

# ST Express Internal Safety Audit

Report #: 2025-14

## Executive Summary

Internal Safety Audits are required to be completed annually by federal regulations for ST Express commuter bus service. 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 reviewing safety controls, processes, and procedures to ensure the safe operations, maintenance, and safety oversight of ST Express. King County Metro (KCM), Pierce Transit (PT) and Community Transit (CT) are contracted partners for operations and maintenance of ST Express.

Audit criteria included processes and programs captured by the Agency Safety Plan (ASP) based on guidance from the Federal Transit Administration (FTA's) Safety Management Systems (SMS) framework under 49 CFR Part 673.

The audit period spanned **September 2024 to August 2025**.

### Conclusion

From our audit, we identified **no (0) findings** of non-compliance and **six (6) recommendations as opportunities for improvement**; listed below and discussed in more detail beginning on page 7 of this report.

Summary of results:

Ref #	Issue Title	Risk Rating
R.1	We recommend updating and aligning the job descriptions for the Deputy Director of Bus & Paratransit and the Executive Director of Rolling Stock to reflect current roles within the new organizational structure.	N/A
R.2	We recommend developing & implementing formal minimum staffing level requirements for key ST Express operations and maintenance oversight roles.	N/A
R.3	We recommend identifying and formalizing alternate on-call duty officer(s) for ST Express.	N/A
R.4	We recommend developing a plan and schedule for procuring replacement vehicles for the aging ST Express fleet and secure appropriate funding sources to ensure timely implementation.	N/A

R.5	We recommend including selected Safety Culture Survey questions as a supplemental component to the required SMS refresher training and/or Employee Engagement Survey.	N/A
R.6	We recommend identifying and documenting roles, responsibilities, and training requirements for both the current and future iterations of EAMS.	N/A

## Background

### Federal requirements for ST Express Commuter Bus service

In 2018, the FTA published 49 CFR Part 673, that requires bus 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.

### ST Express bus service

Sound Transit, as the owner of the ST Express commuter bus service, provides fiscal, performance, management, and safety oversight. Sound Transit contracts with Community Transit, King County Metro, and Pierce Transit for the management of operations and maintenance, along with safety processes under several intergovernmental agreements (IGAs).

For ST Express, there are four (4) Agency Safety Plans governing bus safety. Each must be reviewed and approved according to local requirements. Sound Transit's ASP must be approved by WSDOT; however, CT's, KCM's, and PT's Agency Safety Plans only need 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 safety and operations staff to verify their understanding of safety 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 and met with staff at partner agency operations and maintenance bus 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, and 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.

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, CT, KCM, and PT during the audit period.

SMS Framework	Number of findings	Number of recommendations
Safety Plan	0	0
Safety Policy	0	3
Safety Risk Management	0	1
Safety Assurance	0	1
Safety Promotion	0	1
<b>Totals</b>	0	6

## 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:

- Expected Outcomes
- Regulatory Updates to the ASP
- Safety Performance Measures and Targets
- Conformance with FTA Guidelines
- Regulatory Oversight and Acknowledgement
- Review & Update of the ASP
- Coordination with Planning Stakeholders

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

- **Staff Interviews:** Met with staff overseeing Agency Safety Plan review, revision, and approval. Additionally, staff responsible for interagency coordination for ST Express and management of safety performance measures and targets.
- **Document Review:** Examined documented evidence of Agency Safety Plans conformance to state federal regulations and guidance for Sound Transit and contracted partners. Additionally, the development and tracking of safety performance measures and targets.

The audit team did not review the September 2025 ASP during this audit cycle. The current revision was signed by the CEO on October 2, 2025 and published after completion of audit fieldwork.

