



NATIONAL TRANSPORTATION SAFETY BOARD  
**Investigative Hearing**

Washington Metropolitan Area Transit Authority Metrorail train 302 that encountered heavy smoke in the tunnel between the L'Enfant Plaza Station and the Potomac River Bridge on January 12, 2015

<b>GROUP</b>	<b>F</b>
<b>EXHIBIT</b>	
47	

Agency / Organization

WMATA

Title

**WMATA Internal Safety and Security  
Report with Attachment, 2013**



January 30, 2013

Mr. James Benton  
Chair, Tri-state Oversight Committee  
Maryland Department of Transportation  
7201 Corporate Center Drive  
Hanover, MD 21076

**Re: WMATA Annual Safety and Security Audit Report and Certification**

Dear Mr. Benton:

The Washington Metropolitan Area Transit Authority (WMATA) is pleased to submit the attached 2012 Annual Safety and Security Audit Report (**Attachment 1**). This report is submitted to meet the requirements of 49 CFR Part 659.27 and Section 6.3 of the Tri-state Oversight Committee's (TOC) Program Standard and Procedures. Please also find attached WMATA's internal safety and security audit schedule for the three year period of October 1, 2012 through September 30, 2015 (**Attachment 2**).

**2012 Safety and Security Program Highlights**

As you are aware, WMATA continued to take significant steps in 2012 to further strengthen its safety and security programs and to continue to implement a strong and proactive safety culture throughout the organization. Highlights of our efforts included:

- Continuing to implement WMATA's Hazard Management Procedure and expanding our safety reporting and analysis capabilities through the automated and centralized Safety Measurement System (SMS).
- Continuing to implement a Fire/Life Safety Assessment Program to inspect all bus and rail facilities, including stations, yards and maintenance facilities to improve Fire/Life Safety throughout our system.
- Initiating a new Fatigue Risk Management System to improve worker performance and to reduce the risk of accidents and incidents in safety-critical functions of rail, bus and Metro Access. In doing so, we have worked closely with TOC to review policies, perform a Fatigue Hazard Assessment, and to implement fatigue countermeasures.
- Completing 102 open Accident/Incident Investigations that have been adopted by the TOC. We have also continued to respond to open recommendations made by the National Transportation Safety Board (NTSB). Since 2006, the NTSB has issued a total of 27 recommendations to WMATA. At this time, 7 have been closed and we have submitted 13 more for closure.
- Supporting and responding to the Federal Transit Administration's (FTA) August 2012 audit of WMATA, which found that WMATA "has made considerable progress in strengthening its safety organization, safety analysis capabilities, and information sharing and communication processes regarding safety issues."

**Washington  
Metropolitan Area  
Transit Authority**

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*A District of Columbia,  
Maryland and Virginia  
Transit Partnership*

Mr. James M. Benton

Re: WMATA Annual Safety and Security Audit Report and Certification

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- Conducting threat and vulnerability assessments (TVA) of the Dulles project and WMATA facilities, hiring and training 58 new sworn police officers (26 to support the Dulles extension and 32 to improve bus security), and continuing to implement the MetroStat program to strategically deploy and more effectively combat crime throughout our system.
- Continuing to make significant investments to improve the safety of critical rail infrastructure. In FY12, WMATA invested \$770 million in its capital improvement programs. Work performed under the programs has included rehabilitating station platforms, track, and systems, improving preventive maintenance of escalators throughout the system, procuring a new Track Geometry Vehicle to improve our track inspection programs, improving wireless communication capabilities in tunnels and underground stations, ongoing installation of new security cameras at all stations, and planning for the delivery of the 7000-series rail cars and the opening of the Dulles extension.

In 2012, WMATA continued to implement its internal safety and security audit program to fully comply with the requirements of 49 CFR Part 659 and TOC's Program Standard and Procedures. The attached report documents the internal safety and security review activities performed by WMATA for calendar year 2012 and provides the status of subsequent findings and corrective actions.

### **Annual Certification**

I hereby certify that WMATA is in compliance with the requirements of its SSPP and SEPP with the exception of the remaining open findings identified during WMATA's 2011/2012 audit cycle.

### **Conclusion**

In conclusion, I would like to thank you for your continued oversight, cooperation and support of WMATA's safety and security programs. WMATA remains fully committed to implementing a proactive and effective system safety program in compliance with TOC's Program Standard and Procedures and all other applicable Federal and state regulations and requirements. I look forward to our continued partnership as we continue to progress WMATA's safety and security programs.

If you have any questions regarding WMATA's Annual Safety and Security Audit Report, please do not hesitate to contact me or James Dougherty, Chief Safety Officer.

Sincerely,



Richard R. Sarles  
General Manager and Chief Executive Officer

Attachments

**ATTACHMENT 1:  
WMATA 2012 ANNUAL SAFETY AND SECURITY  
AUDIT REPORT**

## 1.0 Introduction

The Washington Metropolitan Area Transit Authority (WMATA) is required by Section 6.3 of the Tri-State Oversight Committee's (TOC) Program Standard and Procedures, and by Paragraph 3.1 of the Memorandum of Understanding by and between WMATA and TOC to develop an Annual Safety and Security Audit Report, which is to be submitted to TOC on or before February 1<sup>st</sup> of each year. This report must:

- Provide a summary of the internal audits performed during the preceding calendar year.
- Include the completed internal audit checklists used to perform the internal audits during the preceding calendar year.
- Document the findings identified as a result of the audits performed during the preceding calendar year.
- Identify the corrective action plans developed to address the findings generated through the internal audit process for the preceding calendar year.

This document has been developed to meet these requirements and serves as WMATA's **2012 Annual Safety and Security Report** to TOC.

## 2.0 Summary of Internal Audits

The audits performed during the 2011/2012 audit cycle were done so in accordance with the TOC approved WMATA standard operating procedure for performing internal safety and security audits. Under this procedure, the internal safety and security audits were performed by WMATA department rather than by program element. In this manner, WMATA evaluated the implementation of all applicable System Safety Program Plan (SSPP) and Security and Emergency Preparedness Plan (SEPP) elements for each audited department, rather than evaluating a limited number of safety and security program elements across the organization. This has been done to reduce the audit burden placed on WMATA's departments as a result of participating in multiple audits throughout the three year audit cycle. It has also been done to improve the thoroughness of the audits performed for each department.

During the 2011/2012 audit cycle, internal safety and security audits were performed for each of the following departments:

- Engineering (Office of the Chief Engineer, Vehicles (CENV), and Office of the Chief Engineer, Infrastructure (CENI))
- Station & Systems Planning
- Training
- Rail Operations Scheduling (ROSC)
- Customer Service (CSVC)
- Revenue



**Results of the ROSC, CSVC, and Revenue audits were included in WMATA's 2011 Annual Safety and Security Report. However, because the final audit reports for these departments were not submitted to the TOC until June 2012, they have been included again as part of this report.**

As required by Section 6.2 of TOC's Program Standard and Procedures, WMATA provided TOC with the internal audit checklists in advance of each audit as part of each audit notification package. Audit teams consisted of both WMATA and contractor personnel and included representatives from WMATA's Department of Safety and Environmental Management (SAFE), the Metro Transit Police Department (MTPD), and Quality Assurance. The audits included document and record reviews, interviews of applicable staff, and field verifications and inspections. Final audit reports documenting the audit results, including findings, recommendations and associated corrective action plans were developed and submitted to TOC in accordance with TOC's Program Standard and Procedures.

The completed checklists used to perform the internal audits are included in **Appendix A**. The corrective action plans developed in response to the internal audit findings are provided in **Appendix B**. The following provides a summary of the audit results for each of the internal safety and security audits conducted during 2011/2012 audit cycle.

### **2.1 Engineering (CENV and CENI) – Summary of Audit Results**

WMATA currently has two distinct main engineering departments, both falling under the Department of Transit Infrastructure and Engineering Services (TIES). CENV is responsible for vehicle engineering and CENI is responsible for infrastructure. The CENI area is also the primary department conducting and overseeing the WMATA Safety and Security Certification program per the guidance and direction of SAFE. For this reason, two separate audit interviews were conducted, both on 13 March 2012, with the two separate engineering areas.

The primary areas of non-compliance centered on a lack of documentation of policy, supporting procedures and internal controls. The applicable SSPP areas audited for both areas were:

- Element 5 – SSPP Implementation – Tasks and Activities
- Element 6 – Hazard Management Program
- Element 8 – Managing Safety in System Modifications
- Element 11 – Emergency Management
- Element 17 – Configuration Management

The audit interviews for the engineering area were completed on March 13, 2012. Documentation provided prior to the audit interview was reviewed by the audit team, and additional documentation was requested at the audit interview. A supplemental document request was provided to each area electronically. Field verifications were performed for the CENI audit to verify engineering support provided to infrastructure departments.

## **WMATA 2012 Annual Safety and Security Report**

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Overall, the audit team found that for the CENV area, there was a strong commitment to improvement and compliance with safety- and security-critical requirements. The CENV group has had much improvement in documentation and other system safety requirements through the careful planning and certification process for the 7K cars, and is to be commended for their strong commitment, which bodes well for overall improvement of reliability and longevity of rolling stock for WMATA.

The audit team's findings were primarily in the area of development, review and revision, implementation and approval of engineering documentation. Significant findings of concern are:

1. The CENI group did not have adequate documentation for the safety-critical activities that are performed. Existing documentation is outdated, some of it is inaccurate, and the management group overall did not have a high degree of familiarity with system documentation governing its activities other than documentation pertaining to Safety and Security Certification.
2. Field verifications indicated that sufficient engineering support existed for the TRST area, but not for Power, COMM and ATC.

