

SENT VIA EMAIL

January 9, 2026

Jim Ottman
Compliance Audit Manager – Audit Division
Sound Transit

**Re: Approval of the 2025 Central Link Light Rail Internal Safety Audit (2025-14)
and the Sound Transit Security and Emergency Management Internal Audit
(2025-05) final reports.**

Mr. Ottman,

WSDOT has accepted the 2025 final report for the Internal Safety Audits of Central Link Light Rail (2025-14) and the Sound Transit Security and Emergency Management Internal Audit (2025-05).

2025-14 Audit topics covered include:

- 1) 0.0 Introduction
 - a) 0.1 ST Background
 - b) 0.2 Scope and Purpose
 - c) 0.3 Organizational Chart
 - d) 0.4 System and Description
 - e) 0.5 Expected Outcomes
- 2) 1.0 Safety Plan 673.11
 - a) 1.1 Regulatory Updates to the Agency Safety Plan
 - b) 1.2 Safety Performance Measures and Targets 673.11 (a)(3)
 - c) 1.3 Conformance with FTA Guidelines 673.11 (a)(4)
 - d) 1.4 Regulatory Oversight and Acknowledgement 673.15
 - e) 1.5 Employee Safety Committee
 - f) 1.6 Review and Update of ASP 673.11(a)(5)
 - g) 1.10 Certificate of Compliance 673.13
 - h) 1.11 Coordination with Planning Stakeholders 673.15
- 3) 2.0 Safety Management Policy 673.23(a)(B)
 - a) 2.1 Safety Management Policy Communication 673.23 (c)
 - b) 2.3 Safety Accountabilities and Responsibilities 673.23(d)
 - i) 2.3.1 Organizational Roles and Responsibilities 673.23(d)(1)(2)(3)(4)
 - c) 2.4 Plan Implementation
 - d) 2.5 SMS Documentation and Records 673.31
 - e) 2.6 Access to SMS Documentation and Records 673.31
- 4) 3.0 Safety Risk Management 673.25
 - a) 3.5 Transit Asset Management

- 5) 4.0 Safety Assurance 673.27(a)
 - a) 4.1 Safety Performance Monitoring and Measurement 673.27(b)
 - i) 4.1.1 Rules Compliance and Procedure Review - Maintenance Audits and Inspections Facilities and Equipment Inspections
 - b) Roadway Worker Protection (RWP) Plan and Required Training 671
 - c) 4.1.2 Safety Data
 - d) 4.1.7 Corrective Action Plans
 - e) 4.5 Safety Culture Assessment
- 6) 5.0 Safety Promotion
 - a) 5.1 Competencies and Training
 - i) 5.1.1 Public Transportation Safety Certification Training Program

2025-05 Audit topics covered include:

- 1) 1.0 Safety Plan 673.11
 - a) 1.7 Public Safety and Emergency Management
 - b) 1.8 Drills and Exercises
 - c) 1.9 After Action Reports
- 2) 2.0 Security
 - a) Roles and Responsibilities
 - b) Contractor Oversight
 - c) Crime and Event Response
 - d) TSA BASE Audit

There was one (1) finding within 2025-14

- F.1- Approximately 30% (66 of 227) of Standard Operating Procedures (SOPs) and Standard Maintenance Procedures (SMPs) for Link Light Rail are past due for their required 10-year review

There were three (3) recommendations within 2025-14

- R.1- We recommend ST collaborate with the EAMS vendor to activate notifications to ensure KCM staff receive timely updates regarding maintenance parts availability.
- R.2- We recommend revising the Design Criteria Manual to incorporate a defined process that ensures ST's Infrastructure team is formally engaged in decision-making for vertical conveyance systems at future Link stations.
- R.3- We recommend conducting a review of the second overhead crane utilization and maintenance processes at OMF East to determine whether current equipment capacity is sufficient to minimize disruptions and support ongoing maintenance.

