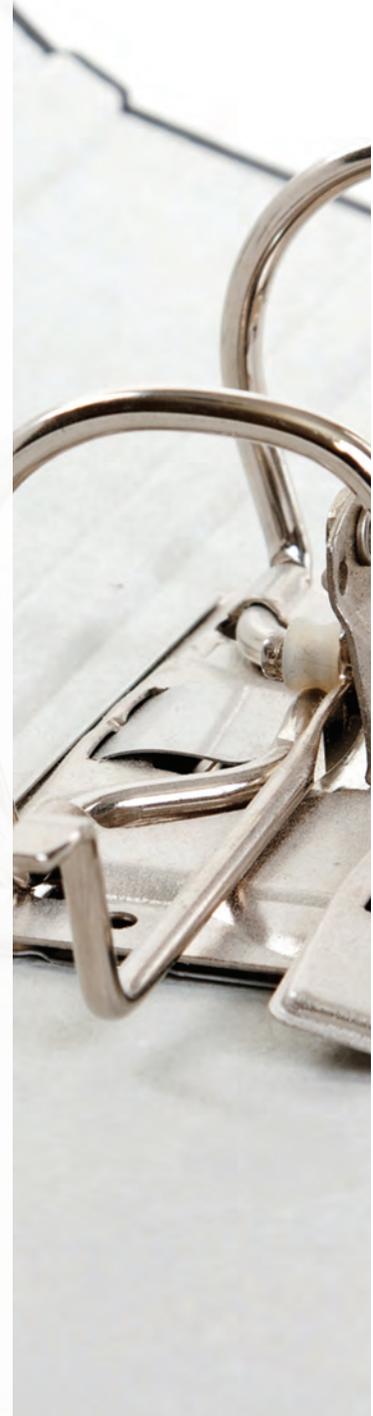
Opportunity: Such realignment might afford the Department the ability to refocus efforts into areas such as criminal investigations and liaison opportunities with other local and regional law enforcement agencies – areas where the Department seems to have lost some important focus. A detailed analysis of this and similar issues will be addressed later in this report.

Establishing a Formal, Written MPD Strategic Plan

Once the MPD's mission, vision and purpose have been updated and aligned with the Metra organization as a whole, the next priority needs to be the development of a formal strategic plan for the Department - one that can be used to guide key departmental decisions over the next three to five years on issues ranging from strategic long-term risk management to investment priorities and resource planning.

The MPD Strategic Plan should be formally ratified by the Board in order to guide the growth and development of the Department on a year-to-year basis. Particular attention needs to be given to identifying and eliminating unnecessary or redundant services, providing new services crucial to the Department's updated mission and targeting the most attractive opportunities to reallocate and reposition staff and other resources in ways that will significantly improve the Department's effectiveness and efficiency.

This plan should, at minimum, include: goals and objectives; an updated organizational chart with appropriate reporting channels; a clear articulation of the MPD's obligations to various constituencies, including the general public, Metra's management and board, regulators and third-party law enforcement agencies and organizations; core principles driving the Department's development and operations; resource requirements from personnel and training to technology and communications; operational tasks and dependencies; timing considerations; investment requirements; and performance-tracking metrics.



RECOMMENDATIONS

MISSION AND STRATEGY

- 1.1 Mandate:** Have Metra's Board of Directors clarify its mandate for the Metropolitan Police Department.
- 1.2 Mission:** Realign the MPD's mission with this mandate and with Metra's broader mission. Make sure that the mission specifically references passenger safety, homeland security, infrastructure protection and protection of Metra property.
- 1.3 Strategic Plan:** Develop a formal, written MPD Strategic Plan that outlines a vision and roadmap for the Department's growth over the next three to five years and addresses the 50 recommendations in this report. The plan should identify unnecessary or redundant services, new services crucial to the Department's updated mission and the most attractive opportunities to reallocate and reposition staff and other resources in ways that will significantly advance the Department's effectiveness and efficiency. Key elements addressed should also include: vision, key principles, strategic goals and objectives; resource constraints; organizational structure and chart; core program activities; schedule and timing considerations; key milestones; performance metrics; and a governance process to review, update and refine the plan at regular intervals over its full duration.



LEADERSHIP: THE DRIVER OF CHANGE

The single greatest challenge in the Department is leadership. We uncovered critical challenges that have been either ignored or poorly addressed for several years. Across essentially all of the Department's various operating units, the gaps and vulnerabilities we identified ultimately lead back to an absence of leadership on many fronts.

These include deficits in senior-level leadership experience, insight and vision, a lack of initiative in driving changes and improvements to MPD operations, and a corresponding lack of confidence in the Department's leaders among rank-and-file employees. Missing from day-to-day operations are attention to internal and external communications, championship of success and proactive interaction with Metra's management and Board. Also missing is a focus on factors that will determine the Department's relevance over the next decade and beyond - issues such as technology, training and collaboration with other federal, state and local partners to ensure the security and safety of Metra's passengers, staff and infrastructure.



KEY MESSAGE

Culture and Morale

These Major Drivers of MPD Employee Performance Are Critically Low across the Department

Over and over, academics, experts and scientists report that the unsung driver of program excellence is how employees at every level of the organization view the value and importance of their roles and contributions to the entity, their immediate team and the constituencies they serve.

One of the greatest challenges confronting Metra and the effectiveness of the Metra Police Department is re-energizing the spirit and dedication of the MPD's workforce - at every level of the Department.

Senior-Level Vision, Insight and Experience

The MPD leader's first priority should be defining the primary purpose for the Department, articulating a vision and mission, outlining a strategic plan and guiding all personnel in managing operations and planning for higher performance in the future.

The head of the Department needs to lead its executives in asking and answering critical questions. How should the organization reduce crime and create the safest environment for passengers? How should it develop an effective and efficient staffing and budgeting plan? How should it develop leaders within the organization who will translate strategy into action in areas ranging from patrol assignments, investigations and internal affairs to policies and resource allocation?

Combating Crime and Terrorism

Missing is a focus on factors that will determine the Department's relevance over the next decade and beyond. Very little attention has been paid by MPD leaders over the last several years to implementing numerous new policing tactics that have proven extremely successful across the nation in combatting crime and terrorism. These include core fundamentals such as:

- **Community Engagement:** Having officers spend more time engaging with the community they serve to identify needs and to develop strategies to address them collaboratively.
- **Crime Reduction:** Identifying the most significant crime problems commuters face, as well as their root causes, and developing a program to reduce or eliminate opportunities to commit these acts.
- **Technology:** Using new technologies that allow police departments to use crime-analysis data to allocate diminishing resources in the most cost-effective and efficient manner.
- **Training:** Ensuring mandated training is provided to address issues such as use of force and bias-based policing.
- **Collaboration:** Partnering with other federal, state and local agencies to ensure the security and safety of Metra's passengers, staff and infrastructure.





Internal and External Communications

We uncovered many deficiencies in internal communications up and down the chain of command, including an absence of proactive interaction with Metra's management and Board and a lack of commitment to ensure MPD rank-and-file employees understand the organization's mission, operational strategies, goals and objectives. It was clear that many front-line officers and first-line supervisors did not understand these. We also found that Metra's leaders do not actively and visibly champion success - either the Department's performance or that of individual employees. If MPD is to succeed, senior leaders will need the communication skills to articulate the Department's current state and future path, as well as the change-management skills critical to implementing new policies, procedures and practices.

Confidence and Trust in Leaders Among MPD Personnel

Our assessment revealed that a strong majority of MPD personnel at all levels of the organization have an appreciation for passengers' safety and consider the Department's role and their job within it important. Many expressed frustration that police neither ride the trains nor focus on preventing crime that occurs onboard. Officers and conductors spoke up about crime going unaddressed because of a lack of police presence. There is little question that, on the whole, MPD personnel want to deliver excellent public safety services to those they are sworn to serve and protect. Many individuals, however, expressed little faith and confidence in MPD's senior leadership to manage the Department based mostly upon what they believe is a lack of vision, initiative and the necessary skills.

RECOMMENDATIONS

LEADERSHIP

- 2.1 Create Job Description:** Develop a formal description and position profile for the Metra Police Department Chief of Police.
- 2.2 Engage New Chief:** Recruit and engage a highly qualified individual to serve as Chief of Police. Must be a proven leader, capable of championing the MPD's vision, executing the Strategic Plan, communicating with internal and external stakeholders, earning the trust and confidence of MPD staff, increasing morale and guiding the Department's development over the next three to five years, and beyond.
- 2.3 Define the Mission:** Develop the purpose, vision and mission of the Department and then lead the implementation of its goals, objectives, policies, procedures and work standards.
- 2.4 Enact an Internal Communications Plan:** Rebuild the faith and confidence of MPD personnel by enhancing communications internally and externally to ensure all stakeholders receive, understand and support the new leadership and the Department's direction.
- 2.5 Build Leadership in Depth:** Identify, develop and train commanders and supervisors with a focus on developing both buy-in and the skills needed to lead the newly defined mission and strategy.





OPERATIONS AND EQUIPMENT: THE ENGINES OF PERFORMANCE

The Metra Police Department is comprised of approximately 105 sworn officers, led by a Senior Corporate Director of Police, Chief of Police, Operations Commander, District Commanders, a Communications Commander and a Special Operations Commander.

Structure and Organization

The MPD is organized into three Districts, each supervised by one of two district commanders as well as a lieutenant assigned to oversee each of the three eight-hour shifts. In short, 84 shifts run from 6:00 a.m. to 2:00 p.m.; from 2:00 p.m. to 10:00 p.m.; and from 10:00 p.m. to 6:00 a.m.

All communications operations for the Metra Police Department are housed in the Consolidated Control Facility (CCF), supervised by a lieutenant commander and staffed by 11 officers. Additional MPD representatives working in the Consolidated Control Facility include a Special Operations Team comprised of a commander (sergeant), eight officers and six K-9 teams of officers and dogs.

The Department's staffing and organizational structures need to be reorganized so that personnel are engaged more effectively in meeting the mission and strategic objectives. For example:

SHIFT SCHEDULES for patrol beats are not based upon any identifiable strategy, patrol activities, response times, calls for service or coverage. Schedules are driven by a predetermined level of minimum staffing that is not defined or measured by service levels or outcomes.

BEATS are frequently aligned in close proximity to one another, with no operational reason for added coverage - a sign of poor leadership and planning and an inefficient use of resources.

ARRESTS are rarely made, and there appears to be no organizational incentive for officers to make criminal arrests.

KEY MESSAGE

To Protect Passengers, MPD Officers Must Ride the Trains

This Change Will Represent a Strategic Shift for the Department on Multiple Levels

The Department must ensure passengers are protected by MPD officers riding trains and reacting to incidents as they happen, rather than responding from train platforms by taking reports about events after they occur.

This process will be difficult. It will require challenges such as:

- Training and equipping officers to communicate in new ways with passengers
- Developing new strategies and policies for patrol, officer safety, arrests on the trains and prisoner transport
- Creating new procedures for report writing, ordinance enforcement, and partnering with local police agencies along Metra's routes





Assignments and Activities

One of the most remarkable findings of our assessment was that Metra officers rarely ride trains. When we began our assessment, we asked a number of Department members what they perceive to be the main job of their department. The answers varied widely. Many individuals indicated the MPD's main job is to "protect the critical infrastructure." Others reported the main focus of the Department is "getting the trains moving after an accident." It was surprising to us that almost no one indicated his or her job is to protect the passengers and employees.

Several officers said they had not been on the trains while on duty in years. In addition, with the exception of the Millennium Park Station, officers spend little time at stations or on platforms. Union Pacific or AMTRAK Police generally patrol the main downtown terminals: Ogilvie Transportation Center and Union Station. Metra K-9 officers rarely patrol on trains.

MPD officers respond to all accidents occurring on Metra lines and Metra trains. They patrol the rail lines assigned to their districts and ensure crossings and Metra properties are safe and secure. MPD officers are encouraged to meet with trains on their route platforms and maintain contact with train conductors. Officers fill out contact cards with the train numbers and contact information of the conductors with whom they speak. If problems develop on the trains, conductors contact the Consolidated Control Facility and ask that an officer meet the train at the nearest platform on the train's route for enforcement action. If an MPD officer is not able to respond in a timely manner, the Consolidated Control Facility contacts a local Police Department to assist with the incident. Some MPD officers are assigned to foot patrol at some of the key stations, such as the station at Millennium Park. Metra officers are also tasked with collecting cash at ticket machines in the train stations, serving as an armed cash-collection service.



Employment and Resourcing

The assessment team identified several issues here that require attention.

1. During peak events in the City of Chicago, such as Taste of Chicago and the Fourth of July, Metra hires a private security company, Securitas, to have its personnel ride Metra trains and ensure rider safety. Metra also contracts security services with Burlington Northern Santa Fe (BNSF) and Union Pacific Rail Road (UP), as these entities operate Metra-owned equipment with their UP and BNSF crews over their rail lines.
2. Pay incentives for the position of sergeant and above do not encourage officers to reach for greater leadership positions. The Department's current compression of the pay grades and availability of virtually unlimited overtime has incentivized officers to try and maximize overtime pay rather than accept the increased responsibility of a higher rank.
3. Metra officers work a significant number of overtime hours. This includes overtime patrol work scheduled by the MPD to meet the minimum number of officers MPD has identified as being required to staff a patrol shift. This minimum number is known as a minimum-staffing standard, however, it has no basis in strategic program management.
4. A comprehensive staffing analysis using accurate data for calls for service and crime incidents would help the Department allocate its personnel in a more effective manner. Assigning officers to shifts that accurately reflect the time and location with the greatest demands for service would allow the Department to dramatically reduce overtime levels.
5. We identified officers performing overtime shifts in their personal vehicle, a practice that presents liability issues.

Community Policing

Community policing can only be fully accomplished by engaging the Metra community, its passengers. The most effective way to achieve this is to put MPD officers on the trains and in the stations.

- With close daily contact between MPD officers and passengers, opportunities abound for discussions regarding passengers' questions, community concerns and how to address priorities such as safety and security.
- The presence of officers aboard trains will reduce passenger concerns about crime, deter crimes of opportunity and enable a swift response to calls for service.
- An on-train presence will also boost a "see-something-say-something" mentality among passengers and encourage exchanges between officers and Metra riders that are more meaningful than hurried encounters in stations as passengers rush to and from trains.
- Onboard patrols will also, we believe, result in a dramatic expansion of officers' ability to gather intelligence and tips regarding safety, crime and possible terrorist activity by enabling passengers to bring information forward more quickly than they do today.



Foot Patrol Operations

There are certainly times when foot patrols are warranted to best address specific problems and to provide enhanced protection of passengers and Metra property and facilities. These foot patrol deployments, as well as any other special deployment of officer resources to mitigate a specific issue, should be considered a planned or directed patrol. Documentation of planned patrol strategies is necessary to ensure the most effective patrol plans are implemented when crime patterns are detected.

Before planned patrol strategies can be developed or implemented, the nature and extent of the particular problem must be identified. Field officers or their supervisors may identify a problem; or these problems may be identified through formal crime analysis. Once identified, they should be communicated to all MPD personnel. In all cases, before a patrol plan is developed, the problems identified must be related to an area of responsibility for the Department. Both the initial identification of a problem and also the planned patrol response must be as complete as possible with respect to details, description and facts.



Investigations

The capacity to investigate serious crime is critical to all law enforcement agencies. Bringing crimes committed against Metra passengers or on Metra properties to a successful conclusion could be dramatically improved by utilizing a trained investigative staff. The Department currently has just one member assigned on a full-time basis to investigative responsibilities - a reduction in staff from the four personnel assigned in the past.

