

# ST Express Internal Safety Audit

Report #: 2023-03

## Executive Summary

### Audit Objective & Scope

The Audit Division conducted our annual Internal Safety Audit of ST Express Bus service to evaluate compliance to Sound Transit's Agency Safety Plan (ASP), associated plans, procedures, policies, and to applicable Federal Transit Administration (FTA) safety requirements.

Supported by separate intergovernmental agreements, Community Transit, King County Metro Transit, and Pierce Transit operate ST Express service on behalf of Sound Transit. The scope of this audit included Sound Transit's management and oversight of the ST Express program; as well as the operations and maintenance programs being implemented by our partner agencies.

Our audit commenced on March 1, 2023 and concluded with a closing meeting on April 19, 2023.

The following elements of the ASP were reviewed as part of our audit scope:

- 1.2 Conformance with FTA Guidelines
- 1.4 Review and Update of the ASP
- 1.5 Emergency Management and Preparedness Program
- 2.3 Safety Accountabilities and Responsibilities
- 2.4 Plan Implementation
- 3.1 Hazard Identification
- 3.2 Hazard Assessment and Evaluation
- 3.3 Risk Treatment
- 4.3 Management of Change
- 5.1 Safety Communication
- 5.2 Competencies and Training

Additionally, our scope included a review of results from prior ST Express internal safety audits.

### Audit Results

As a result of this audit, we found no **(0) findings** of non-conformance and have **three (3) observations** as opportunities for improvement. Additionally, two (2) previous audit observations are recommended for closure.

## Conclusion

Based on our interviews with ST and partner agency staff, site visits, and documentation reviews, we conclude that the ST Express program operates in compliance with the requirements of the ST ASP and with applicable FTA safety requirements.

We found the ST Express program to be well managed by both ST and its partners and that programs are in place to promptly address safety concerns. ST staff are actively involved in all phases of hazard management for the program, from providing input on specifications for new vehicles and equipment, to ensuring partner agency work orders that address safety issues are promptly completed.

Our audit resulted in **three (3) new observations** which are areas where the audit team identified opportunities to further strengthen safety oversight for the ST Express program.

## Audit Results

The following table summarizes, by ASP section, the analysis we performed during Field Work and the associated exceptions (if any). Those results listed in *\*\*italics* are from previous audits and are expanded upon separately:

Criteria	Tests Performed	Results	Finding or Observation
1.2: Conformance to FTA Guidelines	<ul style="list-style-type: none"> <li>• Is ST in compliance with FTA CFR Part 655 and Part 673 requirements?</li> <li>• Is ST able to ensure that partner agencies maintain compliance?</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of appropriate reference to drug &amp; alcohol requirements and policy in ASP and IGAs.</li> <li>• IGAs lack requirements for Part 655 compliance</li> </ul>	<p><b>Observation #1</b></p> <p><b>Observation #2</b></p>
1.4 Review and update of the ASP	<ul style="list-style-type: none"> <li>• Is ST Express staff (ST Operations) reviewing annual updates to the ASP?</li> <li>• Is ST ensuring partner agency ASPs maintain alignment with the ST ASP?</li> </ul>	Pass	None
1.5 Emergency Management and Preparedness Program	<ul style="list-style-type: none"> <li>• Are emergency preparedness plans in place for ST Express?</li> <li>• Are emergency preparedness plans exercised to an acceptable level?</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency plans established and effective. Familiarization training for first responders is ongoing.</li> <li>• <i>**ST has not participated in a bus specific emergency drill for ST Express. (2021 Observation)</i></li> </ul>	None

