

OFFICE OF OPERATIONS

OPERATIONS ORDER NO. 7

May 7, 2018

SUBJECT: MOBILE PHONE VALIDATOR WITH ENABLED GLOBAL POSITIONING SYSTEM – ESTABLISHED

PURPOSE: The purpose of this Order is to establish procedures for the use of the Global Positioning System (GPS) feature on the Mobile Phone Validators (MPV) owned by the Los Angeles County Metropolitan Transportation Authority (LACMTA or MTA). The MPV will be utilized by personnel assigned to Transit Services Division (TSD) and those assigned to work TSD on a Cash Overtime Allotment System for Timekeeping (COAST) overtime detail.

The MPV is a resource assessment and dispatch tool that can assist with accountability and officer safety. The Department's contract with LACMTA requires the Department to use the MPV to ensure compliance with the Key Performance Indicators (KPI). One such KPI requires the use of GPS to track the assignment of assets to ensure officers maintain presence at certain checkpoints. Additionally, the Office of the Inspector General (OIG), LACMTA, is mandated to conduct audits that promote the efficiency and effectiveness of MTA programs, and the MPV will provide data that will allow the OIG, LACMTA, to perform this duty.

PROCEDURES: The KPI requires a daily summary of work activity for each employee. The MPV is preloaded with LACMTA applications including an officer application: this GPS-enabled program will allow for officers to complete an electronic activity log that will capture information like a Daily Field Activities Report (DFAR). The MPV officer application will eventually replace a paper DFAR. Additionally, the MPV is equipped with applications that allow for fare checks, issuing e-tickets for both transit and parking violations, and validating parking permits.

Currently, officers are required to broadcast their Code-6 location every time they move about the transit system and arrive at their required checkpoints. Officers broadcast their movements and current locations to Communications Division (CD), resulting in almost-constant radio traffic on the TSD frequency. The MPV will reduce this necessity by automatically capturing their checkpoint locations without a required radio broadcast, thus mitigating heavy radio traffic and freeing the frequency to be used during critical instances. In addition, the TSD watch commander will be able to track an officer's location in real-time. Such functionality will provide the TSD watch commander situational awareness, particularly when officers are on a moving train and need to provide an updated location during additional unit or back-up requests.

Note: GPS data must be reviewed periodically because the accuracy of the MPV GPS can be impacted by various factors, including but not limited to, tunnels, locations of platforms, weather conditions, and unforeseen system errors. The ability of the MPV to track an officer's location does not relieve him/her of the requirement to broadcast a Code-6 location during any contact which would normally require an officer to do so.

- I. OBJECTIVES OF THE GPS-ENABLED MPVs.** The objectives of the implementation of the MPV include:
- Contract compliance with Key Performance Indicators (KPI);
 - Tracking the assignment of officers to ensure they meet checkpoint requirements;
 - Ability to assess and redeploy units throughout the system to more efficiently respond to emergency calls and tactical incidents;
 - Enhancement of officer safety through greater situational awareness by the TSD watch commander who can monitor officers' movements throughout the rail and bus system in real-time;
 - Improved officer safety through significant reduction of radio traffic;
 - Capturing the daily summary of work activity of officers via the officer application and the elimination of the use of the handwritten DFAR; and,
 - The ability to check fares, issue e-tickets for both transit and parking violations, and validate parking permits, utilizing the MPV.
- II. TRANSITION PERIOD.** The Department will provide a 90-calendar day transition period once an officer is trained and deploys the MPV at TSD.
- Note:** During this 90-calendar day period, unintentional deviations in policy and procedure from the MPV directives will be considered training issues. During the transition period, Department employees should only receive training to ensure compliance. A Training Evaluation and Management System II (TEAMS II) action item should not be generated.
- III. REVIEW OF MPV GPS DATA BY OFFICERS.** The accuracy of police reports, officer statements, and other official documentation is essential for the integrity of any investigation. Prior to documenting an incident, participating in an interview or other investigative activity, officers shall be allowed to review MPV GPS data pertaining only to their individual activity to ensure all reports are complete and accurate.
- IV. PROHIBITION AGAINST MODIFICATION OF DATA.** The MPVs are the sole property of LACMTA. Officers shall not copy, edit, alter, erase, or otherwise modify in any manner MPV data, hardware, or systems except as authorized by law or Department policy. Additionally, officers shall not make any intentional mechanical alterations or modifications which would interfere with the proper operation of the MPVs. Any violation of the provision is considered serious misconduct and subject to disciplinary action.
- V. ACCESS TO MPV GPS.** Only supervisors assigned to TSD and personnel designated by the Chief of Police shall have real-time access to the MPV's GPS system. As part of the Department's compliance requirement, LACMTA auditors will have delayed access to perform compliance audits.