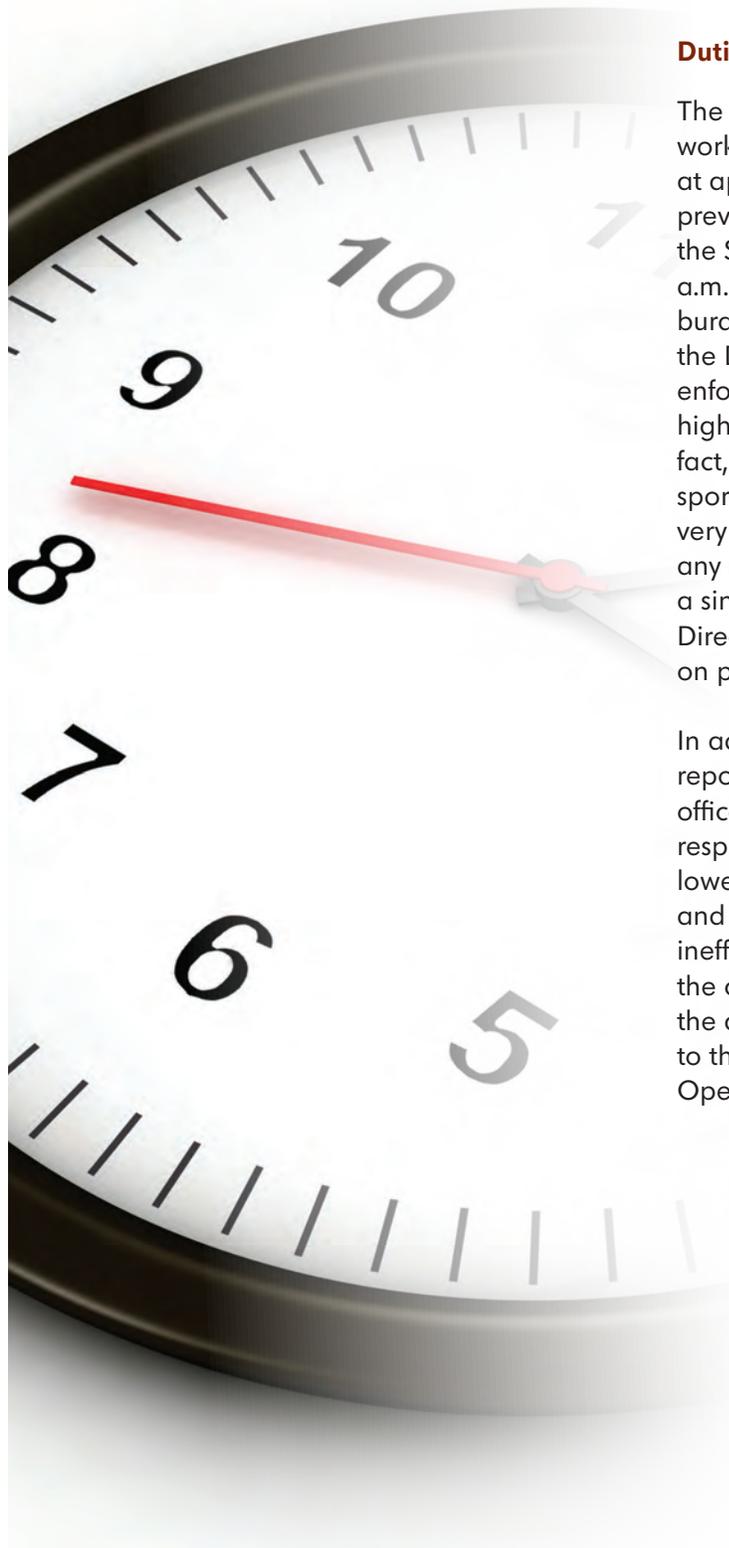
The lone detective position has been marginalized by MPD management because of a past incident and is only assigned background investigations of new hires, theft investigations in the Metra offices (a rare occurrence) and the transportation of evidence to the lab. There appear to be no other well-trained or experienced investigators in the MPD, and the few criminal investigations MPD handles are assigned to someone other than the experienced detective currently serving in the position. There is little to no follow-up on crimes reported to Metra other than that of local law enforcement. We strongly urge the MPD to re-establish its Investigative Unit and staff it with experienced and well-trained detectives.





Squad Cars and Equipment

Our assessment team determined that the Department's equipment and other physical assets – from squad cars to communications – are not on a par necessary to support the scope of normal responsibilities of a modern law enforcement agency. MPD squad cars have excessive mileage and are generally unreliable. As there are no spare cars available, officers double up on patrol when cars break down. Many computers in the cars do not function properly, forcing officers to leave their patrols to go to an MPD office whenever they need to compose a report. The problem is compounded as officers often wait in line to use the single system working at the time of our review. Radio communications have been problematic as well, with many areas within Metra's coverage area experiencing dead zones – although this obstacle may be soon addressed by the rollout of the statewide radio "Starcom" system. Fingerprinting and Livescan systems are dated and unreliable.



Duties of the Operations Commander

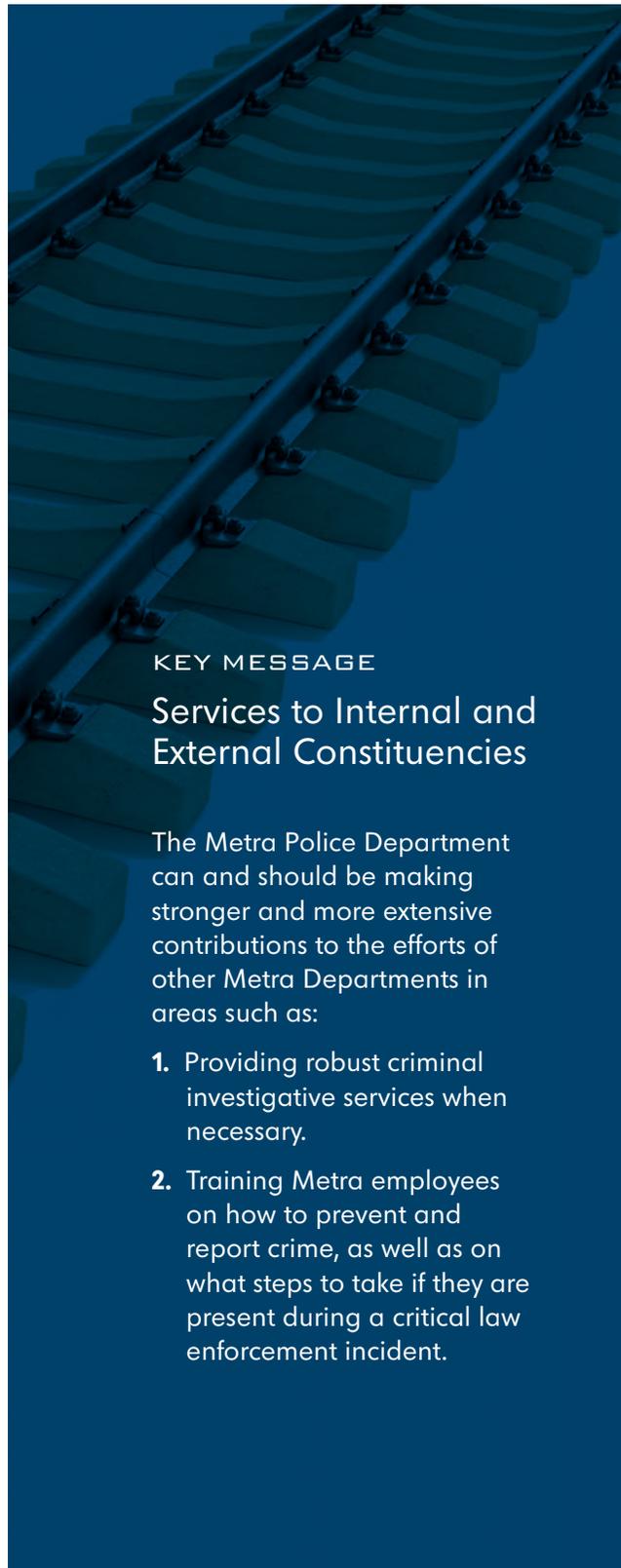
The current Operations Commander routinely works 12- to 13-hour days, as he reports to work at approximately 4:30 a.m. daily to review the previous day's activities and prepare to brief the Senior Corporate Director of Police at 6:00 a.m. and Chief of Police at 7:00 a.m. This is both burdensome and unnecessary, especially since the Department is not a major municipal law enforcement operation that routinely deals with high-profile major felony crime investigations. In fact, Metra officers engage in enforcement activity sporadically at best. We question whether this very early and dual briefing requirement serves any real purpose. If a morning briefing is desired, a single briefing of both the Senior Corporate Director and the Chief should be structured based on purpose and operational need.

In addition, the Operations Commander reportedly reviews all reports submitted by Metra officers for quality control purposes. Such a responsibility is typically assigned to staff much lower in the organizational structure of an agency, and can only be considered an inappropriate and inefficient use of the Commander's time. Both the current morning briefing requirement and the quality control duties unnecessarily contribute to the excessive work burden placed upon the Operations Commander.

Inter-Agency Cooperation

There is little interaction between Metra and other agencies in the Chicago metropolitan area that addresses any significant crime control or counter-terrorism efforts. The interaction of MPD officers with other law enforcement agencies is usually limited to determining which local or municipal jurisdiction will handle an accident involving a Metra train and a vehicle. As noted earlier, because Metra is the second-largest commuter rail line in the nation, delivers transit services across six counties and is a critical service for one of the most populous cities in the nation, we believe it is critical that the Department take a more hands-on and proactive approach to collaborating with its neighboring federal, state and local law enforcement agencies.

Serious consideration needs to be given to assigning MPD personnel full-time to the collaborative efforts currently underway in the region.



KEY MESSAGE

Services to Internal and External Constituencies

The Metra Police Department can and should be making stronger and more extensive contributions to the efforts of other Metra Departments in areas such as:

1. Providing robust criminal investigative services when necessary.
2. Training Metra employees on how to prevent and report crime, as well as on what steps to take if they are present during a critical law enforcement incident.

RECOMMENDATIONS

OPERATIONS AND EQUIPMENT

- 3.1 Staffing Analysis:** Conduct a comprehensive staffing analysis using accurate data for calls for service and crime incidents to identify how personnel should be engaged more effectively in meeting the Department's mission and strategic objectives.
- 3.2 MPD Staff on Trains:** Based on the study's recommendations, reorganize the Department's staffing and organizational structures and ensure, at minimum, MPD officers regularly conduct on-train patrols.
- 3.3 Ancillary Services:** Discontinue the practice of having sworn officers collect cash at ticket machines in the train stations and serve as an armored vehicle cash-collection service. Task these officers to on-train patrols or other core duties. Assign cash-collection duties to either non-sworn personnel or a third-party contractor.
- 3.4 Cross-Constituency Support:** Expand services to internal and external constituencies.
- 3.5 Investigations:** Review the Department's investigations and use these findings to re-establish the MPD Investigative Unit. Staff this unit with experienced, well-trained detectives.



- 3.6 Equipment:** Upgrade the Department's equipment - from squad cars and computers to communications.
- 3.7 Operations Commander:** Reduce the workload on the Operations Commander. Combine the briefings to the Senior Corporate Director and the Chief of Police into one, and conduct it at or about 8:00 a.m. Also, devolve responsibility for conducting quality control reviews of all reports submitted by Metra officers to individuals lower in the Department's organizational structure.
- 3.8 Fusion Center:** Assign a sworn member of the Department to work on a full-time basis in the local Fusion Center, the Chicago Crime Prevention and Information Center in Chicago.
- 3.9 Mutual Aid Agreements:** Enter into official agreements with other federal, state and local agencies to share information when needed and appropriate to assist in preventing, responding to and investigating threats or acts of terrorism as well as day-to-day security and crime incidents.

KEY MESSAGE

Metra Police Must Hold Employees Accountable

Trust and Respect of Community Is at Stake

Law enforcement organizations that do not proactively police themselves are those who tend to lose the community's trust making it more difficult to provide professional public safety services to those they are sworn to protect and serve.



INTERNAL AFFAIRS AND DISCIPLINE: HALLMARKS OF AN EFFECTIVE DEPARTMENT

As is true of all law enforcement agencies, one of the Department's most important responsibilities is to set and enforce high standards for employee conduct and behavior.

Responsible Party

We learned that the MPD employee usually tasked with handling internal affairs cases is the Special Operations Unit lieutenant. This is unusual given that employees working Special Operations details are typically involved in higher-profile cases that can be the subject of complaints.

Role of Chief of Police

We also learned that the Chief of Police plays a small role in the internal affairs process. Complaints are typically received by Metra's Administrative offices and forwarded to the Senior Corporate Director of Police, Security and Emergency Preparedness, who then passes them to the Chief for assignment to the Special Operations lieutenant. The details of the subsequent investigation are then forwarded back to the Senior Corporate Director of Police who determines whether the complaint is sustained and assigns the appropriate discipline, while the Chief simply weighs in with an opinion.

- In most law enforcement agencies, the Chief of Police is the leader tasked with setting the policies, procedures and practices for the organization and then serving as an example for the Department's rank and file by leading the effort to ensure complaints are handled in a thorough, fair and objective manner.
- The Chief also usually determines the level of discipline assigned for a sustained complaint. Metra's Director, however, has the final say on employee discipline. In matters involving MPD employees, we believe the Chief is better suited to make such recommendations and assume the responsibility for answering to the community for any shortcomings in the internal affairs process. This is important to gain and maintain the trust of both the Metra community and the Department's employees.

The Chief of Police also plays only a small role in ensuring fairness and accountability in discipline cases, a process led by Metra's Disciplinary Review Panel (DRP). This committee is comprised of the heads of Metra's various departments. It reviews the investigative outcomes for major discipline cases throughout Metra and makes recommendations to the Metra Director on discipline. One of the goals is to ensure consistency in the level of discipline meted out across departments. Although the Chief is invited to sit in on DRP discussions when they involve an MPD employee, the Chief does not have a vote regarding the level of discipline meted out. This diminishes the Chief's role and image as the Department's leader. We suggest that Metra reconsider the role the Chief of the Metra Police Department plays in leading and taking responsibility for the Department's internal affairs.

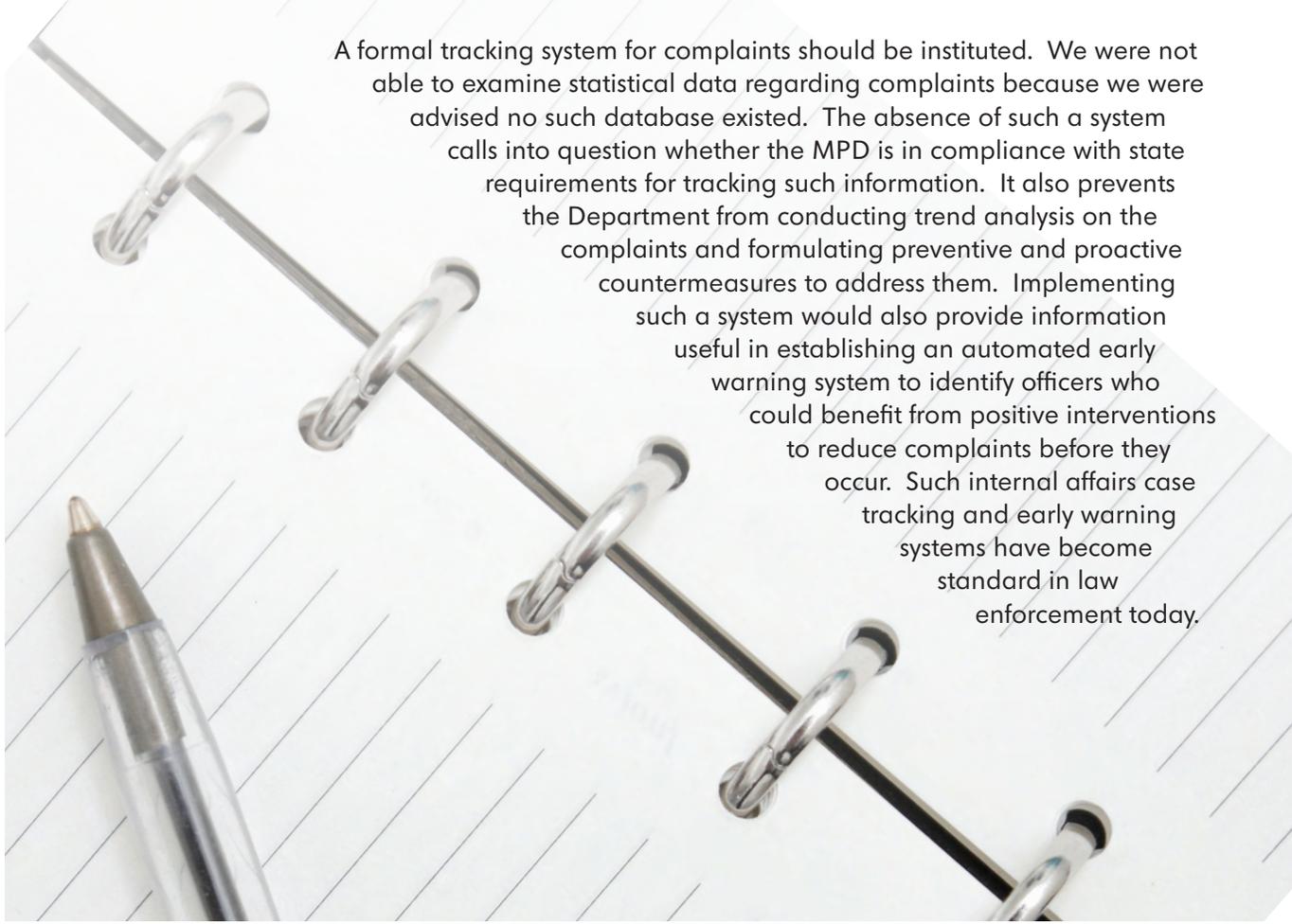


Establishment of Internal Affairs Unit

We suggest that the MPD establish its own internal affairs unit separate from the rest of Metra at large and staffed by individuals who are familiar with the work police officers do on a day-to-day basis. Care needs to be taken that any investigation of a criminal complaint is separate from the concurrent internal affairs administrative process if a criminal complaint is involved. This is standard practice for most progressive police agencies across the nation.