### **2.2 Station and Systems Planning – Summary of Audit Results**

The audit interview for this audit was scheduled and completed on March 12, 2012. Overall, the level of compliance with the SSPP, the SEPP, and the requirements of system safety and security standards was very good. Good practices are currently in place, such as extensive documentation of the department's standards and guidelines for planning and excellent communications and cooperation among the department personnel.

Documentation provided prior to and at the audit interview was reviewed by the audit team. The following elements of the SSPP were applicable in this audit

- Element 6 – Hazard Management Program
- Element 7 – Safety and Security Certification Program
- Element 16 – Training and Certification Review/Audit
- Element 17 – Configuration Management

The audit team's findings were all in the area of development of and improvements to supporting documentation. The major finding of concern is that some documentation is not annually updated, and some documentation is still needed to bring the department into full compliance.

### **2.3 Training – Summary of Audit Results**

WMATA currently houses training in several departments; for this reason, the training audit was conducted in three parts. The Technical Training Department, TTDC, is currently housed within TIES. The Roadway Worker Protection (RWP) training program is housed under the Operations Management Services Department. WMATA's corporate training department, Training and Organizational Development (T&OD), is housed within the Human Resources Department.

## **WMATA 2012 Annual Safety and Security Report**

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Because of this organizational arrangement, three separate audits were conducted with the three primary training areas. The primary areas of non-compliance centered on a lack of documentation of policy, supporting procedures and internal controls. The applicable SSPP areas audited were:

- Element 5 – SSPP Implementation – Tasks and Activities
- Element 6 – Hazard Management Program
- Element 9 – Safety Data Acquisition
- Element 11 – Emergency Management
- Element 13 – Rules and Procedures Compliance and Review
- Element 16 – Training and Certification Review/Audit
- Element 17 – Configuration Management
- Element 18 – Employee and Contractor Safety Program
- Element 19 – Hazardous Materials
- Element 20 – Drug and Alcohol Abuse

The audit interviews for TTDC and RWP were completed on November 30, 2011. The audit interviews for T&OD were completed December 12, 2011. Documentation provided prior to the audit interview was reviewed by the audit team, and additional documentation was requested at the audit interview. A supplemental document request was provided to each area electronically.

Field verifications were performed for a selection of courses over the period from January 1, 2012 to March 31, 2012. All safety- and security-critical areas of New Employee Training were verified in the field, as well as 100% of the RWP courses. A selection of technical training courses were verified, but due to scheduling needs, the sample size verified was too small to ensure coverage of all safety- and security-critical training requirements. However, rather than delay the ISSA report for all training areas, the Chief Safety Officer decided to deliver the report, and will amend the CAP if needed as ongoing verifications are performed throughout the remainder of the calendar year.

Overall, the audit team found that there was a strong commitment to training by training staff in all areas. There was also a strong commitment to improvement and compliance with safety- and security-critical requirements. The audit team commended all training departments for this commitment, which bodes well for overall improvement of training and of safety and security at WMATA.

As part of the pre-audit activities and the audit interview, the audit team conducted a review of the requalification and retraining needs for the TTDC area on behalf of SAFE in order to close (CF Maintenance CAP #M14). As a result of the reviews within those interviews, TTDC developed a matrix documenting all requalification/recertification needs for their area, and M14 was closed.

The audit team's findings were primarily in the area of development, implementation and approval of departmental documentation.



### **2.4 Rail Operations Scheduling – Summary of Audit Results**

An audit of ROSC was conducted on November 29, 2011. Documentation provided prior to the audit interview was reviewed by the audit team, and additional documentation was requested at the audit interview. The following SSPP Elements were reviewed as part of the audit:

- Element 5 – SSPP Implementation – Tasks and Activities
- Element 6 – Hazard Management Program
- Element 9 – Safety Data Acquisition
- Element 11 – Emergency Management
- Element 17 – Configuration Management

ROSC is a relatively new department within WMATA, which existed for just over 2 years at the time of the audit. No documentation for the tasks performed in support of the scheduling function was available at the time of the reorganization. Although some documentation has been developed since the Department's creation, critical documentation still needs to be developed. As a result, the audit team's findings were primarily in the area of development, implementation and approval of departmental documentation.

### **2.5 Customer Service Departments – Summary of Audit Results**

The CSVC audit was held on September 8, 2011 (delayed from the original scheduled date due to the repercussions of the August 23, 2011 earthquake). The audit team determined during the course of this audit that a separate customer service function existed within the Office of Rail Transportation (RTRA). As such, a separate interview was conducted on October 31, 2011 with the RTRA Customer Service function. Field verifications were performed on September 8 and November 28, 2011. The following SSPP Elements were reviewed as part of the audit:

- Element 5 – SSPP Implementation – Tasks and Activities
- Element 6 – Hazard Management Program
- Element 9 – Safety Data Acquisition
- Element 11 – Emergency Management
- Element 13 – Rules and Procedures Compliance and Review
- Element 16 – Training and Certification Review/Audit
- Element 17 – Configuration Management
- Element 18 – Employee and Contractor Safety Program

The audit of these departments determined that the overall level of compliance with the SSPP and SEPP requirements was good. Safety and security practices were in place, including documentation of Customer Service training, a Continuity of Operations Plan (COOP) for the Customer Service, Marketing and Communications (CMSC) Customer Service area, excellent quality assurance processes, fully developed and documented scripts for the Customer Service agents, and excellent communications and cooperation among the management team in the CMSC area. For the Rail CSVC area, the manager had a high degree of involvement in the quality assurance processes, and personally verified that accurate external notifications had been performed.

The audit team's findings were primarily in the area of development of and improvements to supporting standard operating procedures and other documentation. Additionally, the audit team identified concerns regarding the need for additional security training for the Lost & Found function of CMSC Customer Service.

### **2.6 Revenue Department and MTPD – Summary of Audit Results**

An audit of the Revenue Departments, which includes revenue collection and processing, and is housed under the Office of the Chief Financial Officer (CFO), was conducted in August 2011. MTPD was also audited, as this Department has duties for guarding the revenue collection process. The Revenue Department and MTPD were audited separately, and had separate criteria under the SSPP and SEPP according to their required duties and responsibilities.

The audit interview for the MTPD revenue area was completed on August 22, 2011. The CFO audit was completed on September 2, 2011. Representatives from MTPD attended the MTPD revenue audit, but were required per the WMATA SSPP and WMATA's Internal Safety Audit (ISA) procedure to participate as observers only. Representatives of MTPD did however participate as audit team members for the CFO revenue audit interview.

Field verifications for both areas were performed over the period between the August 23, 2011 and October 12, 2011. Since the revenue process is protected, and schedules are not published, the field verification process was time-consuming and unpredictable. However, the unpredictability of the collection process was considered an excellent security measure and was commended. The following SSPP Elements were reviewed as part of the audit:

- Element 5 – SSPP Implementation – Tasks and Activities
- Element 6 – Hazard Management Program
- Element 7 – Safety and Security Certification Program
- Element 9 – Safety Data Acquisition
- Element 11 – Emergency Management
- Element 14 – Facilities and Equipment Inspections
- Element 16 – Training and Certification Review/Audit
- Element 17 – Configuration Management
- Element 18 – Employee and Contractor Safety Program
- Element 19 – Hazardous Materials

Many good safety practices were determined to be in place, such as documented procedures for MTPD's revenue operations and excellent documentation for TRES revenue reporting and accountability. Areas of non-compliance centered on a lack of documentation and supporting procedures and verifications for a number of required areas. There were also some procedural findings that require corrective action to ensure reduction of hazards. Primary areas of non-compliance and/or concern included:

1. Both revenue functional areas have some non-compliance in configuration management and document control.

2. The CFO revenue area does not currently require employees to take 5 consecutive days of vacation per year. This practice is recommended by FTA for revenue operations, and is used to address the issue of employees who may choose to commit fraud through falsifying documentation. When they are required to take leave, the opportunity for other employees to discover the ruse discourages this fraudulent activity.
3. The CFO revenue area requires employees to have initial background checks per WMATA's Policy Instruction. However this practice is not now continued periodically throughout the employee's tenure with Revenue. Revenue has previously recognized this deficiency and is currently developing SOPs to address this deficiency.
4. The CFO Revenue Office does not provide its revenue collection employees with crime prevention and personal security training. Since these employees, although they have an MTPD escort, are exposed to a greater risk of crime and violence than most other WMATA employees, they should receive specialized training to protect themselves and appropriately respond to security-related incidents in which they are involved. The audit team recommended that the CFO Revenue Office work closely with MTPD to identify these special risks and provide appropriate training.
5. The revenue building has never had a threat and vulnerability assessment to identify security risks and vulnerabilities and corrective actions to mitigate them. Currently, MTPD has contracted with the Volpe Center to perform a full system TVA. The CFO Revenue area is tasked with ensuring that the department participates fully in the TVA process and addressing any findings in the most expedient way.
6. The CFO Revenue Office should have formal written procedures for securement of the revenue processing areas during emergencies (i.e., if evacuation of the area or building is required, or if responders must enter the area to manage an emergency event). These procedures should be practiced in annual drills at the revenue facilities.

