

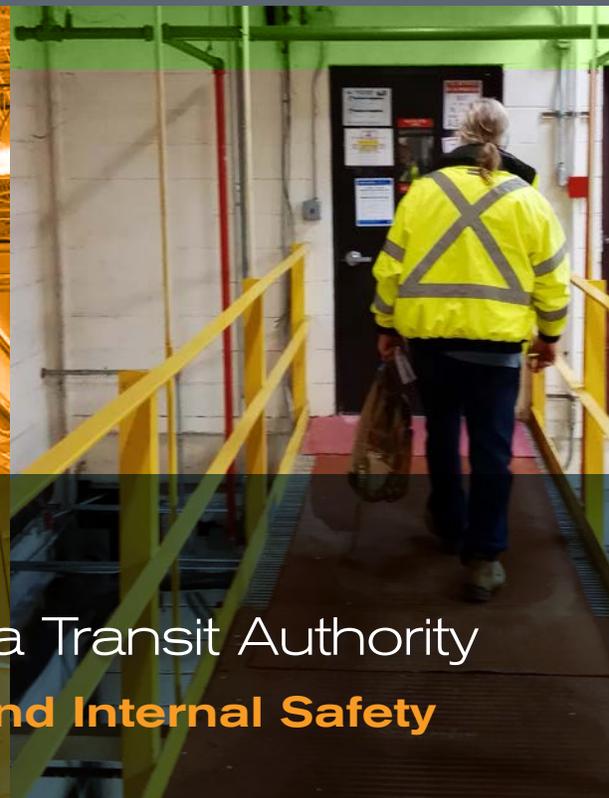
The Washington Metrorail Safety Commission

Safety Audit

of the Washington Metropolitan Area Transit Authority

Audit of Metrorail's Internal Reviews and Internal Safety Reviews Programs

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Final Report:
March 24, 2026

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Prepared under the authority of the Washington Metrorail Safety Commission

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Executive Summary

Internal safety reviews (ISRs) are required by federal regulation and the Washington Metrorail Safety Commission (WMSC) Program Standard. They are designed to provide a review of compliance with its Public Transportation Agency Safety Plan (PTASP) and to provide continuous safety improvement. Internal safety reviews are conducted by each transit agency reviewing each element of its Public Transportation Agency Safety Plan over the course of a three-year period.

These reviews, that are wholly conducted by the Washington Metropolitan Area Transit Authority (WMATA), are complementary to the WMSC's own triennial audits of the WMATA PTASP, and both necessarily contribute to ongoing safety improvement at Metrorail.

The WMSC performed this audit of WMATA Metrorail's Internal Reviews and Internal Safety Reviews Programs by conducting in-depth interviews and document and data

Internal safety reviews are conducted by each transit agency reviewing each element of its Public Transportation Agency Safety Plan over the course of a three-year period.

reviews during August and September 2025, with additional follow-up and documentation reviews that occurred in November 2025.

The audit scope included an assessment of Metrorail's audit practices and procedures, and associated training for purposes of compliance with applicable plans, policies, regulations, and industry best practices.

To meet the audit objectives, the WMSC reviewed operational practices, procedures, equipment, modifications, and associated training in relation to rules, procedures, regulations, and best practices.

This audit also focused on Metrorail corrective action plans including corrective action plans as a result of WMSC findings, WMATA-recommended corrective actions that are overseen by the WMSC, and other corrective actions previously closed by entities such as the National Transportation Safety Board and the Federal Transit Administration.

Positive practices were identified, as well as 1 finding and 1 recommendation:

► **Finding #1:** Metrorail is not conducting internal safety reviews for each element of its Public Transportation Agency Safety Plan.

Recommendation #1: Metrorail should review its record retention policies and assess these policies in relation to its internal audit cycles.





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| BL | 8 | Largo | 4 |
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| BL | 6 | Largo | |

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Background and Scope

Background and Scope

Internal safety reviews are required by federal regulation (49 CFR Part 674) and the WMSC Program Standard (section 4.C).

The WMSC conducted this audit in accordance with the requirements of the WMSC Compact and 49 CFR Part 674, which require that the WMSC conduct a complete audit of WMATA's Public Transportation Agency Safety Plan (PTASP) within a three-year period. (WMSC Compact Section 30(e), 49 CFR section 674.31.) To achieve this, the WMSC conducts audits on an ongoing basis over the three-year timeframe.

The audit scope included an assessment of Metrorail's audit practices and procedures, and associated training for purposes of compliance with applicable plans, policies, regulations, and industry best practices which are conducted under Metrorail's Internal Safety Reviews or Internal Reviews Programs.

Internal safety reviews are required by federal regulation (49 CFR Part 674) and the WMSC Program Standard (section 4.C). These reviews are designed to further continuous safety improvement from within a transit agency by providing an internal audit of all elements of the PTASP over the course of a three-year period. Metrorail notifies the WMSC of internal safety review activities, and provides an annual report signed by the General Manager to the WMSC that provides the results of the internal reviews, findings, and any related internal corrective action plans. The WMSC reviews the internal safety review documents in accordance with the WMSC Program Standard.

The audit was based on the WMATA's Public Transportation Agency Safety Plan (PTASP) effective December 31, 2024 (Rev. 5.0), Metrorail's procedures and documentation, and other associated requirements. The specific elements of the Public Transportation Agency Safety Plan covered in this audit are listed in Appendix D.

The next sections present a general description of Metrorail's Internal Reviews and Internal Safety Reviews Program, including a review of investigations and other oversight activities, review of previous corrective action plans required, and descriptions of the WMSC's finding and recommendations from this audit.

Audit Work

The WMSC received initial documents related to this audit from Metrorail on August 18, 2025, made subsequent document requests, and reviewed the documents provided by Metrorail throughout the course of this audit. The WMSC conducted an entrance conference on

