# SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY:

The Parking Enforcement Section Should More Effectively Manage Its Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

July 17, 2012

OFFICE OF THE CONTROLLER
CITY SERVICES AUDITOR

The City Services Auditor (CSA) was created in the Office of the Controller through an amendment to the Charter of the City and County of San Francisco (City) that was approved by voters in November 2003. Under charter Appendix F, CSA has broad authority to:

- Report on the level and effectiveness of San Francisco's public services and benchmark the City to other public agencies and jurisdictions.
- Conduct financial and performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of processes and services.
- Operate a whistleblower hotline and website and investigate reports of waste, fraud, and abuse of city resources.
- Ensure the financial integrity and improve the overall performance and efficiency of city government.

CSA may conduct financial audits, attestation engagements, and performance audits. Financial audits address the financial integrity of both city departments and contractors and provide reasonable assurance about whether financial statements are presented fairly in all material aspects in conformity with generally accepted accounting principles. Attestation engagements examine, review or perform procedures on a broad range of subjects such as internal controls; compliance with requirements of specified laws, regulations, rules, contracts or grants; and the reliability of performance measures. Performance audits focus primarily on assessment of city services and processes, providing recommendations to improve department operations.

CSA conducts its audits in accordance with the Government Auditing Standards published by the U.S. Government Accountability Office (GAO). These standards require:

- Independence of audit staff and the audit organization.
- Objectivity of the auditors performing the work.
- Competent staff, including continuing professional education.
- Quality control procedures to provide reasonable assurance of compliance with the auditing standards.

For questions regarding the report, please contact Director of City Audits Tonia Lediju at Tonia.Lediju@sfgov.org or 415-554-5393, or CSA at 415-554-7469.

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City and County of San Francisco
Office of the Controller – City Services Auditor

San Francisco Municipal Transportation Agency: **July 17, 2012**
The Parking Enforcement Section Should More Effectively Manage Its Resources,
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Purpose of the Audit

The audit evaluated the performance of the Parking Enforcement Section (Parking Enforcement) of the San Francisco Municipal Transportation Agency (SFMTA). The audit set out to assess whether Parking Enforcement has enough staff and at the right levels, seeks reimbursement for providing traffic control services when possible, adequately trains its staff, effectively and efficiently deploys its staff, has adequate internal controls to prevent unauthorized changes to citations, effectively manages its vehicles, and has appropriately delegated parking enforcement duties to the San Francisco Police Department. This is the second in a series of annual audits, each which will address one SFMTA division or major function.

Highlights

Parking Enforcement:

- Should be enabled to be reimbursed for providing traffic control services in more instances, including all street fairs for which its parking control officers (PCOs) direct traffic. For each hour of traffic control service provided by a PCO on overtime that it is reimbursable but not recovered, SFMTA loses $65, potentially totaling tens of thousands of dollars lost per year.

- Has 261 PCOs, but too few are available to consistently cover all shifts on all beats because about 40 PCOs are on long-term leave or are assigned to non-enforcement duties outside their job description. SFMTA cannot know if Parking Enforcement is adequately staffed until it makes all reasonable efforts to reduce absenteeism, assigns all PCOs to PCO duties, and establishes workload and productivity standards for PCOs.

- Bases scheduling and deployment of staff to beats and shifts (and the beats themselves) on past practice instead of analyses of available data and factors that indicate changes in parking behavior, such as data from SF*park*.

- Has its three assistant directors and 23 senior PCOs supervising too many employees each. The staff-to-supervisor ratios of 8-to-1 and 12-to-1, respectively, exceed the recommended span of control and may reduce management's effectiveness.

- Should make PCOs available for other enforcement duties by expanding its use of vehicle-mounted camera and video technology.

- Offers robust initial training to PCOs, but does not provide ongoing training. Nearly three-quarters of surveyed PCOs indicated that they would benefit from more training on parking violation codes and would like more refresher training.

- Has plenty of vehicles in its fleet, but sometimes has just enough vehicles to meet its daily needs because a quarter of the fleet is out for repair for an average of 45 days. Of 261 three-wheeled Go-4 vehicles,

Recommendations

The report's 39 recommendations include that SFMTA should:

- Seek full reimbursement for all events that require traffic control by PCOs whenever not prohibited by law or city agreements.

- Make greater efforts to control the duration of long-term leave, and ensure that parking enforcement beats and shifts are optimal.

- Conduct a staffing analysis to determine what would constitute an adequate number of PCOs.

- Seek to hire an additional assistant director.

- Offer ongoing in-service training to PCOs, consistent with their labor agreement.

- Require senior PCOs to periodically spot check the work of PCOs.

- Work with the Central Shops Department to determine how vehicles can be repaired more promptly.

- Develop a vehicle

most are beyond the recommended life span of six years, and one-fifth have more than the recommended maximum of 60,000 miles.

- Does not have a vehicle replacement plan. Parking Enforcement needs to better plan and schedule the disposal and acquisition of vehicles.

- Needs better controls to prevent and detect improper canceling and voiding of citations. No controls exist over canceled citations, which is a problem because 10 percent of surveyed PCOs indicate that they have deliberately and inappropriately canceled or voided citations, while 28 percent reported that they are aware of this occurring.

- Does not log or manage the complaints it receives to ensure that they are efficiently and effectively resolved.

replacement plan.

- Establish polices on, track, and control canceled parking citations. Offer training on canceling and voiding citations.

- Require management of its Customer Service Center to review adjustments to citations fines.

CITY AND COUNTY OF SAN FRANCISCO

OFFICE OF THE CONTROLLER

Ben Rosenfield
Controller

Monique Zmuda
Deputy Controller

July 17, 2012

Board of Directors
San Francisco Municipal Transportation Agency
1 South Van Ness Avenue, 7th Floor
San Francisco, CA 94103

Mr. Edward D. Reiskin
Director of Transportation
San Francisco Municipal Transportation Agency
1 South Van Ness Avenue, 7th Floor
San Francisco, CA 94103

Dear Board Chairman Nolan, Board Members, and Mr. Reiskin:

The Office of the Controller, City Services Auditor Division (CSA), presents its audit report of the Parking Enforcement Section (Parking Enforcement) of the San Francisco Municipal Transportation Agency (SFMTA). The audit objectives were to assess whether: Parking Enforcement has enough staff at the right levels, Parking Control Officers (PCOs) are adequately trained to do their jobs, Parking Enforcement effectively and efficiently deploys available staff, the costs of traffic control assignments are reimbursed, Parking Enforcement has adequate internal controls to prevent unauthorized changes to citations, Parking Enforcement's vehicle fleet is effectively managed, and parking enforcement duties performed by the San Francisco Police Department under an agreement with SFMTA are reasonable.

The audit concluded that Parking Enforcement:

- Should be enabled to be reimbursed for providing traffic control services in more instances.
- Should analyze its staffing to determine adequate levels, seek to reduce absenteeism, assign all PCOs to PCO duties, and establish workload and productivity standards for PCOs.
- Should make better use of available data to define beats and to schedule and deploy its staff.
- Has managers and supervisors that oversee too many staff, possibly reducing management's effectiveness.
- Should consider expanding use of vehicle-mounted cameras to free up PCOs for other enforcement duties.
- Does not provide ongoing training for PCOs.
- Inadequately plans for replacing its vehicles.
- Needs controls to prevent and detect improper cancellation or voiding of citations.
- Lacks a system to log, manage, and track all complaints from the public.

The audit report includes 39 recommendations for SFMTA to consider. SFMTA's response to the audit is attached as an appendix.

CSA appreciates the assistance and cooperation that SFMTA and the General Services Agency's Central Shops Department staff provided to us during the audit. For questions regarding the report, please contact me at Tonia.Lediju@sfgov.org or 415-554-5393, or CSA at 415-554-7469.

Respectfully,
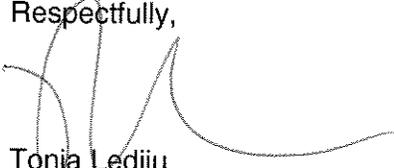
Tonia Lediju
Director of City Audits

cc: Mayor
      Board of Supervisors
      Civil Grand Jury
      Budget Analyst
      Public Library

TABLE OF CONTENTS

GLOSSARY OF TERMS

311	311 Customer Service Center
AD	Assistant director; supervises senior parking control officers
beat	Geographically defined parking enforcement area
board	Board of Directors of San Francisco Municipal Transportation Agency
boot/scofflaw	Parking Enforcement detail that locates vehicles with five or more outstanding parking violations, cites the vehicles, and immobilizes them with a boot device
City	City and County of San Francisco
CSA	City Services Auditor Division of the Office of the Controller
Central Shops	Central Shops Department, part of General Services Agency
detail	Type of enforcement to which parking control officers are assigned such as general enforcement, disabled placard, residential parking, boot/scofflaw, street sweeping, and tow
eTIMS	Electronic Ticket Information Management System
FTE	Full-time equivalent
fixed post	Parking control officers assigned to traffic control duty at specific locations
GPS	Global Positioning System
GSA	General Services Agency
general enforcement	Beats that cover metered parking and other common parking limitations such as painted curbs; excludes targeted enforcement of disability placards, scofflaw or time limits in residential permit areas.
Go-4	A three-wheeled, gasoline powered vehicle used by parking control officers
LPR	License plate recognition; system using cameras to photograph license plates of illegally parked vehicles
PCO	Parking control officer
Parking Enforcement	Parking Enforcement Section of San Francisco Municipal Transportation Agency
MOU	Memorandum of understanding
Police Department	San Francisco Police Department
RPP	Residential parking permit area

SFMTA	San Francisco Municipal Transportation Agency
SF*park*	San Francisco's smart parking meter program
Senior PCO	Senior parking control officer (direct supervisor of PCOs)
Sustainable Streets	Sustainable Streets Division of San Francisco Municipal Transportation Agency
TOLE	Transit-only lane enforcement

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

INTRODUCTION

Audit Authority

This audit was conducted under the authority of the Charter of the City and County of San Francisco (City), Section 3.105 and Appendix F, which requires that the City Services Auditor (CSA) of the Office of the Controller conduct periodic, comprehensive financial and performance audits of City departments, services, and activities.

This is CSA's second annual performance audit of a unit of the San Francisco Municipal Transportation Agency (SFMTA). This audit evaluates the operations of SFMTA's Parking Enforcement Section (Parking Enforcement). This work will inform SFMTA's leadership as it addresses ongoing fiscal concerns.

Background

In November 1999 the voters amended the City Charter by passing Proposition E, which called for the creation of SFMTA through the consolidation of the San Francisco Municipal Railway and the Department of Parking and Traffic. The new agency began on July 1, 2002. In November 2007 voters approved Proposition A, which granted SFMTA regulatory authority over the taxi industry, effective March 1, 2009.

The SFMTA is responsible for operating and maintaining the City's network of surface transportation that includes pedestrians, bicycles, transit, traffic and parking. SFMTA also regulates the taxi industry in San Francisco.

Governance of SFMTA

SFMTA is governed by a seven-member board of directors (board) appointed by the mayor and confirmed by the Board of Supervisors. The board sets policy for the SFMTA, approves its budget and appoints the SFMTA executive director (Director) who serves as the chief executive responsible for day-to-day operations of the agency.

Parking Enforcement's organizational placement within SFMTA

Parking Enforcement was part of the Safety, Training, Security and Enforcement Division during the audit's fieldwork phase but was later dissolved. The fiscal year 2010-11 and 2011-12 budgets for that division were $55.7 million and $55.9 million, respectively. Exhibit 1 shows the total budgeted amounts for SFMTA and the amounts

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

allocated for its various programs, including the former
Safety, Training, Security and Enforcement Division.

EXHIBIT 1	San Francisco Municipal Transportation Agency Budget by Program Fiscal Years 2010-11 and 2011-12		
Program	2010-11 Original Budget	2011-12 Adopted Budget	Difference
Accessible Services	$21,527,155	$21,549,070	$21,915
Administration	55,580,032	58,987,665	3,407,633
Agency wide Expenses	122,132,166	126,785,319	4,653,153
Development and Planning	598,207	604,441	6,234
Parking and Traffic	72,590,712	73,186,298	595,586
Parking Garages and Lots	21,861,955	22,201,245	339,290
Rail and Bus Services	422,195,697	418,967,316	(3,228,381)
Safety, Training, Security and Enforcement	55,651,824	55,876,450	224,626
Taxi Services	2,876,443	2,409,307	(467,136)
Total	$775,014,191	$780,567,111	$5,552,920

Source: City's fiscal year 2010-11 and 2011-12 Adopted Budget and Annual Appropriation Ordinance

The Sustainable Streets Division now houses Parking Enforcement.

In March 2012 SFMTA eliminated the Safety, Training, Security and Enforcement Division, splitting its responsibilities between two of the agency's remaining five divisions. The five divisions are:

- Administration
- Capital Programs and Construction
- Finance and Information Technology
- Sustainable Streets
- Transit

Parking Enforcement is now part of the Sustainable Streets Division (Sustainable Streets).

Sustainable Streets is responsible for providing multimodal transportation planning, engineering and operational improvements to the City's surface transportation network. In addition, Sustainable Streets is responsible for off-street parking including the management of 19 parking garages and 21 surface parking lots accounting for 15,000 parking spaces and 24,000 on-street parking meters. Further, Sustainable Streets' activities support sustainable community and economic development within the context of

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

SFMTA's Transit First Policy. The Transit First Policy (Sec. 8A.115 of the city Charter) calls for all city departments to emphasize public transportation and other alternatives to the private automobile.