**APPENDIX A**  
**COMPLETED INTERNAL AUDIT CHECKLISTS**

## Appendix A – Completed Internal Audit Checklists

**WMATA System Safety Program  
Internal Safety & Security Audit Report**  
Auditors: Nichols, McCoy, Adams, Briscoe, Sullivan  
Date: March 13, 2012

Department: Engineering (CENV) Participant: Petersen, Lopez	Compliance			Comments
	1	2	3	
1. CENV Engineering Policies & Standards	X			
2. SOPs		X		In place to govern EMIs and MSIs; no methodology for criticality; Criticality/System safety methodology not evident in SOPs and other documentation; ERB does not have SOPs or methodologies; FMEA-FMECA methodology needs to be documented.
3. Configuration Management & Document control of policies & procedures		X		Review/update & approval procedures for all documents not in place.
4. Internal Controls Policies/SOPs	X			Verifications are kept in EMI/MSI packages.
5. SOPs for vendor/contractor audits/assessments of quality & safety, documentation, etc. (external QA/QI/QC)	X			Review & approval of vendor programs. In house consultants follow the departmental SOPs for ECR's submitted by vehicle contractors; For cars not on property yet changes are part of the technical specification. Reliability (REPA); REPA does the constant monitoring on and off-property for vehicles.
6. Departmental training policy, programs, procedures & matrix		X		There are no requirements needed for continuing education; however, training policy should be in place to cover all WMATA/departmental requirements for training. Can be added to existing documentation if desired.
7. Management SOPs/Methodologies	X			In SOPs.
8. Policies/programs for redesign/re-engineering, including overhaul, rehab, maintainability, remanufacture, replacement/fabrication or OEM parts, etc.	X			Life- cycle planning participation through 7K program.
9. SOPs for coordination with Safety & MTPD	X			In SOPs but not explicit for ERB.
10. SOPs for coordination with other departments through life- cycle planning and implementation	X			

1 = Compliance      2 = Non-compliance      3 = Unable to Audit

*WMATA Internal Safety & Security Audit Report*

The ISSA program is conducted in compliance with 49 CFR 659.19(i), the Tri-State Oversight Committee (TOC) Program Standard & Procedures (PSP) Section 6.1 Internal Safety and Security Audits and the TOC MOU Paragraph 13 and WMATA SSPP 12.1 through 12.3.7.

## Appendix A – Completed Internal Audit Checklists

**WMATA System Safety Program  
Internal Safety & Security Audit Report**  
Auditors: Nichols, McCoy, Adams, Briscoe, Sullivan  
Date: March 13, 2012

Department: Engineering (CENV) Participant: Petersen, Lopez	Compliance			Comments
	1	2	3	
11. Engineering support established for all departments (transportation, training)	X			SOPs. For the 7K series training is fully supported. CENV and TTDC are intertwined and the SOPs support the interaction fully.
12. SOPs for participation in Safety Certification Process	X			

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Biggs, Moses, Briscoe Date of Audit: March 13, 2012				
Department: Engineering (CENI: TSFA, POWR, CONS, COMM, ATC) Participant: Viner, Meyers, Croce, Robinson, Thompson	Compliance			Comments
	1	2	3	
1. CENI Engineering Department Policies & Standards		X		Design Criteria Documents are not current; dated May 2008. P/l's are also not current, including P/l for Configuration Management (PI 4.10/2) which governs most engineering activity at the Authority.
2. SOPs		X		No signature or approval, need SOP to guide the process, review & concurrence by Safety & MTPD needed. SOP 105/safety & MTPD must review scopes; OAPs that describe EMIs, MSIs, etc. are signed by CENV and are not defined as specifically applying to CENI. No Engineering request documentation is created or maintained. SOP 104 is not in force at the current time. Design review board: engineering modifications are reviewed by appropriate stakeholders, including SAFE, but procedures and P/l's should be updated to reflect actual practice. OAPs governing the creation of EMIs, ESBs and MSIs (OAPs 200-06, -11 and -25) are not current, and are not currently adhered to by CENI. All Engineering Change Requests must be documented, even if no engineering action is warranted, and a procedure developed to do so.
3. Document control and configuration Management of all departmental documentation		X		Annual review/update & approval procedures needed for all documentation. See area of concern #1.
4. Internal Controls Policies/SOPs		X		Audits are being conducted, but need formal SOPs; Procedure #308 does not have a standard for auditor qualifications. Methodology for prioritization of audits is not documented.
5. SOPs for vendor/contractor audits of quality & safety, documentation, etc. (external QA/QI/QC)		X		Review & approval of vendor programs. Need update of existing procedures/policies-outdated.
6. Departmental training policy, programs, procedures & matrix		X		
7. Management SOPs/Methodologies		X		No methodology for criticality and decisions based upon exists for CENI. Formal documentation of criteria for prioritization of departmental activities is needed, with safety and security methodologies, hazard/risk assessment and configuration management of the documentation included. COOP also needed.

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WMATA Internal Safety & Security Audit Report

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Briscoe, Sullivan, Biggs, Davidson Date of Audit: March 13, 2012				
Department: Engineering Participant: Viner, Meyers, Croce, Robinson, Thompson	Compliance			Comments
	1	2	3	
8. Policies/programs for redesign/re-engineering, including overhaul, rehab, maintainability, replacement of OEM parts, etc.		X		Condition assessments are done on an as-needed basis; no SOPs for the process. Rehab and replacement program based on an asset management database owned by IRPG. Database is not currently maintained at this time; waiting for FTA state of good repair changes. Authority is undertaking to revive asset management but it is unclear who is responsible. Some reliability information is pulled from Maximo; reportedly it is done monthly. Reliability group – REPA provides data for authority including CENI. Reliability and maintainability reviews of this data are analyzed by CENI group. Daily review of reliability data. No set of written procedures that describe life cycle assessment for planning.
9. SOPs for coordination with Safety & MTPD		X		Only in place for SSC.
10. SOPs for coordination with other departments through life-cycle planning and implementation		X		Training, Transportation, Maintenance, IT, CENI. For training, contracts and submittals are reviewed by TTDC through the certification process; however, no life-cycle planning or documentation exists.
11. SOPs for participation in Safety Certification Process	X			
12. Engineering support established for all departments		X		Insufficient documentation of effective support to Power/ATC/COMM group. Field verification interviews with affected departments revealed that engineering support is not sufficient for departmental needs, as well as a lack of appropriate response to requests from departments for support in the SSC process, especially as regards the acceptance criteria, reliability and maintainability areas.

1 = Compliance

2 = Non-compliance

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*WMATA Internal Safety & Security Audit Report*

The ISSA program is conducted in compliance with 49 CFR 659.19(l), the Tri-State Oversight Committee (TOC) Program Standard & Procedures (PSP) Section 6.1 Internal Safety and Security Audits and the TOC MOU Paragraph 13 and WMATA SSPP 12.1 through 12.3.7.

## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Adams, Sullivan, Briscoe, Moses Date: March 12, 2012				
Department: Station Planning Participant: McElhenny, Dahlberg	Compliance			Comments
	1	2	3	
1. Station Planning Policy document	X			Planning guidelines dated 3-11; signed/approved. Need to add safety & security as principles to document.
	X			Design Criteria Manual is dated 2008; needs review and recommendation from Safety & MTPD; Station Site & Access Planning Manual-May 2008 very good-who needs update and Safety & Security review.
a. Review/update procedures (doc control & configuration management)		X		Not in Planning guidelines; need annual review/revision process. See comments above regarding review/revision, signature and approval. Process is not currently documented, but does include stakeholders. Develop SOP to ensure all documents have a review period of no less than 1 year, that there is a documented process for all stakeholder input and for the approval process, and version control.
b. Supporting Standard Operating Procedures	X			
c. Coordination with Safety Dept.; documentation, SOPs		X		Only through safety certification process.
d. External coordination for scheduling/planning, documentation, SOPs	X			Plant Maintenance, MTPD-OEM, Engineering, SAFE. No current SOP.
2. Training				
a. Documented required training program/position	X			Job descriptions.
b. Training Policy/SOPs		X		SOP needed.
3. I/I Coordination SOPs & protocols	X			Communications protocols.
a. Interdepartmental Coordination: Safety, Rail Transportation, Maintenance, MTPD		X		Safety & MTPD must sign off on all design criteria and planning standards/guidelines.
b. Interagency Coordination SOPs, protocols	X			In SOPs & documented in the planning documentation.
4. Hazard Identification: SOPs, documentation		X		Add to existing documentation.

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WMATA Internal Safety & Security Audit Report

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Department: Station Planning Participant: McElhenny, Dahlberg	Compliance			Comments
	1	2	3	
5. Management methodologies	X			
6. Internal controls	X			Checklists, sheets with guidelines and instructions; Procedures for providing scopes and other documentation; Should develop SOP for each planning project.

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*WMATA Internal Safety & Security Audit Report*

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<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Program</b> Auditors: Nichols, Adams, McCoy, Briscoe, Sullivan, Biggs Date: November 30, 2011				
Department: RWP Training Participants: Stoffregen, Lott, Flowers, Price, Scott	Compliance			Comments
	1	2	3	
1. Training Policy/Procedures				a. WMATA policy (P/I); department policy & procedures, including requirements by job title/position(matrix), requalification, refresher, leave-absence policies & procedures; training plans & planning; training disciplinary procedures, documentation policies, etc. All included in RWPM.
a. Documented policies & procedures	X			
b. Disciplinary procedures		X		b. No formal policy for leave-absence; - need to have disciplinary procedures for missing class, in-class disciplinary procedures.
2. Documented Training Programs	X			Self-Qualification program in place.
a. Lesson Plan, curriculum	X			
b. Testing –Pass/Fail Criteria	X			Retake cardinal rules if does not pass test-2 week minimum interval.
c. Rulebook training & requirements	X			RWP SOP only.
d. Requalification	X			Annual.
e. Refresher		X		Criteria for more frequent training-rules violation, accident/incident RWPM.
f. Hazard identification & reporting	X			Good Faith Challenge.
g. Document Control-(Training document and records maintenance, retention, access, storage and retrieval)		X		Need position title for entering the training records into the LMS.
h. Configuration Management	X			Change logs.
i. Employee & Contractor Training records	X			TOC, FTA, SAFE contractors.

