December 20, 2021

Melonie Collette Barrington, Ed.D.
Director, Office of Safety Review
Federal Transit Administration
U.S. Department of Transportation

Dear Dr. Barrington,

Thank you for the time your that team has spent thus far on the draft State Safety Oversight Program audit report that was transmitted to the WMSC on December 7, 2021 ("draft report"). We view the FTA's audit as an opportunity to enhance our program activities and to enhance our continuous improvement process for the robust safety oversight work that we have been carrying out since our certification in March 2019.

As requested in your December 7, 2021 letter, this letter and the attachments note (1) areas in which the WMSC has already taken action to address issues that were noted in the draft report as potential findings, and (2) specify errors of fact that the WMSC has identified in the draft report.

Most significantly, the draft report incorrectly states that the WMSC did not have a process and criteria for conducting a complete audit of WMATA's compliance with its Public Transportation Agency Safety Plan ("PTASP"). As explained more fully in the attached supplemental comments and support ("Attachment A"), the WMSC has both a process and criteria for auditing WMATA's compliance with its PTASP.

Specifically, the draft report takes issue with the WMSC's recent Audit of Fitness for Duty Programs. The WMSC conducted this audit in accordance with our Program Standard, which – like all prior version of our Program Standard – includes criteria as defined in ISO 19011, Guidelines for Auditing Management Systems (Third Edition 2018-07). The draft report incorrectly states that the Program Standard and PTASP do not include information that would require an audit of drug and alcohol testing, and incorrectly references Section 8 of the Program Standard as the basis for our Audit of Fitness for Duty Programs, when that section relates specifically to safety event investigations, not to audits. Further, the WMSC is fully complying with statutory, regulatory, and Compact requirements regarding fitness for duty, which is described in Attachment A in greater detail.

**Areas the WMSC has addressed**

As part of our continuous improvement process, the WMSC has taken a number of actions that address findings noted in the draft report; accordingly, the WMSC requests that these items be closed:

- Findings 2, 4, 5, 6, 11: As documented in interviews for this audit and in our Program Standard Implementation Guide now revised (latest version included as "Attachment B"), and as discussed more fully in Attachment A, the WMSC has added an additional full-time employee to our investigations team. This Investigations Analyst works with the Investigations Program Manager, including to continue to identify safety events that are not reported to the WMSC or not properly

reported to the WMSC to provide oversight of Metrorail's notifications to both the WMSC and the FTA (see Attachment B). This process also includes ensuring that investigations are conducted for all accidents, and that each accident investigation report, once sufficiently complete, is presented to the WMSC Commissioners for adoption. As documented in the Program Standard Implementation Guide, the investigations team also now holds regular, recurring meetings with their counterparts at Metrorail to crosscheck SSOR entry status to provide these checks on an ongoing basis throughout the year.

- Finding 9: As documented in the draft report, the WMSC at the time of this audit had already developed and adopted changes to our Program Standard and the Program Standard Implementation Guide that became effective on June 1, 2021 that address the previous issues identified in Finding 9. These changes include providing specific details on the tracking and management of RCAs, iCAPAs, and hazards.

For a fuller explanation of the WMSC's response to matters raised in the draft report, please refer to Attachment A.