Development of a Manual and Implementation of a Tracking System

A formal, written manual needs to be created to guide internal affairs investigators and ensure processes that are thorough, fair and objective. We suggest this even while acknowledging that the number of formal complaints the Department receives could be relatively low, averaging only about one to two cases a month, according to the Special Operations lieutenant.



A formal tracking system for complaints should be instituted. We were not able to examine statistical data regarding complaints because we were advised no such database existed. The absence of such a system calls into question whether the MPD is in compliance with state requirements for tracking such information. It also prevents the Department from conducting trend analysis on the complaints and formulating preventive and proactive countermeasures to address them. Implementing such a system would also provide information useful in establishing an automated early warning system to identify officers who could benefit from positive interventions to reduce complaints before they occur. Such internal affairs case tracking and early warning systems have become standard in law enforcement today.

Disciplinary Code and Rules of Conduct

Today, MPD officers adhere to the same disciplinary code and rules of conduct all other Metra employees follow. The Metra Deputy Executive Director of Operations determines which offenses are major, minor or dismissible rule violations. Offenses and violations of rules, policies and procedures are addressed through a series of disciplinary steps that reflect the seriousness of the unwanted behavior and are designed to guide employees' future actions. Unless the violation is major or dismissible – or a manifestly willful violation of the rule – a verbal warning is issued for a first offense.

Formal discipline is assessed in a progressive fashion. If employees waive the investigation and admit to the wrongdoing, they can substantially lessen the level of discipline they receive. The basic disciplinary steps are as follows:

- 1. Letter of Reprimand (LOR).** With a waiver, the Letter of Reprimand is effective for two years. The disciplinary system follows Collective Bargaining Guidelines. The letter is the first step in formal discipline and is arrived at after an investigation has been conducted with positive results (depending on the charge), or a waiver of investigation has been filed. The letter remains in the employee's file, but is only effective regarding any future progressive discipline issues for two years.
- 2. Suspension for Three Workdays.** With a waiver, the suspension is reduced to one workday and is effective for two years. The suspension is reduced to one workday deferred (meaning it's not actually served). If the employee is charged with a new offense within two years, her or she must serve the previously deferred suspension day or days in addition to any new disciplinary penalty.
- 3. Suspension for Five Workdays.** With a waiver, the suspension is reduced to three workdays.
- 4. Suspension for Ten Workdays.** With a waiver, the suspension is reduced to seven workdays.
- 5. Dismissal.**

If disciplinary time-off is a possibility, the officers may appear before a Disciplinary Review Board, which determines the disciplinary measure. This Board is currently chaired by the Metra Chief Operating Officer and comprised of the Director of Engineering, Director of Transportation, Director of Mechanical, Director of Human Resources or the Director of Equal Employment Opportunity and the Senior Director of Police Security and Emergency Preparedness. We noted that neither the Chief of Police or Director of Labor Relations sits on this board. The system has many exclusions for events such as furloughs and medical leave and complicated assessment requirements for situations, for example, that involve when the linear and progressive discipline sequence can be reset at the beginning for a given employee.

We suggest that the Department establish a specific discipline matrix of accepted practices and actions with clearly defined penalties for various types of violations.

RECOMMENDATIONS

INTERNAL AFFAIRS AND DISCIPLINE

- 4.1 Role of Chief:** Give the Chief of Police a stronger role in leading and taking responsibility for the MPD's internal affairs activities. This should include ensuring that the Chief has a vote on the Disciplinary Review Panel regarding the level of disciplined meted out.
- 4.2 Program Development:** Establish a dedicated MPD internal affairs unit. Make this separate from the rest of Metra at large and staff it with individuals who are familiar with the work police officers do on a day-to-day basis.
- 4.3 Internal Affairs Guide:** Create a formal, written manual to guide internal affairs investigators and ensure that processes are thorough, fair and objective.
- 4.4 Complaint Tracking and Early Warning System:** Implement a formal internal affairs tracking system for complaints as well as an early warning system.
- 4.5 Discipline Matrix:** Design a specific discipline matrix of accepted practices and actions with clearly defined penalties for various types of violations.



TRAINING: MISSION REALIGNMENT, LEARNING AND PROMOTION

Training has not been a high priority at the Department for many years. Many officers have not had updated training in critical areas such as search and seizure in more than two decades. While some MPD sworn personnel have made strides recently in securing specialized training, the Department must conduct a needs assessment as it begins to improve its capabilities. Our review of the rosters for in-service training for 2011, 2012 and 2013 (as of May 2, 2013) revealed an emphasis on topics such as explosives and anti-terrorism. While these are relevant to the MPD mission, the rosters show minimal or no training in basic areas that are potential sources of liability for the Department and Metra and the security and safety of the general public. These include use of force, firearms, arrests, search and seizure, internal affairs, evidence recovery and handling, interviewing and interrogation, discrimination and profiling, driving, crime-specific protocols and ethics and integrity, among other areas.

Formal Training for Supervisors and Command Officers

While some MPD supervisors have received a degree of supervisory and command officer training, this training was neither routine nor standardized within the Department. As such, official and certified training for supervisors and command officers needs to be a top priority for the Department. These individuals need to be well versed in how to lead, control and direct the actions of their subordinates to ensure police actions are in line with Department standards.

Leading police departments throughout the nation typically provide training immediately upon the promotion of an individual to the rank of sergeant, with a requirement to attend a 40-hour supervision course within a designated time, typically no longer than a year. The same is true for command officers, whose task it is to hold first-line supervisors accountable in meeting their duties.

It is not necessary for the Department to create these training programs from scratch. Instead, it should consider having MPD personnel attend courses planned and convened by other law enforcement agencies within the greater Chicago region - municipal and state agencies that provide this training to their personnel on a regular basis. MPD personnel would benefit from attending well-established training programs and also expanding their network of peers at other agencies. Having other agencies provide this advanced training would most likely prove more cost effective for the MPD.

Our assessment revealed that some MPD sworn personnel have not received any training updates since graduating from the police academy.

Weapons Qualifications

Early in the assessment, it became evident that the Department's training was deficient in many areas including weapons qualifications. At the time of our assessment, the MPD was transitioning from a Sig Sauer .357 semi-automatic pistol to a Glock 17 9mm semi-automatic pistol. Many of the MPD officers still carrying the Sig Sauer stated that they had not qualified with it for two to three years. While approximately 75 percent of the MPD officers had completed the transition at this time, the training the MPD officers had received had not met the qualification standards suggested by Glock for its pistol, nor had the MPD met the qualification standards set by the State of Illinois or used the same standards as other similar law enforcement agencies.

KEY MESSAGE

An Urgent Matter Weapons Qualifications

Our assessment revealed that the Department's training was deficient in weapons qualifications.

Several MPD officers who still carry the Sig Sauer indicated that they had not qualified with the weapon for two to three years.

Many MPD officers advised us that the only training provided by the Department was the minimum qualification shoot requiring the firing of only 30 rounds each year. This is in stark contrast to a best practice for law enforcement agencies and standards outlined by the manufacturer that range from a 1,000-round course over five days to 500 rounds over two days.

After the Hillard Heintze assessment team apprised Metra executives of this issue, the agency immediately authorized Hillard Heintze to arrange for MPD officers to qualify with the Glock through the Illinois State Police (ISP), using ISP range officers and the ISP range in Joliet, Illinois, where officers received 16 hours of training and fired 500 rounds.

In the future, the MPD range master or designee should conduct training and an annual qualification shoot to test firearms proficiency for all officers. All officers must be able to demonstrate proficiency with the weapon, including shooting, safe handling, proper loading and unloading, cleaning procedures and malfunction drills.



Use of Force

The Department's training records revealed that only three of its officers received training in use of force over a two-and-a-half year period. Regular and frequent training in use of force for all sworn personnel is essential to (1) ensure competency with proper procedures, knowledge and compliance with MPD policy, Illinois law and other relevant regulations, (2) align with national policing best practices and (3) minimize liability associated with complaints or lawsuits regarding use of force. Training frequency and course topics should exceed the minimum requirements for the State of Illinois and address empty-hands procedures as well as baton, pepper foam, firearms and any other means of force authorized.



Arrest, Search and Seizure

Most MPD sworn personnel have not received any recent training on changes to the laws of arrest, search and seizure. In fact, some personnel have not had any training updates since they graduated from the police academy years ago. As sworn police officers, Metra personnel have taken an oath to support and defend the Constitutions of the State of Illinois and of the United States. It is difficult to ensure sworn Metra personnel are adhering to the oath if they are not routinely trained and updated on changes to federal, state and local laws, as well as ongoing changes to case law provided by the courts.

We suggest the Department consider initiating annual training on the laws of arrest, search and seizure, with an emphasis on legal changes and case law updates and how these apply to law enforcement officers in the Metra community. As an alternative to having sworn personnel attend training sessions convened by other law enforcement agencies, the Department could have Metra personnel with teaching and training skills attend such courses and then provide the training in-house to the rest of the Department. The latter option would allow the MPD to customize training to address issues unique to the Metra commuter community.

Investigations

Newly assigned detectives must promptly be provided with training in evidence recovery and handling, interviewing and interrogation, search and seizure and crime-specific investigative protocols, as appropriate.

Pedestrian and Vehicle Stops

The Department needs to ensure that current training on the legal considerations related to pedestrian and vehicle stops is covered in more detail in order to provide officers with a full understanding of when and how they can conduct stops. Such training has the following three objectives:

1. To ensure the constitutional rights of individuals are not infringed upon by officers conducting stops inappropriately.
2. To prepare officers to take full advantage of their legal authority to stop and engage citizens appropriately because of the potential for preventing or interrupting criminal activity.
3. To emphasize the importance of tactically sound approaches to ensure officer safety.



First Aid and First Responder Protocols

There has been no first aid and first responder-related in-service training provided to MPD officers since at least 2011. Certification and recertification in basic first aid, CPR and AED (if issued to officers or installed at stations/platforms and aboard trains) is yet another area where training appears to be lacking. The public has a reasonable expectation that police officers will have and maintain these skills and employ them during medical crises until professional emergency medical personnel arrive.

RECOMMENDATIONS

TRAINING

- 5.1 Training for Supervisors and Command Officers:** Ensure these individuals are well versed in how to lead, control and direct the actions of their subordinates to ensure police actions are in line with the standards of the Department.
- 5.2 Training for Rank-and-File Officers:** Establish training for sworn personnel. Include critical areas such as use of force, firearms, arrests, search and seizure, internal affairs, evidence recovery and handling, interviewing and interrogation, discrimination and profiling, driving, crime-specific protocols and ethics and integrity, among other areas.
- 5.3 Counter-Terrorism and SARS:** Provide specialized training to all MPD personnel on counter-terrorism issues, protocols and tactics and consider participating in the federal Suspicious Activities Reporting program (SARS).
- 5.4 Ongoing Needs Assessment:** Employ regular and ongoing needs assessment as the Department continues to evolve and refine its capabilities.
- 5.5 External Training Opportunities:** Have MPD personnel attend courses planned and convened by other law enforcement agencies within the greater Chicago area.
- 5.6 Weapons Qualifications:** Conduct an annual qualification shoot, testing firearms proficiency for all officers. All officers must be able to demonstrate proficiency with the weapon, including shooting, safe handling, proper loading and unloading, cleaning procedures and malfunction drills. Officers who fail to qualify with the duty weapon should be granted a 30-day period in which to qualify, during which time they will receive remedial training. Officers who do not qualify during this interval should be considered unfit for duty and removed from service.



DEFINITION

Staff and Line Command

Staff command is defined as the issuance of orders by an agent who has no authority in his own right but performs the routine tasks of command as a service for a principal. An example of this type of command is a dispatcher sending a police unit on an assignment. The span of control is limited only to the immediate task at hand.

Line command is the exercise of authority delegated by the Chief of Police to his immediate subordinates and by them to their subordinates down the lines of direct control to the lowest level. Delegation is key to dispersing leadership through the ranks. Delegation also allows managers to use their time more effectively. A leader's effectiveness is often determined by his ability to delegate tasks.

Line command is expressed through a formal system of rank in the Metra Police Department, e.g., Chief of Police, commander, lieutenant, sergeant and police officer.

POLICIES AND PROCEDURES: GETTING A SOLID SET OF RULES IN PLACE

Once the Department has (1) refined its Mission Statement, (2) developed its Strategic Plan, (3) identified which strategic services it should be providing and then (4) aligned its personnel and their responsibilities with available resources in accordance with identified priorities, it will need to (5) revisit and update policies and procedures in multiple areas. The MPD does not currently have adequate written policies and procedures that reflect the most recent updates and innovations to suburban transit police operations. Policies are outdated and ineffective. Some key policies need to be either created or rewritten.



General Orders Manual

Most police agencies have clear policies and procedures outlined in a General Orders Manual (GOM) to eliminate any questions or confusion about specific policies, procedures and practices department members are required to follow both on and off duty.

The MPD has no such Manual. Instead it relies upon memos and notices to advise personnel on current policies, procedures and practices. This makes it difficult for employees to know if they are following the latest policies and procedures and suggests to officers and staff that the Department does not place a high value on policy guidance and compliance. This Manual needs to be a living document that is regularly updated to reflect changes in state and local laws, case law, training protocols and best practices as identified by progressive police agencies across the country and by leading organizations such the Commission on Accreditation of Law Enforcement Agencies (CALEA), the International Association of Chiefs of Police (IACP) and the Police Executive Research Forum (PERF).

While a significant effort will be required to create a General Orders Manual that reflects modern best practices, there are many examples from other transit agencies that could be used as a starting point. We suggest tasking a core group of MPD personnel to assist the Chief of Police in addressing this. Another option is to use a predesigned General Orders Manual template from a private vendor specializing in state-specific manuals, with customization completed as necessary.

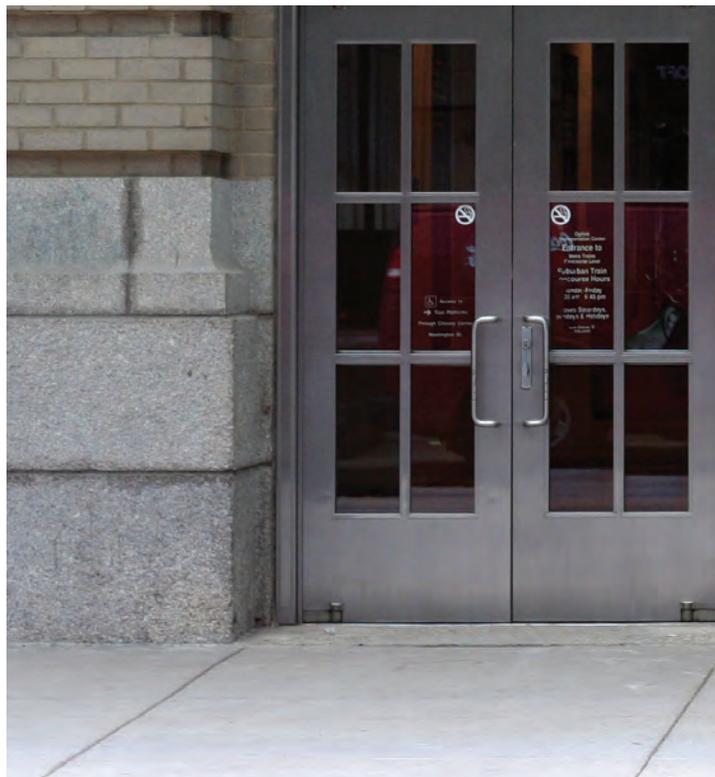


Supervisor and Command Officer Responsibilities

Accountability: The Metra Police Department should establish organizational policies so that each employee reports and is accountable to only one supervisor at a given time. In an emergency or under circumstances where the interest and welfare of the Department or public are in jeopardy, a supervisor may assume command over a subordinate outside his pyramid of authority without violating the unity of command principle.

After such a situation occurs, the supervisor must be prepared to defend whatever position is taken and immediately thereafter, or as soon as possible, advise the person in direct command of the subordinate of the required action and its justification.

Further, the MPD policies need to stipulate that each level of supervision is accountable for the performance of subordinates under their immediate supervision, as well as the proper execution of all duties assigned to that command level. Each supervisor and employee should be accountable for the use of delegated authority. Acts performed without proper authority, authority improperly exercised and failure to exercise authority should be closely scrutinized for potential remedial or disciplinary action.



Span of Control: In defining the span of control for an individual supervisor, the Department should limit this to the number of employees that can be effectively supervised. The span of control for each supervisor should be determined by the nature of the work involved and the employees performing the work. According to a *Police Chief* magazine article that discusses span of control issues for law enforcement agencies, as a general guideline in the United States, the average number of officers assigned to a supervisor in a traditional police department is 8.4 officers, while in one focused on community policing, the average is 7.7 officers per supervisor.²

² Span of Control for Law Enforcement Agencies. Lane, Troy, Assistant Chief, Kansas State University Police Department, Manhattan, Kansas. October 2006 *Police Chief* magazine.