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WMATA Internal Safety & Security Audit Report

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, McCoy, Briscoe, Sullivan, Biggs Date: November 30, 2011				
Department: RWP Training Participants: Stoffregen, Lott, Flowers, Price, Scott	Compliance			Comments
	1	2	3	
j. Emergency preparedness & response	X			
3. Participation on safety committee	X			
4. Training	X			
5. Interdepartmental-interagency communications SOPs –protocols				
a. Safety				
b. MTPD	X			
c. Transportation				
d. Maintenance				
e. Other training units				
f. Other				
6. SOPs for review & updating training programs, policies, plans & procedures	X			
7. Emergency Operations Plans-Training Section preparedness		X		Evacuation of training areas, accountability, facility-specific plans. Not all slide programs had emergency info in them.
8. Accident/Incident Investigation	X			Ensure that position by title for Liaison with SAFE for A/I procedure is documented.
9. Training Management Methodologies	X			
10. QA/QC/QI	X			
11. Internal controls		X		Auditing program.
12. Technical Training				
a. Safety rules and procedures	X			RWP Manual.
i. Safety rulebook/handbook	X			
ii. Cardinal Rules	X			
iii. Emergency Procedures	X			

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, McCoy, Sullivan Date: December 12, 2011				
Department: T&OD Participants: Rose et al.	Compliance			Comments
	1	2	3	
1. Training Policy/Procedure		X		WMATA P/I, Departmental policies and procedures in place. T&OD training plan should be a formalized document, documenting existing methodologies along with the plan for improvement. The existing FY 2012 Plan is a well-constructed plan for improvement, and is commendable. Formal SOPs are still needed for most activities, although currently there is informal documentation of processes (handouts, instruction sheets, etc.). Course Design review guidelines (folder 9).
2. Training Programs		X		Most need to updated and have annual review for changes & updates.
a. Lesson Plan, curriculum		X		
b. Testing –Pass/Fail Criteria		X		Needs to be developed, TTDC has a good methodology.
c. Training requirements by department		X		Currently in process-ongoing; not sure about when the requirements assessment will be completed.
d. Recurring training		X		Requirements, notification.
e. Training Matrix		X		
f. Document Control-Training documentation & records maintenance, retention, storage and retrieval)		X		Version control; need annual review w/SOP.
g. Configuration Management		X		Annual review and revision as needed.
h. Employee Training records	X			
3. Participation on safety committee	X			
4. Training	X			Instructor training requirements & policies, train-the trainer programs, recertification-refresher-continuing education (individual development).

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, McCoy, Sullivan Date: December 12, 2011				
Department: T&OD Participants: Rose et al.	Compliance			Comments
	1	2	3	
5. Interdepartmental-interagency communications SOPs –protocols a. Safety b. MTPD c. Departments d. Other training units e. Other		X		Safety & MTPD must review all training protocols and programs for compliance with the SSPP & SEPP. How are training needs assessed, monitored and fulfilled.
6. SOPs for development of SOPs		X		
7. Emergency Operations		X		Evacuation of training areas, accountability, facility-specific plans, COOP.
8. Security Training		X		Need TVA to identify threat/vulnerabilities at CTF and develop SOPs with MTPD.
9. Training Management Methodologies	X			
10. QA/QC/QI		X		Training QA programs, training field evaluations, student evaluations, instructor evaluations (Level 1); not implemented; do not have currently a full QA program.
11. Internal controls		X		Safety Compliance/EM Prep not part of Performance evals; Internal audit of classes; needs to be formalized.
12. Vendor training	X			

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, McCoy, Sullivan Date: December 12, 2011				
Department: T&OD Participants: Rose et al.	Compliance			Comments
	1	2	3	
13. Training Areas	X			
a. Safety	X			NEO, EAP, ADA, serving cust w/ disabilities.
b. Supervision	X			Bus-Technical Success Behaviors (safety content), Reasonable cause.
c. Security	X			Violence, Sexual harassment, difficult people.
d. Emergency Preparedness		X		All-classroom safety/evacuation (need formal training for instructors in all emergency procedures).
e. Management	X			EEO, Diversity, Performance Management.
f. Quality	X			Supervision/quality courses.

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy Date: November 30, 2011				
Department: Technical Training Participants: Peterson, Handley	Compliance			Comments
	1	2	3	
1. Training Policy/Procedures	X			
2. Documented Training Programs		X		Self-Certification program in place; disciplinary procedures, Some external certifications-need to provide contact info at beginning of class to students for contacting the instructor for miss-outs.
a. Lesson Plan, curriculum		X		Need to have verifications for every class instructor to fill out that all training was given.
b. Testing –Pass/Fail Criteria	X			
c. Rulebook training & requirements	X			Familiarization class. Power; ATC, COMM, AFC
d. OJT		X		All practicals & OJT must be documented with curriculum, checklists, & verification.
e. Recertification	X			
f. Refresher		X		What are standards, infractions (absence, accident/incident). Ensure that refresher programs are fully developed and formalized.
g. Safety training		X		Optimally addressed by the individual familiarization courses and added to the student guide/references as they are updated in the next year. Provided throughout many courses, but not all; need to ensure that safety information is fully presented and documented wherever applicable in all training programs.
h. Hazard identification & reporting	X			
i. Document Control-(Training records maintenance, retention, access, storage and retrieval)	X			

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy Date: November 30, 2011				
Department: Technical Training Participants: Peterson, Handley	Compliance			Comments
	1	2	3	
j. Configuration Management	X			
k. Employee Training records	X			
l. Emergency preparedness		X		Fire/emergency in classroom – need to have a formal instruction.
m. Safety Criticality		X		Add to training programs.
3. Participation on safety committee	X			
4. Training	X			Instructor training requirements & policies, train-the trainer programs, recertification-refresher-continuing education. Draft OAP 205 – Training and Qualifications.
5. Interdepartmental-interagency communications SOPs –protocols				
a. Safety				
b. MTPD				
c. Transportation	X			
d. Maintenance				
e. Procurement				
f. Engineering				
g. Other training units				
h. Other				
6. SOPs for review & updating training programs, policies, plans & procedures	X			
7. SOPs for development of SOPs	X			
8. Emergency Operations Plans- Training Section preparedness		X		Evacuation of training areas, accountability, facility-specific plans. COOP is dated 2009, needs update & correction. HSAS is no longer in operation. COOP needs to have updated orders of succession embedded or attached. Update & hold exercise within 1 year.
9. Accident/Incident Investigation		X		Need have SOP to support A/I procedure.
10. Training Management Methodologies		X		No day-to-day methodologies in place.
11. QA/QC/QI		X		Training QA programs, training field evaluations, student evaluations, instructor evaluations. Need to formalize the trainer evaluation. Make sure that the student feedback loop is documented in SOPs.

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<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy Date: November 30, 2011				
Department: Technical Training Participants: Peterson, Handley	Compliance			Comments
	1	2	3	
12. Internal controls		X		SOP in place for QA reviews, process of course reviews/audits must be fully documented to ensure proper change control.
13. Vendor training	X			
a. Documentation				
b. SOP for program review		X		Current contract language has training requirements; make sure SOP in place in TTDC to ensure review is performed.
14. Technical Training				
a. Safety rules and procedures				
i. Safety rulebook/handbook			X	Not applicable.
ii. Emergency procedures/drills	X			
iii. Blue flag	X			
iv. High voltage	X			Stingers, PPE, hot sticks; familiarization program.
v. Ladders	X			
vi. Forklifts, cherry pickers, scissors lifts, other lifting & storage equipment	X			
vii. Cranes/rigging strapping	X			Current users are certified. Crane class needs to be started for recertification – work with Safety to ensure an SME and crane training is provided for future certifications.
viii. Confined Spaces			X	Not applicable at this time.
ix. PM Criticality/Deferment		X		Should appear in all PM training; use policies from area for which training is performed.
x. Non-revenue vehicles, including motor vehicles	X			Plasser, ballast regulator (Knox).
xi. Small tools	X			Verify online CBT-torque wrenches.
xii. Floor tools	X			
xiii. Hazmat/Bloodborne pathogens	X			Hazmat storage, transport.
xiv. CPR AED & first aid			X	Provided by safety.
xv. Lifts, Jacks	X			
xvi. Lifting, carrying	X			
xvii. Fall protection	X			
xviii. OSHA/PPE	X			
xix. Lockout/tagout	X			

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, McCoy, Briscoe, Sullivan, Biggs Date: November 30, 2011				
Department: Technical Training Participants: Peterson, Handley	Compliance			Comments
	1	2	3	
xx. Rerailing		X		In updated.
xxi. Safety signage		X		No formal training-add to familiarization.
xxii. Housekeeping		X		Add to classes where appropriate.
xiii. Personal Safety on the job-Wellness		X		Hydration, weather conditions, medicine, etc.
b. Crafts				
i. Car Wash/Car cleaners		X		No formal training programs for car wash.
ii. PMs, Work Orders		X		Railcar, Power, ATC, Comm, SMNT, Track & structures. Part of Familiarization training-needs development for other groups familiarization.
iii. Trucks	X			
iv. Wheel Press/true/bore		X		Wheel press course-in development, wheel bore training-in development), Wheel true in redevelopment.
v. HVAC	X			
vi. Electrical & power systems	X			
vii. Signals/ATC/Vital relays	X			Carborne, Wayside, Train Control Rooms.
viii. Equipment	X			Lifts
ix. Fare machines, fare gates	X			
x. Hi-rail & non-revenue maintenance & operation	X			Operation, maintenance.
xi. Welding, Fabrication		X		Revising the Welding course, OJT documentation needed.
xii. Calibration		X		SAMS-hired an instructor, reports to Myron.
xiii. Shelf Life		X		Add to training programs.
xiv. Track	X			Trackwork, switches, rail defects, ballast, ties, inspections.
xv. QA-QI-QC		X		Testing and inspection of repairs-needs to be part of training.