The WMSC thanks the FTA for the opportunity to provide comments on the draft report. Please feel free to contact me with any questions.
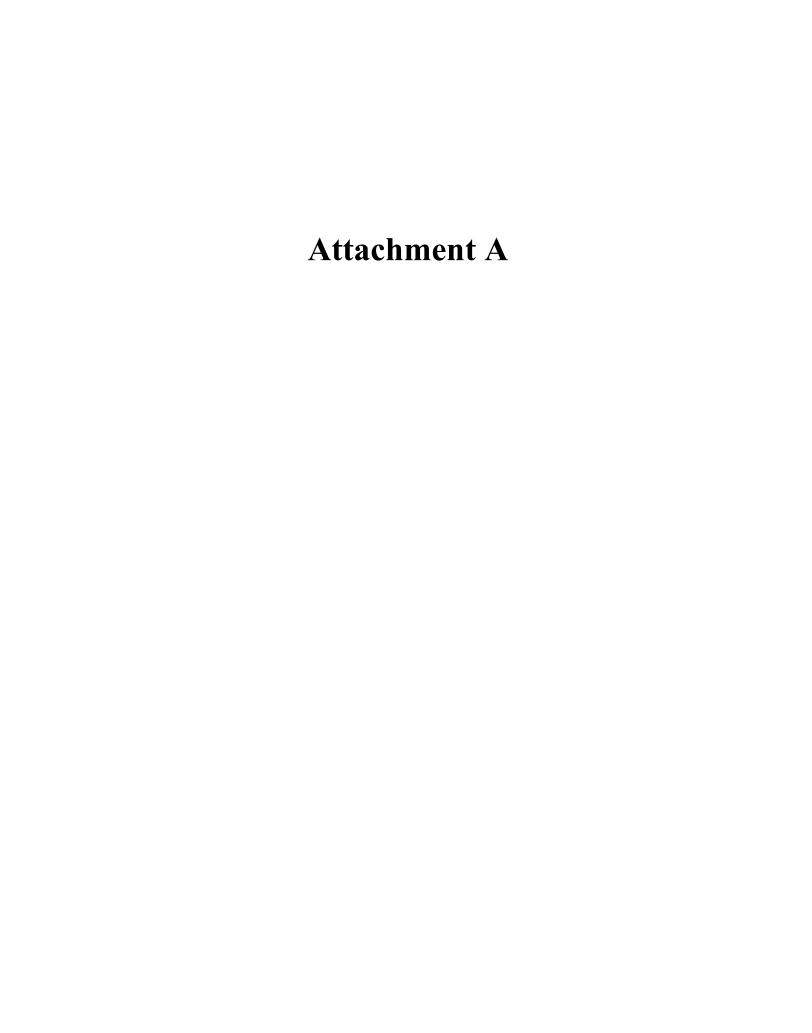
Sincerely,

David L. Mayer, Ph.D.
Chief Executive Officer

Enclosures:

Attachment A: WMSC Supplemental Comments and Support
Attachment B: Revised Implementation Guide for Program Standard Rev. 4.2