Parking Enforcement's purpose and structure

Parking Enforcement's mission is to ease traffic congestion and promote parking turnover by enforcing parking laws and directing traffic. Enforcement efforts are governed by the California Vehicle Code and the San Francisco Transportation Code, and are carried out by Parking Control Officers (PCOs) who are deployed throughout San Francisco to enforce the law by issuing parking citations, arranging for removal of unlawfully parked vehicles, directing vehicular and pedestrian traffic, immobilizing (booting) vehicles, and to provide information to the public. Senior Parking Control Officers (Senior PCOs), who are responsible for supervising and training PCOs, also engage in parking enforcement activities and are responsible for investigating complaints, inspecting equipment, deciding about deployment of PCOs in emergencies, and conducting PCO injury and accident investigations. Exhibit 2 shows Parking Enforcement's location within Sustainable Streets' Security, Investigations and Enforcement Subdivision, with the numbers of budgeted positions by classification.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 2   Organizational Placement of the Parking Enforcement Section
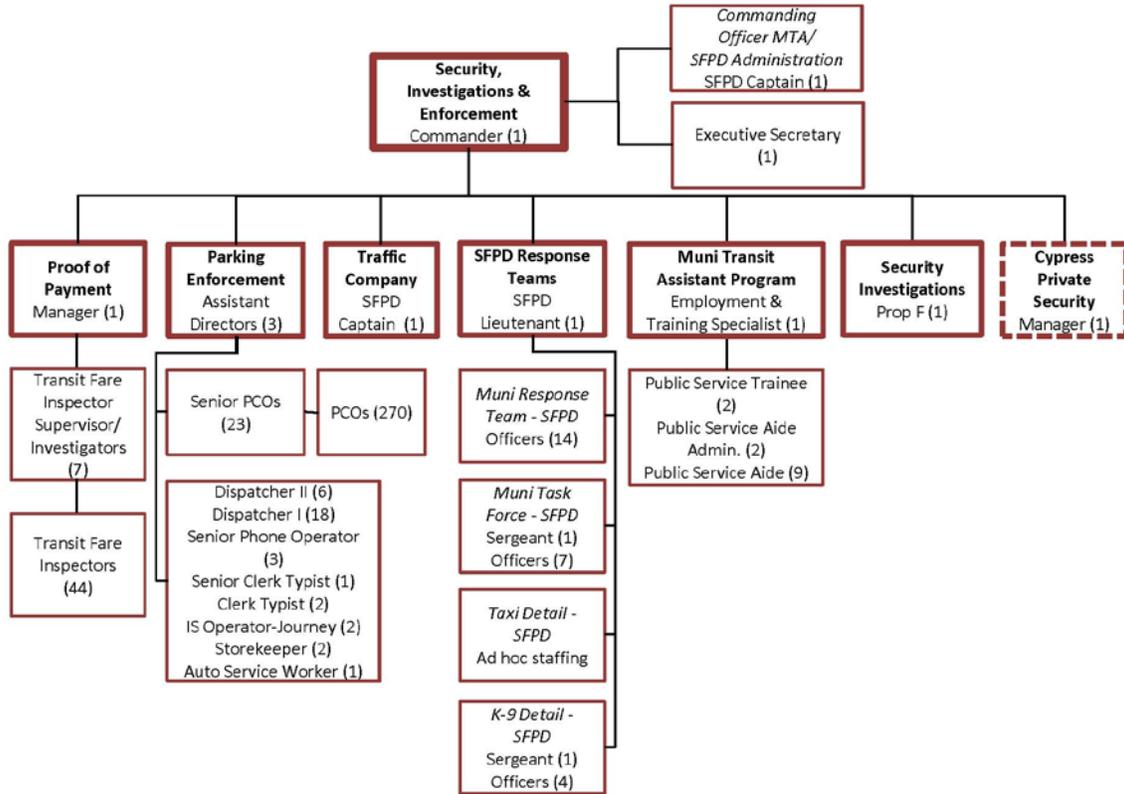
Source: SFMTA

*Ten percent fewer PCOs
are on the job in 2012 than
were in 2005.*

The number of budgeted full-time equivalent (FTE) PCO (class 8214) positions in Parking Enforcement decreased from 324 in fiscal year 2004-05 to 311 in fiscal year 2007-08, and then increased to 327 in fiscal year 2009-10 and has remained at that level through fiscal year 2011-12. In contrast to the net gain of three *budgeted* FTE PCO positions over those years, during the same period the number of *filled* PCO positions declined from 289 to 266 and, as of March 2012, there were just 261 filled PCO positions, for a net loss of 28 FTE (10 percent) since fiscal year 2004-05. Exhibit 3 compares the number of filled (actual) and budgeted positions during fiscal years 2004-05 through 2010-11.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 3	Actual and Budgeted Parking Control Officer Positions Fiscal Years 2004-05 Through 2010-11
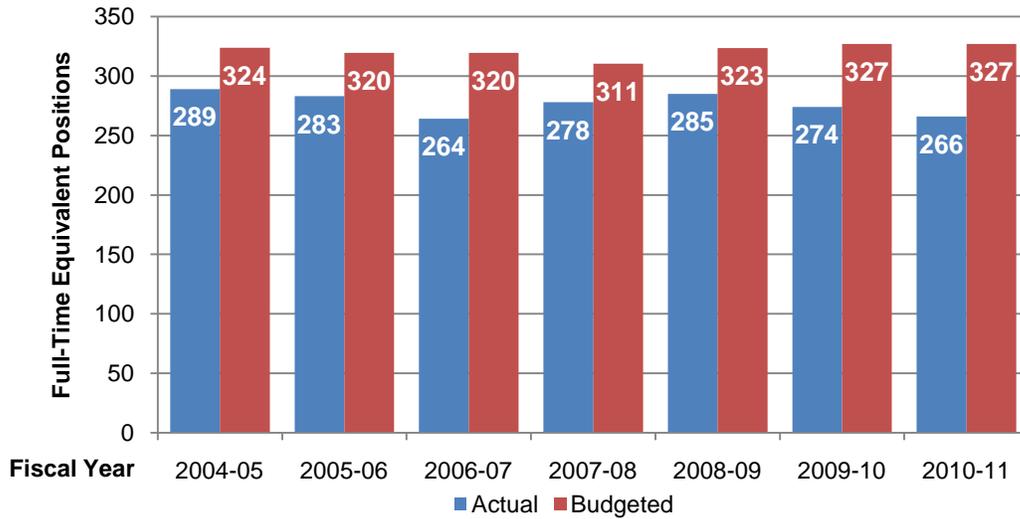
Source: CSA analysis of SFMTA data.

Parking Enforcement generates three times as much revenue as it costs to operate.

Parking enforcement is a significant source of revenue for SFMTA as citation revenue accounts for almost three times the program's operating expenditures. Exhibit 4 compares Parking Enforcement's operating expenditures and citation revenues for fiscal years 2008-09 through 2010-11.

EXHIBIT 4	Parking Enforcement Operating Expenditures and Revenues Fiscal Years 2008-09 Through 2010-11
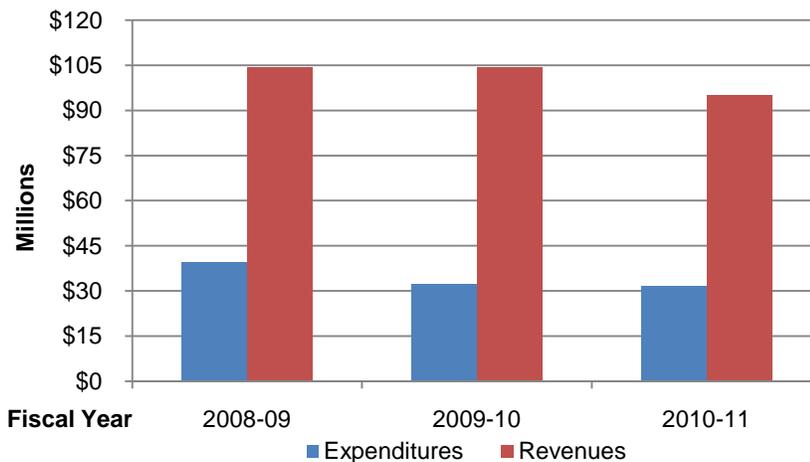
Note: Excludes citation revenue that reverts to the State of California or other entities.

Source: CSA analysis of SFMTA data

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Parking citations and citation revenue are down sharply since 2009.

From fiscal year 2004-05 to 2008-09, the number of citations issued decreased 13 percent but revenue from parking fines and fees increased 21 percent. However, while the number of citations issued declined 17 percent in the two years from fiscal year 2008-09 to 2010-11, revenues from fines and fees declined 9 percent. SFMTA attributes the decrease in citations to various factors such as increased compliance by parkers due to fine increases over the years, as well as a weak economy since 2008. Exhibit 5 compares the number of citations issued and amount of citation revenue generated during fiscal years 2004-05 through 2010-11.

EXHIBIT 5	Parking Citations Issued and Citation Revenue Collected Fiscal Years 2004-05 Through 2010-11
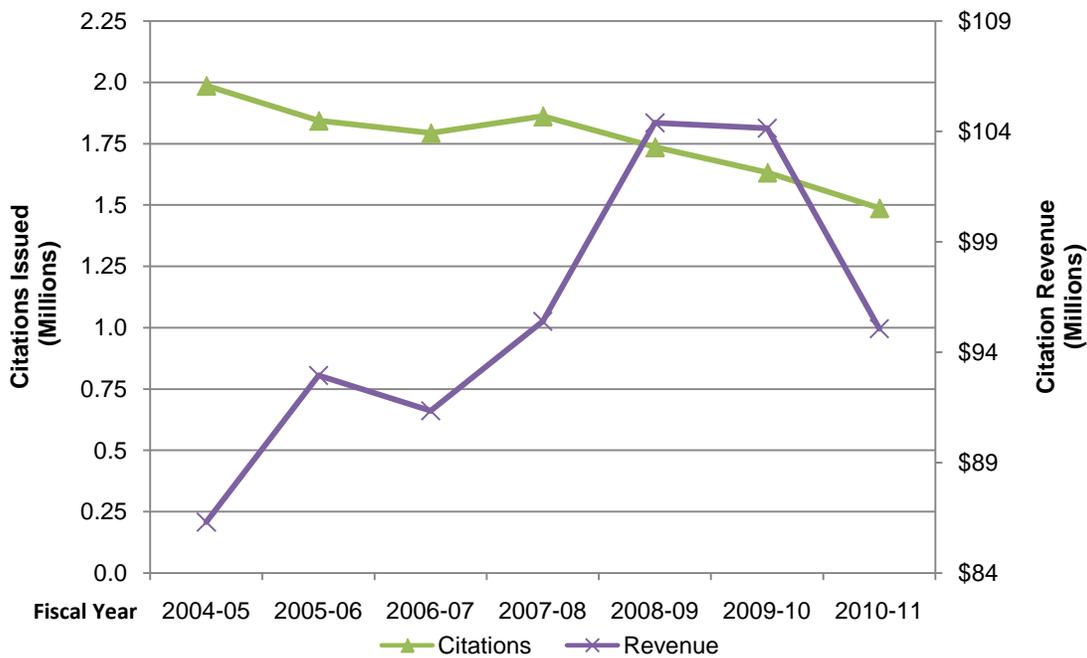
Source: CSA analysis of SFMTA data

Almost all citations are issued by parking control officers.

PCOs issue the vast majority of the City's parking citations, and do so primarily by using electronic handheld devices that record all relevant citation information and that allow the issuing officer to print citations in the field.[1] PCOs can

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[1] Certain other city employees, including police officers, can issue parking citations. Some citations, most often those not issued by PCOs, are handwritten.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

also handwrite citations if necessary. Of the 2,321,029 citations issued during the 18-month audit period, PCOs issued 2,200,520 (95 percent).

How citation data gets into the system, eTIMS.

PCOs turn in their handheld devices at the end of each shift, and citation data is uploaded to an SFMTA internal system. The citation data is uploaded nightly to SFMTA's Electronic Ticket Information Management System (eTIMS). At the same time, handwritten citations are batched and picked up by a contractor for input of data into eTIMS. SFMTA uses eTIMS to accept payments for citations, issue notices to violators, assess penalties for late payments, and, if applicable, dismiss citations.

The citation protest and payment process

Violators can either pay the fine or protest a citation. When a citation is protested, it can go through up to three levels of review:

- 1st level: Written protest
- 2nd level: Administrative hearing
- 3rd level: Appeal to Superior Court

Written protest: SFMTA's administrative review unit, which is part of the customer service group under the Finance and Information Technology Division, analyzes and responds to written protests. This group reviews each protest to determine whether the related citation is dismissible based on criteria in its policy and procedures. If the citation is determined to be dismissible at this point, a review group employee dismisses it in eTIMS. The protestor is notified by letter if the citation is dismissed or upheld. If the citation is upheld, the protestor can then either pay the fine or escalate the protest to an administrative hearing.

Administrative hearing: At a hearing, the protestor must provide evidence to a hearing officer, who is an SFMTA employee but acts as a neutral party, that the citation is invalid and should be dismissed. A hearing officer can delay, deny or dismiss a citation. A delay occurs if facts related to a citation must be investigated. A citation is dismissed or protest denied when the investigation is completed. As with a written protest, if the citation is dismissed at this point, this is done in eTIMS and the protestor is notified by letter.

Court hearing: If the protest is denied by the administrative

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

hearing officer, the protestor can either pay the fine or escalate the protest to a Superior Court hearing. Once an appeal is made to the Superior Court, the citation is no longer under SFMTA's control.

Exhibit 6 depicts the progress of a citation from issuance to payment or dismissal.

EXHIBIT 6	The Parking Citation Process from Issuance to Payment or Dismissal
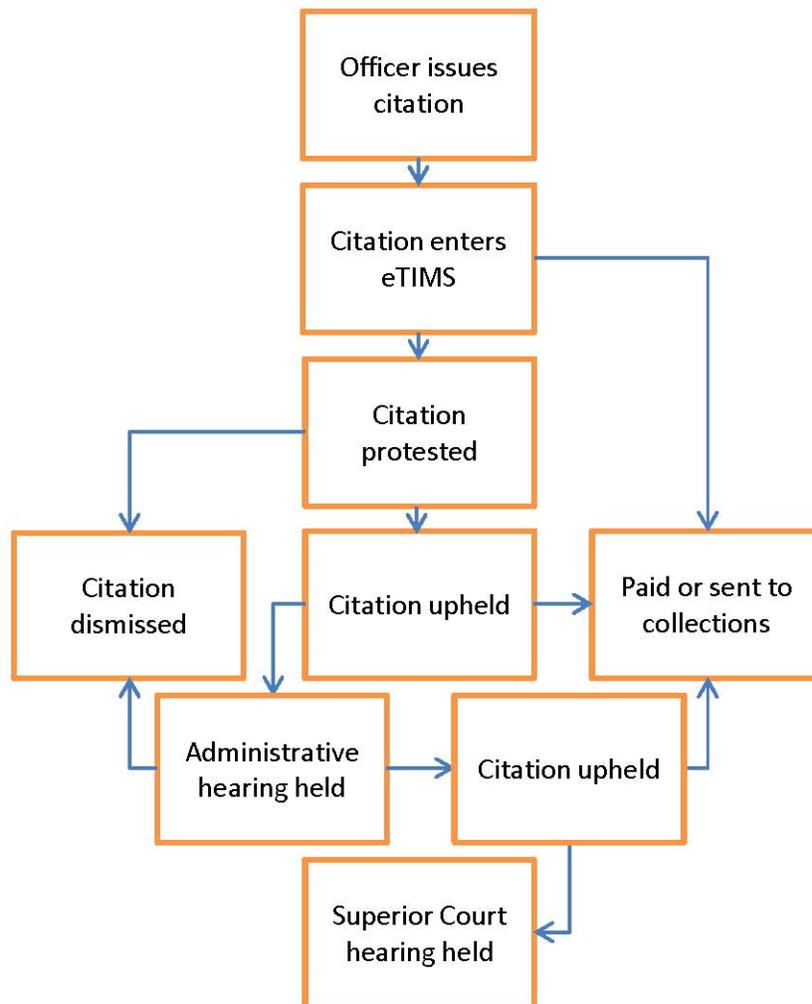
Source: CSA, based on description by SFMTA management

The Parking Enforcement fleet

During the audit, Parking Enforcement had 316 vehicles:

262   Go-4 Interceptor (three-wheeler)
 14   Ford Focus (small sedan)

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

10   Chevy Tracker (small sport utility vehicle)
9   Chevy Metro (small sedan)
8   Toyota Prius (small sedan)
4   Chevy Uplander (minivan)
3   Ford Escape (small sport utility vehicle)
2   Chevy Venture (minivan)
2   Ford pick-up trucks
2   vans (one Ford, one not specified)

83 percent of vehicles in the fleet are three-wheelers, the majority of which are at least four years beyond their expected life of six years.

The Go-4, a three-wheel motorcycle with a body that encloses the driver, is used to cover the majority of the beats and comprises 83 percent of the fleet. The majority of SFMTA's Go-4s were purchased before 2003, making them at least ten years old, and the average age of the Go-4 fleet was nearly nine years as of December 2011.[2] According to a Central Shops supervisor, the expected life of Go-4s is six years or 60,000 miles, whichever comes first. SFMTA is working on a requisition to acquire 25 additional parking enforcement vehicles by the end of 2012. SFMTA's 13 newest Go-4s, purchased in December 2009, were acquired for $28,895 each, for a total cost of $375,635.

Vehicles are assigned based on need.

Parking Enforcement's official policy is that all vehicles are assigned or reassigned to an employee based on operational needs. Parking Enforcement's policies and procedures manual states that each PCO is responsible for the maintenance and safe operation of their vehicle. PCOs are supposed to turn in their Go-4 for preventative maintenance every 3,000 miles.

SFMTA pays Central Shops to maintain its Parking Enforcement fleet.