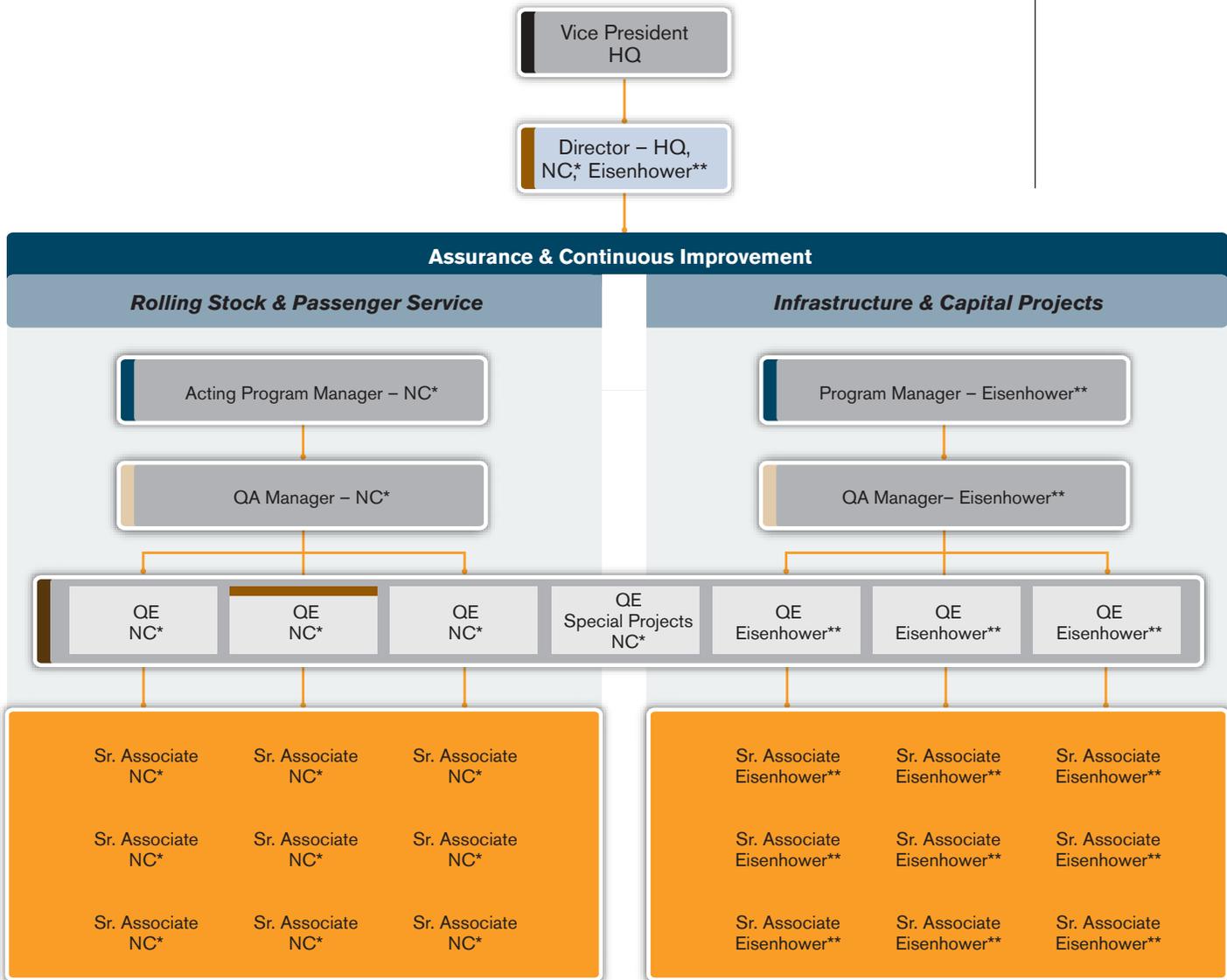


September 4, 2025, and conducted 13 interviews with Metrorail personnel in September and October 2025. The WMSC held an exit conference with Metrorail on November 6, 2025. After the exit conference, Metrorail provided additional information on November 14, 2025, including a request to the WMSC to interview an additional individual. The WMSC honored that request and completed the interview on November 20, 2025.

Lists of documents reviewed and personnel interviewed for this audit are provided in the appendices of this report.

The WMSC provided a draft of this report to Metrorail in January 2026, for technical review and incorporated any comments or technical corrections as appropriate.

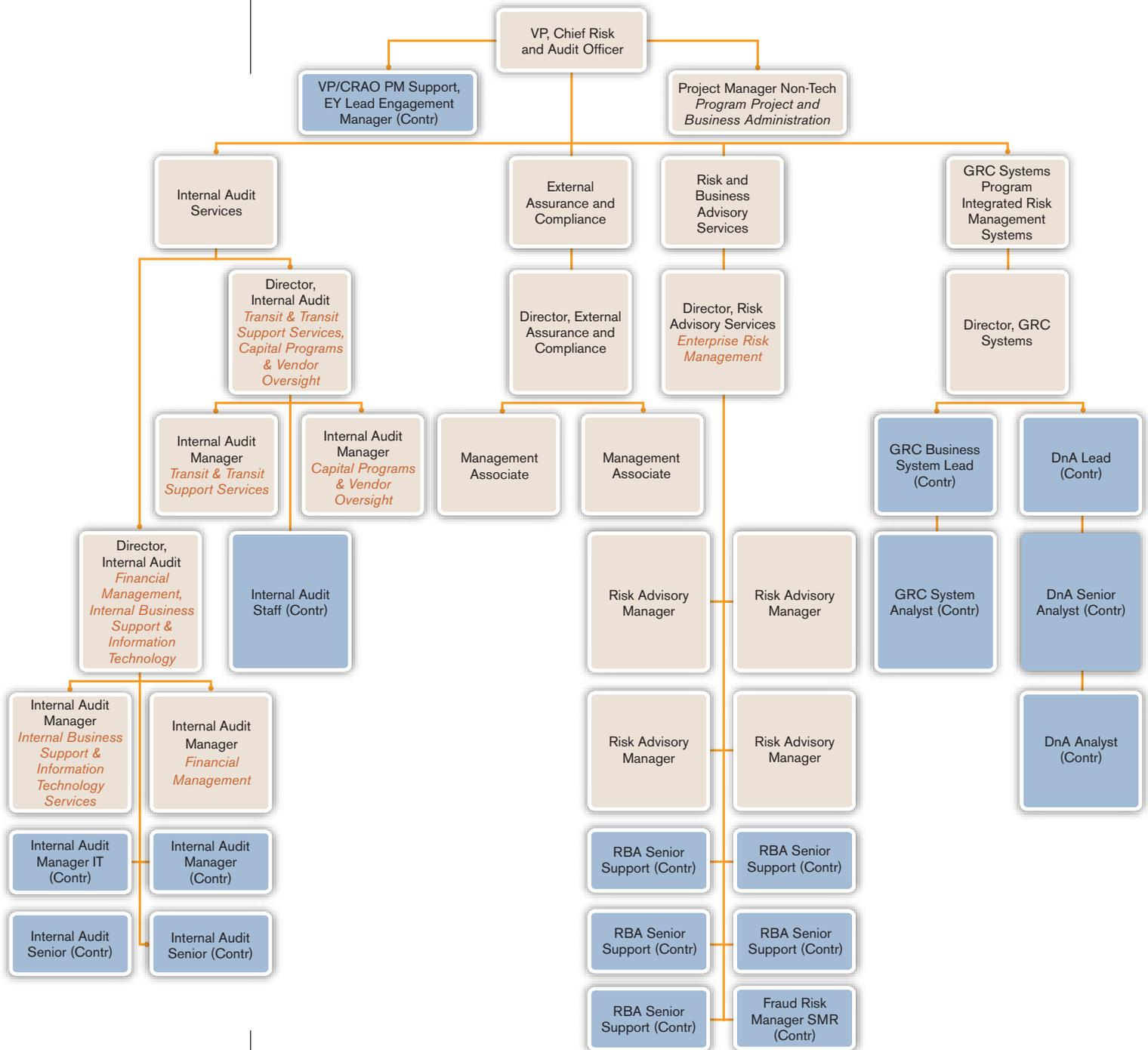
Metrorail’s Quality Assurance, Internal Compliance & Oversight – Current Organizational Structure