**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 Policy**

Areas subject to review under this section include:

- Safety Management Policy Communication
- Safety Accountabilities and Responsibilities

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

- **Staff Interviews:** Met with staff responsible for safety policy implementation, establishing safety responsibilities, and management of operating contract relationships.
- **Document Review:** Reviewed the SMS Policy statement and policy statement approval and communications; Organizational charts and documented job descriptions; ST oversight program plans and procedures for both operations and maintenance oversight of ST express.
- **Field Observation:** Evaluated operating contract relationships through attendance at Joint Bus Safety Committee and ST Express partner agency coordination meetings; conducted site visits at operations and maintenance facilities for ST Express for Community Transit (Everett), KCM (Bellevue), and Pierce Transit (Lakewood).

**i. Section (b) findings:**

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

**ii. Section (b) recommendations:**

**R.1 – We recommend updating and aligning the job descriptions for the Deputy Director of Bus & Paratransit and the Executive Director of Rolling Stock to reflect current roles within the new organizational structure.**

- Current job descriptions reflect pre-organizational restructure roles and do not align with the agency's updated organizational structure.

- The Executive Operations Director, Rolling Stock position is missing from HR's PayScale system, creating gaps in formal documentation and compensation alignment.
- Updating these descriptions ensures clarity of responsibilities, supports workforce planning, and maintains compliance with HR standards.

**R.2 – We recommend developing and implementing formal minimum staffing level requirements for key ST Express operations and maintenance oversight roles.**

- The agency has not established clearly defined optimal staffing levels for oversight of ST Express operations and maintenance. Adequate staffing is critical to ensuring service quality and reliability.
- With operations in 3 counties with 3 different partner agencies and a large and aging ST express revenue service fleet, staff responsible for oversight are stretched thin, potentially effecting ST Express safety.

**R.3 – We recommend identifying and formalizing alternate on-call duty officer(s) process for ST Express.**

- Currently, only one individual is serving in this role 24/7, with on-call responsibilities in the event of an ST Express incident.
- Staff from other departments are “filling in” to assist in providing 24/7 coverage of this role, but there is no established schedule for on-call coverage.

**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:** Met with staff overseeing ST transit asset management strategy and policy; responsible for determining asset condition and state of good repair; responsible for overseeing maintenance of ST Express assets; and responsible for reporting to the National Transit Database and the WSDOT on the condition of ST Express assets.
- **Document Review:** Reviewed ST Strategic Asset Management Plan, inventory and condition rating worksheets, data on asset age and condition ratings, and correspondence with FTA and WSDOT.
- **Field Observation:** Observed the maintenance of the ST Express vehicle fleet at partner agency bus maintenance facilities; surveyed out of commission vehicles and vehicles out of service due to parts delays.

The audit team verified that WSDOT approved Sound Transit’s submittal of the Sound Transit Strategic Asset Management Plan in place of the TAM plan requirement. A TAM plan is required to be submitted to WSDOT for 2026 that meets state and Part 625 requirements.

**i. Section (c) findings:**

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

**ii. Section (c) recommendations:**

**R.4 – We recommend developing a plan and schedule for procuring replacement vehicles for the aging ST Express fleet and secure appropriate funding sources to ensure timely implementation.**

- Fleet management planning for ST Express transit buses has not been scheduled or budgeted for in capital planning programs.
- The average age for active ST Express fleet vehicles is 11 years, nearing FTA’s useful life benchmark of 14 years for transit buses. By operator, Pierce Transit averages 12 years, King County 11 years, and Community Transit 8 years. As vehicles age, maintenance needs and costs typically increase, which can impact reliability and require additional oversight.
- FTA’s Transit Economic Rating Model (TERM) estimates, at 14 years a transit bus would have a condition rating of 2.5, which is considered in marginal condition with defective or deteriorated components in need of replacement”.
- Deteriorating assets may increase the oversight workload for ST Express teams, which were previously identified as potentially understaffed in an earlier recommendation.

**d. Safety Assurance**

Areas subject to review under this section include:

- Safety Performance Monitoring and Measurement
- Safety Culture Assessment

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

- **Staff Interviews:** Met with personnel responsible for maintaining ST Express vehicles and those responsible for oversight of maintenance programs; with staff responsible maintenance plans and procedures; and with staff responsible for implementing the agency safety culture assessment and reviewing survey datasets.
- **Document Review:** Plans and procedures for ST oversight of ST Express operations and maintenance; Partner agency plans and procedures for maintenance performed on ST equipment; Samples of maintenance data and reporting shared between partner agencies and ST; Safety culture survey, communication, and outreach.