2.3 Safety Accountabilities and Responsibilities	<ul style="list-style-type: none"> <li>• Are roles and responsibilities for safety clearly delineated between ST and partner agencies?</li> </ul>	<ul style="list-style-type: none"> <li>• <i>**IGA updates needed to better clarify safety responsibilities between agencies and across departments (2022 Observation)</i></li> </ul>	None
2.4 Plan Implementation	<ul style="list-style-type: none"> <li>• Is the ASP generally being implemented effectively for ST Express?</li> </ul>	Pass	None
3.1 Hazard Identification	<ul style="list-style-type: none"> <li>• Are there effective processes in place to identify hazards throughout the system?</li> </ul>	Pass	None
3.2 Hazard Assessment and Evaluation	<ul style="list-style-type: none"> <li>• Are identified hazards being promptly evaluated to determine next steps for mitigation?</li> </ul>	Pass	None
3.3 Risk Treatment	<ul style="list-style-type: none"> <li>• Are there appropriate processes established for the mitigation of hazards of various scope and criticality?</li> </ul>	Pass	None
4.3 Management of Change	<ul style="list-style-type: none"> <li>• Is ST managing and preparing for changes to the ST Express system and to the oversight of the system?</li> </ul>	Due to limited SOPs, job aids, and training documents, there is a risk of programmatic knowledge loss in the event of staff turnover.	<b>Observation #3</b>
5.1 Safety Communication	<ul style="list-style-type: none"> <li>• Is there effective internal and interagency communication of safety related information and hazards?</li> </ul>	<i>**There is a lack of written procedures for hazard management and communication (2021 Observation).</i>	None
5.2 Competencies and Training	Is ST staff and partner agency staff receiving necessary safety related information and training?	Pass	None

## Previous audit results

Our audit followed-up on the status of open **observations** from prior ST Express internal safety audits conducted in 2021 and 2022. There were no prior Findings. Based on our audit, two (2) observations are recommended for closure with three (3) remaining open.

The following table summarizes those previous results and our recommended status.

Reference ID	Description	Results	Status
<b>O-STX-22-02</b>	Staffing levels for STX Operations oversight are lower than expected compared to staffing levels for similar scope of operations and equipment.	ST is resourcing a ST Express specialist position.  Also, the program receives administrative support from other ST Operations groups.	<b>Recommended for closure</b>
<b>O-STX-21-01</b>	IGAs (revision dates 2019) for ST Express with partner agencies have not been updated since the 2021 ST Express audit to reference correct safety plans.	IGAs have been amended to reflect requirements for ASP, rather than the SSP.	<b>Recommended for closure</b>
<b>O-STX-21-02</b>	ST Emergency Management should consult with operating partners and consider scheduling a drill/exercise involving ST Express within next 12 months.	ST has not participated or led a bus operations specific emergency drill. ST Express provided bus bridges and passenger transfer during LINK operations drills. ST should participate in or lead a bus operations specific emergency drill with partner agencies.	<b>Open</b>

<b>O-STX-22-01</b>	IGAs between ST Express and partnering agencies need to define each side's explicit roles and responsibilities for safety.	IGAs have not been updated to clarify roles and responsibilities for safety.	<b>Open</b>
<b>O-STX-21-03</b>	SOPs defining procedures relating to safety data collection management and distribution are not established. The audit team was unable to test the accuracy of the outcomes of each process which relied on the audit team to trust their processes without verification. Review procedures defined in the "ST Express Operation Oversight Program" and create written SOPs for key processes.	SOPs for key processes have not been established to document procedures to be followed to implement "ST Express Operations Oversight Program" tasks.	<b>Open</b>

## Background

FTA 49 CFR Part 673.27, as well as Sound Transit's Agency Safety Plan, and Audit Division policy and procedures requires that an annual internal safety audit is conducted on each of the agency's four modes of transportation (Link, Tacoma Link, Sounder Commuter Rail, and ST Express Bus service).

Internal safety audits occur to ensure the agency independently evaluates compliance with federal, state, and local requirements; identifies hazardous and risk conditions, and verifies that the agency is fully implementing its safety program as described in our plans and procedures.

All internal safety audits are resourced on a three-year audit plan that is communicated agency-wide. Results of all annual audits are documented in an annual report that is presented to the Finance & Audit Committee (FAC), and distributed to WSDOT's Rail Safety Oversight Program (SSO). The annual report is also distributed to agency leadership and management, as required.

## Methodology

### Standards

We conducted our internal safety audit in accordance with Audit Division policies & procedures, which are governed by our Audit Charter; and meet several sets of applicable federal and local auditing standards.