*NC: WMATA New Carrollton HQ

**Eisenhower: WMATA Eisenhower HQ

Metrorail's Department of Audits & Compliance – Current Organizational Structure





Metrorail Internal Safety Review and Associated Corrective and Preventive Actions

Metrorail's Audit & Compliance Department last completed an Internal Safety Review of the Internal Safety Review Program in 2024. The report for that audit was issued on September 18, 2024. This internal review assessed the Internal Safety Review Program in accordance with requirements listed in 49 CFR section 674.27, the WMATA Public Transportation Agency Safety Plan (PTASP), the WMSC Program Standard, the WMATA Quality Management System Plan (QMSP) and departmental policies and procedures. It also included a review of the previously issued WMSC corrective action plans. The four findings from this review and the associated resolutions are outlined below.

➤ **Internal Metrorail Finding ISR-2024-01:** *Quality's process for the identification of Metro's review areas for their triennial work plan needs to be formalized. (Risk Level: Moderate)*

The process for the development of the ISR work plan was not required to be documented. QICO-PRO-P01-04, Section 6.1.1.1 requires that the Quality VP identify the Public Transportation Agency Safety Plan (PTASP) and the specific WMATA business units subject to review to assure each PTASP element or business unit is reviewed over the course of a three-year review period. Quality should formalize through work instruction the process for identifying business functions included in their triennial work plan.

Internal Metrorail iCAPA 37507: Quality should formalize through work instruction the process for identifying business functions included in their triennial work plan.

Quality updated its Internal Safety Review Procedure, QICO-PRO-P01, to document the process for the development of the ISR work.

Although this was completed, the WMSC identified in Finding 1 of this report that the work planning must be reviewed to ensure that each PTASP element or business unit is included over the course of the three-year review period.

The WMSC identified in Finding 1 of this report that the work planning must be reviewed to ensure that each PTASP element or business unit is included over the course of the three-year review period.



Quality updated its Internal Safety Review Procedure, QICO-PRO-P01, to reflect that the notification letters transmitted to the WMSC via emails are to be saved in the ISR folder on the Quality Assurance network drive.

- **Internal Metrorail Finding ISR-2024-02:** Documented evidence of the 30-day notification letter sent to WMSC should be signed by Quality representative and maintained on file. (Risk Level: Low)

QICO-PRO-P01-04 and the WMSC Program Standard require that Quality notify the WMSC of scheduled ISRs a minimum of 30 calendar days before the initiation of the ISR process. In accordance with WMATA's Record Retention Policy, notification letters transmitted to WMSC via emails were purged and not retained in Quality's files. Documented evidence of the 30-day notification letter to WMSC should be signed by Quality representative and maintained on file. Of the ten ISRs reviewed, nine had no documented evidence that the 30-day notifications were sent to WMSC and six had no evidence of a notification letter signed by Quality representative on file.

Internal Metrorail iCAPA 37505: Quality should retain evidence of email transmission to ensure Internal Safety Review (ISR) notification letters to WMSC are in each ISR project folder.

Quality updated its Internal Safety Review Procedure, QICO-PRO-P01, to reflect that the notification letters transmitted to the WMSC via emails are to be saved in the ISR folder on the Quality Assurance network drive.

The listed cause for this finding in the report states that "In accordance with WMATA's Record Retention Policy, notification letters transmitted to WMSC via emails were purged and not retained in Quality's workpapers." The cause listed was not addressed or reviewed as part of the CAP. See recommendation 1 of the present audit for additional information related to this finding.

- **Internal Metrorail Finding ISR-2024-03:** Documented evidence of the draft ISR report sent to Safety Assurance and other applicable internal stakeholders for review and comment should be maintained on file. (Risk Level: Low)

Metrorail's SOP QICO-PRO-P01 requires Quality Assurance to send the draft ISR report to the Office of Safety Assurance and other applicable internal stakeholders for review, comments, and incorporate feedback where applicable. Documented evidence that the draft ISR report was sent to Safety Assurance and other applicable internal stakeholders for review, and comment should be maintained on file. Of the ten ISRs reviewed, six did not have evidence that the draft ISR report was sent to Safety Assurance and other applicable stakeholders for review and comment. In accordance with WMATA's Record Retention Policy, the ISR report sent to Safety Assurance and other applicable internal stakeholders for review and comment via emails were purged and not retained in Quality's files.

Internal Metrorail iCAPA 37504: Quality should retain evidence of email transmission of draft Internal Safety Review reports sent to Safety Assurance and other applicable internal stakeholders for review and comment.

Quality updated its Internal Safety Review Procedure, QICO-PRO-P01, to reflect the following: The ISR report transmitted via emails to Safety Assurance and other internal stakeholders are to be saved in the Quality Assurance network drive.





The listed cause for this finding in the report states that “In accordance with WMATA’s Record Retention Policy, the ISR report sent to Safety Assurance and other applicable internal stakeholders for review and comment via emails were purged and not retained in Quality’s workpapers”. The cause listed was not addressed or reviewed as part of the corrective action plan. See recommendation 1 of the present audit for additional information.

► **Internal Metrorail Finding ISR-2024-04:** *Documented evidence of Annual Reports submitted to WMSC in 2021, 2022 and 2023 were not maintained. (Risk Level: Low)*

Metrorail’s SOP QICO-PRO-P01 requires an annual report to be sent to the WMSC. The WMSC is required to approve, conditionally approve, or state it is unable to approve the report in a written response within 15 calendar days of receipt of the report. Documented evidence of Annual Reports submitted to WMSC in 2021, 2022, and 2023 were not maintained. In accordance with WMATA’s Record Retention Policy, annual reports transmitted to WMSC and responses via emails were purged and not retained in Quality’s workpapers.

Internal Metrorail iCAPA 37506: Quality should retain evidence of email transmission for annual reports to comply with the policy stipulation.

