TORONTO

STAFF REPORT
ACTION REQUIRED

Toronto Police Service – Parking Enforcement Review

Date:	November 7, 2011
To:	Audit Committee, City of Toronto
From:	Alok Mukherjee, Chair, Toronto Police Services Board

SUMMARY

The purpose of this report is to provide the Audit Committee with the results of the Toronto Police Service – Parking Enforcement Review.

RECOMMENDATION

It is recommended that the Audit Committee receive this report for information.

FINANCIAL IMPACT

There are no financial implications related to the receipt of this report.

ISSUE BACKGROUND

At its meeting of October 20, 2011, the Toronto Police Services Board ('the Board') was in receipt of the following reports regarding the Toronto Police Service – Parking Enforcement Review:

- October 3, 2011 from Jeff Griffiths, Auditor General, City of Toronto
  Re: Toronto Police Service – Parking Enforcement Review; and,

- October 7, 2011 from William Blair, Chief of Police
  Re: Response to City Auditor General's Parking Enforcement Review

COMMENTS

The Board received the foregoing reports and approved the following Motions:

1. That the Board send recommendation nos. 2 and 8 to the City Manager for consideration;

2. That the Board send recommendation nos. 4 and 6 to the City Treasurer for consideration; and

3. That the Board receive recommendation nos. 1, 3, 5 and 7, given that the Chief has already responded to each of the recommendations and they are included in Appendix 2, contained in Appendix A.

CONCLUSION

A copy of Board Minute No. P264/11, in the form attached as Appendix "A" to this report, regarding this matter is provided for information.

CONTACT

Chief of Police William Blair
Toronto Police Service
Telephone No. 416-808-8000
Fax No. 416-808-8002

SIGNATURE

_____
Alok Mukherjee
Chair, Toronto Police Services Board

ATTACHMENT

Appendix A – Board Minute No. P264/11

a: Toronto Police Service – Parking Review

Appendix "A"

THIS IS AN EXTRACT FROM THE MINUTES OF THE PUBLIC MEETING OF THE TORONTO POLICE SERVICES BOARD HELD ON OCTOBER 20, 2011

#P264. TORONTO POLICE SERIVCE – PARKING ENFORCEMENT REVIEW

The Board was in receipt of the following report October 03, 2011 from Jeff Griffiths, Auditor General, City of Toronto:

SUMMARY

Over the past number of years, the Auditor General's annual work plan has included a systematic review of City revenue sources. Parking tag revenue is one of the City's major revenue sources and, as such, was selected for audit. The annual value of parking tags issued is approximately $110 million.

The administration of parking tag revenue is comprised of two separate components:

- Issuance of parking tags by the Toronto Police Service through its Parking Enforcement Unit and Municipal Law Enforcement Officers.
- Processing of parking tag information and the collection of parking tag revenue by the Revenue Services Division of the City's Finance Division.

While both organizations operate independently, there is a certain degree of coordination between the two functions particularly in the area of reporting requirements. The Revenue Services Division because of its processing role has the capability of providing a significant number of management information reports for use by the Police Service in managing the parking tag issuance process.

The objective of our review was to assess controls over the issuance, cancellation and processing of parking tags at the Parking Enforcement Unit of the Toronto Police Service.

This review is the second of a two-part review of parking tag revenues. The first report was a review of parking tag revenue practices at the City Revenue Services Division. This report was considered by City Council at its meeting of February 2010 and is available at www.toronto.ca/audit/reports2010_jan27.htm.

This current review relates to the issuance of parking tags by police parking enforcement and municipal law enforcement officers.

This report identifies additional revenue opportunities of over $2.8 million. The realization of certain revenue is dependent on amendments to provincial legislation. The audit results are presented in the attached report entitled “Toronto Police Service, Parking Enforcement Review.”

RECOMMENDATIONS

The Auditor General recommends that:

1. The Chief of Police review the current management reporting process in order to identify areas where reporting could be improved. Periodic reports should be produced identifying both parking tag errors for individual officers and officers not submitting tickets for processing on a timely basis. Further, reporting should be established to immediately identify malfunctioning electronic hand held ticket issuing equipment.

2. The City Manager, in consultation with the City Solicitor and the Chief of Police, consider the feasibility of amending the parking tag form to exclude the expiry month of each vehicle license plate. If required a request be made to the Province to amend legislation.

3. The Chief of Police periodically review parking ticket inventory to identify missing parking tags. Missing parking tags identified should be traced to individual officers responsible and explanations documented. Appropriate action should be taken in circumstances where explanations are inadequate or in circumstances where missing tags are identified on a recurring basis.