Maintenance and repair of Go-4 vehicles is performed by the General Services Agency's Central Shops Department on a work order basis. In calendar year 2011 Central Shops charged Parking Enforcement $534,782 for vehicle repair and maintenance, or an average of $2,049 per vehicle. Despite the average age of SFMTA's Go-4s exceeding their expected life, total repair and maintenance costs, as well as average repair cost per vehicle, have decreased each calendar year since 2009.

To its advantage, SFMTA uses a variety of parking enforcement technology,

SFMTA uses several parking enforcement technological solutions that help improve the efficiency of enforcement efforts. Parking Enforcement is taking advantage of existing

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[2] Parking Enforcement has designated seven Go-4s that will be taken out of service in 2012. These vehicles have been excluded from Go-4 age and mileage calculations.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

including handheld devices and vehicle-mounted camera and video systems.

technology either widely or on a test basis.

A significant technological innovation was the introduction of the handheld electronic devices that PCOs use to record vehicle information and which connect to small printers that generate citations to be placed on cited vehicles. The handhelds also have cameras that can be used to photograph a violation, for example, a car parked in a no parking zone or a car parked on a hill that does not have its front wheels curbed. Such photographs can provide evidence if needed during a citation appeal process.

SFMTA uses License Plate Recognition (LPR) camera technology on several vans to photograph license plates of parked vehicles and identify those that have five or more violations outstanding so the vehicles can be immobilized with a "boot" and cited.

SFMTA is also using LPR technology on street sweeping trucks to determine its effectiveness in capturing images of license plates of illegally parked vehicles.

As a pilot project, SFMTA uses video cameras on buses that travel some of the City's transit lanes to continuously record both a forward view and the right curbside. This allows PCOs who later review the video to observe certain types of parking violations, and issue citations to the offending vehicles' owners. Violations visible on these videos include double parking and parking in a bus zone. Using the recordings, the PCO observes a violation, stops the video, zooms in on the license plate, records the plate number and type of vehicle, matches that to information in a California Department of Motor Vehicles database, and issues the citation using a handheld device. The citation is then mailed to the vehicle owner's address.

Electronic chalking

On a very limited basis, Parking Enforcement is using a technology called "electronic chalking" in areas with parking time limits rather than parking meters. The system uses a Global Positioning System (GPS) to records the precise location of a parked vehicle on a first pass by a PCO and, on a second pass, automatically detects whether or not the vehicle has moved. This system eliminates the need for a PCO to manually mark a vehicle's tire with chalk on a first pass and, on a second pass, determine if the vehicle has

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

moved by looking at the position of the chalk mark. As of the conclusion of the audit, according to SFMTA, this technology was being used on only two vehicles.

What the Police Department agreed to do for SFMTA

SFMTA and the San Francisco Police Department (Police Department) entered a memorandum of understanding in May 2009 to ensure the regular presence of police officers on buses, light rail and public transit vehicles, subway stations, transit shelters and other property and facilities under the jurisdiction of SFMTA. The Police Department also agreed to provide law enforcement services for the Taxi Detail, which includes enforcing laws against those providing illegal taxi services. In the agreement the Police Department also agreed to enforce parking regulations and restrictions, which includes responding to complaints of blocked driveways, every day from 12 midnight until 6 a.m., although this provision expired on December 31, 2009. It was further agreed that all law enforcement functions noted above will be supervised by a senior ranking member of the Police Department, who was to manage SFMTA's Security and Enforcement unit full-time. In exchange, SFMTA agreed to pay the Police Department for its expenses authorized by the agreement.

Objectives

The objectives of the audit were to:

1. Determine whether Parking Enforcement has enough staff and at the right levels.

2. Determine whether PCOs are adequately trained to do their jobs effectively and efficiently.

3. Determine whether Parking Enforcement effectively and efficiently schedules and deploys available staff to provide optimal coverage for key Parking Enforcement duties and geographic areas of the City, and whether all recoverable traffic control costs are reimbursed.

4. Determine whether Parking Enforcement has adequate internal controls to prevent unauthorized changes to citations and their underlying data.

5. Determine whether the Parking Enforcement vehicle fleet is effectively managed, including whether there is an appropriate number and mix of vehicles in working order.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

6. Evaluate Parking Enforcement's management of its customer complaint process and determine whether it can be made more efficient and responsive.

7. Determine whether the parking enforcement-related duties assumed by the Police Department and parking enforcement-related costs paid to the Police Department by SFMTA under their memorandum of understanding are reasonable.

Scope and Methodology

The audit period was July 1, 2010 through December 31, 2011.

To conduct the audit, the audit team:

- Reviewed key documents about Parking Enforcement's mission, duties, structure, and history.
- Reviewed policy and procedure manuals and training manuals.
- Interviewed 29 SFMTA staff and managers to understand controls, practices, and common procedures.
- Tested whether 20 citations issued using handheld devices and 20 handwritten citations properly uploaded to eTIMS.
- Quantitatively analyzed citation data, dismissal data, and void data issued from July 2010 through June 2011.
- Quantitatively analyzed whether certain PCOs voided a significantly higher number of citations during the audit period.
- Surveyed other jurisdictions for relevant data related to parking enforcement practices.
- Calculated the age and utilization of the Go-4 vehicle fleet.
- Conducted an inventory of the Go-4 vehicle fleet based on records and observations.
- Reviewed maintenance performed on Go-4 vehicles and analyzed maintenance costs of the Go-4 vehicle fleet.
- Conducted a written survey of active PCOs and senior PCOs on training, equipment, supervision, and staffing. The response rate for the distributed questionnaires was 72 percent. Survey responses

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

were anonymous.

- Reviewed and analyzed residential parking permit area maps and data for daily assignments, absenteeism, long-term leave, and fixed-post assignments for PCOs.

Scope Limitations

Some audit objectives or subobjectives were not fully met because the information needed to complete the applicable analysis was insufficient or unavailable. Specifically, the audit team could not fully assess whether staff could be more efficiently and effectively deployed because SFMTA could not provide or the audit team could otherwise not obtain:

- The estimated time required to effectively enforce each type of parking citation, from identification of the violation to placing the citation on the vehicle.
- The size of the area (beat) that can be effectively enforced in a given time period for a given type of patrol/detail (not the sizes of actual beats).
- Expected actual (not allotted) travel time between enforcement locations.
- Number of parking spaces in each general enforcement beat.
- Analysis of the impact of SF*park*'s dynamic parking system.

The audit team also could not assess whether parking-enforcement-related costs paid to the Police Department by SFMTA were reasonable as the Police Department does not break out the costs it incurs on behalf of and bills to SFMTA in a way that identifies parking enforcement-related costs.

Statement of Auditing Standards

This performance audit was conducted in accordance with generally accepted government auditing standards. These standards require planning and performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

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Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

CHAPTER 1 – SFMTA Should Be Reimbursed for More of Its Traffic Control Services and Alter Its Agreement With the Police Department

Summary

SFMTA is reimbursed for only 27 percent of the time its staff spends directing traffic for scheduled events. Although seeking reimbursement for the cost of some scheduled traffic control services that SFMTA provides would be illegal or simply not feasible (for example, for services at parades, demonstrations, and San Francisco Giants and 49ers games), a change in city law could allow SFMTA to get reimbursed for its services at street fairs and festivals, at least 15 of which do not currently pay SFMTA. For each potentially reimbursable but unrecovered hour of traffic control service that a PCO provides, SFMTA loses $65.

It is reasonable that the Police Department conducts night parking enforcement, which occurs from midnight to 6 a.m., on behalf of SFMTA. However, the agreement between the departments needs to be changed to allow for this. Further, the Police Department does not charge SFMTA for this service, but plans to begin doing so soon.

Finding 1.1

SFMTA foregoes hundreds of thousands of dollars in revenue each year because it cannot seek reimbursement for the traffic control services it provides for San Francisco Giants and 49ers games and some street fairs.

According to an SFMTA employee responsible for street closures for special events, under city agreements and law, SFMTA cannot recover its traffic control costs for some events, including games of the San Francisco Giants and 49ers and street fairs. If SFMTA were able to recover its costs from all these events, it would be reimbursed approximately $65 per staff hour per PCO,[3] representing hundreds of thousands of dollars in revenue to SFMTA per

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[3] SFMTA's hourly rate of $64.89 for a PCO at salary step 5 on overtime, including a 50.69 percent overhead rate. If senior PCOs ($77.54/hour) or parking enforcement supervisors ($97.42/hour) are also used, the actual average hourly rate for serving the event may be higher.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

year. According to parking enforcement management staff, SFMTA anticipates the need for its traffic control services and has PCOs sign up to provide them on an overtime basis. SFMTA must absorb the cost of much of this overtime because no party can be charged for it.

Of the total of 426 days that SFMTA estimates its Parking Enforcement staff spends performing scheduled or planned traffic control services each year, it seeks reimbursement for only 116 days (27 percent).[4] SFMTA tracks by event or related category some of its labor costs for traffic control services— both those it recovers and does not recover — in the City's accounting system. These are shown in Exhibit 7.

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[4] Estimated days are "event days," not "person days."

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 7	Planned Events Requiring SFMTA Traffic Control Services[a] Fiscal Year 2011-12
Reimbursed Events	**Amount Paid Through 12/23/11**
Other Cost Recovery Events[b]	$424,587
Port Events	67,067
Transbay Terminal	59,730
Outside Lands	34,016
Nike Marathon	20,926
Traffic Signal Work	20,301
Moscone (Convention Center)	15,582
TOTAL REIMBURSED	*$642,209*
Unreimbursed Events	
Giants Games[c, d]	$196,767
49ers Games[c]	162,310
Walk for Life Demonstration	101,454
Folsom Street Fair	76,033
Lombard Street[e]	75,023
Sunday Streets	67,150
Chinese New Year & St. Patrick's Day Parades	17,223
Stern Grove Events	13,208
TOTAL UNREIMBURSED	*$709,168*
TOTAL	**$1,351,377**

Notes:
[a] All traffic control labor costs identified in the City's accounting system.
[b] Includes services for Central Subway project, disabled placard enforcement at 49ers games, etc.
[c] Per SFMTA, city agreements with the 49ers and Giants do not require them to pay for traffic control services for games, except for disabled placard enforcement during 49ers games.
[d] Although costs for games are not recovered, the SFMTA billed and the Giants paid for the Giants' Fan Fest on February 4, 2012, which incurred $6,035 in charges for 91.25 staff hours of service.
[e] This is not an event, but rather as-needed traffic enforcement.

Source: Auditor analysis of data in the City's accounting system.

As shown in Exhibit 7, SFMTA incurred at least $709,000 in unreimbursed costs to provide traffic control services for scheduled events in less than half of fiscal year 2011-12.

Scheduled versus unscheduled fixed-post traffic control

Traffic control is provided by PCOs when the flow of traffic and movement of pedestrians is impeded by unscheduled and scheduled events. Unscheduled events such as power outages (that cause traffic control signals to fail), water main breaks, fires, and traffic accidents, require that PCOs be diverted from their regular parking enforcement duties to the event site streets. According to SFMTA, this work is normally done on employees' regular shifts, not on overtime, but they receive a premium pay rate pursuant to

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

the labor agreement between the City and the PCOs' union. In contrast, scheduled events such as parades, sporting events, street fairs, and routine construction work frequently require traffic control and assistance to pedestrians, but this work can be anticipated and is worked by PCOs on an overtime basis.

49ers and Giants games are not cost recovery events.

Home games of San Francisco's professional baseball and football teams, the Giants and the 49ers, although they require traffic control, do not meet the definition of an athletic event in the San Francisco Transportation Code, Division 1, Article 6, Section 6.10, and are not cost recovery events for SFMTA although they are for the Police Department, which provides security.[5] SFMTA can seek reimbursement for traffic control services from the sponsors of athletic events that take place on the streets, such as marathons, if they impede traffic. Not only are Giants and 49ers games not athletic events under the Transportation Code, according to SFMTA, both teams have agreements with the City, through the Port (Giants) and the Recreation and Park Department (49ers), that do not have provisions for the teams to pay for traffic control services.

For fiscal year 2011-12, SFMTA estimates that its total cost to provide traffic control for Giants and 49ers home games was $743,803.

SFMTA cannot recover costs for unplanned events and many planned events, but should be enabled to recover costs for street fairs and festivals although city law does not provide for it.

Providing traffic control for unscheduled (including emergency) events is part of Parking Enforcement's responsibilities and, as such, the costs associated with this duty should be included in Parking Enforcement's operating budget. In addition, according to SFMTA, the costs of traffic control for scheduled events such as demonstrations and parades are not reimbursable because they are considered expressions of free speech, protected under the First Amendment of the U.S. Constitution, and are governed by city code. The San Francisco Police Code, Article 4 of which addresses parades, does not provide for the police, SFMTA, or any other city department to be reimbursed for providing services for parades.

The San Francisco Administrative Code, Sections 10B.16

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[5] Except for disabled placard parking enforcement during 49ers games. In addition, the cost of SFMTA's traffic control services for the America's Cup regatta events will not be reimbursable.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

and 10B.17, states that anyone desiring additional City resources for parking enforcement and traffic control in San Francisco may request the director of SFMTA[6] to provide personnel to perform such services and, if the request is approved, the department shall determine the staffing needed, and charge the requestor accordingly. These requests can be made by any "person, corporation, firm or other organization," but the types of events to which this part of the code applies is not stated there.

The San Francisco Transportation Code, Division 1, Article 6, Section 6.6(f), provides that sponsors of street fairs must pay the City a permit fee based on the actual costs to the City of temporarily closing the street for the fair, according to a fee schedule in the code, and that the City may charge the fair no other fee.[7] A component of the permit fee is a Municipal Railway fee to be established by SFMTA, which, according to SFMTA, is to cover the cost of using motor coaches instead of electrically powered transit vehicles when necessitated by street closures. However, a fee for SFMTA's traffic control services is not provided for in the code section. In practice, some street fairs and festivals pay SFMTA for traffic control services, while others do not.

It is unclear why some fairs and festivals pay SFMTA for traffic control services and others do not.

SFMTA lists 30 events that pay SFMTA's costs for traffic control services, including some street fairs.[8] In addition to the athletic events such as the Bay to Breakers race, this list includes music festivals such as Hardly Strictly Bluegrass, and other fairs, festivals, and celebrations such as the Fillmore Street Fair, Autumn Moon Festival, and Asian Heritage Street Celebration. However, some similar events are among those on SFMTA's list of scheduled events for which the cost of traffic control services is not recovered.[9]

Fifteen street fairs do not pay SFMTA for the traffic control services it provides them.

Events for which SFMTA could recover its traffic control costs if the City's Transportation Code were changed include:

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[6] The code refers to the former Department of Parking and Traffic.

[7] The fee is to be determined by the City's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT), on which SFMTA sits.

[8] It was outside the audit's scope to determine if SFMTA fully recovers its enforcement costs with the rates it bills or whether it collects those charges.

[9] Many "events" on SFMTA's unreimbursed list are not sponsored events for which reimbursement can be sought, but are parades, marches, or SFMTA traffic control responsibilities such as those on Halloween or recurring duty on Market Street and in other areas of San Francisco.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

1. Castro Street Fair
2. Cherry Blossom Festival
3. Chinatown Moon Festival
4. Chinese Community Street Fair
5. Chinese Flower Market Fair
6. Fillmore Jazz Festival
7. Folsom Street Fair[10]
8. Gay Pride Festival
9. Haight Street Fair
10. Juneteenth Celebration
11. Memorial Day Carnival/Festival
12. North Beach Festival
13. Pink Saturday
14. Union Street Spring Fair & Eco-Urban Festival
15. Vietnamese Tet Festival

Because no records exist that segregate SFMTA's labor hours or costs to provide traffic control services at some of these events, the audit could not estimate how much money SFMTA loses by not getting reimbursed for the labor and overhead costs it incurs to serve these events. However, depending on staffing required at each event, total costs for providing traffic control services over a fiscal year period would be significant.