There were four (4) findings within 2025-05

- F.1- At the time of the audit, Sound Transit lacked a System Security Plan outlining a comprehensive approach to managing security risks and vulnerabilities.
- F.2- Sound Transit lacks a formal Agency Continuity Plan that outlines the continuation of essential services in the event of significant operational disruption.

- F.3- Emergency Exercise Program Procedure (EM08) contains incorrect regulatory references and administrative errors.
- F.4- Outdated training requirements remain referenced in the Integrated Preparedness Plan.

There were eight (8) recommendations with 2025-05

- R.1- We recommend establishing a documented framework to support consistent monitoring and evaluation of police service delivery.
- R.2- We recommend formal procedures be established to support consistent tracking, analysis, evaluation, and reporting of crime data.
- R.3- We recommend developing and implementing standardized procedures for alarm response and follow-up.
- R.4- We recommend implementing a formal hazard risk management framework for Security Operations.
- R.5 We recommend establishing and operationalizing a framework to guide the strategic deployment of security personnel
- R.6- We recommend Emergency Management update drills and exercise procedures to include a notification process for WSDOT SSO when activities are scheduled or conducted.
- R.7- We recommend Emergency Management personnel should complete formal Homeland Security Exercise and Evaluation Program (HSEEP) training.
- R.8- We recommend establishing standardized procedures for reuniting ADA passengers with mobility devices post-emergency egress.

Sound Transit has remained on schedule to audit all Agency Safety plan elements and modal safety programs for Central Link Light Rail and Tacoma Link Light Rail as listed within the 2025 Comprehensive Agency Audit Plan, as required by the Washington State Rail Safety Oversight Program Standard.

Please contact me with any questions.

Sincerely,



Molly Hughes
Public Transportation Safety Administrator (SSOA)
molly.hughes@wsdot.wa.gov
Mobile: 360-742-8458

cc: Patrick Johnson- Deputy Executive Director, Audit Division

Link Light Rail Internal Safety Audit

Report #: 2025-14

Executive Summary

Internal Safety Audits for Link light rail are required to be completed on an annual basis in accordance with federal and state regulations, including the WSDOT State Safety Oversight (SSO) program standards. These safety audits periodically review agency safety programs to ensure that processes are being performed as intended and required under the Agency Safety Plan (ASP).

Audit Objective

Our audit focused on evaluating safety controls, processes, and procedures to ensure the safe operations, maintenance, and safety oversight of Link light rail. Operations and maintenance for Link light rail are provided through a contracted partnership with King County Metro (KCM).

The audit criteria were based on the Agency Safety Plan (ASP) and aligned with the Federal Transit Administration (FTA)'s Safety Management Systems (SMS) framework, as outlined in 49 CFR Part 673. This framework emphasizes proactive risk management, continuous safety improvement, and accountability across all levels of transit operations.

The audit period spanned **October 2024 to October 2025**.

Conclusion

From our audit, we identified **one (1) finding** of non-compliance and **three (3) recommendations as opportunities for improvement**; listed below and discussed in more detail beginning on page 4 of this report.

Summary of results:

Ref #	Issue Title	Risk Rating
F.1	Approximately 30% (66 of 227) of Standard Operating Procedures (SOPs) and Standard Maintenance Procedures (SMPs) for Link light rail are past due for their required 10-year review.	4D
R.1	We recommend ST collaborate with the EAMS vendor to activate notifications to ensure KCM staff receive timely updates regarding maintenance parts availability.	N/A
R.2	We recommend revising the Design Criteria Manual to incorporate a defined process that ensures ST's Infrastructure team is formally engaged in decision-making for vertical conveyance systems at future Link stations.	N/A
R.3	We recommend conducting a review of the second overhead crane utilization and maintenance processes at OMF East to determine	N/A

	whether current equipment capacity is sufficient to minimize disruptions and support ongoing maintenance.	
--	---	--

Background

Federal requirements for Link light rail service

In 2018, the FTA published 49 CFR Part 673, that requires rail properties to develop and use transit-specific safety management systems (SMS) framework through public transportation agency safety plans (ASP) to oversee safety processes.