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Briscoe, Sullivan, Biggs Date of Audit: November 29, 2011				
Department: Rail Scheduling & Planning Participants: Shi Xie	Compliance			Comments
	1	2	3	
1. Rail Scheduling & Planning Policy document		X		No fully documented policy document exists at this time for ROSC. However, many of the processes are partially or informally (draft) documented, including checklists, memoranda and e-mails. Include in the policy document all requirements, prohibitions, guidelines and internal controls, including quality control/ assurance activities of all ROSC tasks and products.
a. Review/update procedures (doc control & configuration management)		X		Draft Document review & policy in place (RTRA), but that document has not yet been formally approved. Document control & configuration management access and publication is controlled in Documentum, but SOP is in draft form. In addition to using the RTRA SOP, Rail Scheduling and planning must define responsibilities and time frames for review & update for internal documents.
b. Rail Scheduling/Planning SOPs for contingencies, emergencies & special events		X		Emergency employee contact listings are in place. No formal Continuity of Operations Plan has been developed yet. Department is not currently in possession of emergency or contingency plans for fire & other emergencies at the work location.
c. Supporting Standard Operating Procedures		X		Currently memoranda exist, but no formal procedures, work flows or methodologies are in place for the area. Have documentation of the special events/trackwork work flow in memorandum format.
d. Coordination with Safety Dept.; documentation, SOPs		X		No SOPs currently in place. Ensure that coordination with SAFE for review of all documentation for compliance with the SSPP is included in documentation developed for 1a.
e. External coordination for scheduling/planning, documentation, SOPs		X		Ensure that all communications with internal and external contacts is properly detailed in departmental documentation, to include: Transportation, Maintenance, MTPD-OEM, IT, CSMC; other internal customers, as well as the Board. External: jurisdictions, other transit systems, NTD-reporting.
2. Training				
a. Documented required training program/position		X		No training in emergencies, contingencies (required MERT training); currently, employees receive on-the-job training that is not documented.
b. Training Policy	X			Policy in place within the Trapeze training document. Classroom training is provided for Trapeze software.
c. Training SOPs		X		No SOPs to support training policy or ensure that employees receive proper training.
3. I/I Coordination SOPs & protocols		X		Communications protocols documentation needed. See 1e.
a. Interdepartmental Coordination: Safety, Rail Transportation, Maintenance, MTPD		X		See 1e
b. Interagency Coordination SOPs, protocols		X		See 1e

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Briscoe, Sullivan, Biggs Date of Audit: November 29, 2011				
Department: Rail Scheduling & Planning Participants: Shi Xie	Compliance			Comments
	1	2	3	
4. Hazard Identification: SOPs, documentation		X		Develop formal SOP for reporting hazards, including scheduling conflicts or errors.
5. Management methodologies		X		

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Sullivan Date: September 8, 2011				
Department: Customer Service (CMSC) Participant:	Compliance			Comments
	1	2	3	
1. Customer Communications Plan/Policy & Procedures	X			SOPs, communications protocols for emergencies; call-backs for customer inquiries. Written scripts dated 10-31-08, telephone scripts (2006).
2. Document control & configuration management of plan/policy		X		Need to have internal document that covers internal SOPs, manuals, scripts, etc.
3. Documentation review/update procedures; change control		X		Review of all internal documentation should be performed at least once annually.
4. Coordination with Safety Dept. and other departments as needed (Ops, MTPD) for customer service issues		X		Formalized communications protocols between departments (for staff and for directors).
5. Customer information plan & procedures for emergencies and contingencies	X			Accidents, incidents, weather, system closures, security threats, for unusual, coordinate with media relations office.
6. Safety & security meetings/briefings	X			Customer communications/information safety & security issues.
7. Training policy, programs, procedures & matrix	X			Safety & security training, supervisory & management training; add supervisory and management training to documentation.
8. Security training for L&F employees		X		Need to ensure that training in contraband is included in security training for L&F employees.
9. Management Methodologies/SOPs	X			Recommend that Director of Customer service provide a formal methodology document, work with audit team to do so.
10. Safety/Security Certification		X		Telephone, other communications equipment.
11. Contractor Coordination		X		Adopt WMATA P/I for full escort.
12. Interdepartmental a. Safety & Security b. MTPD c. IT		X		Policy/procedure and infrastructure-software/hardware. Need to establish communications protocols/SOP for safety-related incident coordination is needed. Have started the process.
13. Equipment	X			Training, operational issues, certification; maintenance; troubleshooting.

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Sullivan, Date: September 8, 2011				
Department: Customer Service Participant:	Compliance			Comments
	1	2	3	
14. Internal Controls	X			Employee reviews & QA, document reviews, self-audits, employee evaluations include safety & security responsibilities. Eval form in place for call takers; L&F employees, S/S not specific in the current documentation.
15. Security programs & procedures	X			
16. Emergency preparedness/COOP <ul style="list-style-type: none"> <li>• Departmental COOP</li> <li>• SOPs for support of system COOP</li> <li>• Security SOPs</li> <li>• Drills, training</li> <li>• Emergency evacuation</li> <li>• Contingency plans</li> </ul>	A. X B. X C. X E. X F. X	D. X		Training in all of the emergency procedures should be documented.
17. QA programs <ul style="list-style-type: none"> <li>a. Training</li> <li>b. Supervision</li> </ul>	X			

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, Briscoe Date: October 31, 2011				
Department: Rail Customer Service Participant: Bumbry	Compliance			Comments
	1	2	3	
1. Customer Communications Plan/Policy & Procedures	X			SOPs and policy for all departmental functions; some documents are not updated, including service reliability initiatives, contact list (has a current date, but many inaccuracies), department of ops contacts out of date.
2. Document control & configuration management of plan/policy		X		Need to have internal document that covers internal SOPs, manuals, scripts, etc.
3. Documentation review/update procedures; change control		X		Review of all internal documentation should be performed at least once annually. Review by SAFE/MTPD for compliance.
4. Coordination with Safety Dept. and other departments as needed (Ops, Maintenance)		X		Formalized communications protocols between departments (for staff and for directors).
5. Customer information plan & procedures for emergencies and contingencies		X		Accidents, incidents, weather, system closures, security threats. Is there any more complete documentation? There is no complete COOP or SOPs in the documentation package.
6. Safety & security meetings/briefings	X			
7. Training policy, programs, procedures & matrix		X		NIMS, safety & security training, supervisory & management training.
8. Departmental Methodologies/SOPs		X		Not all processes are fully documented.
9. Management Methodologies/SOPs		X		
10. Safety/Security Certification		X		Telephone, other communications equipment; not included.
11. Contractor Coordination			X	N/A
12. Interdepartmental a. Safety & Security b. MTPD c. IT		X		Decision loop for all complaint processing needs to be documented.
13. Equipment	X			Training, operational issues, certification; maintenance; troubleshooting.

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, Adams, McCoy, Briscoe, Sullivan, Biggs Date: October 31, 2011				
Department: Customer Service Participant: Bumbry	Compliance			Comments
	1	2	3	
14. Internal Controls	X			Employee reviews & QA, document reviews, self-audits, employee evaluations include safety & security responsibilities.
15. Security programs & procedures		X		Current challenge and ID process not part of the training program.
16. Emergency preparedness/COOP <ul style="list-style-type: none"> <li>• Departmental COOP</li> <li>• SOPs for support of system COOP</li> <li>• Security SOPs</li> <li>• Drills, training</li> <li>• Emergency evacuation</li> <li>• Contingency plans</li> </ul>		X		Threats via phone, internal security & access issues, formalized security policies for department.
17. QA programs <ul style="list-style-type: none"> <li>a. Training</li> <li>b. Supervision</li> </ul>		X		No SOPs.