## **Audit Processes**

Our audits are risk-based and focus on the areas with the highest potential risk impacts or likelihood at the time of the audit. Each audit starts by examining the current processes in place relative to (1) laws or regulatory requirements, (2) agency policies and procedures and (3) industry best practices.

During the audit “planning” phase, we assess the engagement-specific conditions and risk, informing and confirming the audits’ objectives and scope. At this time, relevant controls to mitigate these risks are also identified.

The audit “field work” phase then examines the design of the identified controls to determine if the intent meets the regulations, policies, etc. If the controls are designed to adequately mitigate the risk (control environment), we move on to assess the degree to which the controls are mitigating the risk (control activities). Any areas identified where the control environment or activities do not adequately mitigate the identified risk are identified as an exception.

Exceptions are then defined as either findings or observations.

- **Findings** are the results of the evaluation and verification of evidence against audit criteria showing non-compliance with a policy, procedure, manual, standard, or industry best-practice
- **Observations** are issue that may be compliant with requirements, however, the auditor has determined that the issue poses the potential risk of becoming a finding in the future if recommended changes are not put in place to prevent occurrence.

**Report Prepared by:**

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**Reviewed (QA/QC) by:**

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Heather Wright, Deputy Director, Audit Division

**Approved for release by:**

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Patrick Johnson, Director, Audit Division

## Appendices

### Appendix A: Sound Transit's Title VI notice of rights

Sound Transit conducts Title VI equity analyses for service and fare decisions to ensure they are made as equitably as possible.

More information on Sound Transit's Title VI notice of rights and the procedures to file a complaint may be obtained by:

- Phone: 888-889-6368; TTY Relay 711;
- Email: [stdiscriminationcomplaint@soundtransit.org](mailto:stdiscriminationcomplaint@soundtransit.org);
- Mailing to Sound Transit, Attn: Customer Service, 401 S. Jackson St. Seattle, Washington 98104-2826; or
- Visiting our offices located at 401 S. Jackson St. Seattle, Washington 98104.

A complaint may be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call 888-446-4511.

### Appendix B: Personnel Interviewed - By Position Title

Sound Transit Staff
Executive Director - Operations
Executive Director - Labor Relations
Deputy Executive Director, Transportation and Maintenance
Deputy Executive Director, HR Strategic Partnerships
Executive Operations Director, Commuter Rail, Bus, & Paratransit
Deputy Chief Procurement & Contracts Officer
Director, Agreements
Deputy Director, Bus & Paratransit
Deputy Director, Transportation Safety & Security
Deputy Director, Emergency Management
Manager, Bus & Paratransit
Manager, Emergency Management
Manager, Security & Safety Management System
Manager, Transportation Safety & Security
Program Manager, Substance Abuse
Sr. Transportation Safety & Security Specialist



Sr. Emergency Management Specialist
Transportation Safety & Security Specialist
King County Metro
Transportation Safety & Security Manager
Transportation Safety Administrator
Community Transit
Manager of Safety, Security & Compliance
Manager, Contracted Transportation Services
Assistant Manager, Contracted Transportation Services
Pierce Transit
Safety Officer
Safety Manager
Contracted Services Administrator

## Appendix C: Documents Reviewed

The audit team reviewed the following documents and records during the audit of ST Express.

Agency Safety Plan, <ul style="list-style-type: none"> <li>• Sound Transit, January 2023</li> <li>• King Co. Metro Rev 1.0. Dec 2020</li> <li>• Pierce Transit, Rev 032621, Jun 2020</li> </ul>
Interagency Agreement <ul style="list-style-type: none"> <li>• Community Transit, 2021</li> <li>• King Co. Metro, 2019</li> <li>• Pierce Transit, 2021</li> </ul>
ST Express Operations Oversight Program, Aug 2019
IGA Amendment 1, July 2022
ST Agency Policy 1014: Alcohol and Drug Free Workplace, Feb 2019
Joint Bus Committee Meeting Minutes
FTA Contractors Manual Fiscal Year 2022
STX Incident Debrief Reporting, STX2022-1205, May 2020