Recommendations

SFMTA should:

1. Seek cost reimbursement from sponsors of events that require fixed-post traffic control services except where it is legally or contractually prohibited.

2. Seek a change to the San Francisco Transportation Code, Division 1, Article 6, Section 6.6(f), to require the permit fee paid by sponsors of street fairs or festivals to include a fee for the costs to SFMTA of providing traffic control services.

3. Work with the Port of San Francisco and Recreation and Park Department to see whether SFMTA could recover its costs for traffic control services from the San Francisco Giants or San Francisco 49ers by modifying the City's agreements with the teams.

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[10] However, the cost of enforcement for the Folsom Street Fair's after party is reimbursable.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Finding 1.2

The Police Department's night parking enforcement for SFMTA is reasonable, but the departments' agreement does not allow it and the Police Department is not paid for it.

According to SFMTA and Police Department management, the Police Department performs night parking enforcement for SFMTA, which includes responding to blocked driveway complaints and other complaints, between the hours of midnight and 6 a.m. Having this service performed by the Police Department is reasonable as police officers are already out on patrol during these hours. Additionally, according to SFMTA, this duty can be dangerous and, therefore, is more appropriate for the Police Department.

The agreement between the Police Department and SFMTA states that SFMTA was to assume night parking enforcement.

Although it is reasonable that the Police Department does night parking enforcement, the memorandum of understanding (agreement) between the Police Department and SFMTA states that on December 31, 2009, SFMTA was to assume responsibility for night parking enforcement from the Police Department. It is unclear why this provision was put in the agreement, but the management of SFMTA and the Police Department consulted for this audit agree that the Police Department should continue to provide this service. According to Police Department staff, however, the Police Department does not use its Traffic Company, which is the focus of the agreement on the Police Department's side, to provide this service and, therefore, SFMTA has not been billed for it.

According to the Police Department, it and SFMTA are currently working to amend the agreement to reinstate the Police Department's responsibility to do night parking enforcement and further require SFMTA pay a flat fee for each complaint police officers respond to during night parking enforcement.

Recommendations

SFMTA should:

4. Work with the San Francisco Police Department to amend the memorandum of understanding between the departments to state that night parking enforcement is the responsibility of the Police Department.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

5. Pay the San Francisco Police Department for the night parking enforcement services it performs.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

CHAPTER 2 – Parking Enforcement Schedules and Deploys Its PCOs Without Established Priorities or Analysis of Available Data

Summary

During fiscal year 2010-11, although an average of 171 PCOs were scheduled to provide enforcement coverage on weekdays, only an average of 154 were actually available for assignment. An average of 40 PCOs were unavailable for regular parking enforcement because they were on long-term leave, on modified duty, or were assigned to other duties outside their job description. This partially explains why Parking Enforcement lacks enough PCOs to consistently cover all shifts, assignments, and beats. However, Parking Enforcement has not quantitatively analyzed or developed a model of its staffing needs, and cannot show that all of its shifts, assignments, and beats are optimally designed.

Parking Enforcement also cannot be assured that it is deploying its PCOs effectively because its general enforcement and residential parking permit beats are not based on parking activity data or parking citation data. Further, beat maps are outdated, excluding some areas where parking meters were installed in 2010.

It is impossible to determine conclusively whether Parking Enforcement is adequately staffed because it has no written workload or productivity standards for its PCOs. This also inhibits management's ability to determine whether PCOs are doing their jobs effectively, that is, within a set of established expectations. For example, the average number of citations issued per PCO per day fell from an estimated 60 to 65 in the 1990s to 30 to 35 during the audit period. Several factors for the decline have been suggested (although determining the decline's cause was outside the audit scope), but such information is not meaningful without a basis for comparison using workload and productivity standards for PCOs.

Each Parking Enforcement manager and supervisor is responsible for more staff than is the average among other U.S. law enforcement agencies, which may reduce management's effectiveness. Three assistant directors

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

supervise 23 senior PCOs who, in turn, supervise 266 PCOs, resulting in staff-to-supervisor (or span of control) ratios of nearly 8-to-1 and 12-to-1, respectively. SFMTA should conduct a staff analysis to determine if Parking Enforcement is adequately staffed, including whether it should try to restore a fourth assistant director position.

Parking Enforcement has been testing a license plate recognition system on street sweeper trucks that photograph license plates of illegally parked vehicles. This method does not require PCOs to write citations as street sweepers travel their routes. If successful, the system would allow some or all PCOs now on street sweeping duty to be redeployed to other areas of enforcement where they are needed. Parking Enforcement also should conclude if it can expand its use of video cameras on buses traveling certain transit-only lanes. These cameras capture images of illegally parked vehicles and their license plates so citations can be mailed to the vehicles' owners.

Finding 2.1	**Approximately 40 parking control officers are unavailable for deployment because they are on long-term leave or are assigned duties outside their job description.**

An average of 28 PCOs were on long-term leave or on modified duty in each month of fiscal year 2010-11, making them unavailable to deploy to parking enforcement assignments, and in early 2012 12 PCOs were assigned duties that are not part of their job description.

Long-term leave makes PCOs unavailable for deployment.

PCOs on long-term leave present a staffing challenge for Parking Enforcement. Exhibit 8 shows that, although the average number of PCOs on long-term leave each month declined between fiscal years 2006-07 and 2008-09, it has steadily increased over the last two fiscal years.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 8	Average Number of Parking Control Officers on Long-Term Leave Fiscal Years 2006-07 Through 2010-11
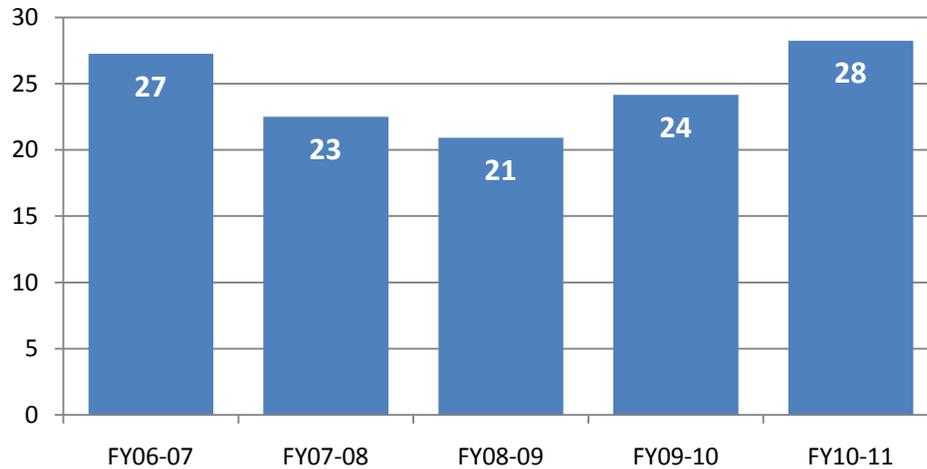
Note: Annual averages based on monthly data. Long-term leave is longer than one work week. Some employees return to work from long-term leave with modified (or light) duties. Because these employees are unavailable to work in the field, this analysis treats time spent on modified duty as long-term leave.

Source: CSA analysis of long-term leave requests provided by Parking Enforcement.

Most (57 percent of) instances of leave of at least one week in fiscal years 2006-07 through 2010-11 were under two months, as shown in Exhibit 9.

EXHIBIT 9	Duration of Long-Term Leave Taken by Parking Control Officers Fiscal Years 2006-07 Through 2010-11	
Duration of Leave	Instances of Leave	Percent of Total Instances of Leave
30 days or Less	193	37%
1–2 months	106	20%
2–3 months	64	12%
3–6 months	75	14%
6 months to 1 year	45	8%
1 year to 2 years	32	6%
2–3 years	9	2%
3+ years	3	1%
Total	**527**	100%

Note: Includes leave longer than one work week that fell, at least in part, sometime between July 1, 2006, and June 30, 2011, but may have begun before or extended beyond that timeframe. Because employees on modified duty are unavailable to work in the field, this analysis treats time spent on modified duty as part of leave duration. Of leave time in this analysis, 12 percent was modified duty.

Source: CSA analysis of long-term leave requests provided by Parking Enforcement.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Parking control officers on long-term leave are gone for an average of two-and-a-half months.

The average duration of PCO leave in the five fiscal years analyzed was 78 calendar days.[11] However, 44 instances (9 percent) were one year or longer, with the longest being over seven years. When a leave becomes extremely long, it may indicate that the employee will be unable to return to work and fulfill the duties of a PCO. Because employees on leave continue to hold their positions, SFMTA cannot fill these positions to meet its need for PCOs who can fulfill the duties of the job.

Parking Enforcement regularly assigns some staff duties outside their job description.

Contrary to their job description, 12 PCOs were given full-time non-enforcement assignments (or details) during the period analyzed by the audit. The official description of the PCO classification's duties can be summarized as enforcing parking laws and, as needed, performing traffic control services. However, according to Parking Enforcement, it has had to use PCOs to fulfill the duties formerly done by employees in now-vacant critical non-enforcement positions in the unit. None of these PCOs are on modified duty. According to the unit, it has been unable to fill these positions appropriately because some of the positions were defunded and it had difficulty getting requisitions approved by the Department of Human Resources for others. Exhibit 10 shows the classifications of the duties that PCOs are inappropriately assigned to fulfill. Parking Enforcement is taking some corrective action and is in the process of hiring five dispatchers which will allow the unit to reassign those PCOs to enforcement duties.

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[11] This excludes 29 instances of significantly longer leave. These statistical outliers represent 6 percent of the records analyzed and, if included, would have increased the average leave duration to 117days.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 10	Financial Impact of Parking Control Officers Covering Duties of Non-Parking Enforcement Positions			
Classification/Description	PCOs Assigned	Average Annual Salary[a]	Annual Difference from PCO Salary[b]	Extra Annual Cost[c]
Communications Dispatcher (class 1704): Receives service requests and dispatches appropriate personnel to provide service.	7	$48,776	$2,431 less	$17,017
Storekeeper (class 1934): Requisitions, receives, issues, and inventories equipment.	2	$48,308	$2,899 less	$5,798
Senior Clerk (class 1406): Performs difficult, responsible, and specialized clerical work.	2	$45,812	$5,395 less	$10,790
Automotive Service Worker (class 7410): Performs semi-skilled work related to maintaining, servicing, and cleaning vehicles.	1	$56,186	$4,979 more	($4,979)
Total	**12**			**$28,626**

Notes:
[a] Average of the classification's salary range.
[b] Based on the average salary for classification 8214 of $51,207.
[c] Difference between average annual salaries multiplied by the number of PCOs assigned.

Source: Auditor analysis based on information from SFMTA and Department of Human Resources.

Recommendations   SFMTA should:

6. Make every reasonable effort to return Parking Enforcement employees from long-term leave as soon as practicable, including by returning them to modified duty that is enforcement-related but does not require work in the field.

7. As soon as it becomes clear that Parking Enforcement employees on long-term leave will be unable to return to work, refer them to appropriate services.

8. Assign all parking control officers to duties appropriate to their classification description.

9. Recruit for and fill all positions currently inappropriately

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

occupied by parking control officers with staff hired for the classifications that apply to those positions.

Finding 2.2

SFMTA has too few parking control officers available to consistently cover all beats and shifts, and has not done a staffing assessment.

Although Parking Enforcement schedules and deploys PCOs to cover all its existing beats and shifts to the extent possible given current circumstances, sometimes too few PCOs are available for regular parking enforcement due to long-term leave and PCOs assigned to non-enforcement duties (as discussed in Finding 2.1), as well as absenteeism and other assignment priorities.

According to Parking Enforcement, it needs 170 to 175 PCOs on a typical weekday to cover all of the beats and field assignments as they are currently scheduled, but Parking Enforcement did not indicate to the auditors that this estimated staffing requirement was based on any quantitative analysis or model. During fiscal year 2010-11, Parking Enforcement scheduled an average of 171 PCOs on weekdays, while the average number of PCOs assigned, present, and doing field enforcement each weekday was 154. Absenteeism and fixed post assignments combined to cause an average of 20 PCOs to be unavailable for regular parking enforcement. These relationships are shown in Exhibit 11.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 11	Average Weekday Parking Control Officers Deployment Fiscal Year 2010-11
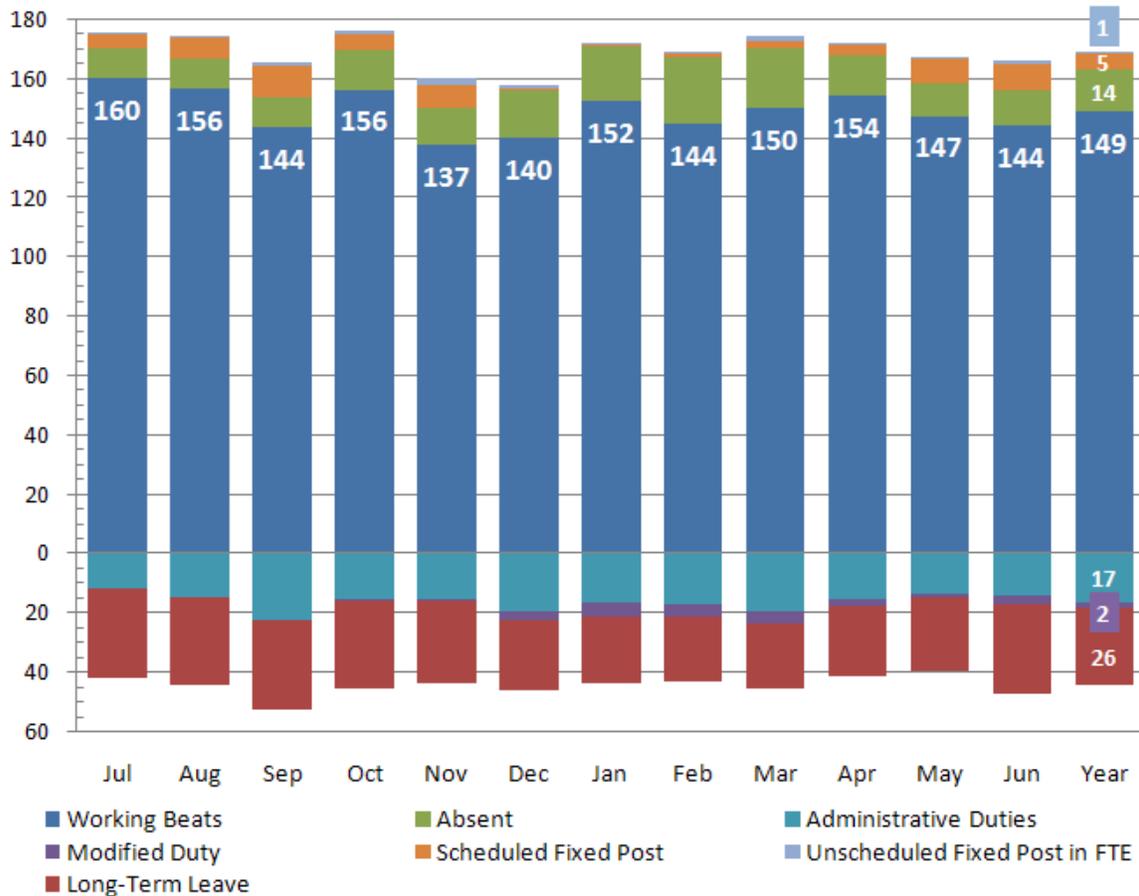
Notes:
a Analysis excludes PCOs scheduled for a regular day off or short-term leave.
b Long-term leave is longer than one work week.
c Modified duty is for PCOs temporarily unable to perform regular job duties and may occur in SFMTA units other than Parking Enforcement.
d Scheduled fixed posts involve traffic control for Giants and 49ers games, so quantities vary seasonally.
e Unscheduled fixed posts are traffic control for emergency situations such as car accidents and fires.