# Attachment A

**ATTACHMENT A**
**WMSC Supplemental Comments and Support**
**in Response to the Draft SSO Audit Report of the WMSC**

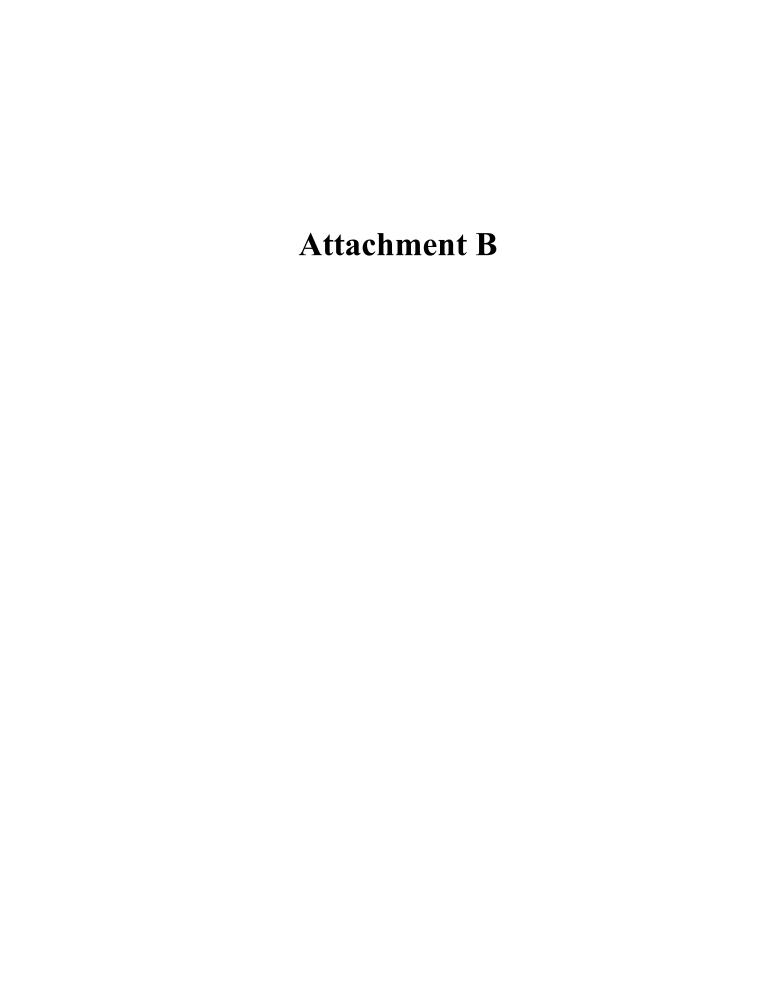| Page(s) | Section (Topic) | WMSC Comments and Support |
|---|---|---|
| ii | Cover letter, Audit Findings (noncompliance basis) | Regarding the statement that findings are "noncompliant[] with specific Part 674 requirements[]", please refer to the comments and support below. To the extent, a finding is based exclusively on a prior version of the Program Standard that is no longer in effect, the WMSC requests that FTA acknowledge that the Program Standard has been revised and as a result such findings be closed. |
| 3–4 | Executive Summary, Summary of Findings (incorporation of below comments and support) | Any comment(s) and support stated below that are relevant to a summary finding stated in this section is also incorporated here. |
| 20 | 6.1 PTASP Review and Approval (Finding 2) | Regarding Finding 2 that "WMSC did not have a documented process for review and approval of WMATA's PTASP[]", the WMSC has a documented approval process for the PTASP. Section 4.A.2 of the current Program Standard (language in effect since June 1, 2021) provides that "WMATA must initiate [the PTASP review] process within a practicable time not later than 9 months from the effective date of the last revision; must be completed within 12 months from the effective date of the last revision." This is further affirmed in the Implementation Guide (for a revised version, see Attachment B) and in the PTASP (Section 1.2 in both the currently in-effect version 1 and version 2 effective December 31, 2021). <br><br> Version 2 of the PTASP (Public Transportation Agency Safety Plan), which takes effect December 31, 2021, followed that documented process. |
| 23 | 7.1 RTA Safety Review Requirements, Audit Evidence (Finding 3, WMATA internal safety reviews covering all PTASP elements) | Regarding the first clause of Finding 3, "WMSC did not ensure that all elements of the PTASP were internally reviewed…", this was not possible. Metrorail's first PTASP came into effect less than two months before the WMSC received FTA's audit notification letter. Internal safety reviews require that WMATA audit the past three-year period of compliance with the safety plan. Because the PTASP was not yet in effect, it could not have been audited during this time. <br><br> Per FTA regulations and guidance, and as stated during this audit process and in the WMSC's Program Standard Implementation Guide, Metrorail's internal reviews and the WMSC's audits began to assess PTASP elements after PTASP implementation began after December 31, 2020. |
| 23–24 | 7.1 RTA Safety Review Requirements, Audit Evidence (Finding 3, WMATA internal safety reviews CAP approval) | Regarding the second clause of Finding 3 (p. 24) "WMSC did not ensure…that CAPs resulting from internal safety review findings were approved[]" and the sentence at the bottom of p. 23 "WMSC should ensure that future Program Standard updates require the approval of CAPs resulting from internal safety reviews, as required by the current Program Standard[]", the WMSC does not agree that 49 CFR § 674.27(a)(4) requires the WMSC to approve such CAPs. The FTA audit team stated during the audit that the sole criteria related to approval and tracking of corrective actions related to internal reviews was the WMSC Program Standard that was then in-effect, as this approval and tracking is not a requirement of the regulation. As this is no longer part of the WMSC's Program Standard (as already noted in the draft report), the WMSC requests that this finding be closed. |