4. The City Treasurer, in consultation with the Chief of Police review and update the "Reason Code" listing. Cancellation reason codes should be specific, relevant and clear enough to facilitate analysis and reporting.

5. The Chief of Police take steps to ensure compliance with the process for maintaining and reviewing Parking Enforcement Officer and Municipal Law Enforcement Officer court attendance records. The Chief of Police, in consultation with the Deputy City manager responsible for Court Services develop a reporting process for Officer court attendance validation.

6. The City Treasurer in consultation with the Chief of Police implement a process to identify and correct parking tag management information system data entry errors in a timely manner.

7. The Chief of Police evaluate the need to continue with the alternate parking tag management information database.

8. The City Manager, in consultation with the City Solicitor and the Chief of Police, consider initiating a request to the Province to amend legislation to allow parking enforcement officers the authority to issue tickets for expired licence plates. Any amendments to legislation provide for a revenue sharing arrangements with the City.

FINANCIAL IMPACT

The implementation of recommendations in this report will result in reducing the number of parking tag cancellations. The City could realize additional revenue in the range of over $2.8 million. However, the realization of certain revenue is dependent on amendments to provincial legislation.

ISSUE BACKGROUND

The Parking Enforcement Unit of the Toronto Police Service enforces the Provincial Offenses Act and City parking by-laws deterring illegal parking and facilitating the free flow of traffic. The unit issues approximately 2.8 million tags annually with a value in the range of $110 million. However, approximately $80 million is realized as revenue when adjusting for tags that are cancelled, uncollectible, dismissed or reduced during court trial.

COMMENTS

This report contains eight recommendations to improve parking enforcement, reduce the number of cancellations and potentially collect additional revenue. The report addresses the cancellation of parking tags over which the Toronto Police Service has direct control. Key issues identified in this report include:

- Parking tag cancellations due to parking tag errors
- Parking tag cancellations due to processing delays
- Parking tag inventory management
- Improving court attendance tracking

The audit report entitled "Toronto Police Service, Parking Enforcement Review" is attached as Appendix 1. Management's response to each of the audit recommendations is attached as Appendix 2.

CONTACT

Alan Ash, Director, Auditor General's Office
Tel: 416-392-8476, Fax: 416-392-3754, E-mail: aash@toronto.ca

Syed Ali, Senior Audit Manager, Auditor General's Office
Tel: 416-392-8438, Fax: 416-392-3754, E-mail: sali4@toronto.ca

The Board was also in receipt of the following report October 07, 2011 from William Blair, Chief of Police:

SUBJECT: Response to City Auditor General's Parking Enforcement Review

Subject: TORONTO POLICE SERVICE'S RESPONSE TO THE CITY AUDITOR GENERAL'S PARKING ENFORCEMENT REVIEW

Recommendations:

It is recommended that:

(1) the Board receive this report; and
(2) the Board forward a copy of this report to the City of Toronto Audit Committee for information.

Financial Implications:

There are no financial implications relating to the recommendations contained within this report.

Background/Purpose:

At its meeting of June 29, 2010, the Board was in receipt of a report from Mr. Jeffrey Griffiths, Auditor General, City of Toronto, entitled, "Proposed Audit of Parking Tag Issuance System." The Board approved this report and agreed to forward a copy to the City of Toronto – Audit Committee for information. (Min. No. P171/10 refers).

As a result, the City of Toronto Auditor General's Office commenced an audit relating to the parking enforcement program. The terms of reference were aligned with the results of an audit previously conducted on the City of Toronto Revenue Services Division with respect to the cancellation of parking tags. The complete audit terms of reference were received on August 13, 2010.

The purpose of this report is to provide the Board with the Service's response to the City Auditor General's review of the parking enforcement program.

Discussion:

The City Auditor General has completed his audit, and his report containing eight recommendations will be tabled at the October 20, 2011 meeting of the Board.

Of his eight recommendations, four are directed to senior City staff. Of these, two require legislative change in order to be implemented and any savings realized.

The remaining four recommendations are directed to the Chief of Police, of which three require the development of reports from the City of Toronto court services and parking tag management

systems. Implementation of these recommendations will therefore require the assistance of the City Revenue Services and Court Services divisions.

The Service's response to each of the Auditor General's recommendations has been provided to the Auditor General's office for inclusion in his report.

Acting Deputy Chief Jeff McGuire, Specialized Operations Command, will be in attendance to answer any questions the Board may have concerning this report.