The 673 rule also requires agencies to maintain documentation outlined in their respective agency safety plan, including those related to SMS implementation and documentation resulting from SMS processes and activities. This rule also requires an annual review of the ASP for updates, corrections, and modifications.

Link light rail service

Sound Transit, as the owner of the Link light rail service, provides fiscal, performance, management, and safety oversight. Sound Transit contracts with King County Metro for the management of operations and maintenance, along with safety processes under intergovernmental agreements (IGAs).

For Link, there are two (2) Agency Safety Plans governing rail safety. Each must be reviewed and approved according to local requirements. Sound Transit’s ASP must be approved by WSDOT; however, KCM’s Agency Safety Plan only needs to be reviewed and approved by Sound Transit prior to approval and adoption.

Audit topic selection

Sound Transit’s Audit Division used a risk-based approach to identify safety management system audit topics to audit. Our assessment included activities and sub-activities specified in Sound Transit’s agency safety plan, and then rated each for the following risk factors:

- Results from previous audits.
- Time since last audited.
- Changes in processes within 3 years.
- Safety data trends and analysis.
- Federal and state regulation updates.
- Best practice & industry guidance.

Methods of evaluation and verification

This audit report is the second audit from our 3-year audit cycle (2024 – 2026), covering portions of elements contained in the Agency Safety Plan.

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

- Interviewed staff to verify their understanding of safety and operational processes.

- Compared agency safety program-related procedures and plans against state and federal requirements.
- Sampled and reviewed records for each audit area to assess compliance.
- Conducted site visits to the Central and East Link operations & maintenance facilities.

Audit Standards

The Internal Audit Division conducted this internal safety audit in accordance with Internal Audit Division policies & procedures, which are governed by our Internal Audit Charter and in accordance with applicable federal, state, and local auditing standards.

These standards require that we plan and perform the 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 the findings and conclusions based on the audit objectives.

The Internal Audit Division is also committed to following safety oversight standards set forth by the FTA, FRA, and all other relevant auditing requirements and standards.

Audit Phases

Each internal 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. Relevant controls to mitigate these risks are reviewed and 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 recommendations.

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

Recommendations will not be assigned to a formal "Management Action Plan" during the audit reporting process. However, auditors will continue to advise the responsible parties to consider appropriate actions regarding the recommendations. Submission of a formal response is optional.

Audit Results

The following table summarizes our findings and observations using the FTA's SMS framework. This final report reflects the current state of safety practices and processes at Sound Transit and KCM during the audit period.

SMS Framework	Number of Findings	Number of Recommendations
Safety Plan	0	0
Safety Policy	0	0
Safety Risk Management	0	3
Safety Assurance	1	0
Safety Promotion	0	0
Totals	1	3

Audit topics reviewed

This section of the report encompasses audit areas we reviewed in this audit cycle, and are organized by each component of SMS:

a. Safety Plan

Areas subject to review under this section include:

- Regulatory Updates to the Agency Safety Plan (ASP)
- Safety Performance Measures and Targets
- Conformance with FTA Guidelines
- Regulatory Oversight and Acknowledgement
- Employee Safety Committee
- Review & Update of the ASP
- Certification of Compliance
- Coordination with Planning Stakeholders

To conduct this evaluation, the audit team used the following methods:

- **Staff Interviews:** Met with staff to review, update, and approve the Agency Safety Plan, ensuring alignment of safety procedures. Assessed how Sound Transit coordinates with KCM to enhance collaboration and manage safety performance measures to meet established targets.
- **Document Review:** Reviewed evidence to verify that the Agency Safety Plan for Sound Transit and KCM complies with state, federal, and local regulations. Additionally, evaluated safety performance measures to ensure alignment with the ASP and the Link Joint Rail Safety and Security Committee (JRSSC).