Quality updated its Internal Safety Review Procedure, QICO-PRO-P01, to reflect the following: Annual reports transmitted to the WMSC and responses received via emails need to be uploaded upon issuance and receipt in the Quality Assurance network drive. The listed cause for this finding stated, “In accordance with WMATA’s Record Retention Policy, annual reports transmitted to WMSC and responses via emails were purged and not retained in Quality’s workpapers.” The cause listed was not addressed or reviewed as part of the CAP. See recommendation 1 of the present audit for additional information.

Assessment of Previous Corrective Action Plans

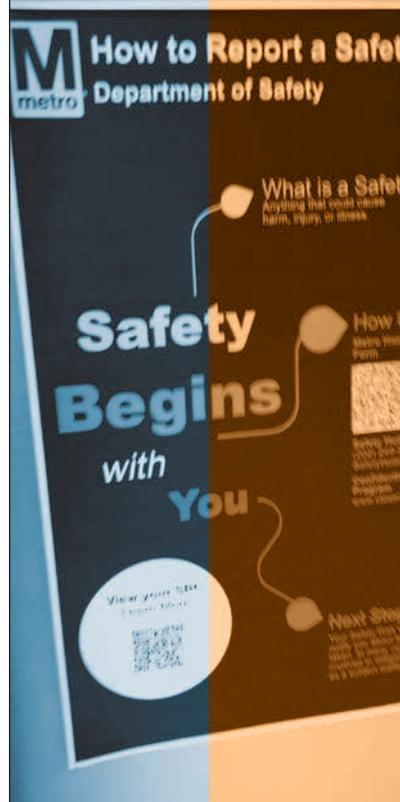
► **C-0235 (Closed)**

Findings from the internal safety review program are not yet systematically incorporated into Metrorail’s Safety Management System (SMS) as specified in Metrorail’s PTASP. (**2023 Audit of Internal Safety Review Program**, finding 1.)

Quality Assurance, Internal Compliance & Oversight updated its Internal Safety Review Procedure to include entry of internal safety review findings into Metrorail’s safety risk management system. During interviews for the present audit and review of the current safety risk management dashboard, there was evidence that findings are now being added to and addressed by Metrorail’s safety management system.

► **C-0236 (Closed)**

Metrorail has not yet implemented training requirements in system safety, hazard management, and SMS training personnel responsible for internal safety reviews as required by the WMSC Program Standard. (**2023 Audit of Internal Safety Review Program**, finding 2.)



During the present audit, the WMSC reviewed the current training matrix along with the training records to confirm that personnel are required to take and enroll in the necessary TSI courses.

Quality Assurance, Internal Compliance & Oversight determined personnel conducting internal safety reviews should be trained in three additional courses that are offered through the U.S. Department of Transportation's Transportation Safety Institute (TSI). These courses are Safety Management System Awareness, Safety Assurance, and Safety Management System Principles for transit. Quality Assurance, Internal Compliance & Oversight's training matrix was updated to include these courses for applicable personnel. During the present audit, the WMSC reviewed the current training matrix along with the training records to confirm that personnel are required to take and enroll in the necessary TSI courses.

▶ **C-0237 (Closed)**

Metrorail does not have a process for, and has not conducted or scheduled, a triennial internal safety review of its internal safety review program as required by the WMSC Program Standard. (**2023 Audit of Internal Safety Review Program**, finding 3.)

Quality Assurance, Internal Compliance & Oversight updated its Internal Safety Review Procedure (QICO-PRO-P01-02) to include an independent review of the Internal Safety Review Program on an ongoing basis. This independent internal safety review was added to the internal safety review schedule. The first such review of the program was completed in 2024 by the Audit & Compliance Department (a separate Metrorail department from Quality Assurance, Internal Compliance & Oversight, which conducts the ISR program. This internal safety review and its findings were reviewed as part of the present WMSC audit.





What the **WMSC** Found

What the **WMSC** Found

Metrorail has created an independent process for conducting the internal safety review of its Internal Safety Review Program, which is conducted by the Department of Audits & Compliance.

Positive Practices

This audit identified several positive practices, or success stories, some of which were the direct result of the WMSC's oversight. However, all of the positives detailed below were implemented as the result of Metrorail's own work. The WMSC encourages Metrorail to continue these positive practices.

- 1.** Metrorail's Department of Audits & Compliance is adopting and regulating the use of artificial intelligence in internal audits and reviews.
- 2.** Metrorail has created an independent process for conducting the internal safety review of its Internal Safety Review Program, which is conducted by the Department of Audits & Compliance. (C-0237)
- 3.** Escalation channels to the Director of Audit and General Counsel are clearly defined.
- 4.** Quality Assurance, Internal Compliance & Oversight is developing a CAP Trends Dashboards that will provide real-time visualization of CAP progress.



Findings and Minimum Corrective Actions

To ensure the agency safety plan leads to safety improvements, both the state safety oversight agencies and the rail transit agencies are required to audit all elements of the agency safety plan as a way of assessing the plan's efficacy in driving continuous safety improvement.

► Finding #1: Metrorail is not conducting Internal Safety Reviews for each element of its Public Transportation Agency Safety Plan.

U.S. Code of Federal Regulations (CFR) Title 49 Part 673 (49 CFR Part 673) requires operators of rail transit agencies subject to the Federal Transit Administration (FTA) State Safety Oversight (SSO) program, to develop a Public Transportation Agency Safety Plan (PTASP). The PTASP defines how each agency will implement its Safety Management System (SMS). This system is the formal, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation.

To ensure the agency safety plan leads to safety improvements, both the state safety oversight agencies and the rail transit agencies are required to audit all elements of the agency safety plan as a way of assessing the plan's efficacy in driving continuous safety improvement.

Requirement:

U.S. Code of Federal Regulations (CFR) section 49 part 674.27 states "The RTA must develop and document an ongoing internal safety review process to ensure that all elements of an RTA's Public Transportation Agency Safety Plan are performing and being implemented as intended" and "The RTA's internal safety review process must ensure that the implementation of **all elements of its Public Transportation Agency Safety Plan are reviewed within a three-year period.**" (Emphasis added.)

Metrorail's Quality Management System Plan (dated October 2023), states in section 3.11.1 "Safety reviews are performed on a three-year schedule. Frequencies may be increased as needed to identify hazards, assess risks, and develop effective risk mitigation strategies more closely."

WMATA's Public Transportation Agency Safety Plan (dated December 31, 2024) section 2.4.2 states "The Office of Occupational Health and Wellness (OHAW) has primary responsibility for administering a Substance Abuse Testing Program for safety-sensitive employees and contractors in accordance with 49 C.F.R. Part 40 - Procedures for Transportation Workplace Drug and Alcohol Testing Programs and 49 C.F.R. Part 655 - Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations." Communication Systems are vital to all of Metrorail's operations including its Emergency Operations Plan (EOP), Continuity of Operations Plan and Emergency Preparedness outlined in Section 1.3 of its PTASP.