| 24–28 | 8.1 Notifications, Audit Evidence (Finding 4)<br><br>8.2 Accident Investigation Requirements, Audit Evidence (Finding 5)<br><br>8.3 Accident Investigation Reports (Finding 6) | Regarding Finding 4 that "WMSC did not ensure that WMATA notified WMSC and FTA of all reportable accidents within the FTA two-hour notification requirement[]", Finding 5 that "WMSC did not ensure investigations were conducted for all accidents," and Finding 6 that the "WMSC did not formally adopt all investigation reports," as WMSC advised FTA in our letter dated May 24, 2021, the WMSC now has additional processes in place under our Program Standard Implementation Guide (see Attachment B). The WMSC Investigations Program Manager—with the assistance of an Investigations Analyst as of July 2021—has worked with the Rail Operations Control Center director and Metrorail's Safety Department to ensure ROCC and Safety Department management oversee the proper fulfillment of reporting requirements. Reporting integrity has also been corrected through our regular interactions with the WMATA Chief Safety Officer and Deputy Chief of Investigations. Further, Section 7 (Safety Event Notification) of the Program Standard, in effect since June 1, 2021, provides the updated process by which the WMSC ensures WMATA notifies FTA and WMSC of all reportable accidents within two hours. Therefore, the WMSC requests these findings be closed.<br><br>In addition, three reports listed in Table 8.2 as not adopted by the WMSC have been adopted by the WMSC. These reports were adopted on March 12, 2020 and December 16, 2020.<br><br>Additionally, regarding Finding 6, investigation reports may not be finished by the time an annual report must be submitted to FTA; however, that a report has not yet been adopted by the time of an annual report means only that adoption will occur at some time later than the date of the annual report. All adopted reports are available on our website. |
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| 31 | 9.1 SSPP/PTASP Audit Requirements, Audit Evidence (Finding 7) | The Draft Report incorrectly states that the Program Standard and PTASP do not include information that would require an audit of drug and alcohol testing.<br><br>Section 5 of the Program Standard states that the WMSC completes a full audit of Metrorail's compliance with its PTASP and other rules, policies, procedures, and requirements every three years. Section 4.13 of WMATA's Agency Safety Plan covers drug and alcohol compliance and associated policies such as the testing program, so the WMSC is therefore required to audit this area. Drug and alcohol compliance is also an element audited under both the SSPP and the PTASP.<br><br>The WMSC conducted the fitness for duty audit in accordance with our Program Standard, which – like all prior versions of our Program Standard – includes criteria as defined in ISO 19011, Guidelines for Auditing Management Systems (Third Edition 2018-07). These best practices are consistent with, and provide specificity to, the requirements set forth at 49 USC § 5329(e) and (f) and at 49 CFR § 674.31.<br><br>As was noted in our numerous discussions, and again in our May 24, 2021 and May 25, 2021 letters to FTA, the WMSC's audit criteria are specifically listed in section 5.C.2 of our June 1, 2021 Program Standard and subsequent revisions, and were previously included in SOP-001. Federal regulations (49 CFR Parts 673 and 674) require, among other things, that the WMSC issues findings when Metrorail |

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| | | is not compliant with its own written requirements. In addition to agency-wide documents or commitments such as the PTASP, these written requirements specific to each area audited are contained in the latest rules, procedures and policies obtained as part of the initial document requests for that audit.<br><br>The WMSC is required by the WMSC Compact and federal regulation to audit fitness for duty as this is part of the commitments within Metrorail's former System Safety Program Plan (SSPP) and current PTASP. Drug and Alcohol Compliance is one of the 21 SSPP elements that has been required to be audited by state safety oversight agencies, and one that continues to be an element under the expanded PTASP regime.<br><br>Additionally, 49 CFR Part 655 specifically designates state safety oversight agencies as entities to which transit agencies must provide drug and alcohol records. 49 CFR § 655.73(d) states: "an employer shall disclose data for its drug and alcohol testing programs, and any other information pertaining to the employer's anti-drug and alcohol misuse programs required to be maintained by this part, … to a State oversight agency authorized to oversee rail fixed guideway systems, upon the Secretary's request or the respective agency's request." These guiding documents and industry best practices demonstrate that the WMSC properly conducted this audit as required as part of our review of WMATA Metrorail's compliance with the transit agency's own long-standing commitments. |
| 33–34 | 9.2 SSOA Triennial Audit Verification of SSPP/PTASP Implementation, Audit Evidence (Finding 8) | Regarding Finding 8 that "WMSC did not conduct a complete triennial audit of WMATA's PTASP[]", WMSC audits do not stand for any one SSPP or PTASP element, each audit covers several elements and elements may be covered by several audits multiple times but in different contexts. The WMSC conducts its audits organized by topic area so that the WMSC can comprehensively audit all relevant portions of the effective safety plan(s) when meeting with that topic area's relevant departments. For example, an audit of equipment maintenance includes discussion on the department's methods for addressing hazards, trending of failures, and completing training—all of which span multiple elements of the SSPP as well as multiple components of the PTASP.<br><br>The list of audits on page 33 was based on our audit schedule at the time but those audits do not constitute "elements" as the term is understood for SSPP or PTASP elements. SSPP and PTASP "elements" are tracked in accordance with the Program Standard Implementation Guide (Attachment B) to ensure that the triennial audit is complete.<br><br>In any event, it is not possible for the WMSC to have yet completed a complete triennial audit of WMATA, as the WMSC had been certified for less than two years at the time of the notification letter for this audit, and the PTASP had been in effect for less than two months. |
| 34–36 | 10.1 Procedure to Review, Approve, and Verify Corrective Action Plans, Audit Evidence (Finding 9) | Regarding Finding 9 that "WMSC did not ensure that WMATA developed CAPs, as required in the WMSC Program Standard, for hazardous conditions, investigation reports, and internal reviews[]", the WMSC acknowledges the finding and has since taken action to address this issue. |