**i. Section (d) findings:**

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

**ii. Section (d) observations:**

**R.5 – We recommend including selected Safety Culture Survey questions as a supplemental component to the required SMS refresher training and/or Employee Engagement Survey.**

- Although past safety culture survey results saw an improvement in participation from previous years, there is still low participation making data less useful for analysis.
- Safety should consider incorporating key safety culture survey questions into annual SMS refresher training or the employee engagement survey, as these channels typically achieve broader participation and receive stronger internal promotion.

**e. Safety Promotion**

Areas subject to review under this section include:

- Competencies and Training

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

- **Staff Interviews:** Met with staff to evaluate training requirements, expectations needs and to determine progress in implementing agency hazard and event communication software (Everbridge).
- **Document Review:** Training plans and matrixes; staff job descriptions.

**i. Section (e) findings:**

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

**ii. Section (d) observations:**

**R.6 – We recommend identifying and documenting roles, responsibilities, and training requirements for both the current and future iterations of enterprise asset management (EAMS) software.**

- Roles and responsibilities for the enterprise asset management system should be identified and documented.
- Interviews and feedback from cross-departmental staff indicate a lack of confidence in interpreting EAMS data due to limited training and technical expertise. Multiple respondents reported that they frequently rely on Facilities staff for assistance with both data entry and interpretation. This dependency suggests a skills gap that may hinder timely and accurate use of EAMS data for decision-making.

- There is currently no formal process to determine which departments use EAMS, assess the extent of their usage, or identify their specific training needs.

## 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-STX-21-01	Open	IGAs should be reviewed and revised to clarify roles and responsibilities.	Reviewed IGA status.	Under Review
O-STX-21-02	Open	ST should conduct or participate in drills/exercises involving bus operations scenarios.	Interviewed ST and partner agency staff.	Under Review
O-STX-21-03	Open	Create SOPs for implementation of ST Operations and Maintenance Oversight program.	Interviewed ST staff, reviewed existing procedures and plans.	Under Review
O-STX-23-01	Closed	Revise ASP to include reference to drug & alcohol program requirements and policy.	Reviewed revised ASP.	Closed
O-STX-23-02	Open	Revise IGAs to reference drug & alcohol program requirements and policy.	Reviewed IGA status.	Under Review
O-STX-23-03	Open	Develop SOPs, job aids, and training documents to prevent programmatic knowledge loss in the event of staff turnover.	Interviewed ST staff, reviewed training and procedures.	Under Review
O-STX-24-01	Closed	Work instructions for partner agency ASP should include revision dates and methods for documenting non-compliance.	Reviewed Work Instructions for ASP review process.	Closed
O-STX-24-02	Closed	It is unclear how discrepancies are communicated from ST Facilities to the JBSC for tracking purposes.	Reviewed JBSC agendas and minutes.	Closed

Issue ID	Status	Description	Actions Taken	Next Steps
O-STX-24-03	Closed	Personnel outside of Facilities are not trained to navigate EAMS for status tracking purposes.	Reviewed JBSC agendas and minutes.	Closed
O-STX-24-04	Closed	The Station Safety & Security Inspections SOP referenced in safety manuals, procedures, and checklists as TSS-SOP-TSS18 is misnumbered as TSS27.	Reviewed current SOPs used for station inspections.	Closed
O-STX-24-05	Closed	There are no written procedures to define the process of the new incident notification software (Everbridge).	Reviewed "WI-003-Sending ST Alerts-SOC Notifications" during the 2025 Emergency Mgt Audit.	Closed

Issue IDs with "F" are findings, Issue IDs with "O" are observations/recommendations that are being monitored and followed up on by Internal Audit staff.