Source: Auditor analysis of SFMTA data.

PCOs are effectively deployed to cover beats, but may be stretched too thin.

Within its existing structure of beats and assignments, Parking Enforcement's approach to deploying PCOs to the field is logical. An analysis of assignment reports for one week found that PCOs were scheduled to work in:

- All of the City's residential permit areas
- Nearly all general enforcement beats
- Specific purpose details such as enforcement against:
  o Parking citation scofflaws

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

- o Disability placard abusers
- o Those parked illegally during street sweeping
- Keeping major transit corridors clear

Although Parking Enforcement's deployment of its available resources appears reasonable, PCOs may be stretched too thin. SFMTA management and the PCO union representative expressed concerns about Parking Enforcement having insufficient resources and possibly inadequate coverage. In the week reviewed, the audit found that:

- The majority of PCOs with enforcement assignments were assigned two beats (53 percent) or more than two beats (6 percent) instead of one.

- Additionally, 37 (36 percent) of those PCOs assigned to general and residential parking enforcement were scheduled to spend two to four hours of their shift enforcing parking on major transit corridors during morning and evening commute hours rather than on their assigned beats.

Parking Enforcement has not assessed how many employees it needs.

Parking Enforcement has not conducted a staffing level analysis to determine the minimum, adequate, and robust staffing levels that would be needed to effectively enforce parking laws. Although conducting such an analysis is beyond the scope of this audit, to estimate a possible improved staffing level for residential and general parking enforcement details, the audit reviewed residential permit parking area maps, general enforcement beats, and other enforcement priorities as stated by Parking Enforcement. This analysis does not consider many pieces of information that would be needed for a complete staffing analysis, such as the size of area a PCO could enforce on a shift and the impact traffic congestion and geography a specific area might have on a PCO's ability to enforce parking. Nonetheless, the results of this limited analysis are shown in Exhibit 12.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 12	Optimal Weekday Staffing for Existing Residential and General Parking Enforcement Details[a]	
Type of Enforcement[b]	Estimated Number of PCOs for Optimal Staffing	Number of PCOs Assigned During Week Reviewed
Residential Parking Permit Areas	73	31
General Enforcement	184	78

Assumptions:

· Residential parking permit areas, hours, and time limits are those as of April 2012.
· One PCO assigned to each current general enforcement beat.[c]
· General enforcement coverage from 7 a.m. to 7 p.m.[d]
· Current 12 percent rate of weekday absenteeism in the division.
· PCOs get time for roll call, check-out, travel, and to cover existing commuter corridor enforcement assignments.

Notes:
[a] Analysis limited to weekdays because significantly fewer PCOs are needed on weekends.
[b] Because SFMTA could not provide data to allow estimates of improved staffing levels for specialized details such as disability placard and scofflaw enforcement, these types of enforcement are excluded.
[c] Parking Enforcement indicated that general enforcement beats are designed to be covered by a single PCO. However, these beats are outdated as discussed in Finding 2.3.
[d] Meters are active from 7 a.m. or 9 a.m. to 6 p.m. in most areas, but can extend to 9 p.m. or 11 p.m. in some areas. General enforcement includes enforcing other parking such as at yellow, red, or blue curbs.

Source: Auditor analysis of SFMTA residential parking permit area maps, general parking enforcement beats, and assignment reports for the week of December 18, 2012.

Parking Enforcement has consistently employed fewer staff than the number of positions approved in its budget (see Exhibit 3 in the Introduction).

Recommendations   SFMTA should:

10. Perform a staffing analysis to determine the number of parking control officers required to provide adequate parking enforcement coverage.

11. In light of the staffing analysis, and after making efforts to control and reduce parking control officers' long-term leave and assignments to non-enforcement duties (see recommendations 6 through 9), request funding for any parking control officer positions needed.

12. Fill as many of its budgeted positions in the Parking Enforcement Section as possible.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Finding 2.3

SFMTA's parking enforcement beats are not data-driven and are outdated.

The department's general enforcement and residential parking permit enforcement beats are not based on parking or citation data and are outdated. Consequently, the department cannot be sure it is deploying PCOs as well as it might.

General enforcement beat maps are old; some meters are not covered.

According to Parking Enforcement, the beats for general enforcement have not been updated in many years. Some surveyed PCOs also indicate that beat maps are outdated and that some new parking meters are not covered by beats. In 2010 SFMTA approved the installation of 1,340 new meters, which do not appear on the department's general enforcement beat maps. The general enforcement beats are also not based on parking activity data or citation data. Without a data-driven process for creating and updating beats, Parking Enforcement may not provide enough coverage where it is most needed.

Parking Enforcement has no data-based criteria for dividing residential parking area into beats.

When a residential permit parking area grows too large to be adequately covered by one PCO, Parking Enforcement subdivides it and assigns two PCOs, but this process does not rely on data-based criteria. To enforce parking restricted by residential parking permits (RPP), Parking Enforcement assigns PCOs to one of 29 permit areas, designated by every letter of the alphabet plus BB, CC, and DD. Permit areas vary from three to four square blocks to 1.5 square miles. The duration of parking permitted for non-permitted vehicles also varies, with the time limit in most of these areas being two hours, although several permit areas have sections where parking is allowed for one, three, or four hours. Further, neighborhoods can expand an RPP with approval of the Board of Supervisors. Because of the variations in time limits for parking, the variations in size of RPP areas, and the necessity for PCOs to make two passes to identify vehicles parked over the limits, some RPP areas that should be covered daily may be covered less frequently. However, SFMTA has not taken these factors (or data on parking usage) into account to create residential permit parking enforcement beats.

When Parking Enforcement breaks some of the larger

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

permit areas into subareas for the purpose of deploying PCOs, management recognizes that it cannot rely solely on the permit area map to determine appropriate enforcement beats. (Eleven of the permit areas are divided into a total of 25 subareas.) Because Parking Enforcement has no established criteria for when or how a permit area should be divided, it does not treat every subarea as a beat when assigning PCOs. In the week analyzed, the 25 subareas were assigned as 15 beats.

The department has access to data that could be used to inform the revision of its beats.

SFMTA has access to a substantial amount of data that would allow it to create data-driven general enforcement and residential parking permit enforcement beats. SFMTA's dynamic parking system, SF*park*, collects a large amount of data about the demand for and usage of metered parking. Additionally, the handheld devices used by PCOs to issue citations contain global positioning system (GPS) data, and the department has historical GPS data on how many citations were issued in any covered location. Analyzing this data would allow SFMTA to have a more accurate picture of where parking enforcement is most needed. However, data from these sources may be insufficient to design beats for optimal coverage. The department will need to gather additional data to determine facts or estimates such as the size of an area that a PCO can be expected to effectively cover in a shift, accounting for key variables such as differences in parking time limits and types of parking to be enforced.

Recommendations

SFMTA should:

13. Establish a data-driven methodology to create and update general enforcement and residential parking permit enforcement beats.

14. Ensure that beat maps are updated when new areas of enforcement are created, such as when meters are installed in areas that previously had none.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Finding 2.4   **Without workload or productivity standards for parking control officers, Parking Enforcement cannot determine if it is adequately staffed.**

Parking Enforcement has no written workload or productivity standards for its PCOs and, as a result, management cannot determine on an ongoing and consistent basis whether PCOs are doing their jobs effectively, that is, within a set of established expectations. For example, as discussed above, one standard of workload would be the area a PCO is expected to patrol in a shift, measured in terms of linear miles, number of parking meters, number of restricted parking spaces, or some other metric. Another standard productivity measure — not to be confused with a quota — for PCOs would be the average number of citations written per shift, week, or month.

The reasons for fewer citations per day are unclear.

According to an assistant director, there are no written criteria for how many citations a PCO should write per day. The assistant director noted that in the 1990s PCOs averaged about 60 to 65 citations a day, but this has since declined to about 30 to 35 citations per day. Consistent with this estimate, an analysis of citations issued in the audit period found that an average of 35 citations per PCO per day was issued. Although it was outside the scope of this audit to verify, the reasons for the decline in citations given by the assistant director include:

- More parking meters but fewer motorists using them.
- Longer time limits at meters.
- Increased citation fines resulting in higher rates of compliance.
- Fewer PCOs working due to budget cuts.
- More PCOs taken from parking enforcement to do fixed-post traffic control and dispatcher duty.

Although there may be several causes for the change in the average number of citations issued per PCO, any such citation trend information is not meaningful without a basis of comparison. To create this basis, Parking Enforcement management would be assisted by workload and productivity standards for PCOs that can serve as criteria for PCO performance and be used to determine how many PCOs are needed to meet the City's needs. Moreover, until

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

SFMTA can accurately measure the overall efficiency and productivity of Parking Enforcement's activities against targets based on actual data, it does not have a basis for assessing the performance of this function as a whole.

Performance appraisal should be a continuous process. The appraisal form used for parking control officers needs improvement.

According to the former deputy director of the Security and Enforcement Division responsible for parking enforcement (deputy director), biannual performance reviews were in effect for the first time in 2011, after it had concluded a six-month review of most staff. Regular performance reviews should help employees and their supervisors identify and work on areas of performance that need improvement. However, the form Parking Enforcement uses has no quantitative objectives or performance measures, including none related to attendance (absences), punctuality (times late for work), or accuracy of citations issued. Consequently, the form is limited in the information it can provide to both the employee and Parking Enforcement management as to how the employee is performing and where improvement might be needed.

Recommendation

15. SFMTA should develop workload and productivity standards for its Parking Enforcement employees so it can assess the organization's overall performance. These standards should be incorporated into the performance evaluation forms used.

Finding 2.5

Parking Enforcement's assistant directors and senior parking control officers supervise too many direct reports, reducing management's effectiveness.

The span of control for Parking Enforcement's assistant directors and front-line supervisors is too broad. Three assistant directors report directly to the Police Department commander that heads this function under an agreement with SFMTA. The three assistant directors supervise 23 senior PCOs, representing a reporting ratio of nearly 8-to-1. In turn, the 23 senior PCOs are responsible for managing 266 (in fiscal year 2010-11) PCOs, a ratio of almost 12-to-1.

A recommended span of control is seven employees to one supervisor.

Results of a survey of law enforcement organizations published by *Police Chief Magazine* in 2009 showed the average ratio of staff to a manager is 7-to-1.[12] Although any

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[12] *Police Chief Magazine* is a publication of the International Association of Chiefs of Police.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

guideline such as this may not apply in all circumstances, the greater the span of control, the more likely it is that the manager's effectiveness diminishes because he or she is less able to adequately supervise staff in addition to performing required administrative and planning tasks.

According to the former deputy director, there had been four assistant directors until one position was defunded. The three assistant directors now have less time to devote to their management responsibilities in addition to the large quantity of administrative work they must perform.

Parking Enforcement's leader has many other responsibilities.

Before March 2012, a deputy director for parking and transit enforcement reported to the Police Department commander who heads this function under an agreement with SFMTA. Since the deputy director position was eliminated in a reorganization — resulting in a newly formed Security, Investigations and Enforcement section (see Exhibit 2) — the commander now directly supervises the three assistant directors for parking enforcement. However, in addition to parking enforcement, the police commander is responsible for numerous other functions including (for SFMTA) transit security and transit fare enforcement, and the Police Department's Traffic Company, which is responsible for all of the City's traffic enforcement.

An additional assistant director would bring that span of control into line.

It was beyond the scope of the audit to conduct a workload analysis of the assistant directors or senior PCOs to determine whether their effectiveness in their primary job duties may be affected by the current staffing levels or organizational structure. However, based on discussions with management and research performed in the area of span of control, it is clear that a fourth assistant director position would provide immediate assistance to the organization by further distributing the assistant directors' responsibilities and allow them to focus more on their primary administrative and planning duties.

Restoring a fourth assistant director would reduce the span of control of these managers to below 6-to-1, which is within the guideline offered in the literature. However, according to the former deputy director, assistant directors are the equivalent of captains, while senior PCOs are the equivalent of sergeants. Missing between these two classifications is the equivalent of a lieutenant

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

classification.[13] Such a level of management could more directly execute day-to-day supervision of the senior PCOs, enabling the assistant directors to focus more on the management and leadership roles they need to attend to as the "assistant leaders" of an organization of nearly 300 employees. However, this change would require a restructuring of the organization with increased costs to MTA.

If the number of PCOs remains constant, for there to be a ratio of seven or fewer PCOs to each senior PCO, there would need to be 37 or more senior PCOs, an increase of 14 from the current 23.

Recommendation

16. SFMTA should, as part of the staffing analysis referred to in recommendations 10 and 11, determine whether the addition of a fourth assistant director position is justified.

Finding 2.6

Expanded use of cameras on street sweeping and transit-only lane vehicles may allow redeployment of parking control officers.

SFMTA could more efficiently deploy PCOs through Parking Enforcement's expanded use of cameras that capture still images and video of vehicle license plates.

License plate recognition cameras on ticket scofflaw vans are proven to work; those on street sweeper trucks are in the pilot phase but appear to hold promise.

Photographs of license plates are made by a system called license plate recognition (LPR) that uses a camera mounted on a Parking Enforcement vehicle equipped with a computer and software that recognizes a license plate number and compares it to a database of plate numbers of vehicles that have outstanding San Francisco parking violations or are stolen. The system automatically alerts the PCO monitoring the system in the vehicle of a "hit" when it encounters such a plate so the PCO can record the information and issue a citation, immobilize the vehicle with a boot device or dispatch a tow truck if needed. These LPR systems are used by the Parking Enforcement "Boot/Scofflaw" unit that patrols city streets looking for vehicles with five or more unpaid parking citations.

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[13] To achieve a span of control of 7-to-1 or less, four lieutenants would be needed to supervise 23 senior PCOs.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Parking Enforcement also has in progress a pilot program using LPR cameras on street sweeping trucks to test their effectiveness in capturing license plate numbers of vehicles illegally parked during street sweeping hours. PCOs assigned to the street sweeping detail are deployed to drive ahead of street sweepers and issue citations to illegally parked vehicles. While the pilot program is conducted, PCOs continue to issue citations in the conventional manner until a determination can be made as to the pilot's success and whether it can be fully implemented. If it is implemented, citations will be automatically mailed to vehicle owners.

According to Parking Enforcement managers, technical problems exist with the LPR technology—such as cameras not capturing some plates or capturing the plates of vehicles legally parked, and poor resolution of images taken in low light—that hamper the program's progress. However, if the technical problems can be resolved and the program fully implemented, it could allow Parking Enforcement to deploy street sweeping PCOs to other enforcement areas where they are needed and reduce the total number of PCOs needed.

Video cameras on buses should make enforcement more efficient.

SFMTA also uses video cameras mounted on buses that travel transit-only lanes.[14] Enforcement of parking laws in these lanes is known as transit-only lane enforcement (TOLE). The TOLE cameras capture continuous video of what is visible in front of and to the right of the bus while it travels its route. The TOLE program is authorized by the State of California, which has permitted San Francisco to equip buses with video cameras on certain TOLE routes.

TOLE videos are downloaded each weekday to two designated computer stations at SFMTA's offices that are equipped with special software. Each day two PCOs view the previous days' videos at these computers, observing violations such as parking in bus zones or double parking. The PCOs stop the videos when they observe a violation, and use the system to zoom in on the license plate of the vehicle so the plate number can be recorded and checked against the California Department of Motor Vehicles database to obtain the registered owner's name and

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[14] In transit-only lanes vehicles other than public transit vehicles are prohibited, facilitating the movement of transit vehicles.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

address. The assigned PCO can then issue a citation immediately in the office using a handheld device. The violation is subsequently mailed to the vehicle's registered owner.

