

Customer Complaint Process Audit

Report #: 2025-10

Executive Summary

Sound Transit's (ST or "Agency") commitment to being a passenger-focused agency is foundational to its mission and strategic plan. A critical component is the agency's ability to capture, respond to, and manage customer complaints in a timely, consistent, and transparent manner.¹ This ensures that the agency's complaint process supports safety, service reliability, regulatory compliance, and public trust. Customer complaints involve a wide range of service conditions, including operator conduct, service delays, safety conditions, accessibility concerns, or facility conditions.

This topic was selected for the 2025 Audit Plan because of risks related to reputational, legal & compliance, safety, and social equity. The objective of this audit was to assess the effectiveness and responsiveness of handling complaints to enhance service quality² and customer satisfaction.

Internal Audit found that the Passenger Care team does consistently responds to customers within an informal three (3) day timeframe, maintains strong customer-service practices (absent policy or governance framework), and leverages customer service software along with well documented procedures that support consistent intake and communication.

The audit did not identify issues that rose to the level of a formal finding. However, we noted several areas where the current complaint process, while operationally functional, is informal and still lacks the governance structure, documentation and system capabilities for consistent program-level monitoring & oversight. Specifically, the agency lacks a formal customer complaints policy, defined program-level governance, and process to monitor and verify complaint resolution metrics across the systems.

Collectively, addressing these gaps would strengthen agency oversight, align reporting with service quality needs, and reinforce a consistent customer complain process across the agency's internal divisions and partner agencies.

Conclusion

An internal audit identified **no findings** of non-compliance and **two (2)**

¹ Sound Transit is a public agency and is subject to the State of Washington's Public Records Act (RCW 42.56.070).

² Service quality is determined by passenger load, on-time performance, customer complaints, and trips operated as scheduled, all of which are monitored monthly, quarterly, and annually by Sound Transit. Retrieved from: 2018 ST Service Standards and Performance Measures ([see link](#)).

recommendations; these are summarized below and discussed in more detail beginning on page 3 of this report.

Summary of results:

Ref #	Issue Title	Risk Rating
R.1	We recommend the agency adopt a formal customer complaints policy, and program-level governance oversight structure.	N/A
R.2	We recommend the agency establish a formal process to validate the accuracy of complaint-resolution metrics and implement close-out controls to confirm that all complaints are resolved, documented, and reported consistently.	N/A

Background

Sound Transit receives between 250 and 445 customer complaints per month across Link, ST Express, Sounder, and Tacoma Link, along with an average of 19 commendations each month. These complaints touch every part of the agency – People & Culture (P&C), Safety, Civil Rights, Equity, and Inclusion (CREI), One Regional Card for All (ORCA) – and involve several operating partners such as BNSF, Community Transit, King County Metro, and Pierce Transit.

As part of our audit, we excluded Title VI, ADA, and public disclosure requests because they follow different processes due to their increased risks.

In reviewing customer complaint data over the previous 12 months, we found that monthly complaint volumes fluctuated between 250 and 445 cases in 2025, yet response timelines improved steadily throughout the year.

Data showed that July 2025 had the highest number of late responses, with about 85 late cases out of 445 complaints (~19%). Late responses decreased consistently afterward, and by November 2025 there were approximately 27 late cases out of 257 complaints (~11%), reflecting a roughly 60% reduction and the lowest late-response rate of the year.

Passenger Care is staffed with dedicated agents and a management team within the Passenger Experience department under Service Delivery. Department-level goals include fostering a customer-centric culture, improving satisfaction, and implementing solutions that elevate the passenger experience. However, Passenger Care (including the customer complaint program) does not have formal program objectives due to the lack of policy and governance framework.

Microsoft Dynamics Customer Relationship Management (CRM) serves as the primary system of record. ORCA-related complaints are recorded in Salesforce for partner agencies. Customer Service data connects directly to CRM, which is the agency's internal monthly business report (MBR), and external reporting occurs through the System Performance Tracker (public-facing).

Together, these systems form ST's primary mechanism for monitoring customer comments and the public's feedback on operational performance and service-quality trends.

Opportunities for Improvement

R.1 We recommend the agency adopt a formal customer complaints policy, and program-level governance oversight structure.

Government auditing standards³ require agencies to establish clear program objectives, written policies, and governance structures that define roles, responsibilities, escalation pathways, and reporting expectations. Benchmarking of other transit agencies policies and governance documentation demonstrates that mature customer-complaint programs typically include formal complaint policies, documented program objectives⁴, and structured reporting mechanisms that promote consistency and accountability.⁵

We observed that ST does not have a formal customer complaints policy, defined program objectives, or supporting governance documents (e.g., Board Resolution) that guides how complaints should be managed across the agency and its operating partners.

Passenger Care uses SOPs to direct daily work, but these procedures do not serve as agency-level policy or establish program-wide expectations. As a result, all complaints follow the same workflow regardless of urgency, complexity, or risk, and program performance is measured primarily by a three-day response metric rather than the quality of the resolution.⁶

³ Government Accountability Office (GAO) – Standards for Internal Control

⁴ For example: Rhode Island Public Transit Authority (RIPTA) Complaint Policy and Procedures specifies that the objectives of their complaint procedures are to:

- (1) Provide an opportunity for customers to report any policies, procedures, or actions by RIPTA/Ride Paratransit Program they believe violate Federal Transit Administration (FTA) regulations.
- (2) Document and investigate the allegations in a timely and thorough manner.
- (3) Timely respond to customers and provide the outcome of the investigation.