Conflict Resolution and De-Confliction: The Department's policies should state that any lawful order from a supervisor to a subordinate shall be obeyed. In the event that an employee receives conflicting orders from supervisors, he or she shall advise the supervisor issuing the last order of the conflict. If the conflict is not resolved at that point, the employee shall obey the last order issued, which would not be considered disobedient of the previous order. In the event that an employee receives an order to perform some act or function that the employee believes is unlawful, the employee shall, whenever possible, immediately advise the supervisor issuing the order of the employee's interpretation of that order. If the conflict is not resolved at that point, the employee shall not be required to obey an order he or she believe to be unlawful. As soon as possible after any incident of this type, the involved supervisor and employee will meet with the next supervisory level in the chain of command to review and attempt to resolve the issue. If the employee has reason to believe that the supervisor's order was a deliberate attempt to intentionally commit an unlawful act, the employee shall report the incident as an allegation of misconduct.



Use of Force

Although not well written, the Metra Police Department's Use of Force Policy appears to appropriately address officers' use of force, including a use of force matrix and the authorized weapons (aside from the recently issued pepper foam). We encourage the MPD to amend the policy to require all sworn members to carry an alternative use of force tool (e.g., baton, pepper foam or electronic control device) in addition to their firearm. While these alternative tools are issued and officers were observed carrying them, the policy does not require officers to do so. MPD must ensure that officers are equipped to avoid circumstances where they are forced to move from empty-hand techniques to their firearm.

The MPD Use of Force policy should be amended to include:

- Guidelines for the use of the recently issued pepper foam.
- A requirement to file a written report of all uses of force (including pointing of a firearm at an individual).
- Language prohibiting shooting at moving vehicles except under narrowly defined circumstances.
- A requirement that all sworn personnel carry at least one less-than-lethal force alternative weapon.
- A requirement that ongoing use of force training and certifications for weapons and other devices occur on a schedule that complies with state law.

Vehicle Pursuits

At the time of our on-site assessment, we were provided with a copy of a memo from former Chief of Police Fred J. Leonard, dated October 6, 2003, with the subject title "General Order # 03-004 Vehicle Pursuits Prohibited." This memo prohibits MPD personnel from engaging in any vehicle pursuit. Accompanying this memo was a document entitled "Recommendation for a New Vehicle Pursuit Policy" by Lieutenant H.R. Fuller, Metra Police Department, dated February 29, 2009, which is attached to an Intergovernmental Risk Management Agency (IRMA) "Model Vehicle Pursuit Policy."

It is our understanding that Chief Leonard's memo has not been rescinded, and thus Metra police officers have been prohibited from pursuing vehicles for any reason. Further, we were told that no action has been taken regarding Lieutenant Fuller's recommended new pursuit policy since it was submitted on February 29, 2009.

Among all law enforcement activity, vehicle pursuits rank among the most dangerous - to the officers involved, to the fleeing driver and any passengers, and to innocent third parties. Many law enforcement agencies across the country have implemented restrictive pursuit policies, so much so that a highly restrictive pursuit policy is considered a national best practice. It is rare, however, for an agency to prohibit vehicle pursuits under all circumstances. Leaders should never implement policy or rules they have no intention of enforcing. It is unrealistic for Metra leaders to expect officers to adhere to such an across-the-board prohibition should the Department's officers be confronted with a choice between following such a policy and pursuing a vehicle containing suspects presenting an immediate grave danger to others. It is unrealistic for anyone to believe that a Department leader would enforce a "no pursuit" policy under such circumstances.

If the Department allows vehicle pursuits, such action should be guided by a restrictive policy that describes the required circumstances that must be present prior to initiating a pursuit.





Secondary Employment

Many law enforcement agencies nationwide allow their officers to engage in employment on behalf of outside entities during off-duty hours. Most of the outside work typically consists of providing security services related to law enforcement, such as security at shopping malls or school districts. Secondary employment allows officers to earn additional income. Yet primary employers conferring this benefit typically require compliance with additional policies to ensure secondary employment does not negatively impact the officer's ability to meet his or her primary employment duties. Agencies allowing secondary employment also typically restrict the types of employers who can hire off-duty officers to avoid any conflicts of interest, either for the officer or for the police department.

The Department allows officers to work secondary employment. We found, however, that the MPD's policies allowing such employment are incomplete, confusing and contradictory. A review of the Department's secondary employment policies, procedures and practices needs to be conducted. The focus should be on ensuring compliance with a written policy directive regarding allowable types of secondary employment, the approval process and maintaining a robust tracking system to track the number of hours individual officers work each week.



Report Writing

The Department needs to put into place policies and procedures that ensure Metra police reports are accurate, thorough, timely and well written. This is essential in order to:

- Document crime details accurately.
- Document the follow-up actions of patrol officers and detectives.
- Capture data for the Uniform Crime Report (required to be filed with the FBI).
- Generate data that can be used for crime analysis and resource allocation.
- Provide the legal basis for the prosecution of crimes.
- Provide information about the level of effectiveness of Department policies and procedures.
- Provide information for personnel evaluations regarding the officers' communication skills.

One main concern that arose during our assessment was the extent of review and scrutiny given to even low-level reports for minor bureaucratic errors while relatively little attention is paid to the effectiveness of the enforcement action. Reports should be reviewed by first-line supervisors; however, in an effective report review process supervisors and command officers know when an exceptional situation should be brought to the attention of the Operations Commander and perhaps even the Chief of Police.

A typical police department requires most reports to be reviewed by an officer's supervising sergeant. Some agencies also require reports involving the use of force, arrests or cases of a sensitive nature to be reviewed by a lieutenant or other command officer. We suggest that the MPD establish and adhere to a similar policy.

RECOMMENDATIONS

POLICIES AND PROCEDURES

- 6.1 Strategic Policy Review:** Revisit and update MPD policies and procedures in multiple areas. Undertake this critical activity once the Department has (1) refined its Mission Statement, (2) developed its Strategic Plan, (3) identified which strategic services it should be providing and then (4) aligned personnel and their responsibilities with available resources in accordance with identified priorities.
- 6.2 General Orders Manual:** Develop a comprehensive General Orders Manual. Make this a living document that is regularly updated to reflect changes in state and local laws, case law, training protocols and best practices as identified by progressive police agencies across the country. Either (a) task a core group of MPD personnel to assist the Chief of Police in addressing this, or (b) use a predesigned General Orders Manual template from a private vendor.
- 6.3 Accountability:** Establish organizational policies so that each employee reports and is accountable to only one supervisor at a given time. Stipulate that each level of command is accountable for the performance of subordinates under their immediate supervision, as well as the proper execution of all duties assigned.
- 6.4 Span of Control:** Define the span of control for supervisors. Limit this to the number of employees that can be effectively supervised.



- 6.5 Conflict Resolution and De-Confliction:** Undertake a careful review of policies in this critical area, particularly with reference to the issues identified in this report.
- 6.6 Foot Patrols:** Require the development of planned patrol procedures to address specific issues. Use a form comparable to the NIMS Form 204. Consult with subordinate personnel on a regular basis to capture ideas and suggestions.
- 6.7 Use of Force:** Review use of force policies. Amend these, at minimum, to address the issues discussed in the preceding pages.
- 6.8 Secondary Weapons:** Establish standards for secondary weapon qualification.
- 6.9 Vehicle Pursuits:** Revisit the policies governing this high-risk area. Avoid a blanket restriction on all pursuits in favor of critical language refinements clearly defining the circumstances that must be present prior to initiating a pursuit.
- 6.10 Secondary Employment:** Undertake a review of secondary employment policies, procedures and practices. Ensure compliance with a rewritten policy directive and maintain a robust tracking system of the number of hours individual officers work each week.
- 6.11 Report Writing:** Establish policies and procedures that ensure Metra police reports are accurate, thorough, timely and well written.

**TECHNOLOGY:
THE MPD MUST ESTABLISH ESSENTIAL SYSTEMS**

One of the most important findings emerging from this assessment is the MPD’s acute need for fundamental IT support systems and capabilities. In fact, the lack of these systems significantly undermines the MPD’s ability to meet its mission and protect both officers and passengers. In particular, the Department needs to focus on areas outlined below.

Information Sharing

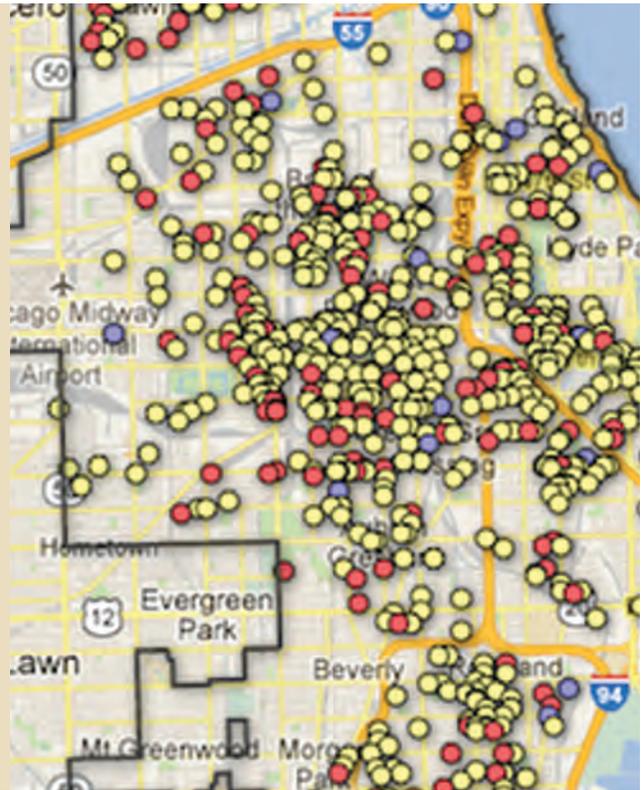
Counter-Terrorism: As a major suburban rail transit agency whose trains and infrastructure extend across multiple counties, communities and local jurisdictions, Metra has a special role to play in countering risks to passengers and the communities through which its trains travel – risks associated not just with criminal activity and severe weather events but also with homeland security. The Department’s ability to share information internally and externally with partner agencies at the local, state and federal level – particularly in counter-terrorism efforts – is vital. These include, for example, northern Illinois suburban police departments, county sheriff departments, Illinois State Police, the FBI, the National Transportation and Safety Bureau and other federal partners participating in homeland security efforts.

Cross-Jurisdictional Threats: Another reason sharing information with partner agencies is so important is that criminals are not confined to one jurisdiction; they frequently operate across cities, counties, states and countries. Information sharing allows police agencies to collaborate and communicate on similar suspects and crimes to solve cases faster by providing the right information at the right time to the right people.



Real-Time Crime Statistics

The Department's ability to allocate resources to reduce crime is difficult if it cannot identify "hot spots" or trends. Real-time crime statistics can provide the MPD command staff with immediate and up-to-date information regarding criminal activity by beat, patrol, district, division or other geographic boundaries. This statistical process, often referred to as CompStat (short for computer or comparative statistics), is a management philosophy for police departments that provides a multi-layered approach to crime reduction and personnel resource management. Started in the late 1990s, CompStat's goal is to improve quality of life for citizens. CompStat creates an accountability framework from which the police chief can hold his or her command personnel accountable for solving or reducing crime in their specific command area.



Case Management and Record Management System

Case Management: The information gathered as part of the Department's investigations process must be stored in a robust Records Management System (RMS). The current system is antiquated and does not work well in a mobile environment. Upgrading the current system will allow all MPD officers to retrieve data in real time. It will also increase the likelihood of successful prosecution and begin to build a base of information allowing for deeper analysis. Additionally, a modern, mobile field-reporting component to the RMS will enable MPD officers and investigators to enter data in the field, avoiding the need to return to headquarters to recreate or republish information after the fact. Timely crime-data entry is critical to maintaining accurate information and creating a streamlined workflow for the electronic transfer and approval of reports.

Data Accuracy: The MPD needs to integrate modern mobile applications with field-reporting, citation and crash-reporting solutions to minimize re-entry of information and enhance data accuracy.

Video Integration

Genetec Video System: Metra has made extensive investments in Genetec video solutions and cameras since May 31, 2013, to provide command and control a view of its busiest stations. There are currently over 1,400 cameras in operation throughout the downtown and suburban stations, and a goal has been set to establish a video presence at all stations in the future. Installing camera systems at all Metra stations supports the law enforcement aspect of the agency, while providing additional visibility and security to the millions of transit passengers who use Metra annually.

Command and Control: Command and control is achieved through this enhanced video by allowing real-time monitoring of stations and rails along the Metra corridors, all viewable at a command center. Metra's stated goal is for the camera feeds to be mutually shared with other law enforcement agencies, such as the Chicago Police Department, as defined by operational and situational needs.

Integration with Mobile Devices: MPD also envisions sharing video with the officers on patrol by integrating the system with mobile devices, which would provide immediate visibility into an event to which they are responding, deliver critical information during the response and shorten the time between assessment and action.



Additional Opportunities

Microsoft Aware: Metra has participated in an executive briefing for the Microsoft Aware solution that enhances the investment in video while expanding real-time crime analytical capability. Our assessment team believes this type of software solution is an appropriate investment, one that is needed to expand the operational efficiencies and effectiveness of the MPD. Using real-time crime statistics is critical to improve crime reduction, overall presence and appropriate officer resource allocation as MPD moves forward.

Real-Time Crime Statistics: Because of its proven success in curbing crime, applying metrics to real-time crime analysis will help foster public support for the MPD. It is not clear whether the Department is collecting data for the crimes committed on Metra lines. For example, it is unclear whether the Union Pacific lines forward crime reports to the MPD for inclusion in its crime statistics.

RECOMMENDATIONS

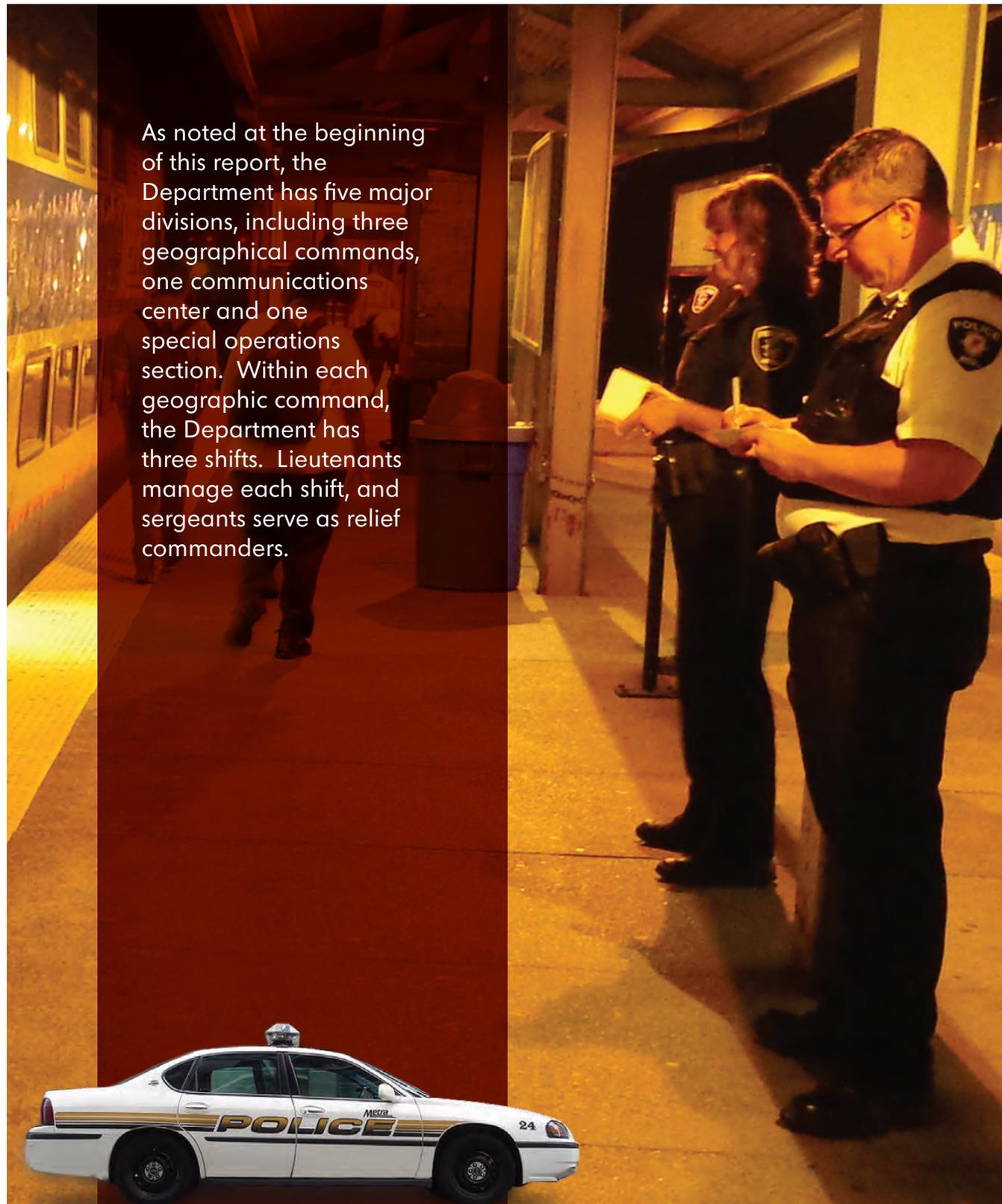
TECHNOLOGY

- 7.1 Real-Time Crime Statistics:** Use programs, such as Computer-Aided Dispatch (CAD) or Record Management System (RMS), to map calls for service and case data geographically over a specific timeframe to allow for correlation of trends. After identifying trends, implement strategic and tactical operations to reduce or solve criminal activity by maximizing the efficiency and effectiveness of staffing and patrols.
- 7.2 Case Management and Record Management System:** Store information gathered during the Department's investigations process in a robust Case Management System or Records Management System to allow all parties to retrieve data in real time, and increase the likelihood of successful prosecution. In addition, use a modern, mobile field-reporting system to provide MPD officers and investigators with a data-entry point in the field rather than having to recall information after the fact. Use national information exchange models to assist integrated justice efforts at the national level to thwart criminal activity, including foreign and domestic terrorism.
- 7.3 Integrated Video:** Work toward goal of establishing a video presence at all stations, and sharing camera feeds with other law enforcement agencies, as defined by operational and situational needs, as well as patrol officers through mobile devices.
- 7.4 Additional Opportunities:** Invest in a software solution, such as Microsoft Aware, to expand the operational efficiencies and effectiveness of the MPD. Ensure the Department is collecting data for the crimes that occur on Metra lines.