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, McKee, Adams, Briscoe Date of Audit: September 2, 2011				
Department: Revenue TRES Participants: Angel Cabrera, Marc Talbert, Larry Miller	Compliance			Comments
	1	2	3	
<b>I. Departmental Policy and procedure established for:</b>				Approval & signoff.
1. Policies and procedures established for revenue control policies and procedures	X			Currently, Revenue Collection Policy & Procedures, Revenue Processing Center Policy & Procedures & Revenue Equipment Policy and Procedures are in revision. This matrix will note where policy/SOP is in place currently and where draft policies/SOPs are in place but are not yet approved. Within 180 days, all procedures should be in place.
2. Bonded employees for handling or controlling revenues		X		No, Currently do background NCIC, not yet doing ongoing investigation. SOP is currently in Draft form.
3. Limited access to processing areas	X			
4. Access events to processing area reviewed and audited			X	MTPD control.
5. Internal Controls		X		Supervisors verify all procedures-Manager does not have a procedure for his/her review. Recommend adding to existing procedures for manager audits & SOPs.
6. Revenue transaction responsibilities clearly defined and assigned to the appropriate transit system personnel	X			
7. Employee responsibilities clearly identified and separated in each phase of distribution, collection and sales	X			
8. Independent comprehensive evaluation of revenue handling procedures	X			Minimum interval biennial (Annually performed by external-OIG).
9. Monitoring fare media	X			Handling of lost and stolen items; no SOPs for protection of blank media. Lost SmarTrip is handled through customer service. Tariff handles lost paper media.
10. Vacation & leave policy		X		Individuals who are responsible for documenting fare revenue are not currently required to take at least 1 week of continuous vacation [this is a best practice of the financial industry for deterrence, because employees who falsify financial records cannot take vacation without risking their activities being discovered].
11. Prospective employees who would be involved in revenue transactions pre-screened for prior conviction records of theft, embezzlement, and/or fraud		X		WMATA background checks applicable. More stringent SOPs need to be in place for random checks throughout the employee's tenure.

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WMATA Internal Safety & Security Audit Report

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, McKee, Adams, Briscoe Date of Audit: September 2, 2011				
Department: Revenue TRES Participants: Angel Cabrera, Marc Talbert, Larry Miller	Compliance			Comments
	1	2	3	
12. Are there written discipline policies for employees not following established revenue handling procedures, e.g. mishandling and misappropriation	X			
13. Contractors required to provide appropriate insurance and employee bonds to cover the risk of loss	X			
14. Revenue equipment designed to record ridership information	X			Significant variance is defined as \$100. Ridership numbers are provided through IT.
15. Removal of revenues from the fare vending machines & parking meters by two revenue persons prior to maintenance being conducted	X			JGB Parking collection procedure.
16. Written policy regarding how the employee should handle invalid fare media instruments	X			Fare adjustment emblem, SOP for this process needed to be included in revenue documentation.
17. SOPs to reconcile cash collected and media sold	X			
18. SOPs for fare collection/parking meter equipment malfunctions	X			revenue equipment designed to prevent unauthorized deletion of stored information.
19. Revenue data extracted from collection devices at the time of revenue extraction	X			Handled by same employees, but use electronic scanners. Scanner abuse/neglect has disciplinary procedures associated with it.
20. Revenue handling procedures for cash specified in writing	X			
21. Daily revenue counts reconciled to daily revenue statistics	X			
22. Revenue deposited daily into a bank	X			
23. Used fare media destroyed after counting and processing	X			

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	1	2	3	
24. Written policy for refunding money for tickets, passes, transfers and tokens	X			<ul style="list-style-type: none"> <li>Refund transactions recorded.</li> <li>Review by supervisor prior to issuance for threshold \$30.</li> <li>Efforts made to ensure that the refund recipient purchased the fare instrument yes for SmarTrip.</li> <li>Trends in refund recipient and refund issuer performed by independent parties</li> <li>Any cash refunds.</li> <li>Cash refunds issued in the form of checks transmitted by the transit firm's central accounts payable function, rather than by a sales agent.</li> </ul>
25. Revenue collected at frequent intervals	X			At least once/day, so large revenues do not stay in fare collection equipment overnight; schedule & interval. M-F is collection.
26. Daily deposit ticket for revenues reconciled with the revenue count made by the bank	X			
27. PCI (payment card) SOPs	X			<ul style="list-style-type: none"> <li>Internal controls/audits.</li> <li>External audits.</li> <li>Coordination with IT (backup, off-site recovery, access to software, intrusion detection reporting/recovery, data security).</li> </ul>
28. SmartBenefits	X			<ul style="list-style-type: none"> <li>Internal controls/audits.</li> <li>External audits.</li> <li>Coordination with IT.</li> </ul> Need to add procedures for SmartBenefits to CFO documentation-see #31-32.
29. Personal check handling procedures and policies	X			Corporate checks or POs, no personal checks.
30. Fare evasion SOPs			X	<ul style="list-style-type: none"> <li>Trend data collection, analysis.</li> <li>Interdepartmental coordination.</li> </ul> MTPD responsibility.
31. Supervision SOPs & QA programs		X		Need to document the Managerial QA process.
32. Management Methodologies		X		Not currently in place.

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	1	2	3	
33. Contractor management & oversight	X			
34. Drug & Alcohol compliance program	X			Only moving violations are tested-supervisors & managers are trained.
35. SOP on SOPs		X		Not in place currently.
36. Safety, MTPD review of all Sops, programs, policy		X		Not currently in place.
37. Document control		X		Not currently in place.
38. Configuration management		X		Not currently in place.
39. Vendor policies & procedures	X			Training, security – per WMATA policy and procedures.
<b>II. Training</b>				
1. Fare Collection/revenue/treasury training policy & programs documented		X		Training SOPs, matrix, QA program, records, testing & certification, pass-fail criteria, disciplinary criteria. Needs to be documented.
2. Employees involved in revenue transactions trained in specific revenue handling procedures as well as functions for which they are specifically responsible	X			Access policy & procedures.
3. Specific crime prevention training programs provided for employees responsible for revenue functions, especially those who interact with the public		X		Work with MTPD to develop a revenue employee specific training in crime & security.
4. Contractor training	X			Requirements, records.
5. OJT		X		Not currently documented.
6. Other training		X		Need Awareness level MERT training.
7. Coordination with Safety & MTPD for training program review		X		Not currently in place.
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	1	2	3	
<b>III. Physical Security</b>				
1. Keys to fare collection/parking equipment and cash handling machines and other unique fare collection equipment controlled through a sign-out/sign-in procedure	X			
2. Inventory and use of security key blanks secured, monitored and inventoried on a regular scheduled basis	X			
3. Employees required to present all pieces of broken keys prior to replacement	X			
4. All keys accounted for at each change of shift and controlled.	X			
5. Keys assigned and controlled according to job functions	X			
6. Revenue secured from direct handling during the vault/cash collection process	X			
7. Revenue stored in a locked and secure location prior to counting	X			
8. Revenues counted in a secure room with at least two revenue personnel present at all times	X			
9. Access to the counting room limited to authorized persons	X			
10. Unannounced audits or inspections made periodically of the counting room	X			
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	1	2	3	
11. Counting room alarms, cameras and access events monitored by off-site personnel	X			
12. Counting room camera angles hidden from persons under observation	X			
13. Counting room security codes and combinations changed regularly			X	Electronic access in place.
14. Counting room employees forbidden from bringing personal items into the counting room	X			
15. Counting room employees wear pocketless clothing		X		Not all employees with access to currency in the revenue building wear pocketless clothing.
16. Money bags and canisters sealed prior to deposit	X			
17. Bag seals secured with numbers assigned to each deposit and reconciled to seal inventory	X			
18. Revenues transferred to the bank using a secure, bonded form of transportation, e.g. armored vehicle	X			
19. Daily deposit ticket for revenues written by a person different than the one transporting the revenues	X			Daily reconciliation of the daily deposit ticket and bank revenue count for farebox revenues performed by the personnel who are not involved in the transport to the bank.
20. Vandalism policy & SOPs		X		Add to Documentation.
21. Money spills	X			
22. Discrepancy investigation procedure	X			
23. Security incident review/committee		X		Add current practice of reviewing specific incidents to documentation.

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	1	2	3	
<b>IV. Emergency Preparedness</b>				
24. Departmental COOP/disaster recovery plan <ul style="list-style-type: none"> <li>• Supporting SOPs</li> <li>• Exercises/training</li> </ul>		X		Ensure that securement procedures are documented for when emergencies occur within the revenue area and responders may come to the revenue building. Do fire drills once a year. COOP planning in the initial stages.
25. Power/communications (IT) failure	X			Partial/total
26. Contingency plans for security threats <ul style="list-style-type: none"> <li>• Bomb threat</li> <li>• Hostage</li> <li>• Active Shooter</li> <li>• Field incidents (Parking)</li> </ul>			X	Field notifications all handled by MTPD.
27. Emergency evacuation procedures		X		Drills need to be held annually for the revenue building.
<b>V. Safety &amp; Security Certification/System Modification</b>				
28. End-user input into acquisition process	X			
29. Facilities security design		X		Stations-vending areas, parking lots; current TVA will address security issues-MTPD.
<b>VI. Interdepartmental/Interagency Coordination</b>				
30. Safety Department <ul style="list-style-type: none"> <li>• Procedure/policy/process reviews</li> <li>• Other</li> </ul>		X		Not in current documentation.
31. MTPD	X			
32. Transportation/Operations/Maintenance	X			Through MOC.
33. IT	X			Help Desk

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Department: Revenue TRES Participants: Angel Cabrera, Marc Talbert, Larry Miller	Compliance			Comments
	1	2	3	
<b>VII. Employee Safety</b>				
34. Safety Committee	X			LSC
35. Hazmat	X			
36. PPE		X		Gloves, shoes vests, goggles, masks-make sure use & training is documented.
37. Job Safety Analysis/Occupational hazard program	X			Recommend formal job safety analysis be done through AON.
38. Accident/injury investigation	X			
39. Accident/Injury prevention programs	X			Addressed through committees & briefings.
40. Hazard and safety concern reporting SOPs	X			

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*WMATA Internal Safety & Security Audit Report*

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## Appendix A – Completed Internal Audit Checklists