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| | | As documented in the draft report, the WMSC developed and adopted changes to our Program Standard and our associated Implementation Guide that would be effective June 1, 2021 that address the previous issues identified in Finding 9. These changes include providing specific details on the tracking and management of RCAs, iCAPAs, and hazards. Therefore, the WMSC requests that this finding be closed. |
| 36–37 | 10.2 Establish Content Requirements for Corrective Action Plans, Audit Evidence (Finding 10) | Regarding Finding 10 that "WMSC did not ensure that WMATA's CAPs included an accurate schedule and responsible individual," the draft report notes that each CAP already includes the responsible party, date of next update and interim milestones as required by 49 CFR § 674.37(a). The draft report however states that the WMSC is noncompliant with section 674.37(a) due to a separate tracking log that is not required by the regulation. In addition, the draft report notes that the WMSC demonstrated a new tracking system during the audit that the WMSC transitioned to on May 1, 2021.<br><br>CAPs may be developed and approved years before an expected closure period and as such, the schedule is inherently subject to change or delay, it is unreasonable to expect CAPs to be static from the date of approval through completion. 49 CFR § 674.37(a) requires a schedule—a feature every one of the highlighted CAPs has.<br><br>Therefore, the WMSC requests that this finding be removed or closed. |
| 40 | FTA Annual report (Finding 11) | Regarding Finding 11 that "WMSC submitted an annual report that did not accurately contain all required information[]", the cited regulation (49 CFR § 674.39(a)) does not require the inclusion of CAP responsible parties in an annual report. The WMSC is in full compliance with the Program Standard section quoted on page 39. The required action that the "WMSC must review the 2021 annual report and ensure that the annual report contains all required elements" will be fulfilled by the deadline for the 2021 report, which is March 2022. |

# Attachment B

# Implementation Guide

### Program Standard Rev. 4.2 (effective December 9, 2021)

## Annual Reports

*Program Standard Section 1.G*

### Communications Director responsibilities:

- Prior to February 15 of each year, assembles relevant data and reports from the prior year's oversight efforts and consults with the staff responsible for the WMSC's SSOR submission.
- Draft report(s) are then shared with internal WMSC stakeholders for review and comment. Convenes work sessions to facilitate draft revision as necessary.
- Once WMSC staff complete the final draft, the WMSC Board is provided the draft for their review and comment. Board feedback is incorporated.
- After Board feedback, another round of internal review is conducted before the report is finalized for transmittal to all required and interested parties including each individual specified in the WMSC Compact and other staff and officials of the jurisdictions and other stakeholders.
- Note: These items may be delegated by the Communications Director in whole or in part

### Attorney-Advisor and Government Relations Lead responsibilities:

- Coordinates report transmittal with the Communications Director.
- A distribution list is maintained to facilitate this process and to ensure complete distribution to all necessary parties. Reports are distributed both by e-mail and in hard copy.

## Minimum Safety Standards

*Program Standard Section 2.A*

In the absence of adequate WMATA standards—that is where a standard is insufficient or lacking—the WMSC may determine that the WMSC will adopt minimum standards WMATA must comply with.

The WMSC will reach this determination by examining results of ongoing oversight work and relevant standards and practices of the U.S. Department of Transportation, the American Public Transportation Association (APTA), or other standard-setting organizations of repute. It may be that, for example, APTA's standard is adopted in whole but it is also permissible to take elements from an APTA standard and USDOT in combination, or if necessary, devise a whole new standard. The objective is to adopt a standard that works best at WMATA and that achieves safety goals.

### Chief Operating Officer responsibilities:

- Determine that a minimum safety standard may be required.
- Appoint a lead staff member for this task.
- Oversee lead staff member through to adoption of the standard.

*Lead staff member responsibilities:*

- Organize internal discussion and schedule work sessions with relevant WMSC stakeholders.
- Gather relevant standards on the safety issue at hand.
- Organize discussions with WMATA as appropriate, which may involve meetings.