Nonconformance:

The WMSC found elements of Metrorail's Public Transportation Agency Safety Plan that were not evaluated during the previous internal safety review cycles. Specifically, Communication Systems and Drug and Alcohol and Fitness for Duty programs.

Communication Systems

Metrorail created a schedule for completing its 3-year internal safety review cycle covering the entirety of its Public Transportation Agency Safety Plan for 2022 to 2025. The plan stated that the "Communications Section (COMM)" was to be audited in Calendar Year 2023; however,



when the WMSC requested the completed internal safety review it was found that the last such review occurred in 2018. The next internal safety review of this area is set to complete in calendar year 2026 as “Communications, Radio, and Engineering.”

| FISCAL YEAR 2024 | | (Exact Sequencing will be determined by June of the prior year) | | | | | | | | | | | | | |
|------------------------|-----|---|-----------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Review Category | No. | Review Name | Assurance Group | Q1 | | | Q2 | | | Q3 | | | Q4 | | |
| | | | | Jul-23 | Aug-23 | Sep-23 | Oct-23 | Nov-23 | Dec-23 | Jan-24 | Feb-24 | Mar-24 | Apr-24 | May-24 | Jun-24 |
| Internal Safety Review | 1 | Communications Section (COMM) | Infrastructure | | | | | | | | | | | | |
| | 2 | Rail Transportation (RTRA) | Rolling Stock | | | | | | | | | | | | |
| | 3 | Office of Plant Maintenance (PLNT) | Infrastructure | | | | | | | | | | | | |
| | 4 | Safety Certification & Construction Safety (SAFE) | Infrastructure | | | | | | | | | | | | |
| | 5 | Safety Investigation and Monitoring (SAFE) | Rolling Stock | | | | | | | | | | | | |

The WMSC has several open corrective action plans that relate to Communication Systems including two that pertain to radio communications: CAP C-0100 which is to address the finding “Metrorail is not maintaining a fully functioning radio communications system in all rail yards and shops” and CAP C-0293, which is to address the finding “Metrorail does not have a reliable communication system for operations or emergencies.”

Several WMSC investigation reports illustrate the effect of communication system failures:

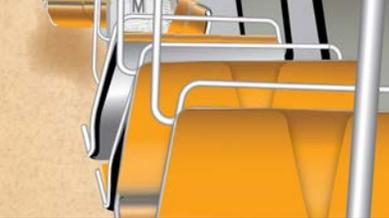
WMSC Investigation Report **W-0252** of an evacuation for life safety reasons at Ronald Reagan Washington National Airport Station on September 3, 2023, found that “Radio communications between the MAC [Mission Assurance Coordinator] and Incident Commander were distorted at various times during the event.”

WMSC Investigation Report **W-0254** of a collision at Rhode Island Ave Station on August 23, 2023, found that MTPD personnel experienced radio communication challenges with the mission assurance coordinator in the control center and as a result had to use cell phones to communicate “throughout the incident.”

WMSC Investigation Report **W-0197** of an evacuation at Eastern Market Station on September 9, 2022, summarized “The investigation identified that the Train Operator experienced radio transmission issues with their handheld radio, which led to the station manager sharing their handheld radio with the Train Operator.”

WMSC Investigation Report **W-0198** of an evacuation event at Rhode Island Ave Station on September 19, 2022, stated “This event demonstrates deficiencies as evidenced by the failed communications between ROIC [Rail Operations Information Center] and the Station Manager and between MTPD and the Office of Customer Service Call Center. For example, there were four failed attempts by ROIC to contact the Station Manager during this event. When the station manager contacted ROIC via phone after the first failed attempt, ROIC personnel made no attempt to conduct a radio check with





the Station Manager while they were on the phone to ensure any subsequent radio communications could be transmitted and received, including evacuation instructions. Despite communications issues being experienced in the field during this event, WMATA communications systems and radio branch reported that there were no radio communications issues found during inspection following the event at Rhode Island Ave-Brentwood Station.”

Published investigation reports and open corrective action plans identifying communication system failures show this area could benefit from the required internal safety review and may even warrant invoking section 3.11.1 of Metrorail’s Quality Management System Plan that states “Safety reviews are performed on a three-year schedule. Frequencies may be increased as needed to identify hazards, assess risks, and develop effective risk mitigation strategies more closely.”

Drug and Alcohol, Fitness for Duty Programs

Metrorail’s Internal Safety Review of Drug and Alcohol, Fitness for Duty was scheduled in the Internal Safety Review 3-year schedule for Fiscal Year 2022 to Fiscal Year 2025 and was to be completed from July 2022 to December 2022.

| FISCAL YEAR 2023 | | (Exact Sequencing will be determined by June of the prior year) | *FY2023 – FY2025 Plan adjusted as a result of WMSC updated 3-Year Plan received January 13, 2022 | | | | | | | | | | | | |
|------------------------|-----|---|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Review Category | No. | Review Name | Assurance Group | Q1 | | | Q2 | | | Q3 | | | Q4 | | |
| | | | | Jul-22 | Aug-22 | Sep-22 | Oct-22 | Nov-22 | Dec-22 | Jan-23 | Feb-23 | Mar-23 | Apr-23 | May-23 | Jun-23 |
| Internal Safety Review | 1 | Drug and Alcohol, Fitness for Duty Programs | Rolling Stock | | | | | | | | | | | | |
| | 2 | Elevators and Escalators (ELES) | Infrastructure | | | | | | | | | | | | |
| | 3 | Engineering and Architecture (ENGA) | Infrastructure | | | | | | | | | | | | |
| | 4 | Office of Emergency Preparedness (SAFE/OEP) | Infrastructure | | | | | | | | | | | | |
| | 5 | Information Technology (IT) | Rolling Stock | | | | | | | | | | | | |



When the WMSC requested the completed internal safety review, Metrorail explained that “This ISR appeared in the CY21 Annual Report Package but was removed from the CY22 Annual Report and not conducted in future iterations[]” and that “The next iteration of this audit is scheduled for implementation by Audit & Compliance during Q3 FY2026.” The WMSC reviewed the Calendar Year 2021 Annual Report and was unable to corroborate that the Drug & Alcohol program was reviewed.

The last record provided to the WMSC was the 2020 Internal Safety Review of Rail Operations Oversight, Supervision & Fitness for Duty dated December 23, 2020, which included fitness for duty. However, the 2020 report did not evidence drug and alcohol testing; the scope also does not provide support of its inclusion.

In each of these findings, the cause statement listed by Audit & Compliance points to WMATA's Record Retention Policy and states that emails were purged and not retained in Quality's workpapers.

As of the date of this report, the WMSC has been unable to complete its scheduled 2024 audit of WMATA's Fitness for Duty and Occupational Health Programs as a result of WMATA disputing the WMSC's authority to audit these areas.