The Board approved the following Motions:

1. **THAT the Board receive the report from the Auditor General and that:**

   - **the Board send recommendation nos. 2 and 8 to the City Manager for consideration;**

   - **the Board send recommendation nos. 4 and 6 to the City Treasurer for consideration; and**

   - **the Board receive recommendation nos. 1, 3, 5 and 7, given that the Chief has already responded to each of the recommendations and they are included in Appendix 2 of the report.**

2. **THAT the Board receive the foregoing report from Chief Blair; and**

3. **THAT the Board send copies of the reports from the Auditor General and Chief Blair to the City of Toronto – Audit Committee for information.**

APPENDIX 1

TORONTO POLICE SERVICE
PARKING ENFORCEMENT REVIEW

April 26, 2011

TORONTO Auditor General's Office

Jeffrey Griffiths, C.A., C.F.E.
Auditor General
City of Toronto

TABLE OF CONTENTS

EXECUTIVE SUMMARY

The annual value of all parking tags issued is approximately $110 million

Over the past number of years, the Auditor General's annual work plan has included a systematic review of City revenue sources. Parking tag revenue is one of the City's major revenue sources and, as such, was selected for audit. The annual value of parking tags issued is approximately $110 million at an average tag value of $40. However, approximately $80 million is realized as revenue when adjusting for tags that are cancelled, uncollectible, dismissed or reduced during court trial.

Toronto Police Service through its Parking Enforcement Unit issues parking tags. Revenue Services Division of the City administers Collection of parking tags

The administration of parking tag revenue is comprised of two separate components:

- Issuance of parking tags by the Toronto Police Service through its Parking Enforcement Unit and Municipal Law Enforcement Officers.
- Processing of parking tag information and the collection of parking tag revenue by the Revenue Services Division of the City's Finance Division.

While both organizations operate independently there is a certain degree of coordination between the two functions particularly in the area of reporting requirements. The Revenue Services Division because of its processing role has the capability of providing a significant number of management information reports for use by the Police Service in managing the parking tag issuance process.

Opportunities to reduce parking tag cancellations

In 2010, the Auditor General issued a report entitled"Controls over Parking Tags needs Strengthening". This review focused on the roles and responsibilities of the Revenue Services Division with particular emphasis on the administrative process relating to the cancellation of a significant number of parking tags. The cancellation of these tags for the most part were outside the control of the Police Service and pertained to tags issued to out of province vehicles as well as tags issued to "drive away" vehicles.

Specific information on these particular cancellations is outlined in our 2010 report. We performed additional audit work in these areas in 2011 and will report the observations not directly related to Toronto Police Service, in a separate report to the City.

Key Issues

This report addresses the cancellation of parking tags over which the Police Service has direct control. Key issues identified in this report include:

- Parking tag cancellations due to parking tag errors
- Parking tag cancellations due to processing delays
- Parking tag inventory management
- Improving court attendance tracking

Additional $2.8 million is potentially collectible

There are opportunities identified in this report to reduce the level of parking tag cancellations. Implementation of the recommendations included in this report could result in additional revenue in the range of over $2.8 million. An analysis of this amount is included in Appendix 2 attached to this report. There are three recommendations that require development of reports from parking tag management system and court services system, implementation of these recommendations would be dependent on the coordination and resources from City's Revenue Services and Court Services divisions. In addition, the realization of certain revenue is also dependent on legislative changes at the provincial level.

BACKGROUND

Approximately 2.8 million tags issued annually by the parking enforcement unit and municipal law enforcement officers

The Parking Enforcement Unit of the Toronto Police Service enforces the Provincial Offenses Act and City parking by-laws deterring illegal parking and facilitating the free flow of traffic. The unit along-with Municipal Law Enforcement Officers issues approximately 2.8 million tags annually with a value in the range of $110 million.

The majority of parking tags issued carry a $30 fine. Fines for parking near a fire hydrant on a fire route or in a disabled parking space can be as high as $450. In general, we have used an average value of $40 a tag in this report. The average value has been arrived based on the total number of tags issued under various types of violations during 2009 and 2010.

2011 Parking Enforcement and operations budgeted cost is $55 million. This includes cost of shared services of other division

The 2011 budgeted operating cost for Parking Enforcement and Operations is $55 million. This amount also includes shared service costs for the Court Services Division and the City Revenue Services Division to administer court processes, the parking tag management information system and revenue collection.

Parking enforcement officers issue the majority of parking tags

The Toronto Police Service employs 306 parking enforcement officers who issue the vast majority of parking tags. A number of municipal law enforcement officers hired independently by private sector organizations issue approximately ten per cent of parking tags. These tags are generally for parking infractions on private property. Municipal Law Enforcement Officers are trained by the Toronto Police Service and revenue related to tickets issued by them accrue to the City.

Most parking enforcement officers use electronic hand-held devices to issue parking tags. A small percentage are issued manually. Municipal Law Enforcement Officers use pre-printed parking tag books to issue parking tags manually.