# Oversight of PTASP

*Program Standard Section 4.A*

WMATA is required to submit a revised PTASP to the WMSC each year. Program Standard section 4.A.2 requires that WMATA must begin the review process not later than 9 months from the effective date of the last revision.

This revision process, including WMSC approval of the PTASP after the WMATA Board and General Manager have signed off must conclude within 12 months of the prior version's effective date.

To achieve this deadline, the WMSC may initiate discussions with WMATA regarding the next PTASP revision during the months of June or July. WMATA then provides a first draft of the revisions in July or August, which, in accordance with Program Standard Section 4.A.2, the WMSC then provides comment(s) on (if any). Thereafter, additional drafts and comments continue until the WMSC is satisfied, at which point, WMATA can then seek WMATA Board and General Manager approval. WMSC Board and approval occurs after this.

*Chief Operating Officer responsibilities:*

- Contact WMATA's Chief Safety Officer to inquire about the PTASP update by the end of July if WMATA has not provided any information about the start of the review before that point (such contact may be part of regularly scheduled meetings or may be in writing).
- Establish a deadline for when WMATA must provide the draft revision.
- In the event WMATA initiates PTASP revisions at another time, make inquiries of the WMATA Chief Safety Officer to gain an understanding of the scope of work and establish a deadline to provide a draft revision.
- Upon receipt of the revised PTASP, organize and disseminate for internal review, guided primarily by FTA's PTASP checklist.
- Within a practicable time thereafter, transmit any feedback on the proposed revision.
- If reviews of additional draft(s) are required due to deficiencies, provide a written explanation to WMATA's Chief Safety Officer, and reaffirm the Program Standard deadline to WMATA (20 days to make the necessary changes and resubmit).
- Ensure WMATA submits PTASP revision within timelines provided.

## WMATA Internal Safety Reviews

*Program Standard Sections 4.B–C*

WMATA QICO publishes a schedule of planned Internal Safety Reviews (ISR) on an annual basis around the start of WMATA's fiscal year (July). After receipt of the schedule, the WMSC reviews to ensure that WMATA is on track to review all PTASP elements within the time remaining for that triennial cycle.

In addition to tracking PTASP elements, the WMSC participates in kick off session, close out meetings, and other meetings related to WMATA's ISRs. When QICO publishes an ISR report, it is transmitted to the WMSC and the WMSC reviews the report. If the WMSC takes issue with any aspect of the report, comments are provided to QICO at that time.

On an annual basis, the WMSC approves the WMATA Annual Safety Review Report and Certification, which must be submitted to the WMSC by February 1 each year. The ISRs completed during that year are included in WMATA's Annual Safety Review Report and Certification. If the WMSC takes issue with any aspect of the report, comments are provided to QICO.

When the PTASP is fully implemented by WMATA, the WMSC will use the elements identified below to form the basis of a checklist or tracker:

1. Safety Management Policy
   a. Safety performance targets
   b. Annual review and update of ASP
   c. Organizational SMS Accountabilities and Responsibilities
   d. Functional area common SMS responsibilities
   e. Functional area specific SMS responsibilities
      i. Executive level (EVPs, SVPs, VPs) responsibilities
      ii. Technical Management (supervisors, managers, superintendents, directors, program managers) level
      iii. Front Line and Represented Employees
      iv. Safety risk coordinators (key personnel)
   f. Accountable Executive responsibilities
   g. SMS documentation
2. Safety Risk Management
   a. Develop and implement a Safety Risk Management (SRM) process for all system elements
   b. Risk Assessment Process
   c. Risk assessment methodology
   d. Hazard identification
   e. Hazard investigation
   f. Hazard analysis and evaluation of safety risk
   g. Hazard resolution (mitigation, elimination)
   h. Hazard tracking
3. Safety Assurance
   a. Systematic, integrated data monitoring and recording of safety performance
   b. Real-time assessment with timely information as to safety management and performance
   c. Internal reviews, departmental controls, compliance and sufficiency monitoring
   d. Document assurance activities

      e. Preventive, Predictive, and Corrective Maintenance
      f. Event reporting/investigations
      g. Change management
      h. Safety and Security Certification
      i. Corrective action plans

4. Safety Promotion
   a. Training
      i. Competencies and Training
      ii. Employee Safety Training
      iii. Safety Rules and Procedures Training
      iv. SMS-specific training requirements
      v. Training Recordkeeping and Compliance with Training Requirements
   b. Contractor Safety
   c. Safety Communications
   d. hazard and safety risk information
   e. safety committees
   f. hazardous materials
   g. Environmental management
   h. Drug and Alcohol Compliance

