

M E M O R A N D U M

DATE: June 27, 2012

TO: SFMTA Board of Directors
Tom Nolan, Chairman
Cheryl Brinkman, Vice-Chairman
Leona Bridges, Director
Malcolm Heinicke, Director
Jerry Lee, Director
Joél Ramos, Director
Cristina Rubke, Director

THROUGH: Edward D. Reiskin
Director of Transportation

THROUGH: Bond M. Yee
Director of Sustainable Streets

FROM: Patricia Fieldsted
Manager, Sustainable Streets Administration

SUBJECT: Status Update: City Services Audit Parking Enforcement Section Report

This memo is to inform the San Francisco Municipal Transportation Agency (SFMTA) Board of Directors of the recent City Services Auditor (CSA) report "The Parking Enforcement Section Should More Effectively Manage Its Resources, Strengthen Some Internal Controls, and Improve the Efficiency of Its Operations."

Please see the attached final report, as well as the SFMTA's responses to the audit recommendations. This material will be discussed at the July 13, 2012 Policy and Governance Committee meeting.

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 (SFMTA). 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



**City Services Auditor Division
Audit Recommendation and Response Form**

Audit Subject: SFMTA Parking Enforcement

Recommendation	Responsible Agency	Response
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.
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.

**City Services Auditor Division
Audit Recommendation and Response Form**

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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.
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.

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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 SFpark to expand and update beat maps accordingly.
15. Develop workload and productivity standards for its Parking Enforcement employees so it can make assessments of 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 FY13/14 performance plans.

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16. Through internal analysis or with assistance of a management consultant, conduct a workload analysis to determine whether Parking Enforcement could benefit with the addition of a fourth assistant director position.	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 camera should be expanded. We will also seek to expand the electronic chalking and transit only lane enforcement programs as resources allow.
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.

City Services Auditor Division Audit Recommendation and Response Form

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<p>19. Offer ongoing, in-service training to parking control officers and their supervisors. The following topics should be considered for inclusion in the training:</p> <ul style="list-style-type: none"> • 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 <i>SFPark</i> parking meters 	SFMTA	<p>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.</p>
<p>20. Work with Central Shops to determine how vehicles can be maintained and repaired more promptly.</p>	SFMTA	<p>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.</p>
<p>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.</p>	SFMTA	<p>Concur. These guidelines will be developed and documented by Parking Enforcement management by December, 2012.</p>
<p>22. Develop a vehicle replacement plan.</p>	SFMTA	<p>Concur. The Parking Enforcement Unit will work together with the SFMTA's Strategic Planning and Policy team to develop a replacement plan.</p>
<p>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.</p>	SFMTA	<p>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.</p>

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24. Ensure that parking control officers 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.
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.	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.
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.

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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).
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.
38. Review periodically 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.

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<p>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.</p>	<p>SFMTA</p>	<p>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.</p>