AUDIT OBJECTIVES, SCOPE AND METHODOLOGY

Why we conducted this review

Our 2009 Audit Work Plan included a systematic review of major City revenue streams over a number of years.

We selected parking tag revenues because of the significant amount of funds involved. This review is the second of a two-part review of parking tag revenues. The first report was a review of parking tag revenue practices at the City Revenue Services Division. This report was considered by City Council at its meeting of February 2010 and is available at www.toronto.ca/audit/reports2010_jan27.htm.

This current review relates to the issuance of parking tags by police parking enforcement officers and to a lesser extent parking tags issued by Municipal Law Enforcement Officers.

Audit Objectives and Scope

The objective of our review was to assess controls over the issuance, cancellation and processing of parking tags at the Parking Enforcement Unit of the Toronto Police Service.

Due to the inter-relationship between the issue of parking tags by the Toronto Police Service and the processing of tags and the collection of revenue by the City Revenue Services Division, we also reviewed where applicable, certain aspects of the City Revenue Services Division.

The audit covered the period from January 1, 2009 to December 31, 2010.

Steps in the review

Our audit methodology included:

- Review of parking enforcement policies and procedures
- Review of Provincial Offences Act Part II and City Parking By-Laws
- Review of various Council reports
- Interviews with Parking Enforcement Unit staff and other relevant City staff
- Review of parking tag cancellation documentation
- Extraction, review and analysis of data from the parking tag management information system.

Audit conducted in accordance with generally accepted government auditing standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

AUDIT RESULTS

Approximately 60,000 tags valued at $2.4 million cancelled each year due to tag errors or processing delays

Parking Enforcement Officers issue the majority of parking tags with electronic handheld devices. A small number of tags are issued manually on pre-printed parking tag forms. All tags issued by Municipal Law Enforcement Officers are issued manually.

Approximately 60,000 tags valued at $2.4 million each year are cancelled due to parking tag errors and processing delays.

Parking Tag Cancellations Due to Parking Tag Errors

Various errors identified during our review

In 2006, the Toronto Police Service Parking Enforcement Unit introduced electronic handheld devices for issuing parking tags. After the introduction of electronic hand-held devices, parking tag errors such as incorrect date and time entries and street names were significantly reduced. However, manual data entry errors entered into electronic handheld devices continue to result in tag cancellations. In addition, parking tags which are manually written continue to contain errors. The type of errors identified during our review are varied. Lost revenue relating to these cancellations is significant.

Details of parking tag cancellations as a result of errors are shown in Table 1.

Table 1: Parking Tag Cancellations Due to Tag Errors

	Number of Tags	Amount
2007	46,000	$1,600,000
2008	50,000	$1,900,000
2009	50,500	$2,100,000
2010	48,500	$2,000,000

In 2010 data entry errors resulted in over $2 million parking tag cancellations

In 2010, errors resulted in over 48,500 parking tag cancellations valued at $2 million. Errors include:

- Incorrect license plate expiry date
- Missing officer signatures
- Incomplete tags
- Incorrect vehicle make and model entries

A 75% reduction in tag errors would result in an additional $1.5 million

The Toronto Police Service has developed various management reports to monitor cancellations by officers. Additional detailed reporting and analysis along with establishing or revising performance standards should assist in the reduction of parking tag errors. A 75 per cent reduction in parking tag errors would result in additional revenue of approximately $1.5 million.

A significant number of cancellations, 30,000 parking tags valued at $1.2 million, were the result of vehicle license plate expiry date errors. Expiry dates entered on parking tags did not match Ministry of Transportation records. The Provincial Offences Act requires the expiry month be entered on all parking tags issued. We have been advised that the entry of the expiry month provides additional validation that the vehicle was in fact involved in the violation.

Considering the number of errors and related revenue losses, the City should review the feasibility of requesting an amendment to the Provincial Offences Act to eliminate the requirement to enter the expiry month on the parking tag. The license plate number together with vehicle make and model should in our view be adequate information to process a parking tag.

Parking Tag Processing Delays

Parking Tags Issued Manually

Internal procedures require municipal law enforcement and parking enforcement officers to submit manually issued tags within 48 hours of issuance. City staff scan paper forms and process parking tag data into the Parking Tag Management Information System within three to five days of issuance. The three to five days has been established internally to ensure tags are processed within the legislated timeframe.

35,000 tags valued at $1.4 million were delayed by 10 or more days

In 2010, approximately 35,000 manually issued tags valued at $1.4 million were delayed in processing. These tags were processed 10 or more days after the issue date. In a number of instances, delays were over a year. Out of these 35,000 delayed tags, 10,000 tags valued at $400,000 were cancelled due to lack of adequate processing time to meet legislative requirements.