### *Chief Operating Officer responsibilities:*

- Organize internal review of WMATA's annual ISR report.
- Within 15 days of receipt of the report, transmit feedback and any required changes to QICO reaffirming to QICO the Program Standard deadline that WMATA has 12 days to address any deficiencies or required changes and to resubmit.
- If WMATA objects to the proposed changes within 10 days of receipt of the WMSC's feedback, coordinate with WMATA on an appropriate course forward within 10 days.
- Ensure WMATA submits annual ISR report and certification of compliance with PTASP within the timelines provided.

### *Audit Program Manager responsibilities:*

- Conduct a review of QICO's annual ISR schedule and completed ISRs from the current three-year cycle against PTASP elements to track whether QICO will comprehensively cover all PTASP elements within the three-year cycle.
- E-mail, call, or meet with QICO on any concerns that result from this review.
- Require QICO to make schedule changes, perform additional ISRs, or another option in order that WMATA cover all PTASP elements within the three-year period.
- Track PTASP elements at least annually to facilitate above review.
- Organize internal feedback on particular ISRs as necessary and provide feedback to WMATA. If changes are required of WMATA, provide a deadline for WMATA to resubmit the report.
- Provide updates to the Chief Operating Officer as necessary, which may occur in any convenient manner.

# WMSC Audits

*Program Standard Section 5.A*

In a similar fashion to how the WMSC reviews WMATA's internal safety reviews, the WMSC will track its own audits against the above-listed PTASP elements to ensure a full audit of Metrorail occurs within the required three-year cycle.

### Chief Operating Officer responsibilities:

- Approve the three-year audit schedule and any changes to that schedule as necessary.

### Audit Program Manager responsibilities:

- Using the above listed PTASP elements, at least annually, track or otherwise ensure that the three-year audit schedule covers all PTASP elements.
- Modify the schedule or audit topics to cover all PTASP elements.
- Provide updates to the Chief Operating Officer as necessary, which may occur in any convenient manner.


# Safety Event Notification and Classification

*Program Standard Section 7.D*

WMATA is required to notify the WMSC in accordance with the Safety Event Notification Matrix in Program Standard Section 7.D. Accidents must also be reported to FTA.

To ensure proper notification and classification of all safety events, the WMSC (typically the Investigations Program Manager or the Investigations Analyst) is in regular communication with WMATA's Director of Investigations or his/her team. Meetings occur at least monthly but in practice may occur at more frequent intervals. During these meetings, safety event notifications are reconciled to ensure that the WMSC, WMATA, and FTA have the same data—this includes crosschecking FTA's State Safety Oversight Reporting (SSOR) tool. Any differences are addressed accordingly. If the WMSC encounters a safety event that was not reported, or was reported incorrectly, the WMSC contacts WMATA's Director of Investigations or his/her team.

For accidents, which are required to be reported to FTA, any event coded as an accident automatically generates a notification to FTA. By ensuring proper classification, FTA's notification is assured through WMATA's system design.

### Chief Operating Officer responsibilities:

- Receive updates from the Investigations Program Manager related to safety event notification.
- Facilitate issue resolution at WMATA as necessary to aid the Investigations Program Manager.
- For issues that cannot be resolved by the Investigations Program Manager, consider invoking Program Standard Section 11 Dispute Resolution and Enforcement.

### Investigations Program Manager responsibilities:

- Monitor all safety event initial notifications for accurate classification and timely notification, which may occur via independent information or other assessment activities.