Note: The audit was planned and performed based on the September 2024 ASP; however, the audit team did review the 2025 ASP, which was signed by the CEO on October 2, 2025.

i. Section (a) findings:

We found no instances of non-compliance requiring revision to the Agency Safety Plan.

ii. Section (a) recommendations:

There are no recommended revisions for the Agency Safety Plan.

b. Safety Management Policy

Areas subject to review under this section include:

- Safety Management Policy Communication
- Safety Accountabilities and Responsibilities
- Organizational Roles and Responsibilities
- Plan Implementation
- SMS Documentation and Records
- Assessment of SMS Documentation and Records

To conduct this evaluation, the audit team used the following methods:

- **Staff Interviews:** Met with Sound Transit and KCM staff to clarify safety roles and assigned responsibilities, and to review how Sound Transit manages operating contracts with its partners.
- **Document Review:** Reviewed the SMS Policy Statement to evaluate its approval and communication processes. Examined organizational charts and job descriptions for accuracy and completeness. Assessed Sound Transit's oversight program plans and procedures for Link light rail operations and maintenance.
- **Field Observation:** Participated in the monthly JRSSC meeting to evaluate communication between Sound Transit and KCM regarding system safety. Additionally, we reviewed operating contract relationships during site visits to the Link Operation Maintenance Facilities (OMF) Central and East.

i. Section (b) findings:

We found no instances of non-compliance with the Safety Management Policy.

ii. Section (b) recommendations:

There are no recommended revisions for the Safety Management Policy

c. Safety Risk Management

Areas subject to review under this section include:

- Transit Asset Management

To conduct this evaluation, the audit team used the following methods:

- **Staff Interviews:** We met with staff responsible for Sound Transit’s asset management strategy and policy, as well as staff overseeing processes such as asset condition assessments, maintaining a state of good repair, managing Link light rail maintenance, and reporting to the National Transit Database (NTD) and WSDOT.
- **Document Review:** Reviewed the Sound Transit Strategic Asset Management Plan (SAMP), including inventory and condition rating worksheets. We also analyzed asset age and condition data.
- **Field Observation:** Observed Link light rail fleet maintenance at each of the two OMFs and surveyed out-of-commission vehicles and those out of service for parts delays.

Auditors verified that WSDOT approved Sound Transit’s submission of the SAMP instead of the TAM plan. A TAM plan that meets federal and state requirements must be submitted to WSDOT in 2026.

i. Section (c) findings:

We found no instances of non-compliance with Safety Risk Management.

ii. Section (c) recommendations:

R.1 – We recommend that Sound Transit collaborate with the EAMS vendor to verify system capabilities and, if feasible, activate notification features to ensure KCM staff receive timely updates on maintenance parts availability.

- The Enterprise Asset Management System (EAMS) includes functionality to send alerts when parts arrive; however, this feature has not yet been activated under the current vendor agreement.
- LRV parts notifications within EAMS are not functioning as intended, which impacts operational efficiency and timely maintenance.
- Sound Transit has Procurement staff at both OMF Central and OMF East; however, KCM staff do not receive notifications from ST Procurement regarding parts requests or availability.

R.2 – We recommend revising the Design Criteria Manual to incorporate a defined process that ensures ST’s Infrastructure team is formally engaged in decision-making for vertical conveyance systems at future Link stations.

- Documenting Infrastructure’s role in the Design Criteria Manual ensures that responsibilities are clear and consistently applied across projects. This reduces ambiguity, improves coordination between departments, and supports stronger internal controls.

- Vertical conveyance systems are critical passenger-facing assets. Early Infrastructure involvement ensures that design decisions support Sound Transit’s asset management objectives, safety requirements, and state/federal expectations for system reliability and accessibility.
- The Infrastructure team is responsible for long-term maintenance activities. Their early involvement helps ensure that design choices align with maintenance capabilities, available parts, and established asset management practices.
- Formalizing their role helps prevent design decisions that could lead to increased downtime, safety concerns, or costly retrofits.

R.3 – We recommend conducting a review of the second overhead crane utilization and maintenance processes at OMF East to determine whether current equipment capacity is sufficient to minimize disruptions and support ongoing maintenance.