10,000 tags valued at $400,000 were cancelled due to lack of adequate processing time to meet legislative requirements

Due to time constraints in meeting legislated requirements, staff generally cancel parking tags not processed within 10 days. The loss of revenue is significant and potentially the result of officers failing to submit tags on a timely basis.

There is a need to ensure that management information reports identify officers who continually submit parking tags late. A reporting process should be established to identify cancelled tickets due to delays in submission of parking tags. An explanation should be provided for all tickets cancelled where the established processing schedule is not met.

A 75 per cent reduction in parking tag processing delays would result in additional revenue of approximately $300,000.

Parking Tags Issued Through Handheld Electronic Devices

Hand-held devices provide electronic updates for tags issued to the Parking Tag Management Information system each hour.

Malfunctioning handheld devices result in update delays

Malfunctioning handheld devices result in update delays. We noted delays in the electronic tag update process from one day to over 50 days resulting from malfunctioning handheld devices. Due to time constraints in meeting legislated requirements staff generally cancel parking tags not processed within 10 days.

Cancellations resulting from malfunctioning handheld devices result in revenue loss in the range of $30,000. A lack of adequate controls to identify update delays could result in larger discrepancies.

Status reports providing information on data transmission delays or where handheld devices failed to transmit data to the Parking Tag Management Information System would assist in identifying delayed or missing parking tag data updates on a timely basis.

Recommendations:

1. **The Chief of Police review the current management reporting process in order to identify areas where reporting could be improved. Periodic reports should be produced identifying both parking tag errors for individual officers and officers not submitting tickets for processing on a timely basis. Further, reporting should be established to immediately identify malfunctioning electronic hand held ticket issuing equipment.**

2. **The City Manager, in consultation with the City Solicitor and the Chief of Police, consider the feasibility of amending the parking tag form to exclude the expiry month of each vehicle license plate. If required a request be made to the Province to amend legislation.**

Parking Tag Inventory Management Requires Improvement

The Toronto Police Service distributes 12,500 pre-printed parking tag books annually

Each year, the Toronto Police Service distributes 12,500 pre-printed parking tag books to parking enforcement officers and municipal law enforcement officers. Each book contains 25 tags. Municipal Law Enforcement Officers are the primary users of these books. Inventory control over pre-printed parking tag books needs improvement.

A number of missing parking tag sequences identified out of 50 parking tag books sampled

Our review of 50 manual pre-printed parking tag books indicated a number of missing parking tags. Initially, staff advised that these particular tags were a part of the inventory of books held by Municipal Law Enforcement Officers. However, our further verification of missing parking tag inventory identified that these tags had been issued and in fact had not been accounted for.

Due to the elapsed time from the date of issuance of these particular tags, we were unable to determine the reason why these tags were not processed.

Missing pre-printed parking tags present risk of misuse

Missing pre-printed parking tags present the risk of misuse of pre-printed parking tag books and revenue loss. A periodic review of parking tag ticket inventory and investigation into missing parking tags would strengthen controls over pre-printed parking tag forms.

Recommendation:

3. The Chief of Police periodically review parking ticket inventory to identify missing parking tags. Missing parking tags identified should be traced to individual officers responsible and explanations documented. Appropriate action should be taken in circumstances where explanations are inadequate or in circumstances where missing tags are identified on a recurring basis.

Updating Cancellation Reason Code List Will Improve Analysis and Reporting

Updating the Cancellation "Reason Code" list will result in better analysis of cancellations and assist in identifying staff training needs

The Parking Enforcement Unit and Revenue Services Division, both use a parking tag cancellation "Reason Code" list. The actual cancellation list outlines specific reasons for ticket cancellations. The information on the list is used as a basis for reporting reasons why tags are cancelled.

The cancellation list is over 10 years old and has not been periodically reviewed. The addition of new cancellation reasons over the last number of years has resulted in vague, redundant and duplicate codes.

Certain codes do not adequately describe the reason the tag was cancelled. The original intent of the list was to simplify the reporting process and to provide management with detailed information as to why tags were cancelled and to address areas requiring additional review.

In addition, there is no easy way to determine whether the Police Service or the City Revenue Services Division originated the cancellation request because the reporting process does not have this capability.

Approximately 50,000 tags valued at $2 million are included in the "Officers Request to Cancel" category

The Parking Enforcement Unit staff also use a reason code described as "Officer's Request to Cancel". This reason code is of limited use when attempting to categorize and analyze ticket cancellations. Approximately 50,000 tags valued at $2 million were included in the "Officer's Request to Cancel" category.