Recommendations   SFMTA should:

17. Continue to expand the use of license plate recognition and video technology to capture parking violations and minimize, where possible, the use of parking control officers on street sweeping detail so they can be redeployed to where they are most needed.

18. As Parking Enforcement expands the use of license plate recognition and video technology, assign parking control officers returning from long-term leave who require modified duty to photo or video enforcement assignments.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

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Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

CHAPTER 3 – Parking Control Officers Do Not Receive Ongoing Training

Summary

SFMTA offers new hire training, some conflict resolution training, and updates PCOs on procedures through meetings with their supervisors. However, SFMTA provides Parking Enforcement staff with little formal, ongoing training, and does so inconsistently, despite the fact that in-service training is required by the PCOs' labor agreement. Types of citations with the highest dismissal rates may indicate areas where more training would be beneficial. Without ongoing training, PCOs may not be properly updated on changes to parking citation code or SFMTA policies.

Finding 3.1

Initial training of parking control officers is robust, but required in-service training is lacking.

PCOs receive little formalized training after they engage in two to three weeks of new employee training just after they are hired. The new employee training is the only formal training consistently provided to PCOs that instructs them on their job duties and responsibilities for enforcing parking violations under the California Vehicle Code and San Francisco Traffic Code. According to SFMTA, PCOs receive conflict resolution training every few years; however, the training is not consistently offered and has not been offered recently. According to the former deputy director, PCOs may not always be up-to-date on code changes relevant to their jobs and would benefit from in-service refresher training on current code enforcement requirements and how they should be applied in San Francisco.

The majority of PCOs report that they would benefit from refresher training, including on relevant codes.

To assess whether PCOs believe they are adequately trained, the audit surveyed them. Of those who responded, 77 percent agreed that they get the training they need on parking violation code. However:

- 73 percent agreed they would benefit from more training on parking violation code.
- 69 percent would like more refresher training.
- 48 percent do not believe that they receive enough training to make them aware of injury prevention

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

techniques and options.
- 47 percent indicate that they are unsure how to enforce certain parking violation codes.[15]
- 40 percent believe that they do not frequently enough receive training on how to do their job.
- 37 percent indicate that they have not received sufficient training to deal with angry members of the public.

In response to open-ended survey questions, three PCOs specifically requested additional training and one PCO noted that he or she was never trained on the new (SF*park*) parking meters and, therefore, could not assist the public on how to use them. Another respondent stated that PCOs get injured getting in and out of their Go-4 vehicles, possibly indicating a need for ergonomic training.

Frequently dismissed types of citations may indicate that PCOs could be better trained on some codes.

An analysis of the dismissal rates of various types of parking citations from July 1 through December 31, 2011, indicates that PCOs may benefit from more training in some types of parking violations or how to cite them. Of the 33 parking violation code sections with the most citations issued, citations under 6 code sections (18 percent of the violation categories considered) had dismissal rates of 5 to 8 percent. This contrasts with the average dismissal rate of 2 percent for citations in the other 27 categories analyzed. Exhibit 13 shows the types of citations with the highest dismissal rates.

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[15] According to Parking Enforcement, this response is explained by the fact that enforcement assignments are specialized, so some PCOs do not need to enforce certain parking codes to adequately fulfill their duties.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

EXHIBIT 13	Most Commonly Dismissed Citation Types July 1 Through December 31, 2011			
Violation Code	Violation Type	Citations Issued	Citations Dismissed	Dismissal Rate
V22500I	Bus Zone	3,326	258	8%
T33C	Temporary Restricted Parking	2,306	166	7%
T33.1	Construction Zone	2,385	122	5%
T38A	Red Zone	11,043	541	5%
T38C	White Zone	7,333	338	5%
V22500L	Wheelchair Access	1,179	92	5%

Note: "V" indicates California Vehicle Code; "T" indicates San Francisco Transportation Code.

Source: CSA analysis of SFMTA records

Although parking citations may be dismissed for reasons beyond the control of PCOs, and some types of citations may be more often protested than others, increased training on issuing citations under the code sections above may help reduce dismissal rates.

The parking control officers' labor agreement requires in-service training.

According to the memorandum of understanding between SFMTA and SEIU Local 1021, effective July 1, 2010, which covers PCOs and senior PCOs, SFMTA agreed to institute in-service training. However, according to the former deputy director, SFMTA has not invested the time and resources to create in-service training programs in Parking Enforcement. Instead, according to SFMTA staff, senior PCOs are to meet with their staff to discuss any updates on procedures, but this may or may not consistently occur. According to SFMTA staff, the department is now developing an in-service training program.

Inadequate training may result in mistakes, injuries, inefficiency, and a loss of revenue to the City.

If Parking Enforcement personnel are not trained to perform their jobs as effectively, efficiently, and safely as possible, they, the City, and the public that parks on San Francisco's streets may be adversely affected. Citations that should be issued and are not—or citations that are improperly issued and later dismissed—due to inadequate training may cause parking laws to be unevenly enforced and a loss in fine revenue to the City. If enforcement that should increase parking turnover to benefit those seeking parking and nearby merchants does not occur when it should, the mission of Parking Enforcement may not be fully achieved. Further, if a citation is issued incorrectly, this can cost SFMTA hours of extra administrative work to dismiss the

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

citation if protested.

Recommendation
19. SFMTA should offer ongoing, in-service training to parking control officers and their supervisors. The following topics should be considered for inclusion in the training:

- Enforcement of codes related to the most often dismissed citations: bus zone, temporary restricted parking, construction zone, red zone, white zone, and wheelchair access
- Injury prevention and ergonomics
- Conflict resolution (dealing with angry customers)
- San Francisco's SF*park* parking meters

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

CHAPTER 4 – The Parking Enforcement Fleet Should Be More Effectively Managed

Summary

Parking Enforcement has more than enough three-wheeled Go-4 Interceptor vehicles (Go-4s) to meet its needs. However, a repair backlog causes a quarter of the Go-4 fleet to be out of service for an average of one to two months at a time, sometimes leaving Parking Enforcement with just enough vehicles to meet daily needs.

The majority of Go-4s are beyond their recommended life of six years and 20 percent have exceeded the recommended maximum of 60,000 miles. This may necessitate more frequent and more costly repairs, and indicates the need for many vehicles to be retired and replaced soon.

Lacking a formal vehicle replacement strategy to determine when Go-4s should be removed from the fleet, Parking Enforcement instead purchases most of its Go-4s every three to four years when funding is available. This causes much of the fleet to reach the end its useful life at the same time.

Key Parking Enforcement fleet information—mileage readings, inventory records, and repair costs—is inaccurate and should be improved for more effective vehicle maintenance and replacement planning.

Alternatives to Go-4s must be further explored and encouraged. The majority of PCOs believe Go-4s make their jobs less efficient. Seattle and Las Vegas use electric and hybrid vehicles, bicycles, walking, and car-pooling in their parking enforcement functions.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Finding 4.1

Parking Enforcement has more than enough vehicles, but just enough to meet daily needs because so many are out of service.

Although there is nearly one Go-4 vehicle for every parking control officer, one-quarter of Go-4s are unavailable while out for repair, which can take 45 days or longer.

Parking Enforcement must keep many more vehicles in its fleet than are needed in the field each day because of how many are unavailable while out for maintenance or repair. Parking Enforcement has 262 active[16] Go-4 vehicles which form nearly a 1-to-1 ratio of Go-4s to active PCOs This represents far more Go-4s than the maximum number of PCOs with field duty assignments who reported to work on a single day, which was 203 during the audit period.

Far fewer than 200 PCOs work in the field on an average weekday, and not all PCOs need a Go-4 to perform their duties.[17] However, the number of *available* Go-4s is far less than their total number. For example, records dated March 1, 2012, show :

- 64 Go-4s (25 percent of those active) were out of service while awaiting or undergoing maintenance or repair.
- Out-of-service Go-4s had been out for an average of 45 days, which represents a repair backlog.[18]
- 5 Go-4s had been out for over 100 days.

A vehicle deficit could result.

The potential for a vehicle deficit exists under current circumstances because of the number of out-of-service Go-4s. According to the Central Shops Department (Central Shops), part of the City's General Services Agency, a vehicle deficit causes some Go-4s to be used for two shifts per day. Using a Go-4 in this way causes fewer vehicles to be needed at once, but soon may necessitate more frequent maintenance on each vehicle and, if continued, may cause those vehicles to need to be replaced.

More prompt repair of Parking Enforcement vehicles would significantly increase the number of vehicles available for use. However, the old age and high mileage of a significant portion of the Go-4 fleet mean that, even with normal use,

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[16] Active vehicles are those that are used; inactive vehicles, which may be kept to supply parts, were not analyzed.

[17] Some beats or details are covered by sedan, or by van.

[18] The Central Shops Department, a division of the City's General Services Agency, maintains Parking Enforcement vehicles.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

some Go-4s may soon deteriorate to the point where repair costs are prohibitive and vehicles must be retired sooner (see Finding 4.2)

The majority of Go-4s have exceeded their recommended lifespan and one-fifth has exceeded the maximum recommended mileage.

According to a Central Shops supervisor, the manufacturer's recommended useful life of a Go-4 is six years or 60,000 miles. Expected vehicle lifespan and mileage are important considerations, as many of SFMTA's Go-4s are older and some have traveled many miles. Specifically:

- 155 Go-4s (61 percent of those available) are six years old or older.
- The average age of Go-4s is 9.2 years.
- The oldest group of Go-4s, consisting of six vehicles, is 16 years old.
- 52 Go-4s (20 percent) have more than 60,000 miles.
- 35 (14 percent) have more than 70,000 miles.

An additional quarter of the Go-4 fleet will have reached the end of its useful life before 2015.

Go-4s were driven an average of 3,823 miles in calendar year 2011.[19] At this pace, another 29 (11 percent of the total) Go-4s will be at or over 60,000 miles by the end of 2014. Vehicles acquired in 2003 or earlier cost SFMTA $334,739 to maintain and repair in fiscal year 2010-11, or 60 percent of the fleet's total maintenance and repair costs of $555,546. These repairs are performed by Central Shops, as none of the Go-4 vehicles in Parking Enforcement's fleet are under manufacturer warranty.

Parking Enforcement has 31 Go-4 vehicles that are not driven much, most of which are older.

Despite the average of more than 3,800 miles Go-4s are driven each year, 31 (12 percent of the total) Go-4s traveled less than 2,000 miles in calendar year 2011. The majority of these are older vehicles. The PCO in charge of fleet maintenance explained that these vehicles were kept as spares in case a PCO's normally assigned vehicle is unavailable. If an adequate number of vehicles can be maintained on a daily basis, some of these spare vehicles, especially the higher total mileage and older ones, may be able to be retired. The audit did not determine the condition of these vehicles and could not determine the relative cost difference between maintaining older vehicles and newer vehicles because repair records are sometimes incomplete, but the average cost of maintaining a Go-4 in calendar year 2011 was $2,049.

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[19] Due to missing dates in SFMTA's records of odometer readings, calendar year timeframe is approximate.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Parking Enforcement must analyze vehicle utilization to better manage its fleet.

The *Guide to Federal Fleet Management* published by the U.S. General Services Administration (GSA) states that oversight of vehicle utilization is a critically important best practice in managing a vehicle fleet, and that fleet managers should analyze utilization data quarterly and take appropriate action when usage is falling short or excessively surpassing the guidelines. Pooling vehicles means having employees share the same vehicle when usage falls below the requirements for full-time vehicle assignment. Rotating vehicles can be done when one vehicle has met or exceeded utilization guidelines and another has fallen short during a given time period.

Recommendations

SFMTA should:

20. Work with the Central Shops Department to determine how vehicles can be maintained and repaired more promptly.

21. Establish and enforce monthly utilization guidelines for Go-4 vehicles. Ensure that Go-4 usage is relatively evenly distributed to avoid some vehicles getting heavy use while others are infrequently used.

Finding 4.2

Parking Enforcement needs a vehicle replacement plan.

Parking Enforcement lacks objective criteria for retiring Go-4 vehicles.

SFMTA purchases Parking Enforcement Go-4s when funding is available, rather than scheduling the acquisition and disposal of vehicles at regular intervals. As a result, Go-4s are retired only when Central Shops determines that the vehicle can no longer be safely operated.

The San Francisco Administrative Code, Section 4.10-1(b), states that the City Administrator may adopt rules and regulations necessary to implement a vehicle fleet management program, including rules covering vehicle maintenance programs and vehicle replacement plans. A principal administrative analyst with Central Shops stated that it does not proactively communicate replacement schedules to city departments, but will provide input when asked.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
**Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations**

Parking Enforcement may have to eliminate some vehicles as of July 2014.

Although most of Parking Enforcement's vehicles are not passenger vehicles or light-duty trucks, some are (see Introduction). Therefore, implementation of a vehicle replacement plan would help Parking Enforcement comply with Administrative Code Section 4.10-1(c), which states that, beginning no later than July 1, 2014, and every year thereafter, the City Administrator shall: (1) remove from service and discontinue the operation of all passenger vehicles and light-duty trucks in the municipal fleet that are 12 years old or older; and (2) reduce the total number of passenger vehicles and light-duty trucks in that portion of the municipal fleet under his or her direct jurisdiction by 5 percent from its size on July 1, 2008.

Parking Enforcement purchases Go-4s in large quantities every three to four years rather than purchasing fewer as they wear out.

Per Central Shops, Parking Enforcement usually purchases vehicles in big lots, so many Go-4s tend to break down or reach the end of their useful life (and need replacement) at around the same time. This cycle may require less effort by those responsible for acquisition, but it does not contribute to smoothing vehicle maintenance and repair costs. As seen in Exhibit 14, SFMTA purchased 35 or more Go-4s every three to four years since 1999, and purchased none in five of the last eight calendar years.

EXHIBIT 14 | **Go-4 Acquisition By Year**
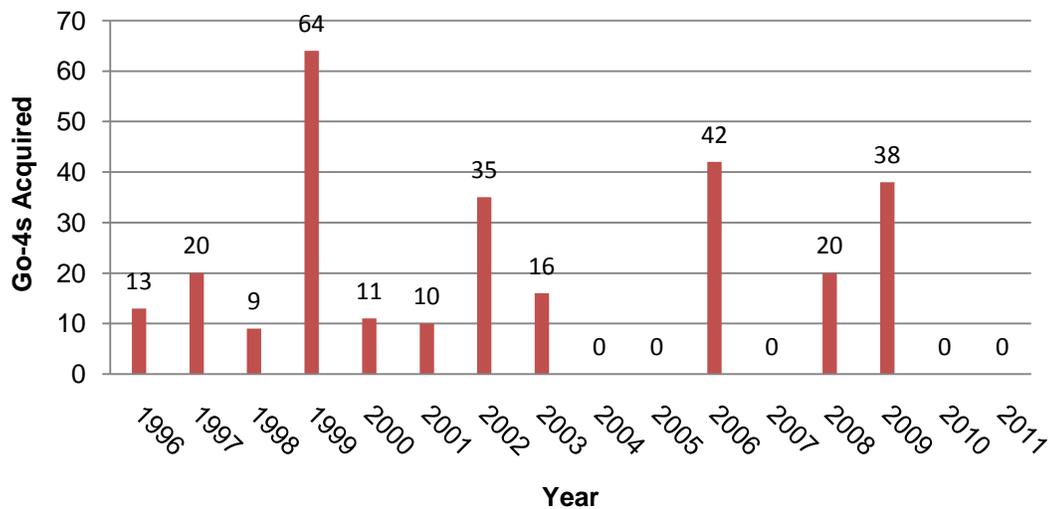
Source: Auditor analysis based on SFMTA data.