- Where a notification appears to incorrectly classify a safety event, or where an event identified independently by the WMSC is not properly reported by WMATA, contact SAFE to rectify or make further inquiry into the event.
- If the SAFE individual contacted does not amend the notification as directed, escalate the matter to the WMATA's Deputy Chief of Rail Investigations.
- For matters that cannot be resolved, escalate the matter further to the WMATA Chief Safety Officer.
- If it remains unresolved with the Chief Safety Officer, consult with the WMSC Chief Operating Officer to devise a path forward (which may involve using Program Standard Section 11 Dispute Resolution and Enforcement).
- Provide updates to the Chief Operating Officer as necessary, which may occur in any convenient manner.
- Hold meetings with Metrorail on a regular basis, currently biweekly with the Deputy Chief of Rail Investigations, to
  - review latest events
  - discuss upcoming investigation reports that are due
  - any comments on already submitted investigation reports that have been sent back to Metrorail by the WMSC.
  - These meetings also include any relevant updates on WMSC-conducted investigations, if such investigations occur.
  - These meetings are also used to reconcile any differences with event notifications and to be sure the same data is recorded.
    - This confirmed information is used as the basis for completion of related SSOR information
- If the WMSC identifies a possible safety event that has not been reported, the WMSC raises these events to Metrorail, typically through the Deputy Chief of Rail Investigations, but through other contacts if that individual is not available, and requests further information or notification
- These tasks may also be carried out by the analyst or other personnel designated by the Investigations Program Manager or COO.

## Safety Event Investigations Reports

*Program Standard Section 8.B*

When a safety event occurs that requires an investigation report, which is indicated in the Safety Event Notification Matrix (Program Standard Section 7.D) or is requested as provided for in that matrix, the WMSC Investigations Program Manager begins to track the status of that report. When a preliminary report is required, WMATA must submit it within 14 days of the event. The preliminary report serves as the first pass at reviewing known information and allows the WMSC to ask questions on missing information or inaccurate information and possible corrective actions while the involved personnel can readily recall the events. WMSC staff encourage WMATA staff to be open to feedback at this stage of the investigation.

When a draft final report is required, it is due within 60 days of the event (46 days after the preliminary report). Once this report is received, WMSC staff thoroughly review every part of this report and provide comments. This review is extensive and sometimes requires internal work sessions as well as regular work sessions with WMATA. There may be several rounds of review of this draft final report.

### Chief Executive Officer responsibilities:

- Consult with the WMSC Board Chair generally regarding the maximum number of reports that can feasibly be adopted in a given meeting.

### Chief Operating Officer responsibilities:

- Coordinate with the Investigations Program Manager and Chief Executive Officer on what reports will be presented for adoption at each public meeting.
- Provide updates to the Chief Executive Officer as necessary, which may occur in any convenient manner.

### Investigations Program Manage responsibilities:

- Ensure investigation reports are provided by WMATA within the timelines provided in the Program Standard (14 days for prelim, 60 days for final).
- Request investigation status updates from WMATA if necessary.
- Organize internal review of all draft final investigation reports, which includes review of any associated Recommended Corrective Actions (RCA) proposed by SAFE. To the extent practicable, promptly return feedback to WMATA.
- Transmit any required changes on the draft final report and restate the 14-day Program Standard deadline for when a new draft must be submitted.
- Determine when each report has been appropriately completed by WMATA and is ready for adoption.
- Coordinate with Chief Operating Officer and Chief Executive Officer to confirm which (if any) reports will be presented for adoption at each public meeting.
- Provide updates to the Chief Operating Officer as necessary, which may occur in any convenient manner.

## WMATA Plans

*Program Standard Section 9.A.2*

Ordinarily, where corrective actions result from safety events, they follow WMATA's internal corrective action process and are called a Recommended Corrective Actions (RCA)—formerly known as Preventative Action Plans. Internal safety review CAPs (iCAPa) also follow the approved internal corrective action process.

The initial vetting of the RCA language itself is included in the investigation report process noted above. The WMSC also requires that WMATA SAFE track the status of each RCA, and updates are provided as part of regular meetings with the WMATA Chief Safety Officer.

WMATA is also required to maintain a hazard log. For urgent hazards or trends, as specified in the Program Standard, WMATA is required to provide all information related to the hazard and immediate corrective action or mitigation within 24 hours.

### Chief Operating Officer responsibilities:

- Inquire or receive updates from WMATA Chief Safety Officer on a regular basis, at least monthly.

- Coordinate with Investigations Program Manager regarding urgent hazards or trends and any associated corrective action that may require approval.

*Investigations Program Manager responsibilities:*

- Monitor the RCA process and consult with internal WMSC subject-matter experts as relevant to the RCA issue.
- Provide feedback or require changes of WMATA as necessary.
- Request or otherwise obtain WMATA's current hazard log at least quarterly and coordinate internal review.
- For urgent hazards or trends, organize internal review of the known information as expeditiously as possible, including review and approval of any associated corrective action. Transmit written feedback to WMATA on necessary changes to the proposed CAP; however, this information may first be conveyed verbally or other means if such communication would serve to improve safety.