The only way to determine the specific reason why cancellation was requested is to review each and every ticket. For the most part, this is impractical and time consuming and makes the identification of cancellation trends extremely difficult.

Updating the cancellation code list will result in improved analysis of parking tag cancellations and assist in identifying staff training needs.

Recommendation:

4. The City Treasurer, in consultation with the Chief of Police review and update the "Reason Code" listing. Cancellation reason codes should be specific, relevant and clear enough to facilitate analysis and reporting.

Court Attendance Tracking Requires Improvement

Parking Enforcement Officers

Parking enforcement officers are required to provide evidence in court for tags contested by vehicle owners. Officers receive additional pay when court attendance is required during off duty hours. In 2010, officers received additional pay of approximately $750,000 for off duty court appearances.

Records for officers not attending court do not exist

The process of tracking court attendance needs improvement. Parking Enforcement Unit procedures require that records of officers not attending scheduled court dates be maintained and receive supervisory review. These records do not exist.

In 2010, over 14,000 tags valued at $1.1 million were cancelled due to officer non-attendance

The lack of accurate court attendance records results in inadequate supervisory review of court attendance. In 2010, over 14,000 tags valued at $1.1 million were cancelled due to officer non-attendance at court hearings. Officer court attendance trends and related ticket cancellations should be analyzed and acted upon.

The City Court Services System may have the capability to generate reports indicating tag cancellations due to officer non-attendance at court hearings. This report can be used to monitor trends in officer non-attendance and to validate court attendance records and related payments.

Municipal Law Enforcement Officers

Parking enforcement policies and procedures require a year-end review of Municipal Law Enforcement Officer (MLEO) court attendance. This review is not taking place.

Review of MLEO court attendance will improve efficiency and effectiveness of enforcement efforts

According to staff, this review does not occur because extensive paperwork and manual processes make it difficult to manage and review court attendance. The existing City Court Services System may have the capability of generating MLEO court attendance reports. Consequently, this information should be requested. A review of MLEO court attendance will improve the efficiency and effectiveness of MLEO enforcement.

Recommendation:

5. The Chief of Police take steps to ensure compliance with the process for maintaining and reviewing Parking Enforcement Officer and Municipal Law Enforcement Officer court attendance records. The Chief of Police, in consultation with the Deputy City Manager responsible for Court Services develop a reporting process for Officer court attendance validation.

Parking Tag Computer Data Entry Errors

Data errors result in cancellation of parking tags

The Parking Tag Operations Unit at the City Revenue Services Division manually enters data for tags issued in paper form. As data entry errors result in parking tag cancellations, data entry controls are an important consideration.

During our review, we noted a variety of parking tag error types. One example relates to incorrect officer badge numbers. We reviewed certain officer badge numbers that obviously did not exist. We noted over 500 tags entered which contained incorrect badge numbers. The most common data error was an incorrect badge number of '99999'. In addition to cancellation of parking tags, data entry errors also result in incorrect management information reports.

Evaluate the need for an alternate database maintained at an annual cost of $90,000

In early 2010, the Parking Enforcement Unit developed a separate database for maintaining manually issued parking tags. At the time of our review, three members of the police service devote a half day on a daily basis to maintaining the alternate database at an annual cost of approximately $90,000.

According to management, the development of the alternate parking tag database was necessary. The existing parking tag management information system produced reports which contained errors.

We understand there may have been data integrity issues with reports generated from the existing system and the need for additional reports. However, the development and maintenance of duplicate systems generally result in additional data integrity issues and inefficiencies. Improvements to the existing system are a better solution as they result in greater resource efficiencies and minimize the risk of data integrity issues.

Recommendations:

6. The City Treasurer in consultation with the Chief of Police implement a process to identify and correct parking tag management information system data entry errors in a timely manner.

7. The Chief of Police evaluate the need to continue with the alternate parking tag management information database.

Other Issues

Vehicles Operating with Expired Vehicle Registration Plates

25,000 vehicles operating with expired license plates identified during 2010

Our analysis of parking tags issued to vehicles during 2009 and 2010 identified approximately 23,500 and 25,000 vehicles operating with expired license plates. Further analysis indicated that 3,000 vehicles operating with expired plates during 2009 continued to do so in 2010.

Provincial legislation restricts parking enforcement officers to issue tickets for expired license plates

Provincial legislation does not provide the authority for parking enforcement officers to issue tickets for expired license plates. Only uniformed police officers have the legislative authority to issue tickets for expired license plates.

With the significant number of vehicles operating with expired licence plates and parking enforcement officers in a position to identify expired licence plates, consideration should be given to pursuing legislative changes to allow parking enforcement officers to enforce license renewal legislation.

