



## NOTICE OF NON-COMPLIANCE:

### 2025 WMSC AUDIT OF METRORAIL'S ELEVATORS AND ESCALATORS – FINDING #4

ISSUED FEBRUARY 5, 2026

#### Summary

As part of the 2025 WMSC Audit of Metrorail's Elevators and Escalators (<https://wmsc.gov/audits/>), the Washington Metrorail Safety Commission (WMSC) issued a finding stating that Metrorail personnel are not trained on fall protection requirements listed within its job hazard analyses.

As a result, a corrective action plan (CAP) is necessary to address this finding. The WMSC Program Standard states in section 9.C.3.a that “Within 30 days from the date the WMSC issues a finding or recommendation, WMATA must propose a suitable CAP (corrective action plan).” CAP WMSC-25-C0314 should have been developed and a draft submitted to the WMSC by November 14, 2025, however, WMATA has objected to, and has not provided a draft corrective action plan.

#### Authority

The Washington Metrorail Safety Commission (WMSC) Compact (P.L. 115-54), Article IV, Powers, Sec. 30(a) states “In carrying out its purposes, the Commission, through its Board or designated employees or agents, shall, consistent with federal law: (a) Adopt, revise, and distribute a written State Safety Oversight Program[]” and Sec. 30(c) states “(c) Require, review, approve, oversee, and enforce the adoption and implementation of any Corrective Action Plans that the Commission deems appropriate[.]” Further, WMSC Compact Sec. 31(c) provides that the WMSC may “[c]ompel WMATA’s compliance with any Corrective Action Plan or order of the Commission by such means as the Commission deems appropriate...”.

Pursuant to WMSC Compact Sec. 30(a) and 30(b) and 49 CFR sec. 674.27(a)(1), version 8 of the WMSC Program Standard became effective on October 1, 2025 (maybe found at <https://wmsc.gov/program-standard/>). Program Standard sec. 9.C states that “Each finding issued by the WMSC requires WMATA to develop a suitable CAP. The WMSC may also require WMATA to develop a CAP due to other types of findings or conclusions, including from the sources noted in Section 9.A.”

This Notice of Non-Compliance is brought in accordance with Program Standard sec. 11.B:

In the event WMATA fails to comply with any provision of this Program Standard, the WMSC may issue a notice of non-compliance, provide notice that the WMSC is invoking a power provided in Section 11.C, or both. The WMSC will identify the noncompliance issue and state any action required of WMATA in an email to the WMATA Executive Vice President and Chief

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Safety & Readiness Officer, or the General Manager. WMATA must then respond by the deadline set by the WMSC. If WMATA fails to address the issue, the WMSC may take further action described in this Section 11.

### **Background**

Metrorail is currently only training one class of employees in the Office of Vertical Transportation, elevator and escalator heavy repair journeyman (special projects), on its fall protection program and requirements. This includes requiring initial training and refresher training. Other elevator and escalator personnel such as journeyman technicians, master technicians, compliance managers, and compliance officers are not trained on Metrorail's fall protection program or requirements. Journeymen and master technicians can be assigned to complete the work covered by the job hazard analysis, including heavy repair in which fall protection may be required to complete the tasks.

The Job Hazard Analysis for Traction Elevator Preventive Maintenance, Repair, Service, Inspection (dated May 30, 2024) states in section 5 that personnel should "1c. Utilize fall protection if needed." The job hazard analysis also lists "Lockout/Tagout, Jumper Policy, Confined Space, and Fall Protection" as required training. The current elevator and escalator safety training matrix includes a requirement for fall protection training for only one position: elevator and escalator heavy repair journeyman (special projects) despite others performing the same types of tasks.

Worker safety is a fundamental part of the safety of the WMATA Rail System, and it is identified in WMATA's Public Transportation Agency Safety Plan. The WMSC is obligated to oversee the safety elements in WMATA's Agency Safety Plan. The WMSC and WMATA have had ongoing discussions attempting to resolve the differences that are preventing Metrorail from producing worker safety-related documents. However, WMATA stated that it would stand by its objections for producing any worker safety information. As the WMSC explained in its written response to Metrorail's written objections, and in subsequent discussions, Metrorail's objections to the WMSC's authority are without merit and do not justify its refusal to fully respond and participate in the CAP development process, and the lack of required corrective action continues to put WMATA personnel worker safety at risk.

The WMSC issued its final report for this audit on October 15, 2025. From there, in accordance with the WMSC Program Standard (section 9.C.3.a) a draft corrective action plan should have been submitted to the WMSC on November 14, 2025. To date, a draft CAP has not been received.

### **Compliance**

The corrective action plan related to Finding #4 of the WMSC's 2025 Audit of Elevators and Escalators has not been received. For WMATA to return to compliance, WMATA must submit a draft corrective action plan for WMSC review and approval.



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