IV. SPECIAL FOCUS ON STAFFING, PERSONNEL AND OVERTIME

As noted at the beginning of this report, the Department has five major divisions, including three geographical commands, one communications center and one special operations section. Within each geographic command, the Department has three shifts. Lieutenants manage each shift, and sergeants serve as relief commanders.



**STAFFING:
THE DEPARTMENT'S BASIC FRAMEWORK**

The Metra Police Department uses a minimum staffing scheme to define the number of officers on duty at each of its geographic commands. This is illustrated in the table below (Figure 4). It is important to note that the Department provides essentially equal staffing through the day, and somewhat reduced staffing on the weekends, as Metra train ridership is much greater during the day than at night, and substantially lower on weekends than on weekdays.

Shift	Rock Island District One		Milwaukee North District Two		Metra Electric District Three	
	Current	Minimum	Current	Minimum	Current	Minimum
Monday-Friday						
Shift 1	7	5	8	6	6	5
Shift 2	6	5	7	6	7	6
Shift 3	-	-	7	5	6	5
Truck 1	-	-	-	-	4	4

Shift	Rock Island District One		Milwaukee North District Two		Metra Electric District Three	
	Current	Minimum	Current	Minimum	Current	Minimum
Saturday -Sunday						
Shift 1	4	3	4	4	5	5
Shift 2	4	3	4	4	5	4
Shift 3	-	-	4	4	5	4
Truck 1	-	-	-	-	0	0

FIGURE 4: MPD STAFFING

THE MPD'S DAILY ACTIVITIES: SIX MEASURES OF PRODUCTIVITY

A comprehensive assessment of a police organization typically examines how officers spend their time on duty. This reveals the nature of activities in which they are engaged and how much time is devoted to these activities.

In this section, we will examine six measures of Metra police productivity:

- 1. Calls for service**
- 2. Crime statistics**
- 3. Arrests**
- 4. Traffic stops**
- 5. Work schedules**
- 6. Traffic crashes**

1. Calls for Service

The most frequently used approach to building a staffing model for a law enforcement agency is to examine citizen-generated calls for service. These are situations in which a citizen calls the police, and the department dispatches one or more officers to address the citizen's concerns.³

Unfortunately, MPD data systems do not readily support that kind of inquiry for several reasons. Because Metra is not a public safety answering point (PSAP), citizens who dial 911 to request police services from Metra are routed instead to the law enforcement agency with jurisdiction at the location the call was made. That agency may notify Metra or may resolve the issue by itself. Many calls to the Metra communication center come from on-duty train employees. They may be reporting that a passenger was a victim of a crime, or that a passenger committed a crime. Finally, some phone calls come from Metra officers, sometimes because they find themselves out of radio range. What is clear from the data, however, is that very few calls come directly from citizens.

2. Crime Statistics

In some cases, statistics on criminal activity can be a good indicator of police department activity. The Department reports crime to the Illinois State Police as part of the FBI Uniform Crime Reporting (UCR) system. Crime reporting for the MPD is challenging because of jurisdictional and procedural issues.

Consider the case of a passenger who arrives at his destination in Elgin and discovers that someone has taken his wallet from the breast pocket of his coat. The victim calls 911 and is connected to the Elgin Police Department. At that

³ Wilson, Jeremy M. and Weiss, Alexander. (2012) "A Performance-Based Approach to Police Staffing And Allocation." U.S. Department of Justice, COPS Office.



point several things might happen. The Elgin Police Department may simply take the report as if it occurred in its jurisdiction or it might notify the Metra Police Department, but what happens next may be a function of how long it will take the officer to respond to that location. The Elgin Police Department may wait for the MPD, or it may decide to take the report and simply forward a copy to Metra for its records.

The critical issue is that if the Elgin Police take this report, the offense will not show up on Metra crime statistics. This may result in the underreporting of crime on the system, and it will make it more difficult to develop a data-driven crime control strategy.

The most often-used measure of crime is the Uniform Crime Report (UCR), which was developed and is maintained by the FBI. The most serious offenses are called "index" offenses. Index offenses include: Criminal Homicide, Forcible Rape, Robbery, Aggravated Assault/Aggravated Battery, Burglary, Theft and Motor Vehicle Theft.

Index Offenses Reported: From January 1, 2012, through November 30, 2012, the MPD reported the following Index Offenses (**Figure 5**). These numbers are extraordinarily low. According to this report, Metra recorded fewer than one index offense per day. This is inconsistent with Metra police officers' statements to us that portions of

the network were very dangerous, and that crime and disorder are common on the trains and at Metra facilities. This reported data does not support such an assertion.

Given the relatively low level of crime reported, the question is whether crimes occurring in the Department's jurisdictions are reported to Metra or to another agency.

3. Arrests

Index Offense Arrests: The MPD's Uniform Crime Report (**Figure 5**) also includes arrests for index offenses for the same time period.

Whether or not the number of reported offenses accurately reflects the number of offenses on the Metra system, it is clear that the number of index arrests is remarkably low: approximately one per month.

Reported Index Offenses		Arrests
Criminal Homicide	0	0
Forcible Rape	0	0
Robbery	33	4
Aggravated Assault/Battery	12	3
Burglary	2	0
Theft	173	6
Motor Vehicle Theft	6	0
Arson	1	0
TOTAL	227	13

FIGURE 5: MPD REPORTED INDEX OFFENSES AND ARRESTS, 1/1/2012 - 11/30/2012

MPD Total 2012 Arrests: We also obtained data about Metra arrests for less serious offenses. During 2012, Metra police officers made 360 arrests, including index arrest offenses. This data is based on charges filed.

MPD Arrests by Month: It is interesting to note that arrests in the summer are significantly greater than in other months. This may be related to large special events in Chicago that significantly increase ridership (Figure 6).

MPD Arrests by Day of Week: Next, we observed arrests by day of week. Although there are differences by day of week, it is important to recall that this is a year’s worth of data, so any differences are spread out over 52 weeks (Figure 6).

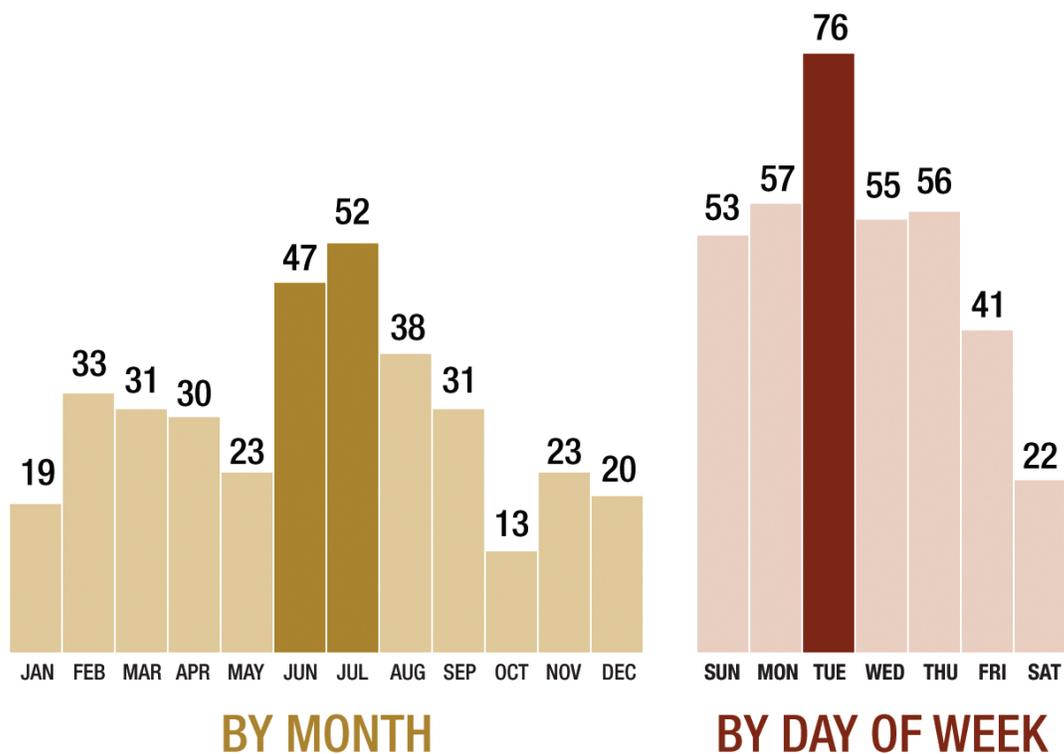


FIGURE 6: MPD ARRESTS - BY MONTH AND DAY OF WEEK



MPD Arrests by Division: As indicated in the following figure, the Special Operations Unit accounts for a substantial portion of the Department's arrests (**Figure 7**).

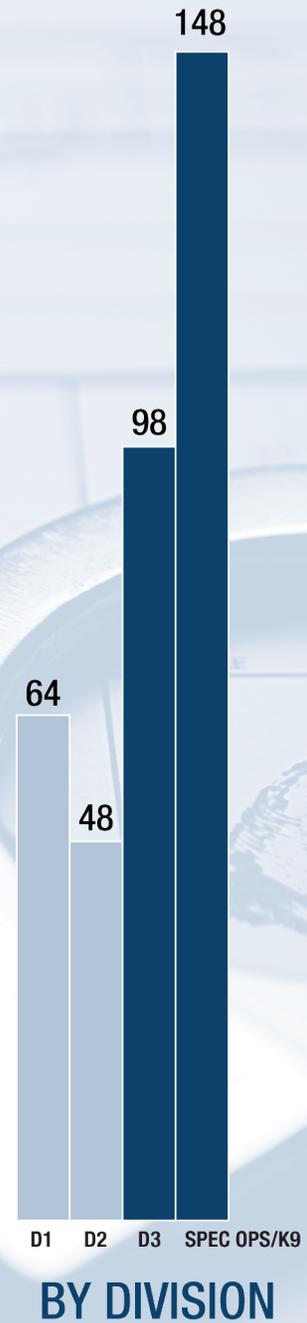


FIGURE 7: MPD ARRESTS - BY DIVISION*

* District data provided for two cases was unclear and has been omitted from above graphic.



The following table (**Figure 8**) illustrates the charges filed during these arrests. Recall that one arrest can result in one or more charges.

Charges Filed	Count
Aggravated Assault	4
Aggravated Battery	3
Aggravated Robbery	2
Armed Robbery	3
Assault	7
Attempted Robbery	1
Attempted Theft	2
Battery	10
Burglary	1
CDP	1
CDSSP	1
CTSSL (Trespassing)	173
Deceptive Practice	7
Disorderly Conduct	48
False Bomb Report	1
Gambling	2
Intoxicated Passenger	2

FIGURE 8: CHARGES FILED DURING ARREST





Charges Filed	Count
Obstructing a Peace Officer	2
Obstructing Arrest	1
Obstructing Identification	2
Obstructing Justice	1
Possession of Controlled Substance - Heroin	1
Possession of Controlled Substance	4
Possession of Cannabis	8
Possession of Drug Paraphernalia	2
Public Indecency	4
Reckless Conduct	7
Theft	4
Theft of Mislaid Property	1
Theft of Services	47
Theft (Over)	1
Trespassing on Right of Way	2
Unlawful Use of Weapons	3
Warrant Arrest	1

Among the most common arrests are CTSSL (trespassing, 170 charges filed), Disorderly Conduct (48 charges filed), and Theft of Services (non-payment of fare, 46 charges filed).

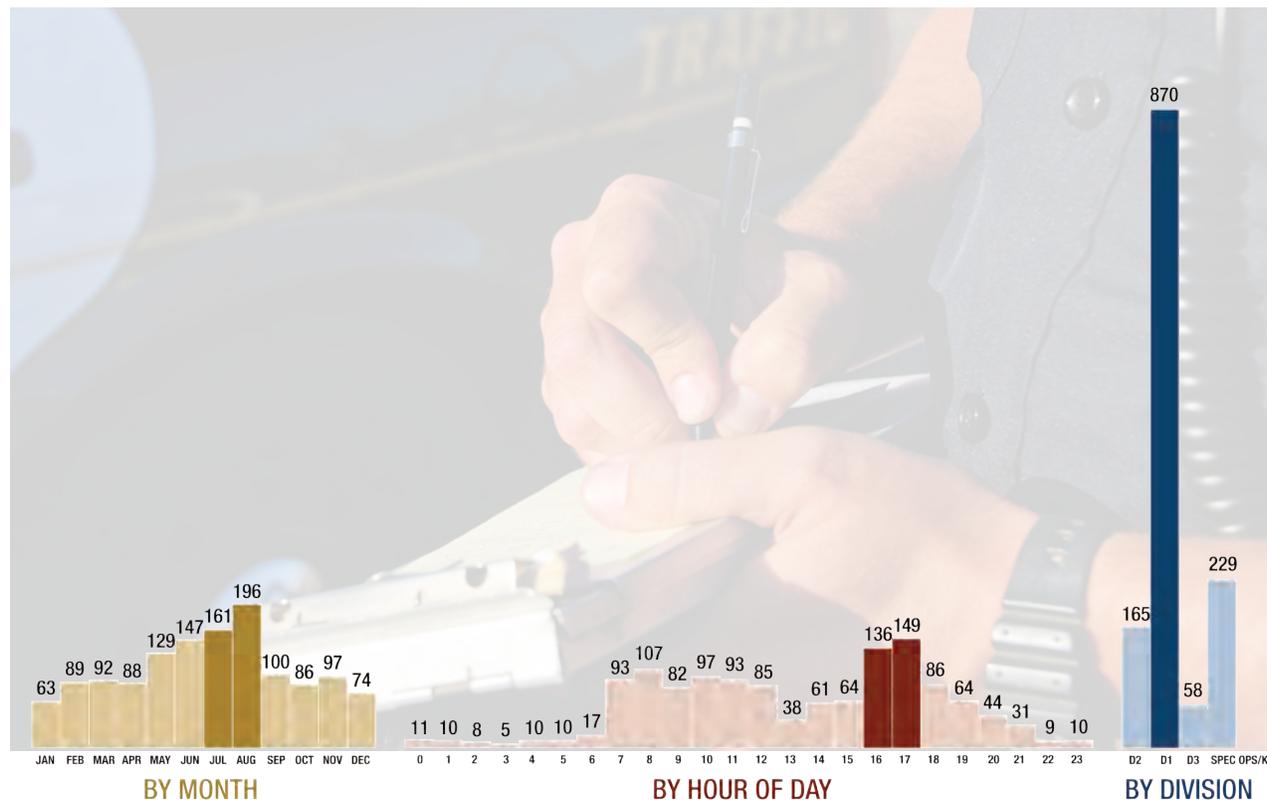


FIGURE 9: MPD TRAFFIC CITATIONS - BY MONTH, HOUR OF THE DAY AND DISTRICT

*Time-of-day data provided for two cases was unclear and has been omitted from above graphic.

4. Traffic Stops and Citations

According to data submitted to the Illinois Department of Transportation (IDOT), MPD officers in 2012 stopped 610 vehicles for violations of the Illinois Vehicle Code. This represents fewer than two stops per day. During the same period, the MPD issued 1,322 traffic citations. The difference between these numbers is based on the fact that some stops result in more than one citation, and because citations written for traffic accidents are not included in the IDOT data set.