Providing parking enforcement officers with the authority to ticket vehicle owners operating with expired license plates would improve the efficiency of enforcing license renewal laws.

Potential revenue in the range of $2.75 million from expired license tag fines

The fine for operating a vehicle with an expired license plate is $110. Improved enforcement will generate additional revenues in the range of $2.75 million. While this revenue will accrue to the Province, a revenue sharing arrangement could be negotiated which would provide for a percentage of the revenue collected being forwarded to the City. This additional revenue is revenue which neither the Province nor the City would otherwise collect.

On a conservative basis assuming that approximately 75 per cent of the fines were collected, the Province would still receive $2.1 million. As the process would be managed by the City, a revenue sharing agreement between the City and the Province where the two parties shared 50 per cent of revenue collected, additional revenue in the range of $1.0 million would accrue to the City.

Recommendation:

8. The City Manager, in consultation with the City Solicitor and the Chief of Police, consider initiating a request to the Province to amend legislation to allow parking enforcement officers the authority to issue tickets for expired licence plates. Any amendments to legislation provide for a revenue sharing arrangements with the City.

CONCLUSION

Key audit recommendations included in this report are as follows:

- Action is required to minimize tag cancellations caused by errors and processing delays
- Additional management reporting is required to identify the source and type of errors
- Missing parking tags require analysis and follow up
- Court attendance tracking should be improved
- Options for providing legislative authority to parking enforcement officers to enforce motor vehicle license plate laws should be pursued.

This report contains eight recommendations related to improvements in the management, administration and enforcement of the Provincial Offense Act II and City parking by-laws regulating traffic movement and ensuring public safety. There are three recommendations that require development of reports from parking tag management system and court services system. Implementation of these recommendations would be dependent on the coordination and resources from City's Revenue Services and Court Services divisions.

The adoption of the recommendations in this report could result in additional revenue of over $2.8 million. However, the realization of certain revenue is also dependent on legislative changes at the provincial level.

Exhibit 1

Toronto Police Services
Parking Enforcement Review

Estimated Potential Additional Revenue

	Maximum Revenue	Conservative Estimated Revenue
	$ M	**$M**
Correction of Errors	2.0	1.5 (75%)
Processing Delays	0.4	0.3 (75%)
Expired Plates	1.0	1.0 (100%)
	3.4	**2.8**

APPENDIX 2

Management's Response to the Auditor General's Review of Toronto Police Service – Parking Enforcement Review

Rec No	Recommendation	Agree (X)	Disagree (X)	Management Comments: *(Comments are required only for recommendations where there is disagreement.)*	Action Plan/ Time Frame
1.	**The Chief of Police review the current management reporting process in order to identify areas where reporting could be improved. Periodic reports should be produced identifying both parking tag errors for individual officers and officers not submitting tickets for processing on a timely basis. Further, reporting should be established to immediately identify malfunctioning electronic hand held ticket issuing equipment.**	X		As the City maintains the book of record, implementation is contingent upon receipt of the City reports on processing delays or other identified items. Verbal reporting of malfunctioning of hand held devices is in place based on officer's observations. TPS knows immediately through officer reporting when a handheld device is malfunctioning and steps are taken to retrieve the data. Time is required for the data retrieval process.	The Chief will Review the current management reporting process and identify required reports. Timeline: Q1-2012 The Chief will utilize the reports as part of the management reporting process. Timeline: Upon receipt of reports from City The Chief of Police will review the opportunity, feasibility, viability, costs and benefits of potential software amendments to allow for electronic reporting. Timeline: Q2-2012

APPENDIX 2

Management's Response to the Auditor General's Review of Toronto Police Service – Parking Enforcement Review

Rec No	Recommendation	Agree (X)	Disagree (X)	Management Comments: *(Comments are required only for recommendations where there is disagreement.)*	Action Plan/ Time Frame
2.	**The City Manager, in consultation with the City Solicitor and the Chief of Police, consider the feasibility of amending the parking tag form to exclude the expiry month of each vehicle license plate. If required a request be made to the Province to amend legislation.**	X		Validation tag information is a legislated requirement as noted in O. Reg 949, Form 1, Certificate of Parking Infraction. This is a Provincial standard and makes sense to assist in prosecutions. City of Toronto staff use this entry as a quality control check to ensure effective, efficient and fair business practices. TPS produces Risk Management Reports every five weeks. One category is wrong validation and cancellations by officer are reviewed and appropriate action is taken.	The Chief of Police will participate in discussions at the request of the City Manager. The Chief of Police will continue with Risk Management reporting.