- VI. RETRIEVAL AND ARCHIVING OF MPV GPS DATA.** Data from the MPV GPS will be available for sampling by both TSD supervisors and LACMTA contract compliance auditors. The MTA requires that the data be archived for review by LACMTA contract compliance auditors for five years.
- VII. CONFIDENTIAL NATURE OF DATA.** The MPV information is limited to enforcement, investigative, and administrative activities. Officers shall comply with all applicable laws and policies regarding confidential information including Department Manual Section 3/405, *Confidential Nature of Department Records, Reports and Information*. Unauthorized use of MPVs may compromise employee privacy and Department investigations. Therefore, any unauthorized use or release of MPV information is a violation of law and Department policy and is considered serious misconduct and subject to disciplinary action.
- VIII. PROCEDURE FOR REVIEWING MPV GPS DATA FOR INCIDENTS INVESTIGATED BY PROFESSIONAL STANDARDS BUREAU OR THE MULTI-DISCIPLINARY COLLISION INVESTIGATION TEAM.** Officers involved in an incident investigated by an entity within Professional Standards Bureau (PSB) or the Multi-Disciplinary Collision Investigation Team (MCIT) shall not be allowed to review MPV GPS data until authorized to do so by the assigned investigative supervisor. Officers will, however, be allowed to review the relevant MPV GPS data prior to being interviewed or providing a written statement. An officer may have an employee representative present during the review of MPV GPS data without the PSB or MCIT investigator or supervisor present. In any incident investigated by PSB or MCIT, the review of MPV GPS data shall not occur jointly among the involved officers. In a Categorical Use of Force (CUOF) Incident, the separating and monitoring of officers involved shall be maintained during the review of the MPV GPS data.
- IX. DOCUMENTATION OF MPV GPS DATA.** While MPV GPS data can be a useful resource for complete and accurate police reports, officers shall not directly reference MPV GPS nor attach any related MPV GPS reports to any police report, except when used as evidence in an investigation.
- X. MPV GPS COORDINATOR'S RESPONSIBILITIES.** The Training Coordinator, TSD, is designated as the MPV GPS Coordinator (as an ancillary duty) and shall be responsible for the following:
- Providing relevant access of MPV GPS data to authorized users as designated by the TSD commanding officer;
 - Verifying authorized users have been trained on the use of the MPV GPS; and,
 - Notifying the watch commander and LACMTA personnel or their contracted application developers in the event it appears that the MPV GPS has been tampered with.

May 7, 2018

XI. SUPERVISOR'S RESPONSIBILITIES. Supervisors shall be responsible for the following:

- Reviewing relevant MPV GPS data prior to submitting any administrative reports (e.g., non-categorical use of force investigations, pursuits, complaint investigations, officer-involved traffic collisions, etc.);
- Facilitating access for officers who need to review MPV GPS data pursuant to this Order; and,
- Reviewing any deviations from Department policy and procedures and to take appropriate action if necessary.

Note: Procedures for chain of command investigations are not affected by this section.

XII. COMMANDING OFFICER'S RESPONSIBILITIES. The commanding officer of TSD shall ensure compliance with this Order.

AUDIT RESPONSIBILITY. The Commanding Officer, Audit Division, shall review this directive and determine whether an audit or inspection shall be conducted in accordance with Department Manual Section 0/0830.30.

If you have any questions, please contact Transit Services Bureau, at (213) 922-3614.



MICHEL R. MOORE, First Assistant Chief
Director, Office of Operations

DISTRIBUTION "A"