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Via E-Mail

November 22, 2024

Melonie Collette Barrington, Ed.D.
Director, Office of Safety Oversight and Compliance
Federal Transit Administration
East Building
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: FTA Finding and WMSC Proposed Corrective Action Plan

Dear Dr. Barrington,

On September 20, 2024, the Federal Transit Administration (FTA) issued its Final State Safety Oversight Program Audit Report of the Washington Metrorail Safety Commission (WMSC). As part of that audit report, the FTA issued Finding 1: “WMSC did not ensure that WMATA’s CAPs included an accurate schedule.” The corresponding required action stated: “WMSC must ensure that its CAP tracking logs are updated and contain all required information, including current schedules.” There were no other findings or required actions.

To address Finding 1 and its required action, the WMSC proposes the following updates to our CAP Tracker. This would be for the currently open CAPs and for all future CAPs:

1. Add a new column for Date WMSC approved CAP for Implementation. This would capture the date that the WMSC approved the CAP (Program Standard Section 9.C.2). (See blue column in image below.)
2. Add a new column for Anticipated Closure Date. This would capture the 60 days that the WMSC must respond to WMATA’s CAP closure request (Program Standard Section 9.C.6). (See yellow and green columns in image below.)

A Responsible y (denotes nable items)	WMATA Hazard Rating	Captures Program Standard Section 9.C.6's 60 days for WMSC to respond to WMATA's CAP closure request. This is 60 days from the date the last deliverable (column G).		Date WMSC approved CAP for implementation	Date WMSC Closed CAP	Source
		Last Deliverable due from WMATA	Anticipated Closure Date			
1-6), QICO (AI 7)	2C	10/24/24	12/23/24			WMSC Directive (10/20/2020)
AI 1, 3-5), Safety , Quality (AI 6)	4E	04/18/25	06/17/25			High Voltage Traction Power Audit (10/27/2021)
AI 1-2), QICO (AI 3)	3C	01/17/25	03/18/25			High Voltage Traction Power Audit (10/27/2021)

FTA Finding and WMSC Proposed Corrective Action Plan

Other aspects to note based on initial feedback to a version of this proposal:

- Initial feedback: “Part 674.37 requires that the “individuals responsible for taking those actions”. This matrix specifies the “Party” (department) responsible.”
 - Every signed CAP document lists the department and individual person responsible for each actionable item. The CAP Tracker logs only at the department level because WMATA personnel change roles frequently. However, at any given time, throughout the lifecycle of the CAPs, the WMSC is aware of the exact WMATA individual responsible for every because the WMSC receives a current list of all such responsible individuals for all CAPs on a weekly basis from WMATA. (See example in image below.)

WMSC-23-C0241	3C	Metrorail must train personnel to implement safety management systems principles such as hazard identification, tracking mitigation and monitoring, and must develop, implement, and specify in Metrorail requirements such as the WMATA Transit Agency Safety Plan.					
	1) SMS Awareness Training	SAFE	Michael Vitale	Thu 02/01/2024	Wed 05/15/2024	Fri 02/09/2024	
	2) Documented Process	CENV	Anthony Johnson	Thu 02/01/2024	Wed 02/05/2025		
	3) SMS Training Implementation	Fleet	Quisham Hamilton	Wed 05/15/2024	Wed 05/14/2025		
	4) Dashboard Implementation Report I	Fleet	Quisham Hamilton	Thu 05/01/2025	Wed 08/13/2025		
	5) Dashboard Implementation Report II	Fleet	Quisham Hamilton	Fri 08/01/2025	Wed 11/12/2025		
	6) Corrective Action Plan Verification	Quality		Wed 11/12/2025	Fri 12/12/2025		

- Initial feedback: “The CAP matrix should include the “Date of WMSC approval” (or date CAP identified) as specified in Program Standard 9c2. This would document how long the CAP is open.”
 - As noted above, the WMSC proposed to add a column that would be “Date WMSC approved CAP for Implementation.”
 - The CAP Tracker currently captures the date the CAP was identified, denoted by the column “source,” which lists the document that issued the CAP (e.g. audit, order, etc.) and the date that document was issued.
- Initial feedback: “CAPs should summarize the required actions consistent with Program Standard 9c2. Such as CAP WMSC-20-C0070 should specify “submission of the revised course schedules, curricula, syllabi, exams, and other relevant documentation.”
 - Each signed CAP has specific deliverables or actionable items that capture the stated specificity. All CAP deliverables/actionable items are then tracked in the WMSC’s CAP Deliverable Table. (See example in image below.)

Cap ID	Delive... Number	Deliverable Title	Deliverable Description	Deliverable Start Date	Deliverable End Date	WMATA Responsible Party
WMSC-22-C0213	15	Assessments & Implementation Plan	As per Actionable Item #12 (Develop Task Order), Communications & Signaling will submit quarterly updates of approved assessments to include Scope of Work (SOW) and schedule.	12/13/23	05/14/25	Communicat & Signaling
WMSC-22-C0213	16	Implementation	As per Actionable Item #15 (Assessments & Implementation Plan) Communications & Signaling will submit quarterly updates on implementation activities to include but not limited to procedures updates, training of all applicable maintenance and supervisory staff, reporting and compliance activities, per the corrective action requirements.	06/19/24	09/23/26	Communicat & Signaling
WMSC-22-C0213	17	CAP Verification Report	Quality Assurance, Internal Compliance & Oversight will evaluate actionable items submitted to confirm there is evidence of the above actionable items.	06/17/26	10/21/26	Quality Assurance, Internal Compliance

FTA Finding and WMSC Proposed Corrective Action Plan

- Initial feedback: *“Program Standard 9c specifies CAPs to “provide other safety improvements while CAPs are under development”. Consider including a “Notes” column to document temporary mitigations. Ex. CAP WMSC-24-C0277 may have mitigation of bulletin reminding technicians to verify tools are calibrated until an system is in place.”*
 - When temporary mitigations are necessary, those become specific deliverable/actionable items that are captured in the signed CAP as well as the WMSC’s CAP Deliverable Table. For C-0277, interim mitigations were not necessary. The revised standard operating procedure is expected to be completed by March 2025.
- Initial feedback: *“The CAP matrix should document the CAPs that extend past the original approved “Deliverable due from WMATA”, consistent with SSOR requirements for “Proposed Implementation Date”.”*
 - The WMSC’s CAP Deliverable Table captures this information in two ways: (1) it logs the date the deliverable was actually submitted (in addition to the date was due), and (2) if a modification request results in a changed deadline, that information is logged in the Deliverable Table notes column (and also in a dedicated log for modification requests). Additionally, each CAP has an assigned folder that documents every modification request and the associated approvals/denials of those requests. Therefore, the WMSC maintains this information at all times and relies on this information to complete SSOR on an annual basis.

Once approved by the FTA, the WMSC will make the stated changes within 60 days. We look forward to receiving FTA’s feedback on our submission package and look forward to implementing this program.

Sincerely,

David Mayer
Chief Executive Officer
Washington Metrorail Safety Commission