<b>WMATA System Safety Program</b> <b>Internal Safety &amp; Security Audit Report</b> Auditors: Nichols, McCoy, Adams, Briscoe Date of Audit: August 22, 2011				
Department: MTPD Revenue Protection Division Participants:	Compliance			Comments
	1	2	3	
<b>I. Departmental Policy and procedure established for:</b>				
1. Policies and procedures established for MTPD revenue control policies and procedures	X			
2. SOP document control & configuration Management		X		Approval & signoff; research and planning; No written procedure.
3. Internal Controls		X		No written procedure, no current documentation.
4. Revenue transaction responsibilities clearly defined and assigned to the appropriate MTPD personnel	X			Any patrol officer can do it. Revenue teams have a schedule for the day. Announced via radio for where revenue teams are and their assignments. No written procedure for the assignment process, which falls outside of revenue specific operation. Patrol Officers assigned to the Revenue building daily. There is special training for the money train: Officers assigned to the money train are assigned to the revenue division (RPD-revenue protection division). Need to have a long gun certification.
5. Training in MTPD Revenue SOPs a. Training Program, lesson plan b. OJT c. Training records d. Training QA		X		Need to have a formalized training program, and include OJT & field work with Training Officers to ensure that training was performed properly.
6. MTPD responsibilities clearly identified and defined in SOPs	X			
7. Required Equipment a. SOPs for special equipment signout/return	X			Communications, weapons General order 130 for firearms.
8. Response to critical emergencies	X			Revenue officers will respond to other locations in critical emergencies-how is that handled (needs to be detailed in the money train procedure—see 10c below).
9. Special situations	X			Handling of revenue, AFC Keys.

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WMATA Internal Safety & Security Audit Report

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Department: MTPD Revenue Protection Division Participants:	Compliance			Comments
	1	2	3	
10. Revenue train escort SOP				
a. Personnel authorized to board/ride money train	X			10c not in compliance-no procedures for handling emergencies for Revenue Protection Division while on Revenue Duty.
b. Train inspection procedure pre & post-collection	X			
c. Emergency procedures for money train emergencies		X		
11. RCF Building Security SOPs				
a. Access control				
b. Alarm monitoring				
c. RCF Property Pass				
d. RCF Master & Sub-master Key control			X	Key control will pass to CFO Revenue Operations; the SOP should be amended to reflect the change. Key Issue Procedure will be CFO revenue responsibility-documented verification provided.
e. CCTV				
f. Coin Room				
12. Key Control SOP			X	See #11 above.

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**APPENDIX B  
CORRECTIVE ACTION PLANS TO  
ADDRESS INTERNAL AUDIT FINDINGS**

## Appendix B – Corrective Action Plans to Address Internal Audit Findings

**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**Engineering: CENV and CENI**  
**~June 20, 2012**

CAP #	Finding/Area of Concern	Corrective Action	Date Due	Dept & Staff Responsible
E1	Engineering Policy and Procedure is not fully formally documented.	Ensure that all engineering policies and procedures are fully documented, those out of date are revised to be current and all are signed/approved, to include: a. All applicable OAPs, P/Is, departmental procedures, policies and guidelines b. Departmental management methodologies Refer to the CENI matrix for complete details on documentation needs. It is strongly recommended that CENI review and consider adapting CENV internal policies, procedures, guidelines and processes to its use.	03/31/15	TIES - Troup
E2a	Documentation is not annually reviewed, revised and controlled. (CENI)	Develop and implement annual review of all departmental documentation. Ensure that SAFE & MTPD review all engineering documentation, including departmental procedures, guidelines, policies and processes, for compliance with safety & security requirements.	03/31/13	CENI - Viner
E2b	Documentation is not annually reviewed, revised and controlled. (CENV)	Develop and implement annual review of all departmental documentation. Ensure that SAFE & MTPD review all engineering documentation, including departmental procedures, guidelines, policies and processes, for compliance with safety & security requirements.	03/31/13	CENV - Reynolds
E3	CENI has no COOP	Develop, train on and exercise annually a departmental COOP.	03/31/14	CENI - Viner
E4	No life-cycle planning is done for the department supported by CENI.	Develop and implement full life-cycle planning for infrastructure elements supported by CENI.	03/31/15	CENI - Viner
E5	Not all departments have sufficient engineering support from CENI.	Ensure that all TSSM/PWR, ATC, & COMM engineering requests are documented and addressed in a timely manner. In addition, ensure that all inquiries, communiques and requests from stakeholder departments regarding acceptance, reliability and maintainability, including during the SSC process, are addressed in a timely manner.	03/31/15	CENI - Viner

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**~June 20, 2012**

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
E6a	Safety and security methodologies are not included in departmental documentation. (CENI)	Ensure that safety & security criticality methodologies are properly documented in departmental methodologies. Include decision methodology for FMEA/FMECA.	03/31/14	CENI - Viner
E6b	Safety and security methodologies are not included in departmental documentation.(CENV)	Ensure that safety & security criticality methodologies are properly documented in departmental methodologies. Include decision methodology for FMEA/FMECA.	03/31/14	CENV - Reynolds
E7a	No training policy/procedures.(CENI)	Ensure that departmental training requirements, including agency requirements are documented & have a responsible position for verification.	03/31/14	CENI - Viner
E7b	No training policy/procedures (CENV)	Ensure that departmental training requirements, including agency requirements are documented & have a responsible position for verification.	03/31/14	CENV - Reynolds

## Appendix B – Corrective Action Plans to Address Internal Audit Findings

**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**SAAM**  
 ~June 20, 2012

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
SAAM1	SAAM has not met all document control and configuration management requirements for its operation	Ensure that all required departmental tasks, processes and procedures are formally documented, including review by SAFE/MTPD for compliance with safety & security documentation and training policies and procedures. The Planning Guidelines need to ensure that safety and security are specifically named as guiding principles per the department's current practice.	04/18/13	SAAM - McElhenny
SAAM2	No procedure for annual review/revision of departmental documentation	Develop review and update procedures for all departmental documentation or documentation used in the department, to include Design Criteria Manual and Station Site & Access Planning Manual. All documents should be signed by approving authority.	04/18/13	SAAM - McElhenny
SAAM3	No formal procedure for hazard identification	Add the formal process for reporting hazards to departmental documentation	04/18/13	SAAM - McElhenny

## Appendix B – Corrective Action Plans to Address Internal Audit Findings

**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**Training: TTDC, RWP, T&OD**  
**~June 20, 2012**

CAP #	Finding/Area of Concern	Corrective Action	Date Due	Dept & Staff Responsible
TR1a	Training policy and procedure are not fully documented. (T&OD)	Ensure that all training policies and procedures are fully documented and approved, to include: SOPs, EOPs, Lesson plans/curricula, pass/fail criteria, training requirements by department, recurring/refresher/recert training, training matrix by position and document control-change control-configuration management of training programs and documentation, and ensure that SAFE & MTPD review all training documentation for compliance with safety & security requirements. TTDC needs to document refresher requirements, all OJT provided through TTDC, training evaluation process & procedures, student feedback review and incorporation, SOP/instruction to support the A/I procedure, and management methodologies.	02/28/13	Rose-T&OD
TR1b	Training policy and procedure are not fully documented.(TTDC)	Ensure that all training policies and procedures are fully documented and approved, to include: SOPs, EOPs, Lesson plans/curricula.	02/28/13	Peterson-T&OD
TR2	T&OD interdepartmental and interagency communications are not fully documented.	Ensure that all communications with other departments and agencies are documented in SOPs or methodologies.	02/28/13	Rose-T&OD
TR3	No internal SOP format is available for T&OD.	Develop an internal T&OD format for departmental procedures.	08/28/12	Rose-T&OD
TR4	No current T&OD COOP is outdated and is not practiced.	Develop a full training department COOP and ensure that exercises are held annually to train for emergencies.	02/28/13	Rose-T&OD
TR5	No TVA has been performed for training area.	Work with MTPD to ensure that training departments participate in the TVA process that T&OD, trainers and vendors have the proper security-related training to their positions, including emergency preparedness.	02/28/13	Rose-T&OD
TR6	No formal training quality or internal controls program is in place	Develop formal documentation of training evaluations (student, instructor, field) with SOPs, checklists and forms) and other internal controls (training audits, reviews, etc.).	02/28/13	Rose-T&OD



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**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**Training: TTDC, RWP, T&OD**  
**~June 20, 2012**

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
TR7	No courses are currently offered in rail supervision to ensure quality control of rail operations.	Develop a rail supervision course based on the bus supervision course currently offered by T&OD.	03/31/14	Rose-T&OD
TR8	There is no module/instruction on classroom emergencies documented for TTDC training.	Develop, document and add information to each training program in classroom emergencies.	02/28/13	Peterson-TTDC
TR9	Safety-critical instruction needs to appear in TTDC courses, and some courses need further/initial development.	Ensure that information on PM criticality, deferment, safety-criticality, housekeeping, safety signage, shelf-life and personal safety is included in training programs. Use existing policies and procedures developed in the departments for applicable courses. Additional training revision or development is needed for specific areas-refer to matrix section 14.	08/31/13	Peterson-TTDC
TR10a	No SOP for vendor training review is in place (T&OD)	Ensure that vendor reviews are formally documented through SOPs and reports.	08/31/13	Rose-T&OD
TR10b	No SOP for vendor training review is in place (TTDC)	Ensure that vendor reviews are formally documented through SOPs and reports.	08/31/13	Peterson-TTDC
TR11	Certain technical training courses need revision or development	Ensure that courses/modules/instruction in car cleaning, PMs-work orders (where needed), truck rebuild, splicing, rerailling, wheels (press-true-bore), calibration, welding and fabrication are developed and approved.	02/28/13	Perterson-TTDC
TR12	No formal leave, absence or disciplinary process for the RWP class	Ensure that RWPM and student information includes how to contact instructor for missing class due to illness or emergency, and discipline policy for unexcused absence.	08/28/12	Lott-RWP
TR13	No process exists for requiring employees to retake RWP for infractions of WMATA RWP policy and procedures	Ensure that RWPM includes refresher/retake as applicable to rules violations, incidents, accidents or other adverse events concerning the RWP program.	08/28/12	Lott-RWP
TR14	Responsibility for entering training records into the Learning Management Program is not identified.	Revise SOP to reflect responsibility for entry of training information into LMP.	08/28/12	Lott-RWP