APPENDIX 2

Management's Response to the Auditor General's Review of Toronto Police Service – Parking Enforcement Review

Rec No	Recommendation	Agree (X)	Disagree (X)	Management Comments: *(Comments are required only for recommendations where there is disagreement.)*	Action Plan/ Time Frame
3.	**The Chief of Police periodically review parking ticket inventory to identify missing parking tags. Missing parking tags identified should be traced to individual officers responsible and explanations documented. Appropriate action should be taken in circumstances where explanations are inadequate or in circumstances where missing tags are identified on a recurring basis.**	X		As the City maintains the book of record, implementation is contingent upon receipt of a City report relating to gaps in serial numbers. This report will provide opportunity for spot checks, especially with MLEO agencies, to ascertain the reasons for gaps, which may be a result of a data entry issue, an officer issue or scanning issues with the City scanning equipment and will allow for appropriate action to be taken.	The Chief will utilize the report as part of the management reporting process. Time Frame: Upon receipt of reports from City.
4.	**The City Treasurer, in consultation with the Chief of Police review and update the "Reason Code" listing. Cancellation reason codes should be specific, relevant and clear enough to facilitate analysis and reporting.**	X		The City of Toronto programs and maintains the cancellation codes within their Parking Tag Management System. The City of Toronto is currently reviewing the cancellation code listing with a view to consolidating all reason codes, such that certain reason codes can be grouped for enhanced reporting and for greater efficiency.	The Chief of Police will participate in reviewing and updating the reason code list at the request of the City Treasurer.

APPENDIX 2

Management's Response to the Auditor General's Review of Toronto Police Service – Parking Enforcement Review

Rec No	Recommendation	Agree (X)	Disagree (X)	Management Comments: *(Comments are required only for recommendations where there is disagreement.)*	Action Plan/ Time Frame
5.	**The Chief of Police take steps to ensure compliance with the process for maintaining and reviewing Parking Enforcement Officer and Municipal Law Enforcement Officer court attendance records. The Chief of Police, in consultation with the Deputy City manager responsible for Court Services develop a reporting process for Officer court attendance validation.**	X		As the City maintains the book of record, implementation is contingent upon receipt of the City report relating to court attendance. The Deputy City Manager responsible for Court Services to review the possibility of providing a report which indicates officer non-attendance to court, based on docket disposition, as they hold the book of record. The book of record would include both PEO and MLEO court reporting.	The Chief of Police will validate and analyze trends and take appropriate action to ensure compliance. Time Frame: Upon receipt of reports from City.
6.	**The City Treasurer in consultation with the Chief of Police implement a process to identify and correct parking tag management information system data entry errors in a timely manner.**	X		Manual tags issued by MLEOs which are processed manually by City data entry staff are the concern.	The Chief of Police will participate at the request of the City Treasurer.

APPENDIX 2

Management's Response to the Auditor General's Review of Toronto Police Service – Parking Enforcement Review

Rec No	Recommendation	Agree (X)	Disagree (X)	Management Comments: *(Comments are required only for recommendations where there is disagreement.)*	Action Plan/ Time Frame
7.	**The Chief of Police evaluate the need to continue with the alternate parking tag management information database.**	X		Staff assigned to these duties are restricted duty and on workplace accommodation plans and as such opportunity costs for enforcement are not lost.	The Chief of Police will continue to capture errors and "lates" in the database as a basis for comparison to PTMS and business continuity pending implementation and experience with City reports as described in Number 6 above. Time Frame: Consider upon completion of 6 by the City Treasurer.

APPENDIX 2

Management's Response to the Auditor General's Review of Toronto Police Service – Parking Enforcement Review

Rec No	Recommendation	Agree (X)	Disagree (X)	Management Comments: *(Comments are required only for recommendations where there is disagreement.)*	Action Plan/ Time Frame
8.	**The City Manager, in consultation with the City Solicitor and the Chief of Police, consider initiating a request to the Province to amend legislation to allow parking enforcement officers the authority to issue tickets for expired licence plates. Any amendments to legislation provide for a revenue sharing arrangements with the City.**	X		The processing of all offences relating to vehicle operations fall under Part I of the POA. The processing of all offences relating to the parking of a vehicle fall under Part II of the POA. The Expired License Plate Offence is processed under Part I of the POA. In order to enforce under Part I the officer must demand identification as the Offence Notice is issued to the operator of the vehicle and not the vehicle itself. As such, there is a requirement for the officer to demand identification which would require additional authority in the form of a potential Special Constable status which could potentially result in job evaluation and salary impacts, not to mention could result in a distraction from the primary unit mandate of parking enforcement.	The Chief of Police will participate in discussions at the request of the City Manager.