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# Appendices

## Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their safety audit of ST Express Staff will be listed by position titles only:

- Sound Transit
  - Director, Transportation Safety & Security
  - Director, Asset Management Headquarters
  - Deputy Director, Bus & Paratransit
  - Deputy Director, Enterprise Asset Management
  - Deputy Director, Safety Promotion
  - Manager, Bus & Paratransit
  - Manager of Security & Safety Management System
  - Manager, Safety Assurance
  - Manager, Accounting
  - Manager, Safety Analytics
  - Superintendent, Bus & Paratransit Maintenance
  - Program Manager, Safety & Security Data
  - Sr. Compliance Analyst, Accounting
  - Manager, Transportation Safety & Security
  - Senior Transportation Safety & Security Specialist
  - Senior Specialist, Safety Investigations
  - Senior Program Manager-Human Resources
  - Transportation Safety & Security Specialist
- King County Metro
  - Transit Safety Administrator
- Community Transit
  - Program Manager, Contracted Services
  - Assistant Manager of Transportation
  - Safety Manager
  - Manager of Environmental Health and Safety
  - Contracted Maintenance Management
  - Contracted Operations Management
- Pierce Transit
  - Contracted Services Administrator
  - Safety Coordinator
  - Vehicle Maintenance Management
  - Operations Management

## **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
- Employee Safety Committee memorandum approval of ASP, September 2024
- SMS Policy Statement, October 4, 2024
- ST Board Motion No. M2025-41, ASP Approval
- WSDOT Memo: ASP Review and Approval, 2024
- WI-001-ASP Annual Partner Review Process, R1-January 2025
- 2025 ASP Review, tracking spreadsheet
- 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
- Sound Transit Strategic Asset Management Plan, February 2021
- TSS-SOP-TSS18-Station Safety & Security Inspections, 2024
- Transportation Safety and Security Facility Inspection Checklist, November 2024
- Joint Bus Safety Committee Meeting Minutes (September 2024-August 2025)
- JBSC Monthly Event and Hazard Logs (September 2024-August 2025)
- ST Express Partner Agency Daily Logs (September 2024-August 2025)
- ST Express Fleet Inventory and Avg. Fleet Age Calculations, September 2025
- Sample Quarterly ST Maintenance Audit Correspondence-Community Transit
- Annual asset inventory reporting to WSDOT and acceptance, 2024
- TSS-SOP-TSS08-NTD Annual Reporting, September 2025
- ST Express KPI and Safety Performance Tracking, September 2025
- Sound Transit Station Safety Inspection Checklist (online form/SharePoint)
- ST Express Bus Operations Oversight Program (STX-PLN-10001), Rev 1.0, December 2021
- Job Descriptions for ST Express management roles, Pay Source September 2025

- **King County Metro documentation and records**

- Agency Safety Plan, May 2024
- KCM Transit Operations Policies and Procedures Index, January 2024

- **Community Transit documentation and records**

- Agency Safety Plan, January 2025
- FTA Drug & Alcohol Compliance Auditing Program-Final Audit Report (of Community Transit), June 2018
- MP000.001 PM Philosophy and Standards, June 2024
- SOP M005 Return to Service Inspection, August 2024
- SOP MS21 Lock-Out Tag-Out, 2022

- Safety Committee Charter & Mission, 2025
- DAMIS reporting, 2024
- SOP M001 PMI and Servicing Procedures, June 2024
- SOP M008 Torque Wrench and Torque Control Tooling Use, July 2024
- **Pierce Transit documentation and records**
  - Agency Safety Plan, July 2025
  - FTA Acceptance Memo, FTA Drug & Alcohol Compliance Auditing Program, May 2025
  - Sample ST/PT email communications regarding FTA DMAIS submittal, 2025
  - Pierce Transit Preventative Maintenance Program Overview, January 2025
  - FTA Memo, FTA Drug & Alcohol Program Compliance Letter, May 2025
  - Sample Training Curriculum, Materials and Tracking, July 2025

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## 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.

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