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**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**Training: TTDC, RWP, T&OD**  
**~June 20, 2012**

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
TR15	For RWP training emergencies, defined as large-scale changes to the training policy, program and plan, such as retraining of all WMATA staff due to adverse event investigation, there is no written methodology	Ensure that emergency training plan is documented.	02/28/13	Lott-RWP
TR16	RWP Liaison with SAFE to participate in Accident and incident investigations is not identified.	Identify and document A/I representative and position responsible for entering training records for RWP.	06/01/12	Lott-RWP
TR17	RWP does not have a documented internal control program for audits of its courses	Develop, document and implement a formal audit program for the RWP training program.	02/28/13	Lott-RWP
TR18	WMATA's Bloodborne Pathogens program, including training, is not compliant with the OSHA standard 1910.1030	Bring WMATA's BBP training program into compliance with OSHA training standards.	08/31/13	Dougherty-SAFE

## Appendix B – Corrective Action Plans to Address Internal Audit Findings

**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**ROSC**  
**~June 20, 2012**

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
RS1	Departmental safety-critical tasks are not fully and formally documented	Develop and implement formal documentation for all safety-critical functions in ROSC. Ensure Draft QA SOP is signed.	12/31/13	Shi Xie, ROSC
RS2	Configuration Management/Document Control for policies and procedures is not in place	Develop and implement documented document control for policies and procedures. These can be integrated into existing documents and policies as desired or be stand-alone procedures. They should include review & update procedures, with specified intervals to be no less frequent than annually. Also ensure that review of all documents by MTPD and SAFE for compliance with the SSPP and SEPP are included.	10/01/13	Shi Xie, ROSC
RS3	No departmental COOP	Work with MTPD-OEM to develop, implement, train in and exercise a departmental COOP for ROSC.	12/31/13	Shi Xie, ROSC
RS4	Ensure that all interdepartmental and interagency communications protocols are documented	May be developed and included as part of documentation for RS1.	12/31/13	Shi Xie, ROSC
RS5	No training procedures or matrix	Ensure that formal training documentation is developed to ensure that all employees receive required training.	10/01/13	Shi Xie, ROSC
RS6	Internal controls are not fully documented	Ensure that all internal QA/QC processes are fully documented with procedures and verifications. May be included as part of documentation in RS1.	01/01/13	Shi Xie, ROSC
RS7	No Management Methodologies in place	Document all functions of ROSC management. May be included as part of documentation in RS1.	12/31/13	Shi Xie, ROSC

## Appendix B – Corrective Action Plans to Address Internal Audit Findings

**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**CSVC-CMSC**  
**~June 20, 2012**

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
CS1	Configuration Management/Document Control for policies and procedures is not in place	Develop and implement documented document control for policies and procedures. These can be integrated into existing documents and policies as desired or be stand-alone procedures. They should include review & update procedures, with specified intervals to be no less frequent than annually. Also ensure that review of all documents by MTPD and SAFE for compliance with the SSPP and SEPP are included.	11/15/12	Brett Tyler, CVSC (lead) P. Bumbry, Rail CVSC (Support)
CS2	External communications protocols are not fully documented	Ensure that all communications with other departments are documented as SOPs or protocols, including with IT, MTPD and SAFE.	11/15/12	Brett Tyler, CVSC (lead) P. Bumbry, Rail CVSC (support)
CS3	No job-specific training in security or identifying contraband is provided for Lost & Found employees	Work with MTPD to establish a formal training for L&F employees in security & contraband.	11/15/12	Brett Tyler, CVSC
CS4	Formal training is not provided in all emergency procedures	Ensure that formal training is provided to employees in all of the emergency procedures for CSVC.	11/15/13	Brett Tyler, CVSC
CS5	There is no formal departmental policy & procedure in place for contractors working in the CMSC suite.	Formally adopt WMATA P/I for contractor escort.	09/30/12	Brett Tyler, CVSC
CS6	No contingency plan/COOP/security threat information in place for Rail CSVC	Develop, train in and implement COOP/security plan & procedures for Rail CSVC.	12/31/13	P. Bumbry, Rail CVSC
CS7	Methodologies are not in place for management of the Rail Customer Service Function.	Develop methodologies to cover all management functions of the Rail Customer Service; ensure that the decision loop for external notifications of complaints to operations, maintenance, safety & security are fully documented. Also include all quality processes/internal controls currently being performed.	12/31/13	P. Bumbry, Rail CVSC

## Appendix B – Corrective Action Plans to Address Internal Audit Findings

**WMATA System Safety Program**  
**Internal Safety and Security Audit Corrective Action Plan**  
**Revenue**  
**~June 20, 2012**

<b>CAP #</b>	<b>Finding/Area of Concern</b>	<b>Corrective Action</b>	<b>Date Due</b>	<b>Dept &amp; Staff Responsible</b>
T1Rev1	MTPD Revenue Operations has not met all document control and configuration management requirements for its operation	Develop and implement document control and configuration management requirements.	11/15/13	Chief Taborn, MTPD
T2Rev5	TRES Revenue employees are currently not bonded	TRES is in the processes of developing an SOP for bonding of employees to submit to the HR department.	09/15/12	R. Srinath, TRES
T3Rev6	CFO Revenue has not met all document control and configuration management requirements for its operation	Develop and implement document control and configuration management requirements.	11/15/13	R. Srinath, TRES
T4Rev7	TRES does not require 5 consecutive days of vacation for all employees (non-represented) who document and maintain records	Institute mandatory vacation policy as recommended by FTA.	09/30/12	R. Srinath, TRES
T5Rev8	Periodic background checks are not performed after employees are hired.	Institute periodic background checks for all TRES employees at a maximum interval of once annually.	09/15/12	R. Srinath, TRES
T6Rev11	No job-specific security training is in place for TRES employees. Employees currently not required to have MERT training.	Work with MTPD to ensure that all TRES employees receive documented job-specific training in security and MERT training.	11/15/12	R. Srinath, TRES
T7Rev16	TVA has not been performed for the revenue building	TVA should be performed for revenue building.	03/15/13	Chief Taborn, MTPD
T8Rev17	PPE training is not currently provided to TRES employees	Ensure that employees receive formal training on all required PPE.	09/15/12	R. Srinath, TRES
T9Rev18	Not all employees with access to currency in the revenue building wear pocketless clothing.	Ensure that all employees with access to currency should wear pocketless clothing while working with currency.	09/15/12	R. Srinath, TRES
T10Rev19	The Revenue Building maintenance area has some industrial safety deficiencies.	Ensure all containers with flammables are not stored in open areas where there is welding/open sparks.	09/15/12	R. Srinath, TRES
T11Rev20	The communications room in the revenue building is no longer secured	TRES has initiated the process with CENI of implementing a long-term solution to ensuring equipment cooling and security are applied for the Revenue Building. The process should be completed by the corrective action date due.	09/15/12	R. Srinath, TRES

**ATTACHMENT 2:  
WMATA INTERNAL SAFETY AND SECURITY AUDIT  
SCHEDULE – OCTOBER 2012 THROUGH  
SEPTEMBER 2015**

**WMATA**  
**Internal Safety Audit Schedule**  
**Performance Period: October 1, 2012 through September 30, 2015**  
**Revision Date: September 25, 2012**

<b>Year 1</b>	
<b>Quarter</b>	<b>Audit Areas</b>
1 (Oct, Nov, Dec)	IT, RTRA
2 (Jan, Feb, March)	Public Information
3 (April, May, June)	Procurement, Materials
4 (July, Aug, Sep)	Revenue, Customer Service
<b>Year 1 will begin October 1, 2012 and run until September 30, 2013</b> <b>It will begin again October 1, 2015, and subsequently October 1, 2018</b>	

<b>Year 2</b>	
<b>Quarter</b>	<b>Audit Areas</b>
1 (Oct, Nov, Dec)	Rail Scheduling, Training
2 (Jan, Feb, March)	Engineering, Station Planning
3 (April, May, June)	PLNT
4 (July, Aug, Sep)	ELES, MTPD
<b>Year 2 will begin October 1, 2013 and run until October 1, 2014</b> <b>It will begin again October 1, 2016, and subsequently October 2019</b>	

<b>Year 3</b>	
<b>Quarter</b>	<b>Audit Areas</b>
1 (Oct, Nov, Dec)	SMNT (ATC, COMM)
2 (Jan, Feb, March)	TRST & SMNT (MOW, Power)
3 (April, May, June)	CMNT
4 (July, Aug, Sep)	QAAW, Drug and Alcohol
<b>Year 3 will begin October 1, 2014 and run until September 30, 2015</b> <b>It will begin again October 1, 2017, and subsequently October 1, 2020</b>	

\*Please note that this schedule includes auditing all SSPP and SEPP elements by Department to reduce the burden placed on WMATA's departments to participate in multiple audits throughout the three year schedule.