◆ **Minimum Corrective Action:**

Metrorail must review the current agency safety plan against the current internal safety review schedule to ensure that all elements of the agency safety plan are included in the internal safety review schedule. As the agency safety plan is revised annually, the three-year internal safety review schedule must be revised as necessary to account for any changes to the agency safety plan that affect the schedule.

Recommendation #1: Metrorail should review its record retention policies and assess these policies in relation to its internal audit cycles.

To conduct thorough internal reviews and internal safety reviews, Metrorail should ensure that it is maintaining all business records necessary to permit those reviews to be adequately conducted.

Requirement:

Metrorail's Quality Management System Plan (QMSP), Version 3.0, dated October 31, 2023 states in section 2.1 that "Metro developed the Core QMS Standards shown below in Figure 3 to address the 15 Core QMS elements identified in the Federal Transportation Administration (FTA) Quality Management System Guidelines and elements from ISO 9001 tailored to a transit-specific context." Metrorail's Digital Modernization Department is accredited to ISO 9001: 2015.

ISO 9001: 2015 states in section A.6. that "The organization is responsible for determining what documented information needs to be retained, the period of time for which is to be retained and the media to be used for its retention." In clause 4.4.2(b) it states that "To the extent necessary, the organization shall: retain documented information to have confidence that the processes are being carried out as planned."

Nonconformance:

Metrorail's 2024 Internal Safety Review of the Internal Safety Review Program identified four findings. Three of the findings (ISR-2024-02, ISR-2024-03, and ISR 2024-04) related to the retention of documented evidence to prove compliance with procedural or regulatory requirements. In each of these findings, the cause statement listed by Audit & Compliance points to WMATA's Record Retention Policy and states that emails were purged and not retained in Quality's workpapers. This brings into question how the policy was formulated in alignment with the periods covered by Metrorail's internal review and internal safety reviews cycles.

Metrorail did not address the listed cause in the audit report for any of the findings' corrective action plans, choosing to make procedural updates, rather than review its retention policy, despite it being listed as the cause.





Consistent with the WMSC Program Standard and 49 CFR Parts 673 and 674, Metrorail should consistently identify and document root causes for all Internal Review and Internal Safety Review findings in accordance with its procedures and SMS requirements.



♦ **Recommended Corrective Action:**

Metrorail should review its retention policies considering all applicable standards, accreditations, certifications, and regulations to ensure that the retention policy enables retrieval of necessary records when conducting internal reviews and internal safety reviews.

Issues Resolved During the Audit

Consistent with the WMSC Program Standard and 49 CFR Parts 673 and 674, Metrorail should consistently identify and document root causes for all Internal Review and Internal Safety Review findings in accordance with its procedures and SMS requirements. Thorough root cause analysis is fundamental to any quality management system. A systematic approach to the review of findings and recommendations is necessary to ensure that the underlying or principal cause is being addressed rather than surface level causes. Addressing the root cause of the issue helps to prevent reoccurrence.

Requirement:

Metrorail's Quality Management System Plan (QMSP), Version 3.0, dated October 31, 2023 states Metrorail is to "Document and maintain records of the root cause and corrective actions taken. Corrective actions, including root cause analysis, performed to address non-conformance(s) are documented on a traceable report by Metro's quality representative, and maintained as a quality record in accordance with the QMSP" (Section 3.9.1.)

The procedure defines root cause analysis as the "process to identify the primary cause of a non-conformance which, if corrected, prevents reoccurrences of non-conformance, failures, or unacceptable deviations."

Nonconformance:

In conducting this audit, the WMSC reviewed all of Metrorail's internal corrective action plans (iCAPAs) issued from January 1, 2023, to August 15, 2025. The total number of iCAPAs issued during this period was 139; however, nine of those iCAPAs are related to WMATA's Bus or MetroAccess operations and were excluded from the WMSC's review. The WMSC found that the majority of the 130, approximately 91%, of Metrorail's internal corrective action plans addressed the root cause of the findings and outlined iterative and achievable steps to address the root cause.

There were several examples, outlined below, in which the plans address the specific issue raised by the associated finding; however, do not address the root cause of the finding.

Examples of this include the following:

- ▶ QICO-I-TCSS-23-11 states "Revise all Job Descriptions in accordance with HR-TA-P02-00 to assure they are up to date."

The actionable items of the CAP include the identification of all job descriptions and then the review/revision of job descriptions not meeting the minimum requirements. This is a one time action and not a review of why the job descriptions were not in line with Metrorail's requirements or the creation of processes and procedures from prevent reoccurrence.

Each iCAPA addresses this by requiring the corresponding departments to develop a training matrix but it is not clear why they were unaware of the requirement to have one.

- QICO-BDPM-24-04 states “Enforce the use of required tools during brake disc slant, concave, and scoring wear measurements.”

The internal CAP requires that a manual and SOP be updated and then audits completed to ensure proper use but does not address why personnel did not initially have the proper tools as required by the SOP. No additional training was provided, only requirements for supervisors to verify tool usage. Personnel were not provided additional explanation or re-training.

- QICO-GPRF-24-02 states “Develop and implement a written respirable crystalline silica program that requires compliance with Occupational Safety and Health Administration regulations on respirable crystalline silica.”

While the WMSC acknowledges the hazard identification and mitigation work conducted by WMATA, it is not clear through the finding or the CAP why this program did not exist previously if there was a known exposure hazard. Additional root cause analysis should have been completed prior to the programs creation, to assess the need for other similar programs.

- QICO-EQTL-24-03 states, “Conduct a comprehensive review of all governing documents to identify and update those that are overdue for revision.”

This iCAPA identified two procedures with issues that were then updated, but there is no evaluation on why these hadn’t been previously updated, and a “comprehensive” review was not conducted.

- QICO-RCTR-25-01 states, “Reinforce strict adherence to Roadway Worker Protection (RWP) standards and safety guidelines and implement continuous monitoring and Quality Checks to ensure compliance.”

In this iCAPA, the only stakeholder actionable item states that “Track Maintenance will provide six (6) months’ worth of records demonstrating verification of replacing expired gloves per SOP 208-05 Equipment Calibration Procedure.” The corrective action plan should have determined why the issue occurred, other occurrences and CAPs, re-training, or adjustments to processes but required only for the department to show six months, without any re-instruction or re-training. The WMSC has a similar open finding from the recently released 2025 Audit of Communication Systems issued on December 4, 2025 which found that “Metrorail does not have adequate supervisory oversight to ensure adherence to testing and replacement requirements for electrical safety gloves.”