Traffic citations by month, hour of day and district are illustrated above (**Figure 9**). Interestingly, these mirror arrest activity by month. It is difficult to argue that the traffic problems related to Metra operations vary significantly by month. However, issues such as improper pedestrian actions and failure to stop at signals would appear to be year-round problems. Note that officers in District Two issue the vast majority of citations.

Next, we looked at the locations where the citations were issued (**Figure 10**). It is interesting to note that over half of all citations were written in the City of Chicago.

Finally, we observed the nature of charges filed during traffic stops (**Appendix A**). There is strong evidence that these efforts are focused on offenses related to reducing conflicts between trains and other system users.

City	Count	City	Count
Arlington Heights	1	Lincolnshire	1
Bartlett	31	Matteson	2
Bensenville	19	Maywood	9
Blue Island	90	Medinah	5
Chicago	728	Midlothian	7
Des Plaines	2	Mokena	12
Dolton	3	Morton Grove	4
East Hazel Crest	3	New Lenox	1
Elgin	88	Niles	4
Elmwood Park	76	Olympia Fields	1
Franklin Park	12	Richton Park	3
Glenview	1	River Grove	25
Hanover Park	16	Riverdale	2
Harvey	9	Robbins	1
Hinsdale	1	Roselle	39
Hometown	1	Round Lake	1
Itasca	27	Schaumburg	18
Joliet	4	Tinley Park	10
La Grange	3	Wood Dale	51
Libertyville	9		

FIGURE 10: MPD CITATIONS ISSUED - BY LOCATION

5. Work Schedules

MPD officers have an unusual work schedule. Officers are assigned to a shift, a location and a day-off group. The work schedule for the eight* personnel currently assigned to the North District afternoon shift is depicted below. (Figure 11 - The "X" indicates the officers' regular days off.)

Officer	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	X						X
2	X						X
3				X	X		
4		X	X				
5						X	X
6	X	X					
7						X	X
8*						X	X
% On Duty	62	75	88	88	88	62	38

FIGURE 11: MPD WORK SCHEDULE (CURRENT)

* The eighth officer is actually assigned to the day shift but is temporarily working afternoons.

Officers work a five-days-on, two-days-off schedule. The final row indicates the percentage of personnel assigned to work that day. Staffing is significantly reduced on weekends, consistent with Metra scheduling. However, the peak staffing is on Tuesday, Wednesday and Thursday.

That is because only one of eight officers is scheduled to be off on those days. Although this allows more staff to have weekend time off, there is no rational basis for this deployment.



The following table (**Figure 12**) illustrates how the work schedule could be modified to better reflect demand. Assigning just two officers to the Saturday and Sunday day-off group reduces staffing on weekends while providing equal staffing on weekdays.

Officer	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	X						X
2	X						X
3				X	X		
4		X	X				
5						X	X
6	X	X					
7 (2)						X	X
% On Duty	62	75	75	75	75	75	62

FIGURE 12: MPD WORK SCHEDULE (HILLARD HEINTZE RECOMMENDATION)



6. Traffic Crashes

Crashes involving Metra trains are a significant issue for a number of reasons. First, the consequences are often very severe. Second, they can significantly disrupt train scheduling and performance. Third, they place a significant burden on first responders from both Metra and third-party agencies. During the first 11 months of 2012, Metra reported 37 accidents. This appears to pose a significant resource challenge for the Department. However, many of these events are on the UP and BNSF lines so they are handled by other agencies. Moreover, we were informed that local authorities handle all incidents occurring in DuPage County.

**OVERTIME:
AN EXAMINATION OF THE MPD'S EXCEPTIONALLY HIGH USAGE RATE**

Our assessment included a review of the Metra Police Department expenses from 2008 to present. The most significant finding was the unusually high level of overtime pay, as seen in the graph below (**Figure 13**). In general, overtime in the 15 to 20 percent range is the level at which management should implement other human resource strategies to reduce overtime and lower overall labor costs.

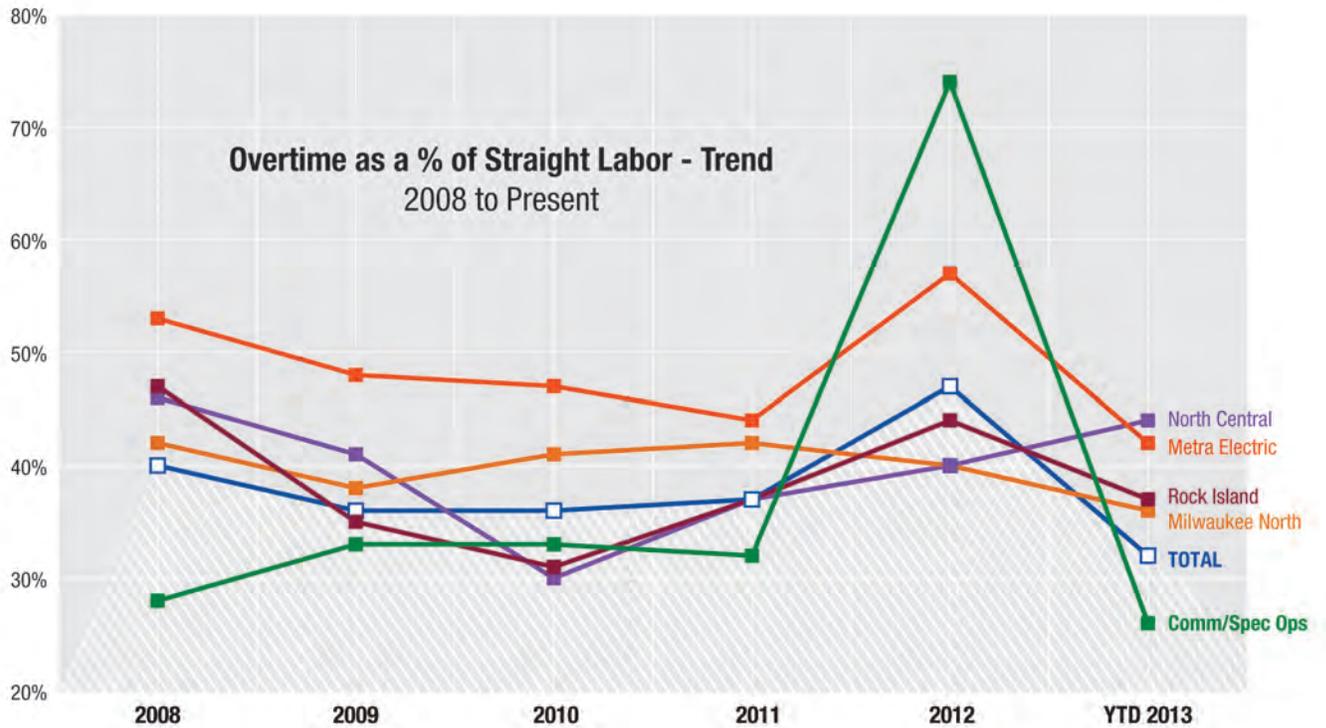


FIGURE 13: OVERTIME AS A PERCENT OF STRAIGHT LABOR

To further illustrate this finding, the following table (**Figure 14**) shows Metra overtime costs for fiscal year 2012 through November 30. They include all union personnel except for the court officer: 73 police officers, 13 sergeants and seven lieutenants.

Personnel	YTD Salary	YTD Overtime	Minimum	Maximum	Average Salary	Average Overtime	%
Police Officer	\$3,585,994	\$1,907,000	\$4,268	\$77,509	\$49,123	\$26,123	53%
Sergeant	\$745,091	\$324,506	\$3,565	\$83,656	\$57,413	\$24,962	43%
Lieutenant	\$436,889	\$241,431	\$7,475	\$76,223	\$62,412	\$34,490	55%

FIGURE 14: METRA OVERTIME ANALYSIS

The overtime costs (\$2,472,937) are significant as a percentage of the total departmental budget and relative to salaries. The generally accepted standard for police overtime costs is approximately 5 to 6 percent of a total police department budget. For the past several years, the MPD’s budget has been about \$16 million, so the overtime rate represents nearly 17 percent of the budget.

Overtime costs were also high relative to salary. When taking into account all employees, overtime pay averaged 52 percent of total salary. It was 53 percent for police officers, 43 percent for sergeants and 55 percent for lieutenants. In a recent study of nine cities, overtime costs were typically 10 to 12 percent of salary.

Some police overtime is certainly unavoidable. It occurs when officers are needed to work beyond their normal shifts or during special events. Some overtime costs are related to special grant-funded initiatives. In Metra’s case, most overtime costs are related to filling positions mandated under the Department’s minimum staffing requirements.

We inquired about when the Department established a minimum staffing level and how the level was determined. The Department’s Director informed us these staffing levels were established to ensure there are adequate resources in the event of personnel reductions. The Director further stated Metra conducted an analysis that indicated it is better to pay relatively high rates of overtime than to hire additional officers. Although we asked to see that analysis, it could not be located and was not provided.

To illustrate how this minimum staffing affects overtime, we examined the minimum staffing requirements for District 2. (Figure 15)

Shift	Monday through Friday		Saturday and Sunday	
	Current	Minimum	Current	Minimum
Shift 1	8	6	4	4
Shift 2	7	6	4	4
Shift 3	7	5	4	4

FIGURE 15: MPD MINIMUM STAFFING REQUIREMENTS (DISTRICT 2)

Shift 2 has seven officers assigned to the work group, but the minimum staffing level is six. If an officer is on vacation (senior officers get 25 vacation days per year), staffing drops to the minimum. If an officer then calls in sick, the shift drops below the minimum, and the Department is required to “hire back” an employee on overtime. Under this scheme (all districts are similar), the Department frequently has to “hire back.” In fact, it happens so frequently that the Department had to develop a policy related to “forcing” officers to work overtime.

In addition to the expense, the MPD minimum staffing requirements are problematic for the following reasons:

- There is no rational basis to justify the minimum levels.
- Officers are frequently working double shifts, which can lead to excessive fatigue, accidents, injuries or errors in judgment.
- The MPD does not include other available resources when assessing the minimum staffing. Even though the Special Operations unit may have significant numbers of officers on duty, the Department still “hires back” to fill slots in patrol.

The first step in correcting this situation is to determine if the additional overtime hours are required to meet departmental objectives. If they aren’t required, the course of action is obvious: reduce the amount of overtime hours allowed. However, if the hours are required, they are better filled with straight-time pay, which would require the addition of full- or part-time employees, or some combination of the two. A more in-depth analysis of the fully loaded hourly costs, with payroll taxes and benefits factored in, is required to determine the cutover point at which it becomes more cost effective to add employees who can fill needed hours with straight-time pay versus overtime from existing personnel.

REALIGNMENT: PATROL, SPECIAL OPERATIONS, DISPATCH CENTER AND COMMAND STAFF

We believe the most important thing the MPD can do is refocus its mission to increase police presence on trains and in high-traffic stations. In order to achieve this strategic priority, improve the efficiency of its staffing model, reduce overtime costs without comparable cost increases elsewhere, and enhance operational performance across all core activities, Hillard Heintze recommends the following:

- MPD should use all available sworn resources including patrol, special operations and communications in its deployment scheme. Every officer should view his or her job as protecting the passengers and employees on the system.
- MPD should immediately eliminate the minimum staffing for patrol and develop a data-driven allocation plan that optimizes resources in high demand areas. MPD should assign most of its resources to work during peak travel times, focusing far less attention to protecting equipment during overnight hours.
- MPD should work with its employee groups to increase the commanders' ability to reassign officers in response to changing crime and disorder patterns.
- MPD should make greater use of technology and non-sworn security personnel to provide protection for equipment. Police officers should focus on people.
- In order to build a data-driven approach to deployment, MPD must re-engineer its information technology system.
- The Department should conduct a comprehensive risk assessment to identify the train trips and facilities that would benefit most from officer presence.



Three other resource-related issues significantly affect MPD staffing.

1. The Department's use of officers for cash collection services appears to be a waste of resources. Other entities could perhaps provide this service for less cost.
2. The Department assigns police officers to staff its communication center. Best practice suggests these positions could be better filled by non-sworn telecommunications personnel.
3. Finally, the Department has a sworn court officer whose job could be filled by a non-sworn employee.

RECOMMENDATIONS

STAFFING, PERSONNEL AND OVERTIME

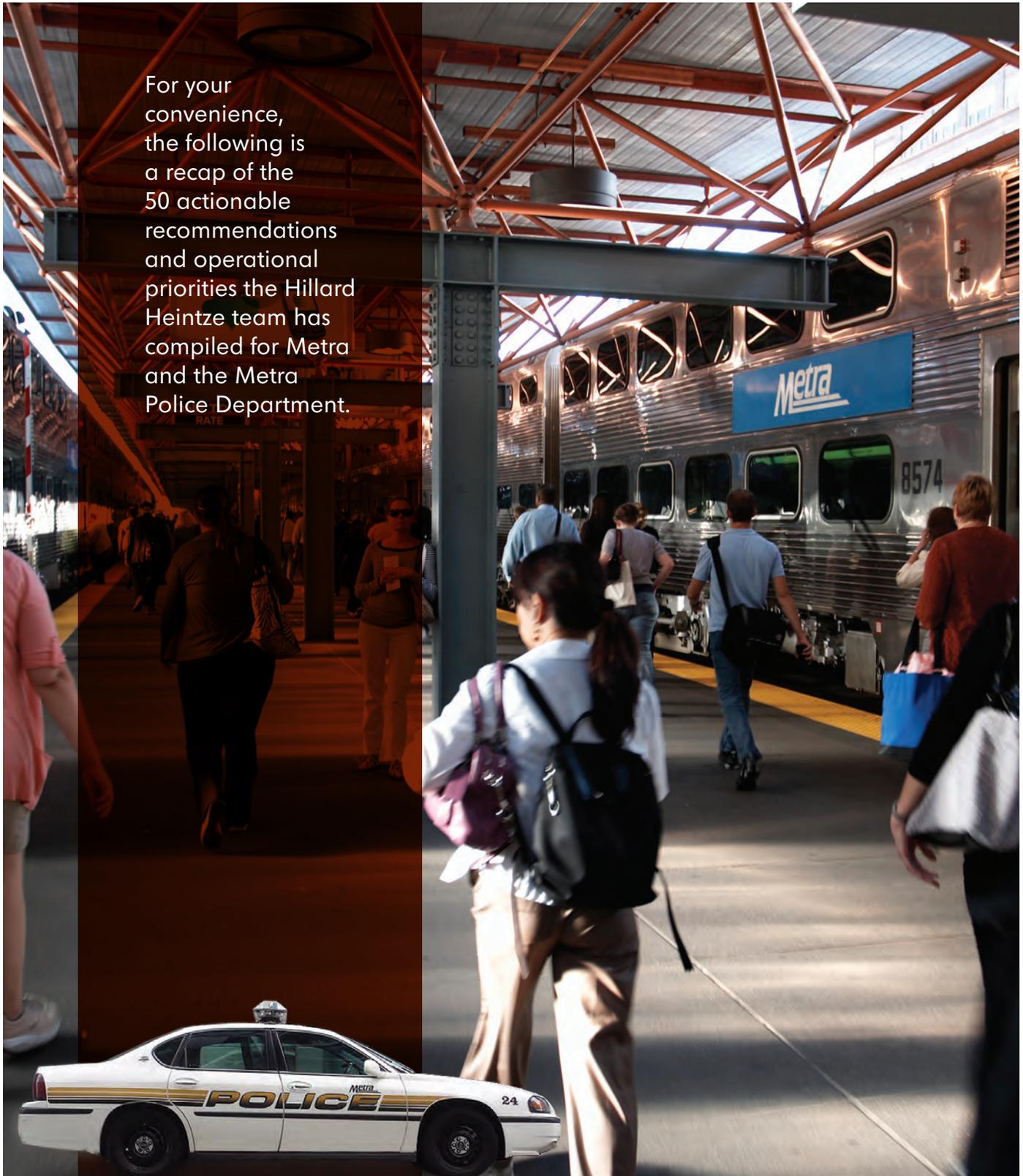
- 8.1 Deployment:** Use all available sworn resources including patrol, special operations and communications in the MPD deployment scheme.
- 8.2 Allocation of Resources:** Eliminate the minimum staffing for patrol and develop a data-driven allocation plan to optimize resources in high-demand areas. Assign most of the MPD resources to work during peak travel times and focus less attention to protecting equipment overnight.
- 8.3 Staffing:** Increase commanders' ability to reassign officers in response to changing crime and disorder patterns.
- 8.4 Overtime:** Undertake comprehensive review of all overtime-related policies and procedures.
- 8.5 Use of Technology:** Make greater use of technology and non-sworn security personnel to protect equipment to allow police officers to focus on people.
- 8.6 Data:** Re-engineer MPD information technology systems to build a data-driven approach to deployment.
- 8.7 Risk Assessment:** Conduct a comprehensive risk assessment to identify the train trips and facilities that would benefit most from officer presence.