⁵ Sample Board Policy: Resolution No. 2020-44 – A Resolution of the Mason Transit Authority Board Adopting a Revised Customer Comment/Complaint Policy. The purpose of this Board Policy is to establish a policy that ensures customers of the system have an easy and accessible way to provide feedback to the agency. ([see link](#))

⁶ Audit notes that the three-day response metric was informally communicated by Passenger Experience
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These gaps exist because policy development and program governance have not been prioritized, and Passenger Care does not have formal authority to establish or enforce management's expectations.

No guidance was provided requiring the division to define objectives or create a unified framework for complaint handling.

Consequently, the program lacks measurable objectives and consistent processes, which limits the agency's ability to assess service quality and ensure accountability across internal business units and partner agencies. Leadership and governance, in turn, receives an incomplete view of program performance, and the absence of the program level structure prevents it from being fully auditable at this time.

Opportunity:

- **Adopt Policy, Program Objectives and Governance Framework:** Adopt a formal complaint policy and governance framework, developed by senior management in coordination with the Board, with standardized reporting.
- **Strengthen Partner Oversight Requirements:** Update partner agreements to include clear resolution reporting and corrective action requirements to strengthen oversight and accountability.

R.2 We recommend the agency implement controls to verify complaint-resolution metrics and ensure timely close-outs.

Best practices for complaint management and auditing internal control principles require agencies to verify that issues are resolved before closing cases, maintain documentation that demonstrates how concerns were addressed, and ensure that outcome data is reliable for decision-making. Essentially, an effective complaint system evaluates both responsiveness and the quality of resolution.

Currently, customer complaints are marked "closed" once Passenger Care sends an initial email or forwards the issue to another team or partner agency. There is no required follow-up or confirmation that the issue was resolved. The current system tracks only responses – not outcomes. For all operating partners such as KCM and Pierce Transit doing work on ST modes, these agencies are not required to report back on resolution outcomes relevant to ST, thereby limiting visibility into corrective actions, if any.

These conditions are the result of the lack of policy authority, system functionality gaps, and partner agreement provisions that do not require partners to report back on complaint outcomes. Specifically, management has asserted that CRM in its current state, lacks the capability to support resolution tracking, and no formal expectations exist for internal units or operating partners to verify resolution before cases are closed.

leadership and is not currently documented in approved policy or SOPs.

Another example of these system gaps is the lack of integration between CRM and the Enterprise Asset Management System (EAMS), which ST uses to log and plan maintenance activities. During the audit period (CY 2024 – CY 2025), facilities-related issues accounted for 7% (or 554 of 8,281) of the total complaints. Because CRM and EAMS do not communicate, Passenger Care cannot see whether complaints captured on work orders were assigned or completed, preventing staff from confirming whether these issues were resolved before closing the related customer complaints.

The absence of formal close-out controls increases the risk of prematurely closing complaints, unresolved issues, and incomplete or inaccurate reporting of program performance. Without resolution data, this impedes management's ability to evaluate service quality or determine whether corrective actions have addressed the underlying issues. Also, since current dashboards focus on responsiveness, leadership may receive an overstated view of program effectiveness.

Opportunity:

- **Enhance Monitoring Through System Integration:** Collaborate with IT (Internal Applications & Services) to evaluate and implement system integration among CRM and other relevant systems could improve status visibility, enable closed-loop issue resolution, and ultimately strengthen monitoring controls.

Conclusion

The Passenger Care team performs well within its operational scope, consistently responding to customers and maintaining strong customer service practices. However, the absence of a formal policy, program objectives, governance structure, and resolution-verification control hinders the agency's ability to manage the complaint handling process as a comprehensive, auditable program.

Implementing the recommended improvements will enable Sound Transit to strengthen accountability, enhance visibility into service-quality issues, and provide leadership and those in charge of governance with more reliable information to support decision-making.

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;
- 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.

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Appendix A: Audit Framework and Compliance Information

Methods of evaluation and verification

To assess compliance during the audit, the auditors completed the following steps:

- Reviewed relevant governance and programmatic documents (policies, procedures, etc.).
- Assessed records for evidence of implementation of and compliance with these documents.
- Conducted desktop and on-site walkthroughs of existing controls and process improvements.
- Interviewed agency senior management and staff.

Audit Standards

The Internal Audit Division conducted this performance audit in accordance with Internal Audit Division policies & procedures, which are governed by our Internal Audit Charter, the intent to follow Generally Accepted Government Auditing Standards (GAGAS or “Yellow Book”) issued by the United States Government Accountability Office (GAO) and the Global Internal Audit Standards (or “Red Book”). The Internal Audit Division recognizes its commitment to upholding these standards while acknowledging the absence of a formal peer review.

These standards require that we planned and performed this audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. The evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The Internal Audit Division is committed to following safety oversight standards set forth by the Federal Transit Administration (FTA), Federal Railroad Administration (FRA), and all other relevant auditing requirements or standards.