A vehicle replacement plan takes into account that vehicles

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

are used and reach the end of their useful lives at varying rates. One of the purposes of such a plan is to be able to anticipate needed vehicle replacements sufficiently in advance so that the new vehicle purchasing process, which can be lengthy, can also be set in motion sufficiently in advance.

Best practices can guide the creation of a vehicle replacement plan

The GSA lists characteristics of fleet replacement plans used in best-practice organizations:

- Includes guidelines to project and plan fleet-replacement requirements.

- Replacement guidelines developed based on empirical analysis of the relationship between vehicle age and/or cumulative usage and total vehicle ownership and operating costs.

- Plan is developed and annually updated such that it projects replacement dates and costs for each fleet vehicle.

Per the GSA, a best-practice fleet does not succumb to underfunding vehicle replacement and causing large backlogs to develop. Shifting costs from acquisition to maintenance and putting mission fulfillment at risk is an unsound management decision and, per GSA, only organizations under the greatest financial duress will do so.

A presentation on fleet replacement best practices by Mercury Associates Inc., a fleet management consulting firm, recommends developing defensible criteria to determine when a vehicle should be replaced.[20] Replacement criteria should include vehicle age, utilization, reliability, condition, and maintenance and repair costs. A point system, in which scores are assigned to the criteria, provides for an objective basis in determining when a vehicle should be removed from service.

Recommendations

SFMTA should:

22. Develop a vehicle replacement plan.

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[20] Apart from the report referred to, Mercury Associates was engaged to conduct work for the City's General Services Agency.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

23. Update the vehicle replacement plan annually to identify vehicles that should be retired based on factors such as vehicle age, vehicle utilization, and repair costs.

Finding 4.3

Parking Enforcement should improve the reliability of data in its various fleet systems to improve fleet management.

Mileage information for some Go-4s in a Parking Enforcement spreadsheet is incorrect, which can negatively impact fleet management.

Go-4 mileage records maintained by both Parking Enforcement and Central Shops contain errors that should be resolved so SFMTA can make vehicle decisions based on accurate information. Mileage information initially provided by Parking Enforcement for the audit contained data entry errors in the number of miles driven in a year.[21] Parking Enforcement annually enters Go-4 odometer readings in a spreadsheet. Some Go-4s bear stickers showing the number of miles that were accumulated under a previous odometer. Errors occurred when the PCO recording the mileage did not add the previous mileage to the current reading. As a result, some Go-4s were shown to have traveled a negative number of miles in a year.

The value of accurate mileage records

Accurate mileage information is essential for good fleet management. Nearly every vehicle management decision depends on accurate odometer reporting. Fleet management tasks including ensuring maintenance at recommended intervals, vehicle replacement, and efficiently analyzing usage data all require accurate mileage records.

Incorrect mileage entries may also come from the fueling system.

Central Shops receives mileage information when PCOs input odometer readings using the fueling system. However, an administrative analyst with Central Shops stated that the information for some Go-4s may be inaccurate because PCOs input incorrect information. For instance, PCOs may incorrectly enter an odometer reading to the tenth of a mile, even though Central Shops' system only tracks to the mile. In this case, 10,000.1 miles will enter into the system as 100,001 miles. The administrative analyst also stated that some PCOs enter numbers like 12345, which are incorrect. Industry best practice

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[21] When presented with mileage errors, Parking Enforcement provided a spreadsheet with corrected vehicle mileage information. The revised mileage information was used for audit analysis.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

recommends implementing excessive mileage reports to identify incorrect odometer readings.

Discrepancies exist between Parking Enforcement and Central Shops' vehicle inventory lists.

Parking Enforcement's fleet inventory list includes inaccurate vehicle inventory levels and identification numbers that do not reconcile with Central Shops' records. The inventory list maintained by Central Shops identified two vehicles that were not on Parking Enforcement's list. In addition, manufacturer's vehicle identification numbers differed between the lists.

As with incorrect mileage records, unreliable vehicle inventory information can impact a host of fleet management activities, including vehicle utilization and replacement planning. According GSA, the first step in determining the vehicle needs of an organization is to assess the current fleet. If fleet information is not sufficiently descriptive, an organization needs to determine what number of vehicles they currently have, including the number, type, age, and condition of the vehicles.

The cost of preventive maintenance for Go-4s was not tracked until late 2010. Even now, repair work is often performed under a preventive maintenance work order.

Through November 2010 Central Shops did not track the cost of preventive maintenance performed on Go-4 vehicles. Since then, Central Shops has tracked preventive maintenance costs, but Central Shops opens most work orders for Parking Enforcement vehicles as preventive maintenance even when they include repair work rather than open an additional work order.

GSA's *Guide to Federal Fleet Management* states accounting and funding methods affect the accumulation of necessary data. Per GSA, a fleet manager must capture, aggregate, analyze, and use cost data for vehicles and operations for which he or she is responsible.

It is important to understand the costs of owning and operating a fleet so management can make informed financial decisions. This information should be readily accessible to Parking Enforcement management and stakeholders.

Recommendations

SFMTA should:

24. Ensure that parking control officers record accurate mileage information from odometers during annual data collection.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

25. Periodically remind parking control officers that it is important that they enter accurate mileage information into the fueling system when they fuel Go-4 and other vehicles.

26. Create and periodically review reports to identify vehicles with incorrectly recorded annual odometer readings and blatantly incorrect mileage information.

27. Update vehicle inventory lists and ensure they are correct. The lists should include accurate vehicle counts, correct manufacturer's vehicle identification numbers, and city vehicle identification numbers.

28. Work with the Central Shops Department to ensure that Central Shops distinguishes preventative maintenance work from repairs and that each category of work is accurately recorded.

Finding 4.4	**Parking Enforcement should continue to explore less use of motor vehicles and incorporate alternative types of vehicles.**
The City's Transit-First Policy requires departments to maximize use of public transit and facilitate travel by bicycle or on foot.	San Francisco Environment Code, Chapter 4, Section 403(a)(1), states that no later than March 1, 2011, all officers, boards, commissions and department heads responsible for departments that require transportation to fulfill their official duties, and other city officials assigned city motor vehicles, shall implement the City's voter-approved Transit-First Policy (San Francisco Charter Section 8A.115) by adopting and implementing written policies for travel required in the performance of public duties that:

- Maximize the use of public transit, including taxis, vanpools, and car-sharing.
- Facilitate travel by bicycle or on foot.
- Minimize the use of single-occupancy motor vehicles.

What to consider before purchasing alternative-fuel vehicles	GSA states that the acquisition of alternative-fuel vehicles should consider:

- Fuel Characteristics: the unique qualities of the type of fuel that powers the vehicle.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

- Cost: Operating costs in terms of fuel and maintenance expenses and long-term fuel availability at a reasonable price.

- Performance: Miles per gallon (or equivalent); ability to start in cold temperatures; acceleration rates.

- Fuel Availability: Location of refueling or recharging facilities; time required to completely refill the vehicle's tank; method of refueling.

Seattle and Las Vegas use electric and hybrid vehicles and bicycles for parking enforcement.

During the audit period, Parking Enforcement tested an electric vehicle but, based on these tests, expressed concern that these vehicles do not have the range or battery life to cover San Francisco's longer or more distant beats. However, according to a parking enforcement supervisor with the Seattle Police Department, the City of Seattle's parking enforcement officers use the T-3 Motion, an electric, zero-emission three-wheel vehicle to patrol in flat areas. The parking enforcement unit of the City of Las Vegas has also incorporated alternative fuel vehicles into its fleet, including hybrid vehicles.

In Seattle and Las Vegas, bicycles, including those with electric assist motors, are available for officers' use. In Las Vegas, officers using bicycles are certified by the Law Enforcement Bicycle Association.

The parking enforcement supervisor with the Seattle Police Department also stated that Seattle encourages its parking control officers to walk their beats, and that the Seattle Police Department is considering a practice used in the city of Philadelphia, where supervising enforcement officers drive enforcement officers to their beats. The enforcement officers would patrol their beat on foot, and the supervisors then remain in the field to supervise.

Using electric vehicles, electric bicycles, conventional bicycles, walking, and carpooling where appropriate is consistent with the City's transit-first policy and can reduce fleet fuel costs. Further, greater use of walking and bicycles would reduce reliance on Go-4s, possibly resulting in fewer unproductive enforcement work hours due to motor vehicle breakdowns. An added benefit of bicycles is that they allow for quick, repeated enforcement in congested areas more

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

easily than larger vehicles.

PCOs believe that Go-4s impede their efficiency.

Eighty (80) percent of surveyed PCOs indicate that the Go-4s interfere with their ability to do their job efficiently. According to the assistant director with responsibility over Parking Enforcement's fleet, the Go-4 is the primary vehicle used by PCOs for patrolling their beats, and Go-4 performance problems can contribute to delays in arriving at beats, more frequent breakdowns while on patrol and, ultimately, less enforcement of parking laws and less citation revenue.

Recommendations

SFMTA should:

29. Continue to explore acquiring alternative-fuel parking enforcement vehicles. Vehicle selection should consider performance, driver safety and ergonomics, purchase price, operating costs, and fuel efficiency, characteristics, and availability.

30. Determine which beats could be patrolled by electric vehicles, bicycle or on foot. Enable PCOs to use forms of transportation other than Go-4s to patrol these beats.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

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Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

CHAPTER 5 –System Controls Need Improvement to Prevent Improper Handling of Citations and to Safeguard Data

Summary

SFMTA has no controls to prevent inappropriate cancelation of citations, which may explain why one-tenth of surveyed PCOs report that they have deliberately and inappropriately canceled or voided citations. Additionally, the lack of management review allows for the incorrect acceptance of reduced fines for late fix-it citations, causing SFMTA to collect only $10 plus any additional late fees rather than the full price of the citation fine. Further, documentation of access levels to Electronic Ticket Information Management System (eTIMS) are not retained or reviewed, increasing the risk that SFMTA staff may incorrectly have higher access than needed for their position.

Finding 5.1

No controls exist over canceled citations although some parking control officers report that they have deliberately and inappropriately canceled or voided citations.[22]

SFMTA does not have controls to prevent or detect the cancelation of parking citations. Specifically, SFMTA does not have policies or procedures on canceling citations, and the handheld citation issuance devices used by PCOs do not retain records of cancelations. Therefore, Parking Enforcement management cannot review or monitor cancelations or determine why a PCO canceled a citation.

Frequent cancellation of citations may indicate a lack of training or employee fraud.

PCOs may cancel incorrect citations, which, if this happens frequently, could indicate that the employee needs more training. Alternatively, inappropriate cancelation of a valid citation may indicate dereliction of duty (for example, giving improper preferential treatment to someone) or fraud (for example, accepting a bribe not to issue a citation). In either case, this causes parking laws not to be enforced and the

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22 Only electronic citations can be canceled, and citations can be canceled only before they have been printed. Both electronic and handwritten citations can be voided, and citations can be voided only after they have been printed or written.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

City to lose revenue.

Even a few deliberately and inappropriately canceled or voided citations are a serious problem.

Of the PCOs surveyed:

- 10 percent reported that they had deliberately and inappropriately canceled or voided a citation.

- 28 percent indicated that they are aware citations being deliberately and inappropriately canceled or voided.

Although these survey results do not reveal how frequently citations were inappropriately canceled or voided (including whether it occurred only once), how long ago this occurred, or why it occurred, the fact that some PCOs acknowledged improperly canceling or voiding citations indicates that management needs to take action. Depending on the cause of the problem, this action could be increased training, supervision, and or monitoring to detect performance problems and/or fraud among PCOs.

PCOs must acknowledge their awareness of SFMTA's citation voiding policy, but apparently it is not always being followed.

Although SFMTA lacks any policies regarding cancelation of citations, it has a policy on voiding citations. Valid reasons for voiding a citation include:

- Officer error such as wrong date, time, address, citation type, penalty, or transposed numbers
- Missed disability placard
- Stolen vehicle
- Jammed or broken parking meter
- Vehicle was previously cited
- Mechanical breakdown of vehicle

SFMTA required each PCO to sign an acknowledgement that he or she will comply with the citation voiding policy. However, based on the survey results presented above, this has not completely eliminated inappropriate voids or cancelations. PCOs may need more training that emphasizes when it is inappropriate to cancel or void a citation and must understand the severity of the possible repercussions for purposely and improperly cancelling or voiding citations. Because SFMTA does not have a policy on canceling citations, some PCOs may not understand when it is and is not acceptable to cancel a citation.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

No patterns were found among voided citations by type of violation or issuing officer.

An analysis to determine whether any PCO voided an unusually large percentage of citations found none.[23] Additionally, the audit analyzed whether any type of citation was voided significantly more frequently than others and found that this was not the case.

Recommendations

SFMTA should:

31. Create a policy that states acceptable and unacceptable reasons for canceling a citation.

32. Determine whether it is possible to retain canceled citation data on its handheld devices.

33. If canceled citation data can be retained and uploaded from handheld devices, regularly generate and review reports of canceled citations to detect any parking control officer that frequently cancels citations or any suspicious pattern of cancelations.

34. Periodically provide required refresher training to parking control officers and senior parking control officers (supervisors) on voiding and canceling citations.

Finding 5.2

SFMTA foregoes revenue by sometimes incorrectly accepting reduced fines for citations paid late.[24]

A review of payment balances for parking citations found that for a few (five of 20) citations tested, SFMTA's Customer Service Center staff—who are not employees of the Parking Enforcement Section—accepted reduced payments of $10 per violation for correctable citations (commonly known as fix-it tickets) received after the deadline. This practice is contrary to SFMTA policies, which require that evidence of citation corrections received late shall incur the full fine due plus late fees. As a result, in these cases, SFMTA failed to collect the full amount of revenue due. Fines for correctable citations generally range from $65 to $114.

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[23] No PCO had voided more than 3.6 percent of the citations he or she had issued during the audit period, and 94 percent of PCOs had void rates of 1 percent or less.

[24] This finding was previously reported in an Office of the Controller audit report, *The Customer Service Center's Cash Handling Processes are Generally Adequate but Need Some Improvement* (referred to here as the SFMTA cash-handling audit report), issued April 5, 2012.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Once a citation is deemed late, the full amount of the citation fine is due.

According to the SFMTA Customer Service *Policies and Procedures Manual,* with proof of correction, window staff can reduce the base fine of correctable citations to $10. However, both the payment and the signoff must be processed by the first due date of the citation, which is 21 days after the first notice of the citation is sent to the violator and when late fees are added. Once late fees have been applied to the citation, the submission is late and the full fine amount is due.

As noted in the SFMTA cash-handling audit report, windows managers did not perform reviews and, consequently, the incorrect adjustments were not prevented.

Recommendations

SFMTA should:

35. Retrain Customer Service Center window employees on the policy for acceptance of payments for correction citations to ensure that the policy is followed correctly.

36. Require Customer Service Center management to review daily reports showing all adjustments (reductions) to citations fines.

Finding 5.3

SFMTA inadequately monitors access granted to its citation information management system.[25]

SFMTA does not maintain a list of access levels granted to users of its eTIMS, so cannot readily review that access levels are appropriate and up-to-date. Because a report of users' access levels cannot be generated from eTIMS, paper copies of system access requests must be maintained and summarized if a review were to be performed.

When access is not properly controlled, users may have higher access levels than needed, and former employees may retain access.

Without a regular review of eTIMS access, including to whom it has been granted and at what levels, SFMTA is less assured of the integrity of data in the system. If access is not disabled when an employee leaves the job that necessitated it or if access is not downgraded when an employee takes a job that requires a lesser access level,

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[25] This finding was also reported in the SFMTA cash-handling audit report.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

problems may result. These include the possibility of users keeping access levels higher than needed, potentially enabling them to alter parking citations when they should not have this ability.