- There is a discrepancy in crane availability between OMF East and OMF Central facilities.
- OMF Central is equipped with one overhead crane and one gantry crane, providing flexibility for maintenance operations. In contrast, OMF East has only a single overhead crane available for performing maintenance activities.
- The ST Rolling Stock team, in coordination with KCM, has requested the addition of a second 10-ton crane at OMF East. However, this request has not been approved through the Sound Transit Service Delivery project process to date.

d. Safety Assurance

Areas subject to review under this section include:

- Safety Performance Monitoring and Measurement
- Rule Compliance and Procedural Review
- Maintenance Audits and Inspections
- Facilities and Equipment Inspections
- Roadway Worker Protection (RWP) Plan and Required Training
- Safety Data
- Corrective Action Plans
- Safety Culture Assessment

To conduct this evaluation, the audit team used the following methods:

- **Staff Interviews:** Met with personnel responsible for maintaining Link light rail vehicles and overseeing related maintenance programs. Additional discussions involved staff responsible for developing maintenance plans and procedures.
- **Document Review:** Reviewed Sound Transit’s oversight plans and procedures for Link light rail operations and maintenance, as well as partner agency documentation for maintenance on Link light rail vehicles. Examined samples of maintenance data

and reports exchanged between KCM and Sound Transit. Assessed the agency's safety culture survey, communication strategies, and outreach initiatives.

i. Section (d) findings:

F.1 – Approximately 30% (66 of 227) of Standard Operating Procedures (SOPs) and Standard Maintenance Procedures (SMPs) for Link light rail are past due for their required 10-year review.

- Data was sampled from the ST Service Delivery Document Control Center SharePoint site. The sampled data was cross-referenced between the Link Rules and Procedures Committee (LRPC) dashboard and the Service Delivery controlled documents listed in the Document Control Center.
- *SOP 1.1 Rules and Procedures Development, Issuance and Revision and SOP DOC-SOP-10003 Periodic Review of Controlled Documents* mandates a review and approval process every ten (10) years to ensure alignment with current practices, systems, and regulatory requirements.
- The FTA's Oversight Procedure 54 – Readiness for Service, also recommends that all systems, subsystems, components, equipment, and materials provided and installed meet the contract requirements.
- Outdated SOPs and SMPs increase the risk of operational inconsistencies, non-compliance with regulatory and contractual requirements, and potential safety issues.

Recommendation: Conduct a comprehensive review of all outdated procedures, revise as necessary, and clearly document both the updated revision date along with the next scheduled review. We also recommend increasing the frequency of procedure reviews to ensure they remain current and effective.

ii. Section (d) recommendations:

There are no recommended revisions for Safety Promotion.

e. Safety Promotion

Areas subject to review under this section include:

- Competencies and Training
- Public Transportation Safety Certification Training Program

To conduct this evaluation, the audit team used the following methods:

- **Staff Interviews:** Met with staff responsible for defining training requirements and expectations, and to assess progress in implementing an event-based communication protocol for Link light rail.
- **Documents Reviewed:** Mechanical training plans, vehicle maintenance matrices, and job descriptions.

i. Section (e) findings:

We found no instances of non-compliance with Safety Promotion.

ii. Section (e) observations:

There are no recommended revisions for Safety Promotion.

Status of Prior Audit Results

This section outlines the open prior audit findings and recommendations reviewed during this audit. The table below provides the status of each item, along with relevant details.

Issue ID	Status	Description	Actions Taken	Next Steps
O-LLR-23-01	Open	While there are numerous operational safety metrics being tracked, there is significantly less maintenance data being obtained, tracked, and analyzed.	Reviewed Link Power Bi data. Unable to interview Program Manager, Safety & Security Data.	Under Review

Issue IDs with “O” are observations/recommendations that are being monitored and followed up on by Internal Audit staff.

REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK

Appendices

Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their safety audit of Link light rail. Staff will be listed by position titles only:

- Sound Transit
 - Executive Operations Director, Rolling Stock
 - Director, Infrastructure Asset Management
 - Director, Asset Management Headquarters
 - Director, Insurance and Claims
 - Director, Facilities Services Delivery
 - Deputy Director, Enterprise Asset Management
 - Manager, Light Rail Maintenance
 - Manager, Insurance and Claims
 - Program Manager, Enterprise Asset Management System (EAMS) Solutions
 - Manager, Light Rail Maintenance
 - Sr. Transportation Safety & Security Specialist, Security
 - Sr. Transportation Safety & Security Specialist, Security Specialization

- King County Metro
 - Superintendent, Rail Training
 - Superintendent, Operations Safety
 - Manager, Training Strategy, Rail Division
 - Manager, Safety Management Systems
 - Manager, OMF Central
 - Mechanical Chief, OMF Central
 - Mechanical Lead, OMF Central
 - Mechanical Chief, OMF East
 - Mechanical Lead, OMF East
 - Coordinator, Occupational Education and Training

Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records during the safety audit.

Sound Transit documentation and records

- Agency Safety Plan (ASP), September 2024
- Agency Safety Plan (ASP), September 2025
- Memo, Employee Safety Committee approval of ASP, September 2024
- 2025 ASP Review, tracking spreadsheet
- Board Motion No. M2025-41, ASP Approval
- WSDOT Memo: ASP Review and Approval, 2024
- WI-001-ASP Annual Partner Review Process, R1, January 2025
- WI-002-ASP-Signature Distribution Process, R0.0, January 2024
- WI-003-ASP-Board Approval Process, R0.0, January 2024
- WI-004-ASP-ESC Approval Process, R1.0, September 2025
- WI-005-ASP ASP Annual Revision, September 2025
- SMS Policy Statement, October 2024
- Sound Transit Strategic Management Plan, February 2021
- Strategic Asset Management Plan (SAMP), February 2021
- Periodic Review of Controlled Documents (SOP-10003), July 2024
- Work Instruction (WI-10013), July 2024
- Emergency Operations Plan, August 2025
- Facilities Maintenance Plan, January 2023
- Transportation Safety and Security Facility Inspection Checklist, November 2024
- TSS Facilities Inspections Tracker, October 2025
- Conveyance Outage Process (SOP-10001), December 2024
- Conveyance Operating Certification Process (SOP-10002), November 2024
- Conveyance Entrapment & Incident Process (SOP-10006), December 2024
- Conveyance Inspection Process (SOP-10012), December 2024
- Conveyance Failures Tracking Sheet, October 2025
- Conveyance Prioritization Chart, October 2025
- Conveyance Mitigation Sheet, October 2025
- Elevator Entrapment Tracking Sheet, October 2025
- Slip and Falls Tracking Sheet, October 2025
- Safety and Security Facility Inspection (SOP-TSS18), December 2024
- Non-Reportable Near Miss Review (SOP-TSS20), July 2025
- JRSCC Charter, June 2025
- JRSCC Meeting Minutes, September 2025
- JRSSC Meeting Minutes, October 2025
- LRV Fall / Injury Tracking Sheet, CY 2025
- FTA Oversight Procedure 54, October 2023
- WSDOT Inspection Report, October 2025

King County Metro (KCM) documentation and records

- Agency Safety Plan, May 2024
- Roadway Worker Protection (RWP) Program
- RWP Course Training Record, October 2025
- Blue Flag Protection, September 2025
- LRV Training Program
- Link Training Records, October 2025
- Ops General Training Records, October 2025
- KCM Transit Operations Policies and Procedures Index, January 2024
- Rules and Procedures, May 2024

Sound Transit's Title VI notice of rights

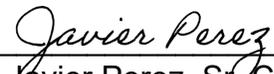
Sound Transit conducts Title VI equity analyses for service and fare decisions to ensure they are made as equitably as possible.

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.

Report Prepared by:



Javier Perez, Sr. Compliance Auditor (Lead Auditor)

Reviewed (QA/QC) by:

Jim Ottman, Compliance Audit Manager, Internal Audit Division

Approved for release by:

Patrick Johnson, Deputy Executive Director, Internal Audit Division