V. SUMMARY OF RECOMMENDATIONS

For your convenience, the following is a recap of the 50 actionable recommendations and operational priorities the Hillard Heintze team has compiled for Metra and the Metra Police Department.



ON MISSION AND STRATEGY

- 1.1 Mandate:** Have Metra's Board of Directors clarify its mandate for the Metropolitan Police Department.
- 1.2 Mission:** Realign the MPD's mission with this mandate and with Metra's broader mission. Make sure that the mission specifically references passenger safety, homeland security, infrastructure protection and protection of Metra property.
- 1.3 Strategic Plan:** Develop a formal, written MPD Strategic Plan that outlines a vision and roadmap for the Department's growth over the next three to five years and addresses the 50 recommendations in this report. The plan should identify unnecessary or redundant services, new services crucial to the Department's updated mission and the most attractive opportunities to reallocate and reposition staff and other resources in ways that will significantly advance the Department's effectiveness and efficiency. Key elements addressed should also include: vision, key principles, strategic goals and objectives; resource constraints; organizational structure and chart; core program activities; schedule and timing considerations; key milestones; performance metrics; and a governance process to review, update and refine the plan at regular intervals over its full duration.

ON LEADERSHIP

- 2.1 Create Job Description:** Develop a formal description and position profile for the Metra Police Department Chief of Police.
- 2.2 Engage New Chief:** Recruit and engage a highly qualified individual to serve as Chief of Police. Must be a proven leader, capable of championing the MPD's vision, executing the Strategic Plan, communicating with internal and external stakeholders, earning the trust and confidence of MPD staff, increasing morale and guiding the Department's development over the next three to five years, and beyond.
- 2.3 Define the Mission:** Develop the purpose, vision and mission of the Department and then lead the implementation of its goals, objectives, policies, procedures and work standards.
- 2.4 Enact an Internal Communications Plan:** Rebuild the faith and confidence of MPD personnel by enhancing communications internally and externally to ensure all stakeholders receive, understand and support the new leadership and the Department's direction.
- 2.5 Build Leadership in Depth:** Identify, develop and train commanders and supervisors with a focus on developing both buy-in and the skills needed to lead the newly defined mission and strategy.

ON OPERATIONS AND EQUIPMENT

- 3.1 Staffing Analysis:** Conduct a comprehensive staffing analysis using accurate data for calls for service and crime incidents to identify how personnel should be engaged more effectively in meeting the Department's mission and strategic objectives.
- 3.2 MPD Staff on Trains:** Based on the study's recommendations, reorganize the Department's staffing and organizational structures and ensure, at minimum, MPD officers regularly conduct on-train patrols.
- 3.3 Ancillary Services:** Discontinue the practice of having sworn officers collect cash at ticket machines in the train stations and serve as an armored vehicle cash-collection service. Task these officers to on-train patrols or other core duties. Assign cash-collection duties to either non-sworn personnel or a third-party contractor.
- 3.4 Cross-Constituency Support:** Expand services to internal and external constituencies.
- 3.5 Investigations:** Review the Department's investigations and use these findings to re-establish the MPD Investigative Unit. Staff this unit with experienced, well-trained detectives.
- 3.6 Equipment:** Upgrade the Department's equipment - from squad cars and computers to communications.
- 3.7 Operations Commander:** Reduce the workload on the Operations Commander. Combine the briefings to the Senior Corporate Director and the Chief of Police into one, and conduct it at or about 8:00 a.m. Also, devolve responsibility for conducting quality control reviews of all reports submitted by Metra officers to individuals lower in the Department's organizational structure.
- 3.8 Fusion Center:** Assign a sworn member of the Department to work on a full-time basis in the local Fusion Center, the Chicago Crime Prevention and Information Center in Chicago.
- 3.9 Mutual Aid Agreements:** Enter into official agreements with other federal, state and local agencies to share information when needed and appropriate to assist in preventing, responding to and investigating threats or acts of terrorism as well as day-to-day security and crime incidents.



ON INTERNAL AFFAIRS AND DISCIPLINE

- 4.1 Role of Chief:** Give the Chief of Police a stronger role in leading and taking responsibility for the MPD's internal affairs activities. This should include ensuring that the Chief has a vote on the Disciplinary Review Panel regarding the level of discipline meted out.
- 4.2 Program Development:** Establish a dedicated MPD internal affairs unit. Make this separate from the rest of Metra at large and staff it with individuals who are familiar with the work police officers do on a day-to-day basis.
- 4.3 Internal Affairs Guide:** Create a formal, written manual to guide internal affairs investigators and ensure that processes are thorough, fair and objective.
- 4.4 Complaint Tracking and Early Warning System:** Implement a formal internal affairs tracking system for complaints as well as an early warning system.
- 4.5 Discipline Matrix:** Design a specific discipline matrix of accepted practices and actions with clearly defined penalties for various types of violations.

ON TRAINING

- 5.1 Training for Supervisors and Command Officers:** Ensure these individuals are well versed in how to lead, control and direct the actions of their subordinates to ensure police actions are in line with the standards of the Department.
- 5.2 Training for Rank-and-File Officers:** Establish training for sworn personnel. Include critical areas such as use of force, firearms, arrests, search and seizure, internal affairs, evidence recovery and handling, interviewing and interrogation, discrimination and profiling, driving, crime-specific protocols and ethics and integrity, among other areas.
- 5.3 Counter-Terrorism and SARS:** Provide specialized training to all MPD personnel on counter-terrorism issues, protocols and tactics and consider participating in the federal Suspicious Activities Reporting program (SARS).
- 5.4 Ongoing Needs Assessment:** Employ regular and ongoing needs assessment as the Department continues to evolve and refine its capabilities.
- 5.5 External Training Opportunities:** Have MPD personnel attend courses planned and convened by other law enforcement agencies within the greater Chicago area.
- 5.6 Weapons Qualifications:** Conduct an annual qualification shoot, testing firearms proficiency for all officers. All officers must be able to demonstrate proficiency with the weapon, including shooting, safe handling, proper loading and unloading, cleaning procedures and malfunction drills. Officers who fail to qualify with the duty weapon should be granted a 30-day period in which to qualify, during which time they will receive remedial training. Officers who do not qualify during this interval should be considered unfit for duty and removed from service.



ON POLICIES AND PROCEDURES

- 6.1 Strategic Policy Review:** Revisit and update MPD policies and procedures in multiple areas. Undertake this critical activity once the Department has (1) refined its Mission Statement, (2) developed its Strategic Plan, (3) identified which strategic services it should be providing and then (4) aligned personnel and their responsibilities with available resources in accordance with identified priorities.
- 6.2 General Orders Manual:** Develop a comprehensive General Orders Manual. Make this a living document that is regularly updated to reflect changes in state and local laws, case law, training protocols and best practices as identified by progressive police agencies across the country. Either (a) task a core group of MPD personnel to assist the Chief of Police in addressing this, or (b) use a predesigned General Orders Manual template from a private vendor.
- 6.3 Accountability:** Establish organizational policies so that each employee reports and is accountable to only one supervisor at a given time. Stipulate that each level of command is accountable for the performance of subordinates under their immediate supervision, as well as the proper execution of all duties assigned.
- 6.4 Span of Control:** Define the span of control for supervisors. Limit this to the number of employees that can be effectively supervised.
- 6.5 Conflict Resolution and De-Confliction:** Undertake a careful review of policies in this critical area, particularly with reference to the issues identified in this report.
- 6.6 Foot Patrols:** Require the development of planned patrol procedures to address specific issues. Use a form comparable to the NIMS Form 204. Consult with subordinate personnel on a regular basis to capture ideas and suggestions.
- 6.7 Use of Force:** Review use of force policies. Amend these, at minimum, to address the issues discussed in the preceding pages.
- 6.8 Secondary Weapons:** Establish standards for secondary weapon qualification.
- 6.9 Vehicle Pursuits:** Revisit the policies governing this high-risk area. Avoid a blanket restriction on all pursuits in favor of critical language refinements clearly defining the circumstances that must be present prior to initiating a pursuit.
- 6.10 Secondary Employment:** Undertake a review of secondary employment policies, procedures and practices. Ensure compliance with a rewritten policy directive and maintain a robust tracking system of the number of hours individual officers work each week.
- 6.11 Report Writing:** Establish policies and procedures that ensure Metra police reports are accurate, thorough, timely and well written.



ON TECHNOLOGY

- 7.1 Real-Time Crime Statistics:** Use programs, such as Computer-Aided Dispatch (CAD) or Record Management System (RMS), to map calls for service and case data geographically over a specific timeframe to allow for correlation of trends. After identifying trends, implement strategic and tactical operations to reduce or solve criminal activity by maximizing the efficiency and effectiveness of staffing and patrols.
- 7.2 Case Management and Record Management System:** Store information gathered during the Department's investigations process in a robust Case Management System or Records Management System to allow all parties to retrieve data in real time, and increase the likelihood of successful prosecution. In addition, use a modern, mobile field-reporting system to provide MPD officers and investigators with a data-entry point in the field rather than having to recall information after the fact. Use national information exchange models to assist integrated justice efforts at the national level to thwart criminal activity, including foreign and domestic terrorism.
- 7.3 Integrated Video:** Work toward goal of establishing a video presence at all stations, and sharing camera feeds with other law enforcement agencies, as defined by operational and situational needs, as well as patrol officers through mobile devices.
- 7.4 Additional Opportunities:** Invest in a software solution, such as Microsoft Aware, to expand the operational efficiencies and effectiveness of the MPD. Ensure the Department is collecting data for the crimes that occur on Metra lines.

ON STAFFING, PERSONNEL AND OVERTIME

- 8.1 **Deployment:** Use all available sworn resources including patrol, special operations and communications in the MPD deployment scheme.
- 8.2 **Allocation of Resources:** Eliminate the minimum staffing for patrol and develop a data-driven allocation plan to optimize resources in high-demand areas. Assign most of the MPD resources to work during peak travel times and focus less attention to protecting equipment overnight.
- 8.3 **Staffing:** Increase commanders' ability to reassign officers in response to changing crime and disorder patterns.
- 8.4 **Overtime:** Undertake comprehensive review of all overtime-related policies and procedures.
- 8.5 **Use of Technology:** Make greater use of technology and non-sworn security personnel to protect equipment to allow police officers to focus on people.
- 8.6 **Data:** Re-engineer MPD information technology systems to build a data-driven approach to deployment.
- 8.7 **Risk Assessment:** Conduct a comprehensive risk assessment to identify the train trips and facilities that would benefit most from officer presence.

APPENDICES

APPENDIX A: CITATIONS ISSUED BY MPD

Charge	Count
Blocking Grade Crossing	1
Blocking Intersection	1
Child Seat	1
Crossed Center Line	1
CTSSL (Trespassing)	4
Disobeyed a Stop Sign	6
Disobeyed One Lane Road	1
Disobeyed One Way Road	1
Disobeyed Police Officer	1
Disobeyed Rail Road Crossing	2
Disobeyed Rail Road Signal	189
Disobeyed Red Light	37
Disobeyed Stop Light	2
Disobeyed Traffic Control Device	110
Disobeyed Traffic Control Light	6
Disobeyed Traffic Control Sign	3
Disobeyed Traffic Control Signal	13
Disobeyed Traffic Sign	15
Disobeyed Traffic Signal	1
Disobeyed Train Signal	8
Disorderly Conduct	1
Do Not Enter	1
Drivers ID Not on Person	3
Driving on Expired Drivers ID	4
Driving on Shoulder	1
Driving on Sidewalk	1
Driving Too Fast for Conditions	1
Driving with License Revoked	4
Driving with License Suspended	36
Driving without Headlights	1
Drop Off Only	2
Drove Off Roadway	3

Charge	Count
Drove Wrong Way on One Way Street	2
DUI	2
Expired Driving Permit	1
Expired License Plates	3
Expired Registration Plate	1
Failed to Stop at Railroad Crossing	10
Failed to Stop at Tracks	1
Failed to Yield at Intersection	1
Failure to Give Information	1
Failure to Reduce Speed	1
Failure to Reduce Speed to Avoid Accident	8
Failure to Signal	6
Failure to Use Seatbelt	16
Failure to Yield	1
Following Too Closely	6
Haz Mat Truck Failed to Stop at Railroad Crossing	1
Headlight Violation	1
Hitchhiking	2
Illegal Parking	6
Illegal Possession of Open Alcohol	1
Illegal Pushing of Vehicle Over RR Tracks	1
Illegal Right Turn	1
Illegal Stopping	2
Illegal Stopping on Right of Way	3
Illegal Stopping on Tracks	23
Improper Equipment	1
Improper Lane Usage	12
Improper Left Turn	1
Improper Operation of Commercial Vehicle	1
Improper Overtaking	6
Improper Overtaking on Right	1
Improper Parking	44

Charge	Count
Improper Passing	2
Improper Passing on the Left	1
Improper Use of Registration	2
Intoxicated on Railroad Property	1
Intoxicated Pedestrian	1
Intoxication Liquor	3
Lane Violation	1
Leaving Scene of Accident	1
License Not on Person	1
Median Violation	2
No DI Ever Issued	1
No Left Turn	89
No Parking Zone	2
No Right Turn	19
No Safety Sticker	1
No Seatbelt	6
No Stopping or Standing	1
No Valid Driver's License	42
No Valid Insurance	3
No Valid Registration	7
No Valid Safety Test	8
No Vehicle Insurance	84
No Vehicle Registration	1
Obstructing Traffic	3
Obstruction	1
Parked in Handicapped Space	1
Parking on Right of Way	1
Parking Violation	10
Parking Where Prohibited	2
Passed School Bus	1
Pedestrian Disobeyed Railroad Sign	1
Pedestrian Disobeyed Railroad Signal	82
Pedestrian Disobeyed Traffic Control Signal	2
Pedestrian Disobeyed Train Signal	23

Charge	Count
Pedestrian on Right of Way	1
Permitting Unauthorized Person to Drive	1
Reckless Driving	4
Seat Belt	1
Seat Belt Violation	3
Soliciting Rides	3
Speeding	11
Spilling Load on Roadway	1
Stop Light	1
Stopped on Crossing	1
Stopped on Right of Way	3
Stopped on Tracks	44
Suspended License Plates	1
Suspended Registration Plates	2
Texting While Driving	1
Trespassing on Right of Way	179
Trespassing on Right of Way Bridge	1
Trespassing on Tracks	1
Unauthorized Parking	7
Violated Crossing	1
Violated Median	14
Violation of DI	1
Violation of License Classification	2
Wrong Way	1
Wrong Way on a One Way Street	1

APPENDIX B: METRA ACCIDENT DATA 2012

Date	Time	Line	Summary
1/9/12	7:05 a.m.	UP-N	UPN Train 314 reported striking a pedestrian at Deer Path Road in Lake Forest. Subject was taken to local hospital where he was pronounced dead.
2/8/12	4:39 p.m.	RID	Chicago Police reported a train struck a vehicle at 112th Street and the Mainline. RI Dispatch was notified and advised it was Train 409. Officer advised the subject was transported via CFD 29 to Christ Hospital.
2/10/12	5:54 p.m.	BN	Train 1282 struck a vehicle at Stone Avenue in LaGrange.
2/25/12	9:10 p.m.	MED	Train 144 reported striking a pedestrian at the Ivanhoe station. Subject transported by Buds Ambulance to Christ Hospital for treatment.
2/28/12	8:01 a.m.	UP-N	Lake Forest Police reported a body on the tracks at Westminster Road.
3/2/12	12:46 a.m.	SWS	Train 841 reported a motorcycle hit the train at Wolf Road in Orland Park with fatality to cyclist.
3/3/12	6:56 p.m.	RID	Train 226 struck and killed a pedestrian at 163rd Street in Oak Forest. Delays reported, notifications sent.
3/7/12	6:56 a.m.	RID	Dead Head Train 6121 struck and killed a pedestrian at 95th Street and Mainline crossing.
3/16/12	5:39 p.m.	UP-NW	GPS reported Train 631 struck a pedestrian near the Arlington Heights Station.
3/25/12	7:54 a.m.	UP-N	UP-N Train 804 struck a pedestrian near Longwood and Beverly in Lake Forest.
3/29/12	7:50 p.m.	NCS	NCS Train 120 struck a passenger at the Morton Grove Station. Fatality.
3/30/12	7:57 p.m.	CUS	NCS Train 120 struck a pedestrian at the Morton Grove Station.
4/1/12	11:30 a.m.	MED	Train 8309 struck a vehicle at 83rd Street on the South Chicago branch. No fatalities.
4/2/12	1:36 p.m.	UP-W	UP Train 33 reported striking a female pedestrian at Park Blvd. in Glen Ellyn.
4/13/12	5:50 p.m.	UP-W	GPS reported Train 49 struck a pedestrian at Westmore Road in Villa Park.
5/22/12	7:36 a.m.	CUS	Train 2101 reported they struck a vehicle at Half Day Road in Bannockburn. Officer advised one occupant of the vehicle was injured and transported to a local hospital. Train delays reported and notifications were made.
5/27/12	9:31 a.m.	UP-W	UP-W Train 504 struck pedestrian on Right of Way east of Grace Street in Lombard.
5/29/12	8:46 a.m.	UP-N	GPS reported Train 335 struck a pedestrian at the Ravenswood Station.
6/17/12	1:12 p.m.	UP-NW	UP-NW Train 710 reported striking a pedestrian at US-14 and Cuba Road in Barrington.

