



WMSC Inspection Report 20250903B

ISSUED 9/8/2025

Inspection Details

Title: Roadway Worker Protection (RWP) Level IV Recertification Training Inspection

Location: Carmen Turner Facility (CTF)

Date of Inspection: 9/3/2025

Time of Inspection: 7:00am to 8:00am, 10:00am to 1:00pm

Unannounced

Risk-Based (Audit)

Functional Area: Roadway Worker Protection

Hazard Rating: 1B

Overview

On September 3, 2025, WMSC Inspectors attended a Roadway Worker Protection Level IV Recertification class at the Carmen Turner Facility (CTF). The goal of the inspection was to monitor Metrorail's training and requalification process for the 192 personnel identified as not meeting Metrorail's requirements to be roadway workers in charge.

This is a risk-based inspection based on an urgent hazard identified during the WMSC's Track, Structures, and Roadway Worker Protection Audit.¹ On July 10 and 11 of 2025, the WMSC visited the Carmen Turner Training Facility (CTF) where RWP training and qualification records are held (there are no electronic or redundant versions of these records). Currently, Metrorail has three levels of RWP qualification: level IV-qualified individuals are referred to as roadway workers in charge and directly ensure the safety of all work taking place in their respective work zone. While at CTF, the WMSC identified level IV RWP training records that did not support the level IV certification given to those individuals. The WMSC issued an urgent hazard notification to Metrorail on July 14 based on this information. As of July 15, there were 1,246 RWP level IV personnel. Since reporting this problem, Metrorail identified 192 level IV personnel who received certifications that do not conform to written requirements.

¹ Also discussed at the WMSC's [August 5, 2025 Public Meeting](https://www.youtube.com/live/pOI4Gyr_JZo?t=805s) (viewable at [youtube.com/live/pOI4Gyr_JZo?t=805s](https://www.youtube.com/live/pOI4Gyr_JZo?t=805s)).



On September 4, 2025, the WMSC issue a [finding](#) that Metrorail is not following its written process to ensure and document that its roadway workers in charge have demonstrated the knowledge and skills required to do their job safely. A draft corrective action plan associated with the September 4, 2025, finding is due to the WMSC by September 11, 2025. To address this finding, Metrorail will be re-training and re-qualifying all 192 personnel; however, in the interim, as a way of monitoring level IV roadway workers in charge, the WMSC is conducting a series of RWP risk-based inspections. As of the date of this inspection (September 3, 2025), the WMSC's understanding from Metrorail was that any changes would occur as part of the corrective action plan process. That corrective action plan is now in development.

On September 3, 2025, the WMSC inspection team attended a recertification training. After concluding the inspection, the WMSC inspectors conducted a debrief with the Technical Training and Development Manager and the Technical Training and Development Instructor in accordance with Program Standard Section 6.F.1.

Defects and Corrective Actions

WMSC Inspections identify safety issues that may be classified as defects, findings, or recommendations. Findings and recommendations are defined by Program Standard Section 5.E.2 and 5.E.3 respectively. Ordinarily, issues identified in a WMSC inspection report are classified as defects. Defects are specific safety issues of non-conformance/non-compliance that are identified and that require remedial action.

This inspection did not identify any new findings or recommendations and therefore does not require a WMSC Corrective Action Plan in accordance with Program Standard Section 5.E.4. Instead, the inspection supports the September 4, 2025, finding and the anticipated Corrective Action Plan.

Defect Observations and Determinations

WMSC Inspectors announced their presence upon arrival on site at Carmen Turner Facility. The WMSC team discussed the inspection activity with the Metrorail Technical Training and Development Manager. Once inside the testing area, the Technical Training and Development Instructor was observed preparing the practical testing environment before the recertification class began: This entails setting up a work zone site on the training facility tracks at CTF to enable the practical portion of the level IV recertification exam. Once setup, the student then identifies all the non-compliant roadway worker protection components that were laid down or missing, and explains what is required to set up a track work zone correctly in accordance with roadway worker protection rules outlined in the Metrorail Operating Rulebook. WMSC Inspectors observed a level IV class with six Metrorail Roadway Workers in Charge (RWIC) recertifying. The practical requalification that occurred on the test track included the following seven topical areas on which the participants would be evaluated:

1. Proper Personal Protective Equipment (PPE) Check
2. Proper Hot Sticking Task
3. Proper "W" - Disc Task



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4. Proper Roadway Hand Signals Task
5. Proper WSAD Installment and Removal Task
6. Minimum Distance Buffer for Exclusive Track Occupancy (ETO) Task
7. Exclusive Track Occupancy (ETO) and Inaccessible Track (IT) Scenario Tasks
8. Joint Occupancy (Piggybacking) Task

Photos



Photo 1. Track testing area.



Photo 2. Track testing area (different angle).



At the conclusion of each assessment, the instructor completed an RWP Level IV Recertification Practical Exercise Evaluation Form, and each student candidate signed their completed form.

Defect 1

WMSC Inspectors observed that Metrorail changed the Level IV RWP recertification exam. Specifically, the exam now includes additional questions and requirements (including topics such as PPE and hot sticking, for example). Metrorail also now requires a passing score of 100% for recertification (previously 90%). Any part of the exam that is scored incorrect or failed is an immediate failure to recertify at the Level IV roadway worker in charge level. Although these changes make the exam more comprehensive and difficult to pass, they constitute a change to WMATA's RWP Program and conflict with statements emailed to the WMSC on September 3, 2025: WMATA desired to institute changes quickly, but WMATA would await the WMSC's finding issuance and corresponding corrective action plan process before implementing any changes.

Additionally, the WMSC's [September 27, 2024 Order](#) on Future Roadway Worker Protection Program Revisions identified that "WMATA's focus on rule changes has effectively diverted attention from ensuring its personnel adhere to rules that are designed for their protection. Although WMATA is working on changes to improve roadway worker safety, this order will help ensure that WMATA implements revisions in an annualized and comprehensive manner." And "the pace of rule changes negatively impacts WMATA's ability to maintain a safe and mature RWP Program." That order cited three findings from the [2024 Roadway Worker Protection Program Audit](#) as evidence:

- Finding 2: WMATA is not providing its personnel with up-to-date and accessible information about the locations where additional RWP is required to prevent serious injury or death.
- Finding 3: WMATA is not systematically identifying, tracking, and mitigating hazards related to RWP as required by its Agency Safety Plan.
- Finding 4: WMATA is training and qualifying personnel on outdated RWP-related procedures and rules.

To begin to address this: Order Section 1 stated that "Until [WMATA] meets the requirements set forth below in Part 2 of this Order, WMATA must maintain its RWP Program as it is written and implemented on October 1, 2024[.]" The only exceptions permitted by that order are for corrective action plans (for the finding issued on [September 4, 2025](#), that process is now underway) and immediate temporary action (exception not invoked by WMATA).

Part 2 of the order relates to WMATA's Future RWP Program, which now encompasses meeting the requirements of the new Title 49 Code of Federal Regulations Part 671 requirements (final rule was on October 31, 2024, one month after the WMSC's order). The WMSC and WMATA are in the process of reviewing and finalizing the new program that would comply with this part of the order.



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Therefore, the additional test questions, requirements, and passing score level conflict with the requirements of the September 27, 2024, RWP Order and the September 4, 2025, finding. WMATA must follow the processes outlined in each before unilaterally instituting changes to roadway worker protection.

Hazard Rating: 1B

Next Steps

Please respond **by Thursday, September 11, 2025**, to acknowledge receipt and to convey responses to the WMSC regarding what, if any, actions will be or have been taken in response.