There are four iCAPAs created during this period, QICO-I-ENGA-23-04, QICO-I-IT-23-01, QICO-I-RADC-23-08, QICO-R-TCSS-23-18, which include the creation of a training matrix. Each iCAPA addresses this by requiring the corresponding departments to develop a training matrix but it is not clear why they were unaware of the requirement to have one. The first actionable item in each of these iCAPAs is identical and states “Develop Training Matrix”. There is a need to review why these departments did not have training matrices rather than just develop one, especially as this affected multiple departments.



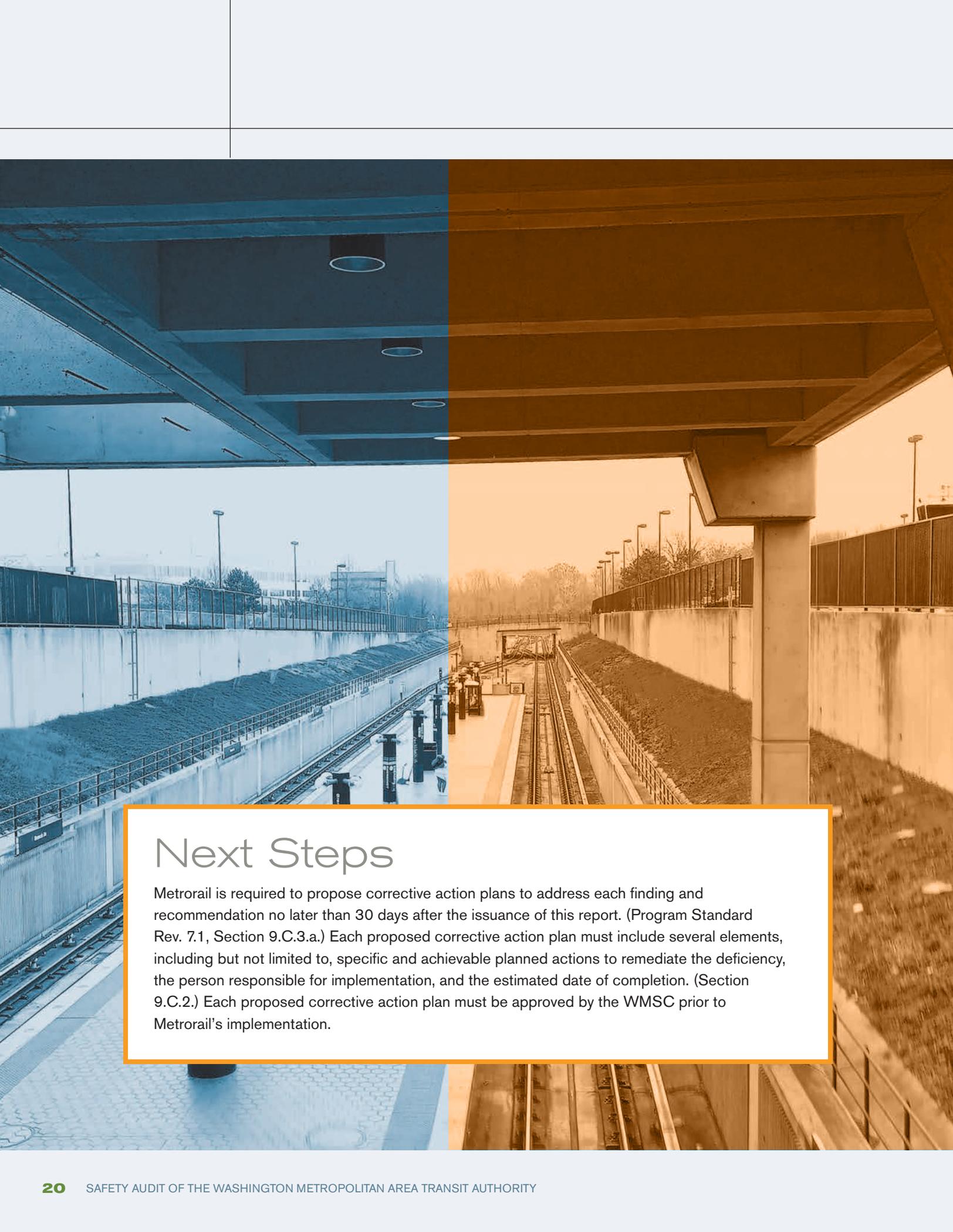


The number of iCAPAs issued along with the iterative steps to address the issues is fully acknowledged and demonstrates Metrorail's commitment to continuous improvement.

The number of iCAPAs issued along with the iterative steps to address the issues is fully acknowledged and demonstrates Metrorail's commitment to continuous improvement. Overall, Metrorail's internal corrective action process/program does address root causes; however, Metrorail should evaluate why some fall short and address the identified issue(s) and provide some additional review or training where necessary.

During the audit, the Quality Department also independently identified an opportunity for continuous improvement related to the implementation and documentation of Root Cause Analysis (RCA) for Internal Safety Review findings and took action to address this issue: Additional external training has been scheduled for March 2026 (specifically covering corrective and preventive actions), updating the iCAPA format to account for and include additional details on root cause analysis, and evidence was provided for a recently-completed internal safety review demonstrating expanded additional supporting documentation and review of root causes for all findings.





Next Steps

Metrorail is required to propose corrective action plans to address each finding and recommendation no later than 30 days after the issuance of this report. (Program Standard Rev. 7.1, Section 9.C.3.a.) Each proposed corrective action plan must include several elements, including but not limited to, specific and achievable planned actions to remediate the deficiency, the person responsible for implementation, and the estimated date of completion. (Section 9.C.2.) Each proposed corrective action plan must be approved by the WMSC prior to Metrorail's implementation.



Appendices

Appendices A

Appendix A: Personnel Interviewed

DEPARTMENT OF QUALITY ASSURANCE, INTERNAL COMPLIANCE & OVERSIGHT

- Director
- Program Manager
- Quality Assurance Manager
- Quality Assurance Manager
- Quality Assurance Manager, Business Performance Team
- Quality Engineer

- Quality Engineer, Special Projects
- Quality Senior Associate
- Senior Associate
- Vice President

DEPARTMENT OF AUDITS & COMPLIANCE

- Director, Internal Audit
- Internal Audit Manager
- Vice President, Chief Risk & Audit Officer



Appendix B

Appendix B: Documents Reviewed

ORGANIZATIONAL CHARTS AND DEPARTMENT RESPONSIBILITIES:

- Assurance Org Chart (08/18/2025)
- Audit & Compliance Organizational Chart (07/25/2025)
- Audit & Compliance Organizational Chart for Internal Safety Review (no date)

PROCEDURES/POLICIES/MANUALS/FORMS:

- Administrative Notice – Responsible Use of Generative Artificial Intelligence Tools (01/29/2025)
- QICO-PRO-P05-03, Quality Record Retention Process (05/31/2024)
- QICO-PRO-TMP02-05, Checklist, Rev. 5 (10/17/2023)
- QICO-PRO-TMP15-08, Internal Review Form (09/20/2024)
- QICO-PRO-W01-05, Internal Review Quality Score (05/30/2024)
- Quality-ASR-TMP01-03, Rev. 3, iCAPA Modification Approval Form (06/12/2025)
- Quality-ASR-TMP02-04, Document Request, Rev. 04 (06/17/2025)
- Quality-PRO-P01-06, Quality Internal Safety Review (08/08/2025)
- Quality-PRO-P06-06, Internal Review and Quality Assessment Procedure (08/08/2025)
- Quality-PRO-TMP01-06, Internal Review Scope of Work, Rev. 6 (01/02/2025)
- Quality-PRO-TMP06-06, IS/ISR Field Assessment, Rev. 6 (04/30/2025)
- Quality-PRO-TMP09-02, Internal Checklist, Rev. 2 (10/08/2024)
- Quality-PRO-TMP11-02, Notable Event, Rev. 02 (09/27/2024)
- Quality-PRO-TMP12-05, iCAPA Executive Signature Page, Rev. 05 (04/02/2025)
- Quality-PRO-TMP13-04, Internal Safety Review Scope of Work, Rev. 04 (01/02/2025)
- Quality-PRO-TMP16-06, Internal Safety Review Form, Rev. 06 (01/02/2025)

- Quality-PRO-TMP23-04, WMSC Letter for Annual Reporting, Rev. 04 (02/03/2025)
- Quality-PRO-TMP34-02, WMSC ISR Cover Letter, Rev. 02 (03/11/2025)
- Quality-PRO-TMP37-12, iCAPA, Rev. 12 (03/11/2025)
- Quality-PRO-TMP40-01, Meeting Agenda & Note, Rev. 01 (02/06/2025)
- Quality-PRP-TMP22-04, WMSC ISR Notification Letter, Rev. 04 (02/03/2025)
- WMATA Public Transportation Agency Safety Plan (12/31/2024)
- WMATA Quality Management System Plan (QMSP), Rev. 3.0 (10/31/2023)
- WMATA-SARE-1.11.03, Corrective and Preventative Actions Procedure (10/31/2023)

TRAINING:

- 2025 WMATA TSI Dates (no date)
- Assurance ELM Training Records (08/13/2025)
- Audit & Compliance Training Matrix for ISR (no date)
- Individual Staff Training Records (Various Dates)
- QMSP Course – WMSPCERT (09/18/2025)
- Quality Training Matrix (no date)
- Training Matrix for Assurance Team (08/18/2025)





INTERNAL REVIEWS AND INTERNAL SAFETY REVIEWS:

- Assurance Internal Calendar 2025 (no date)
- Audit & Compliance Final Report on Internal Safety Review of WMATA Safety Certification Program (02/14/2025)
- Audit & Compliance Final Report on the Internal Safety Review of ISR Program – WMSC (09/18/2024)
- Calendar Year 2024 Annual Safety Review Report and Certification (01/31/2025)
- Internal Review, Engineering & Maintenance, 7000-Series Holding Brake Pressure Switch (01/08/2025)
- Internal Review, Engineering & Maintenance, Grout Pad Renewal Follow-up (07/16/2024)
- Internal Review, Engineering & Maintenance, Rail and Crosstie Renewal (02/04/2025)
- Internal Review, Engineering & Maintenance, Railcar Brake Disc Preventive Maintenance (12/17/2025)

- Internal Review, Engineering & Maintenance, Switch Machine Replacement and Maintenance (07/03/2025)
- Internal Review, Internal Safety Review, Facilities Automatic Fare Collection (08/26/2025)
- Internal Review, Internal Safety Review, Structures Inspection and Maintenance (08/22/2025)
- Internal Safety Review of Safety Certification CAP 37711 (07/18/2025)
- Internal Safety Review of WMATA Internal Safety Review Program CAP 37507 (07/18/2025)
- Internal Safety Review of WMATA Internal Safety Review Program CAP 37506 (07/18/2025)
- Internal Safety Review of WMATA Internal Safety Review Program CAP 37505 (07/18/2025)
- Internal Safety Review of WMATA Internal Safety Review Program CAP 37504 (07/18/2025)
- Internal Safety Review, Facilities Fire/Life-Safety (06/10/2024)
- Overview of Internal Corrective and Preventative Actions (iCAPAs) (08/15/2025)
- QICO-I-FFLS-24-01 (08/09/2024)
- QICO-I-FFLS-24-02 (08/09/2024)
- QICO-I-FFLS-24-03 (08/09/2024)
- QICO-I-FFLS-24-04 (08/09/2024)
- QICO-I-FFLS-24-05 (08/09/2024)
- QICO-I-FFLS-24-06 (08/09/2024)
- QICO-I-FFLS-24-07 (08/09/2024)
- Quality Assurance, Internal Compliance & Oversight – 3 Year Internal Safety Review (ISR) Schedule: Calendar Years 2025-2027 (no date)

MEETINGS:

- Executive Safety Committee Presentation (06/30/2025)

OTHER DOCUMENTS:

- Hazard Log from Safety Risk Management (08/15/2025)
- WMSC Additional Document Request III Memo (10/21/2025)

Appendix D

Appendix D: PTSAP Elements

1. General Requirements

- a. Transit Agency Information
- f. Development and Implementation of a Safety Management System (SMS)

2. Safety Management Policy

- a. Safety Management Policy
- b. Employee Safety Reporting Program
- c. Communication of the Safety Management Policy
- d. Necessary Authorities, Accountabilities, and Responsibilities (including Accountable Executive, SMS Executive, Agency Leadership and Executive Management, Key Staff, and Safety Committees)

3. Safety Risk Management

- a. Safety Risk Management Process (including Safety Hazard Identification, Safety Risk Assessment, and Safety Risk Mitigation)
- b. Ongoing Management of Safety Risk (including Occupational Safety and Health Risk Management, Operational Safety Risk Management, Safety Certification, and Environmental Risk Management)

4. Safety Assurance

- a. Safety Performance Monitoring and Measurement (including Monitoring Operations and Maintenance Procedures, Monitoring of Operational Safety Risk Mitigations, Safety Investigations, Information Monitoring, and Emergency Risk Management)
- b. Management of Change
- c. Continuous Improvement
- d. Corrective Action Plans

5. Safety Promotion

- a. Competencies and Training (including Employee Safety Training, Safety Rules and Procedures Training, Contractor Safety, Training Recordkeeping, Compliance with Training Requirements, and SMS-specific Training Requirements)
- b. Safety Communication (including Direct Staff Communication, Hazard and Safety Risk Information, and Employee Safety Reporting Program Engagement)

6. Documentation





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