Date	Time	Line	Summary
6/25/12	6:57 a.m.	CUS	Train 2208 struck a bicyclist with headphones on at the Hanover Park Station pedestrian crossing.
7/12/12	7:00 a.m.	RID	Train 604 reported a vehicle struck the train at 89th and Laflin streets. Officer advised the driver of the vehicle was injured and transported to Christ Hospital by CFD Ambulance 30, no other injuries reported. Driver of the vehicle was issued numerous citations.
7/17/12	6:03 p.m.	CUS	Pedestrian walked across the Right of Way after work and did not see Train 414 and was struck.
7/30/12	9:18 p.m.	CUS	Two intoxicated pedestrians were walking across the tracks near milepost 37.5. One pedestrian did not move out of the way when the engineer sounded the horn and was struck by Train 2254.
9/8/12	9:57 p.m.	CUS	Tower B17 reported that Train 2721 struck a vehicle at Elgin Avenue. and Raymond Street in Elgin. Elgin Police and Fire were notified. Two adults and one child were injured and transported to St. Joseph Hospital and one 2-year-old with head injuries was airlifted to Lutheran Hospital. No fatality was reported.
9/27/12	12:07 p.m.	CUS	Train 2234 struck a pedestrian who stood on the tracks at Church Road in Bensenville.
10/2/12	5:54 p.m.	MED	Pedestrian was walking next to the tracks near 53rd Street in Chicago. Engineer sounded the horn but subject did not move out of the way and was struck.
10/8/12	4:55 p.m.	RID	Train 422 struck a vehicle at Crawford Avenue in Midlothian. Driver transported to the hospital in critical condition.
10/16/12	8:15 a.m.	RID	Train 302 struck a vehicle at 115th Street and the Mainline in Chicago. RI Dispatch was notified along with Chicago Fire. Officer advised there were one fatality and two injuries.
10/20/12	3:07 p.m.	UP-NW	Pedestrian stood by the crossing at Sand Street in Crystal Lake and stepped in front of Train 709.
10/31/12	9:43 p.m.	CUS	Pedestrian was lying across the tracks just east of the Libertyville Station and was struck by Train 2153.
11/3/12	6:50 p.m.	UP-NW	Pedestrian jumped in front of Train 721 near US-14 and Three Oaks Road in Cary.
11/19/12	5:22 p.m.	RID	Train 413 reported striking a vehicle at 115th Street and the Mainline in Chicago. RI Dispatch was notified. Chicago Fire transported the subject to Metro South Hospital.
11/23/12	6:20 p.m.	UP-NW	Pedestrian stood at the southeast side of Irving Park Depot and as Train 621 (express to Arlington) came through. Subject ran out onto track #2 and stood to face the train.

APPENDIX C: AT-A-GLANCE METRICS AND BENCHMARKS FOR COMPARABLE ORGANIZATIONS

In an assessment of a law enforcement agency, it is often useful to compare the agency with others that are similar in composition. In this case, it is somewhat difficult because even when transit police organizations may appear similar, there are, in fact, significant differences with respect to the mode of transit protected, the degree of shared jurisdictions and the agency's focus. Nevertheless, we have identified four transit law enforcement agencies that are comparable, at some level, to the Metra Police Department. They include: Southern California Regional Rail Authority; Minnesota Metro Transit; New York Metropolitan Transportation Authority; and San Francisco Bay Area Rapid Transit.



Southern California Regional Rail Authority (Metrolink)

Agency Description: Metrolink provides passenger rail service in the Los Angeles metropolitan area. It is governed by the Southern California Regional Rail Authority (SCRRA), a joint-powers authority that was formed in 1991 and comprises five county agencies tasked with reducing highway congestion and improving mobility throughout Southern California: Los Angeles County Metropolitan Transportation Authority (Metro), Orange County Transportation Authority, Riverside County Transportation Commission, San Bernardino Associated Governments and Ventura County Transportation Commission. SCRRA created the Metrolink system in October 1992.

Size of Transit Agency: Metrolink has grown tremendously during its 20 years in service, expanding from three service lines, 11 stations and 2,300 daily boardings to seven service lines, 55 stations and 44,000 daily boardings, all over a 512 route-mile network.⁴

Structure of Policing Function: The Los Angeles County Sheriff's Department serves as the police agency for the Southern California Regional Rail Authority. This is done under contract.

Geographical Scope: The Metrolink policing responsibility extends west to the City of Oxnard (Ventura County), east to the cities of San Bernardino (San Bernardino County) and Riverside (Riverside County), north to the City of Lancaster (Los Angeles County), and south to the cities of San Clemente (Orange County) and Oceanside (San Diego County).

Jurisdiction: The Los Angeles County Sheriff's Department Metrolink Bureau's (the Bureau) jurisdiction includes all on-board incidents within the six counties Metrolink traverses: Los Angeles, Ventura, San Bernardino, Riverside, Orange, and San Diego Counties. By California state law, deputies have police authority throughout California, and thus can take action in any county.

Number of Police Personnel: There are currently 35 deputies assigned to the Metrolink system. This does not include supervisors and support staff, the cost for whom is included in the contract.

Responsibilities and Hours of Operation: The Bureau's deputies ride the trains to conduct fare enforcement and general law enforcement duties. They also conduct right-of-way enforcement details and grade-crossing details as needed. Police hours of operations mirror the Metrolink operations schedule, but vary as needed.

Incident Types: The Bureau investigates two different kinds of crimes on the Metrolink system. Part I crimes include homicide, rape, robbery, grand theft auto and arson. Part II crimes include forgery, fraud, non-aggravated assault, gambling and liquor/tobacco/narcotic possession.

4 http://www.lasdhq.org/lasd_services/contract_law/transit_srv1.html



Minnesota Metro Transit Police Department

Agency Description: In 1993, the Minnesota legislature created the Metro Transit Police Department.

Size of Transit Agency: The Metro Transit system consists of 885 buses covering 123 lines. The system also has one commuter rail, one light rail with 28 light rail coaches, six locomotives and 18 rail coaches.

Geographical Scope: The agency serves eight counties and 85 cities in the region.

Structure of Policing Function: MTPD is a specialty department and was created to supplement but not replace the primary police authorities in the local jurisdictions.

Number of Police Personnel: The MTPD includes approximately 68 full-time officers, 45 part-time officers (primarily off-duty officers from the Minneapolis and St. Paul police departments), four community service officers and five administrative staff.⁵

Responsibilities and Hours of Operation: Transit Police officers ride buses and trains as well as patrol along bus routes, METRO Blue Line (light rail) and the Northstar (railroad) Line. Transit Police officers also inspect fares on Blue Line and Northstar trains. The four community service officers - who are studying law enforcement but are not yet sworn officers - assist with tasks such as traffic and crowd control.

Incident Types: The vast majority are "quality of life" crimes, such as public intoxication, fights, drug use, loitering, drinking on transit property and fare evasion, although there have been some increases in assaults on operators, thefts and robberies (especially of electronic devices) over the past few years.⁶

⁵ <http://www.metrotransit.org/transit-police>

⁶ <http://www.metrotransit.org/Data/Sites/1/media/police/police-mag-1-2-1.pdf>

New York Metropolitan Transportation Authority

Agency Description: The Metropolitan Transportation Authority Police Department is the police agency of New York's Metropolitan Transportation Authority. Officers of the MTAPD are fully empowered under the New York State Public Authorities Law and are commissioned in the State of Connecticut. The department was formed in 1998 with the consolidation of the Long Island Rail Road and the Metro-North Railroad police departments. Since the September 11, 2001 terrorist attacks, the department has expanded in size and has dramatically ramped up its counter-terrorism capabilities, adding canine teams and emergency services officers.



Size of Transit Agency: The MTA consists of 345 rail, subway and bus lines/routes. The 17 rail and 24 subway lines consist of 736 stations covering more than 2,000 miles of track and containing an estimated 9,000 cars. More than 5,700 buses travel an estimated 3,000 miles on 217 lines. Approximately 65,000 employees work for the agency.

Geographical Scope: Its jurisdiction extends across fourteen counties in two states, covers approximately 5,000 square miles, including New York City, Long Island, southeastern New York State and southern Connecticut, and serves a population of 14.4 million people.⁷

Structure of Policing Function: The role and makeup of the MTAPD has changed in recent years, in particular immediately after Sept. 11. "The counter-terrorism role increased dramatically – the department expanded, adding 200 positions," according to MTA spokesman Aaron Donovan. "Canine and Emergency Services Units were added as well as an intelligence unit. And we dramatically increased police patrols and inspections. The Emergency Services Unit, a tactical squad comparable to a SWAT team, is made up of specially trained officers skilled in such areas as heavy weapons, dealing with hazardous materials and train and vehicular extractions. Members of the unit are EMT-qualified. The canine unit includes 50 dogs trained in detecting explosives. Dogs are partnered with designated police officers and are deployed throughout the entire MTAPD jurisdiction. In addition to detecting dangerous items, dogs are used to track individuals and to clear unattended belongings left on MTA properties.

Number of Police Personnel: The workforce of the department totals 716, including civilians.

Responsibilities and Hours of Operation: 24-hour-a-day bus and subway service in the five boroughs.

Incident Types: As in any police department, MTAPD officers investigate a variety of reported incidents. According to MTA spokesman Aaron Donovan, "The number one request for assistance at the stations is a person in need of help, including injured or sick passengers." Trespass on MTA property is also a very common situation officers handle. Other routine tasks include lost or stolen property reports, parking violations in MTA lots and assisting during disruptions of train service.

7 <http://web.mta.info/mta/police/>

San Francisco Bay Area Rapid Transit District

Agency Description: Bay Area Rapid Transit (BART) is an interlocking rapid public transit and subway transit system serving the San Francisco Bay area, connecting the San Francisco Peninsula with Oakland, Berkeley, Fremont, Walnut Creek, Dublin/Pleasanton and other cities in the East Bay. BART is operated by the San Francisco Bay Area Rapid Transit District and was formed in 1957.

Size of Transit Agency: During its 40-year service history, BART has expanded to become the fifth-busiest rapid transit rail system in the United States, comprised of an estimated 700 cars on five routes covering 104 miles and serving 44 stations.

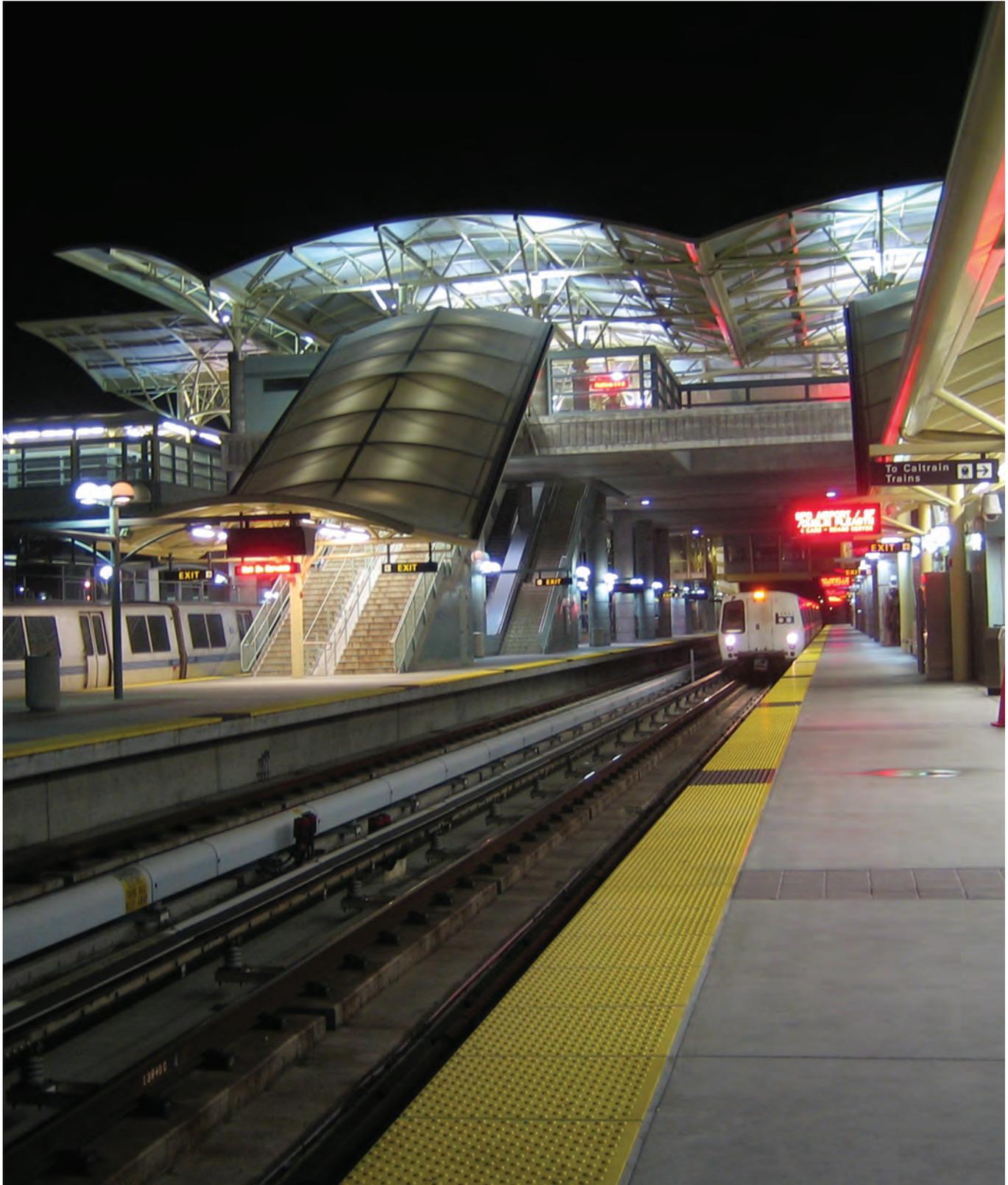
Geographical Scope: BART serves the San Francisco, Alameda and Contra Costa counties.

Structure of Policing Function: The Chief of Police serves as the Chief Executive Officer of the BART Police Department. Additional staff members include deputy chiefs and lieutenants. The three deputy chiefs oversee three divisions under the Police Chief: Support, Operations and Professional Standards and Training. Additional positions include peace officers, community service officers, dispatchers, revenue protection guards and administrative staff.

Number of Police Personnel: An estimated 300 police personnel, with 200 sworn officers.

Responsibilities and Hours of Operation: The BART Police Department mission is “to ensure a safe environment within our transit system, reduce crime through a highly visible police presence and proactive enforcement of the law, and to promote public confidence by working in partnership with our stakeholders and the communities we serve.” The hours of operation for BART services begin at 4:00 a.m. on weekdays, 6:00 a.m. on Saturdays and 8:00 a.m. on Sundays. Service ends daily around midnight, coinciding with the last train at the station.

Incident Types: The BART Police Department investigates all reported crimes that occur on BART property, including transit-related crimes, auto theft, robbery, assaults and homicide.





APPENDIX D: ABOUT HILLARD HEINTZE

Hillard Heintze is one of the leading corporate investigation and security risk management firms in the United States. We help organizations and senior leaders protect their people, property, performance and reputations. We do this by delivering strategic investigations, security and law enforcement advisory services in the U.S. and worldwide that provide insight, deliver assurance and instill confidence.

- **Mission and Culture:** To protect what matters most, we believe that immediate access to trusted counsel, critical insights and the full scope of information vital to strategic decision making is absolutely essential. And we view our role as a trusted advisor as a noble and honorable pursuit. This is our purpose. It's who we are. It's why our clients trust us.
- **National Awards and Accolades:** For three years in a row, Hillard Heintze has been recognized by Inc. Magazine as one of America's fastest-growing private companies - and ranked on the annual Inc. 500/5000 list as No. 242 in 2009, No. 583 in 2010 and No. 764 in 2011. The company has also been acknowledged by the Initiative for a Competitive Inner City (ICIC) as #6 on its 2011 list of the 100 fastest-growing inner city firms in the United States.
- **U.S. and International Geographic Footprint:** Headquartered in Chicago, Hillard Heintze also has operations in Washington D.C., Raleigh, Boston, Miami, San Jose and Virginia Beach, as well as operating capabilities across North and South America, Europe, the Middle East, Africa, Russia and Asia.





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