According to guidelines issued by the Information Technology Governance Institute, to ensure system security, user identities and access rights should be maintained in a central repository.[26] Further, management reviews should be performed of all user accounts and related privileges.

Recommendations

SFMTA should:

37. Retain access request forms for the Electronic Ticket Information Management System.

38. Periodically review access levels in the Electronic Ticket Information Management System to determine whether those levels are appropriate.

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[26] This is known as the COBIT 4.1 framework.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

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Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

CHAPTER 6 – Parking Enforcement Complaints Are Not Managed to Ensure That They Are Promptly and Effectively Resolved

Summary

Parking enforcement-related complaints are responded to by appropriate individuals, including the director and other managerial staff. However, Parking Enforcement does not maintain a database of complaints. As a result, it cannot know the number, age, types or resolutions of complaints and cannot be assured that it resolves complaints promptly, efficiently or effectively.

Finding 6.1

Parking Enforcement does not centrally log or track all complaints so cannot analyze their characteristics or trends or how well it responds to complaints.

Complaints come from a variety of sources.

Parking Enforcement does not have a central log or database for complaints it receives. According to the former deputy director, complaints from the public come through a variety of channels. Individuals may contact the 311 Customer Service Center (311), the city's official telephone number and website for requesting information, to report problems or submit service requests. Others may call SFMTA staff directly, email the Customer Service Center, or visit SFMTA offices. Complaints related to parking enforcement received by 311 are referred directly to Parking Enforcement, while complaints from other sources are referred to various parking enforcement managers, depending on the type of complaint. Parking Enforcement managers reportedly spend a considerable amount of time investigating and resolving complaints.

Complaints are not centrally logged or tracked.

Neither SFMTA nor Parking Enforcement has a central database or log of complaints that it receives or a way to track those it investigates. The only tool currently used by Parking Enforcement is a report generated by 311 listing the complaints it receives, including only brief information on the nature of each complaint, including whether it refers to parking enforcement, and the complainants' contact information.

Without a database, Parking Enforcement cannot efficiently

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

track the progress of complaint investigations or ensure that complaints are being adequately dealt with. Specifically, complaints in a database can be managed efficiently, effectively, and promptly as follows:

- Efficiently—centralized and organized information allows for more effective and prompt responses to complaints and reduce inefficiencies in how complaints are handled.
- Effectively—responses address the issues complained about, investigations occur when needed, and feedback is given to management to get at the root of problems when applicable.
- Promptly—complaints receive a response in a timely manner.

Information potentially valuable to management is unavailable because complaints are not systematically managed or analyzed.

Because complaints are not centrally logged and complaint follow-up is not tracked, Parking Enforcement cannot analyze complaint characteristics or trends, and cannot produce statistical reports on the number, age, types or outcomes of complaints, the duration it takes to respond to complainants or close complaints, or any other data that could inform management about Parking Enforcement's operations through the prism of complaints. For example, large numbers of or increases in certain types of complaints—or complaints related to the actions of particular employees—could indicate operational or employee performance problems that may need to be addressed by management.

Complaints management software makes handling complaints more efficient.

Efficient complaints management is an important element of overall customer service. A complaints management system that includes specially designed software helps ensure that complaints are handled quickly and appropriately, and that appropriate information from complaints is used to inform management where needed. For example, the Office of the Controller's Whistleblower Program has a website where complaints can be submitted, and uses specialized complaints management software that logs complaints, gives complaint ID numbers to complainants so they can follow-up, tracks the stage of each complaint from receipt to closure (noting those complaints that are being investigated), and produces statistics on complaint outcomes.

The Whistleblower Program produces quarterly reports on

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

the complaint and investigation activity, and much of the information in the report is based on data collected by the system.

Recommendation   39. SFMTA should develop a plan to create a complaints management system. The complaints management software must be able to log all complaints in one database and allow the tracking and management of complaints from receipt to closure so that statistics and management reports can be generated.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

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Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

APPENDIX A: DEPARTMENT RESPONSE

SFMTA | Municipal Transportation Agency

Edwin M. Lee | Mayor

Tom Nolan | Chairman
Cheryl Brinkman | Vice-Chairman
Leona Bridges | Director
Malcolm Heinicke | Director
Jerry Lee | Director
Joél Ramos | Director
Cristina Rubke | Director

Edward D. Reiskin | Director of Transportation

June 25, 2012

Tonia Lediju
Audit Director
Office of the Controller, City Services Auditor Division
City and County of San Francisco
City Hall, Room 476
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Ms. Lediju:

Thank you for providing the draft report of your audit to evaluate the performance of the Parking Enforcement Unit of the San Francisco Municipal Transportation Agency. We appreciate the thoroughness of your staff in reviewing the Parking Enforcement Unit's operations and procedures.

While there is certainly room for improvement, we would also like to acknowledge our Parking Enforcement team for the successes they have achieved as public servants of the City and County of San Francisco. They are good people performing very demanding jobs. In addition to their challenging general enforcement duties, they respond to hundreds of planned and unplanned events each year. With the passion and hard work of our Parking Control Officers, we anticipate continued improvements in the months and years to come.

Attached for your review and consideration is the completed Audit Recommendation and Response form. We will work with all relevant parties to address the concerns that you have raised.

If you have any questions or require additional information regarding the Parking Enforcement Unit, please contact Bond Yee, Sustainable Streets Division Director at (415) 701-4677.

Sincerely,

Edward D. Reiskin
Director of Transportation

cc: Bond Yee, Director, Sustainable Streets Division
        Sonali Bose, Chief Financial Officer
        Commander Lea Militello, Security,
        Investigations and Enforcement Director

San Francisco Municipal Transportation Agency
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Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

AUDIT RECOMMENDATIONS AND RESPONSES

Recommendation	Responsible Agency	Response
The San Francisco Municipal Transportation Agency (SFMTA) should: 1. Seek cost reimbursement from sponsors of events that require fixed-post traffic control services except where it is legally or contractually prohibited.	SFMTA	Concur. Ongoing. The SFMTA currently bills for cost reimbursement from sponsors of events for Enforcement costs, except where it is legally or contractually prohibited.
2. Seek a change to the San Francisco Transportation Code, Division 1, Article 6, Section 6.6(f), to require the permit fee paid by sponsors of street fairs or festivals to include a fee for the costs to SFMTA of providing traffic control services.	SFMTA	Do not concur. Currently the SFMTA recovers all fees we are legally allowed. However, seeking a change to San Francisco Transportation Code, Division 1, Article 6, Section 6.6(f) is a policy decision not currently in agreement with the City's SFMTA's policy makers support of community events. While we have explored seeking changes to this code in the past, we have been unsuccessful as such changes were not supported by SFMTA and City policy makers who support street fairs and festivals and expressed their desire to keep fees low so that these venues can continue.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
3. Work with the Port of San Francisco and Recreation and Park Department to see whether SFMTA could recover its costs for traffic control services from the San Francisco Giants or San Francisco 49ers by modifying the City's agreements with the teams.	SFMTA	Partially concur. SFMTA asked the Port and MOEWD in the recent past whether there was an ability to renegotiate with the Giants and was advised that this was not possible under the existing agreement. However, MTA will reach out to the Port and MOEWD once again.
4. Work with the San Francisco Police Department to amend the memorandum of understanding between the departments to state that night parking enforcement is the responsibility of the Police Department.	SFMTA	Concur. This amendment will be incorporated into the revised MOU between the SFMTA and SFPD, and budgeted accordingly for FY 13 and FY 14.
5. Pay the San Francisco Police Department for the night parking enforcement services it performs.	SFMTA	Concur. This amendment will be incorporated into the revised MOU between the SFMTA and SFPD, and budgeted accordingly for FY 13 and FY 14.
6. Make every reasonable effort to return Parking Enforcement employees from long-term leave as soon as practicable, including by returning them to modified duty that is enforcement-related but does not require work in the field.	SFMTA	Concur. The SFMTA will make every reasonable effort to return Parking Enforcement employees from long-term leave as soon as practicable.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
7. As soon as it becomes clear that Parking Enforcement employees on long-term leave will be unable to return to work, refer them to appropriate services.	SFMTA	Concur. Ongoing. The SFMTA is referring employees on long-term leave to appropriate services as soon as it becomes clear they will be unable to return to work.
8. Assign all parking control officers to duties appropriate to their classification description.	SFMTA	Concur.
9. Recruit for and fill all positions currently inappropriately occupied by parking control officers with staff hired for the classifications that apply to those positions.	SFMTA	Concur, pending availability of resources to fund these non-parking enforcement positions.
10. Perform a staffing analysis to determine the number of parking control officers required to provide adequate parking enforcement coverage.	SFMTA	Concur.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
11. In light of the staffing analysis, and after making efforts to control and reduce parking control officers' long-term leave and assignments to non-enforcement duties (see recommendations 6 through 9), request funding for any parking control officer positions needed.	SFMTA	Concur.
12. Fill as many of its budgeted positions in the Parking Enforcement Section as possible.	SFMTA	Concur.
13. Establish a data-driven methodology to create and update general enforcement and residential parking permit enforcement beats.	SFMTA	Concur.
14. Ensure that beat maps are updated when new areas of enforcement are created, such as when meters are installed in areas that previously had none.	SFMTA	Concur. The Parking Enforcement unit is working together with SF park to expand and update beat maps accordingly.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
15. Develop workload and productivity standards for its Parking Enforcement employees so it can assess the organization's overall performance. These standards should be incorporated into the performance evaluation forms used.	SFMTA	Concur. The Parking Enforcement unit will work together with the SFMTA's Technology and Performance unit to develop these standards and work them into FY 13/14 performance plans.
16. As part of the staffing analysis referred to in recommendations 10 and 11, determine whether the addition of a fourth assistant director position is justified.	SFMTA	Concur.
17. Continue to expand the use of license plate recognition and video technology to capture parking violations and minimize, where possible, the use of parking control officers on street sweeping detail so they can be redeployed to where they are most needed.	SFMTA	Concur. The SFMTA is currently testing cameras on street sweepers. Recommendations on this pilot project are expected in early August. At that time we'll evaluate and determine whether the use of these cameras should be expanded. We will also seek to expand the electronic chalking and transit only lane enforcement programs as resources allow.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
18. As Parking Enforcement expands the use of license plate recognition and video technology, assign parking control officers returning from long-term leave who require modified duty to photo or video enforcement assignments.	SFMTA	Concur. As modified duty requests arise, the SFMTA will assess the appropriateness of these assignments, considering liability, training, seniority, and shift bidding issues.
19. Offer ongoing, in-service training to parking control officers and their supervisors. The following topics should be considered for inclusion in the training: • Enforcement of codes related to the most often dismissed citations: bus zone, temporary restricted parking, construction zone, red zone, white zone, and wheelchair access • Injury prevention and ergonomics • Conflict resolution (dealing with angry customers) • San Francisco's SF*park* parking meters	SFMTA	Concur. The SFMTA will develop and hold the first of these on-going trainings the end of this calendar year for at least one watch (approx. 30 staff), and will train all remaining Enforcement staff throughout calendar year 2013.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
20. Work with Central Shops to determine how vehicles can be maintained and repaired more promptly.	SFMTA	Concur. Specific performance standards for promptness are being incorporated into the revised MOU between Central Shops and the SFMTA for FY 13 and FY 14.
21. Establish and enforce monthly utilization guidelines for Go-4 vehicles. Ensure that Go-4 usage is relatively evenly distributed to avoid some vehicles getting heavy use while others are infrequently used.	SFMTA	Concur. These guidelines will be developed and documented by Parking Enforcement management by December, 2012.
22. Develop a vehicle replacement plan.	SFMTA	Concur. The Parking Enforcement unit will work together with the SFMTA's Strategic Planning and Policy team to develop a replacement plan.
23. Update the vehicle replacement plan annually to identify vehicles that should be retired based on factors such as vehicle age, vehicle utilization, and repair costs.	SFMTA	Concur. The Parking Enforcement unit will work together with the SFMTA's Strategic Planning and Policy team to update this replacement plan as necessary, on an annual basis.
24. Ensure that PCOs record accurate mileage information from odometers during annual data collection.	SFMTA	Concur. The Parking Enforcement Unit will both train and reinforce this practice among Parking Control Officers.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
25. Periodically remind PCOs that it is important that they enter accurate mileage information into the fueling system when they fuel Go-4 and other vehicles.	SFMTA	Concur. The Parking Enforcement Unit will both train and reinforce this practice among Parking Control Officers.
26. Create and periodically review reports to identify vehicles with incorrectly recorded annual odometer readings and blatantly incorrect mileage information.	SFMTA	Concur. The Parking Enforcement Unit will review this data as produced by Central Shops and will redirect poor PCO performance as it relates to mileage data entry.
27. Update vehicle inventory lists and ensure they are correct. The lists should include accurate vehicle counts, correct manufacturer's vehicle identification numbers, and city vehicle identification numbers.	SFMTA	Concur. Parking Enforcement will update this list, with the assistance of the Central Shop's tracking systems, by September, 2012.
28. Work with the Central Shops Department to ensure that Central Shops distinguishes preventative maintenance work from repairs and that each category of work is accurately recorded.	SFMTA	Concur. Specific performance standards for distinguishing work categories are being incorporated into the revised MOU between Central Shops and the SFMTA for FY 13 and FY 14.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
29. Continue to explore acquiring alternative-fuel parking enforcement vehicles. Vehicle selection should consider performance, driver safety and ergonomics, purchase price, operating costs, and fuel efficiency, characteristics, and availability.	SFMTA	Concur. These considerations will be incorporated into the vehicle replacement plan.
30. Determine which beats could be patrolled by electric vehicles, bicycle or on foot. Enable PCOs to use forms of transportation other than Go-4s to patrol these beats.	SFMTA	Concur. This matter will be determined by the Parking Enforcement Unit by September, 2012.
31. Create a policy that states acceptable and unacceptable reasons for canceling a citation.	SFMTA	Concur.
32. Determine whether it is possible to retain canceled citation data on its handheld devices.	SFMTA	Concur. The SFMTA will discuss this functionality with PRWT (the eTIMS vendor).

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

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33. If canceled citation data can be retained and uploaded from handheld devices, regularly generate and review reports of canceled citations to detect any parking control officer that frequently cancels citations or any suspicious pattern of cancellations.	SFMTA	Concur, per the above response.
34. Periodically provide required refresher training to parking control officers and senior parking control officers (supervisors) on voiding and canceling citations.	SFMTA	Concur. This training will begin by the end of calendar year 2012.
35. Retrain Customer Service Center window employees on the policy for acceptance of payments for correction citations to ensure that the policy is followed correctly.	SFMTA	Concur. The SFMTA Customer Service unit will retrain their window employees accordingly.
36. Require Customer Service Center management to review daily reports showing all adjustments (reductions) to citations fines.	SFMTA	Concur. The SFMTA is developing procedures to perform regular reviews of compliance adjustments on a monthly basis. Eventual implementation of the item on a daily basis will be dependent on available resources.
37. Retain access request forms for the Electronic Ticket Information Management System (eTIMS).	SFMTA	Concur. The SFMTA is working with PRWT (the eTIMS vendor) to retain and manage these forms.

Office of the Controller, City Services Auditor
SFMTA: The Parking Enforcement Section Should More Effectively Manage Its
Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations

Recommendation	Responsible Agency	Response
38. Periodically review access levels in eTIMS to determine whether those levels are appropriate.	SFMTA	Concur. The SFMTA is working with PRWT (the eTIMS vendor) to periodically produce an access level matrix.
39. Develop a plan to create a complaints management system. The complaints management software must be able to log all complaints in one database and allow the tracking and management of complaints from receipt to closure so that statistics and management reports can be generated.	SFMTA	Concur. The SFMTA will develop a plan to work additional complaint management features into our current 311 system by the end of calendar year 2012. However, implementation of the plan will be dependent on available resources.