<u>SENT VIA EMAIL</u>

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) 2.3.1Organizational 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)
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Mobile: 360-742-8458

cc: Patrick Johnson- Deputy Executive Director, Audit Division

Security and Emergency Management Internal Audit

Report #: 2025-05

Executive Summary

Internal audits of safety and security programs must be performed to ensure that established processes are being implemented as intended and are compliant to applicable federal and state regulations.

Audit Objective

The purpose of this audit is to evaluate Sound Transit's security and emergency management programs by:

- **Identifying applicable federal and state requirements** and assessing the degree to which Sound Transit's plans and policies align with those standards.

- **Reviewing roles and responsibilities** for implementing security and emergency management plans, with a focus on coordination across Sound Transit functional areas, partner agencies, and local jurisdictions.

- **Identifying program gaps** that may impact effectiveness, including areas where enhancements to plans, procedures, or training may be warranted.

Audit criteria included processes and programs captured by the Agency Safety Plan (ASP) and System Safety Program (SSP) based on federal guidance for the Safety Management Systems (SMS) framework under 49 CFR Part 673 and Part 270.

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

Conclusion

From our audit, we identified a total of **four (4) findings** of non-compliance and **eight (8) recommendations as opportunities for improvement.**

For clarity, we've listed the Security & Emergency Management findings separately in a chart below and explained them in more detail starting on page six (pg. 6).

Summary of results:

Security:

Ref #	Issue Title	Risk Rating
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.	Medium-3D
R.1	We recommend establishing a documented framework to support consistent monitoring and evaluation of police service delivery.	N/A
R.2	We recommend formal procedures be established to support consistent tracking, analysis, evaluation, and reporting of crime data.	N/A
R.3	We recommend developing and implementing standardized procedures for alarm response and follow-up.	N/A
R.4	We recommend implementing a formal hazard risk management framework for Security Operations.	N/A
R.5	We recommend establishing and operationalizing a framework to guide the strategic deployment of security personnel.	N/A

Emergency Management:

Ref #	Issue Title	Risk Rating
F.2*	Sound Transit lacks a formal Agency Continuity Plan that outlines the continuation of essential services in the event of a significant operational disruption.	Medium-3D
F.3	Emergency Exercise Program Procedure (EM08) contains incorrect regulatory references and administrative errors.	Medium-5E
F.4	Outdated training requirements remain referenced in the Integrated Preparedness Plan.	Medium-5E
R.6	We recommend Emergency Management update drill and exercise procedures to include a notification process for WSDOT SSO when activities are scheduled or conducted.	N/A
R.7	We recommend Emergency Management personnel should complete formal Homeland Security Exercise and Evaluation Program (HSEEP) training.	N/A
R.8	We recommend establishing standardized procedures for reuniting ADA passengers with mobility devices post-emergency egress.	N/A

Background

Federal requirements for Security and Emergency Management

There are no federal or state requirements for a single agency plan that covers both Security and Emergency Management for all modes and functional areas of a transit agency. Instead, transit agencies develop separate plans to comply with specific requirements from entities such as the Federal Railroad Administration (FRA), Federal Transit Administration (FTA), Transportation Security Administration (TSA), and others. Each is tailored to meet distinct operational and regulatory needs.

In 2018, the FRA published 49 CFR Part 270, requiring rail properties to develop and use transit-specific safety management systems (SMS) framework through a public transportation System Safety Program (SSP) to oversee safety processes. That same year, the FTA issued 49 CFR 673, requiring transit agencies to apply the SMS framework through a Public Transportation Agency Safety Plan (ASP).

Both rules require transit agencies to maintain documentation outlined in their respective safety plans, including documents related to implementing SMS and records created during SMS activities. Federal regulations also stipulate that transit agencies maintain documented plans that address emergency preparedness and response. They also mandate an annual review of the agency's safety plans to ensure timely updates, corrections, and necessary modifications.

Audit topic selection

Sound Transit's Internal Audit Division used a risk-based approach to identify safety management system audit topics. Our assessment included activities and sub-activities specified in Sound Transit's ASP and SSP, 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 (2025 – 2027), covering elements contained in the ASP and SSP as required by FRA 49 CFR 270.303, FTA 49 CFR 673.27 and the WSDOT Rail Safety Oversight Program Standard.

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

- Interviewed staff to verify their understanding of security and safety processes.
- Compared agency safety and security program-related procedures and plans against federal and state requirements.
- Sampled and reviewed records.
- Conducted Link Control Center (LCC) and modal station field visits.

Audit Standards

The Internal Audit Division conducted our internal 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 our findings and conclusions based on the audit objectives.

The Internal Audit Division is also committed to following safety oversight standards set forth by the FRA, FTA, 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. Also, relevant controls to mitigate these risks are also 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 that 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 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 recommendations using SMS principles. This final report reflects the current state of safety practices and processes at Sound Transit during the audit period.

SMS Framework	Number of Findings	Number of Recommendations
Safety Plan		
– Public Safety/Security	1	5
– Emergency Management	3	3
Safety Policy	N/A	N/A
Safety Risk Management	N/A	N/A
Safety Assurance	N/A	N/A
Safety Promotion	N/A	N/A
Totals	4	8

Audit topics reviewed

This section of the report encompasses audit areas we reviewed in this audit cycle.

a. **Public Safety and Security**

Areas subject to review under this section include:

- Security Operations/Roles and Responsibilities
- Contract Oversight
- Crime and Event Response
- Field Activity Specialist Team (FAST)

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

- **Staff Interviews:** Met with staff overseeing Public Safety and Security policies, procedures, and processes to gain insight into how the program is implemented and coordinated.

- **Document Review:** Examined documented evidence of security programs and procedures with a focus on training and contract oversight.

- **Field Visit:** As part of the audit activities, the team performed a site visit at the LCC. The purpose of the visit was to review emergency response procedures and observe operational readiness in real-time environments.

Although the Sound Transit Security Operations Center (SOC) was initially included in the audit scope, our preliminary assessment found that the department is not yet ready for a full assurance audit. The SOC is going through major program changes and rapid staff growth, which are actively reshaping how it operates.

We are deferring the audit of the SOC until its operational framework has stabilized, allowing for a more effective and meaningful evaluation of its program plans and procedures.

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

F-1 – At the time of the audit, Sound Transit did not have a System Security Plan in place outlining a comprehensive approach to managing security risks and vulnerabilities.

Following the publication of the agency's new Emergency Operations Plan (EOP) and the transition of ST Security to the Service Delivery Department, the System Security and Emergency Preparedness Plan (SSEPP) was formally rescinded by ST Safety. While the new EOP functions as an all-hazards response framework it does not fully incorporate key security elements that were previously addressed in the SSEPP.

Specifically, the EOP does not fulfill the agency's requirement for a comprehensive security plan and does not meet the State Safety Oversight (SSO) standards outlined in the WSDOT Rail Program Standard. This creates a compliance gap and leaves key security functions without formal governance.

We recommend that the agency develop and maintain a stand-alone System Security Plan (SSP) that includes:

- An evaluation of our current capabilities to identify and prevent security incidents that may occur on all property.
- Development of a Threat and Vulnerability Assessment Program to identify weaknesses and guide planning activities.
- Improved physical security.
- Review and expansion of training program for security and emergency response.
- Improved coordination with the public safety agencies in the region.

This plan should align with the Washington State Rail Safety Oversight Program Standard requirements and ensure that security functions are clearly defined, documented, and subject to ongoing review and improvement.

ii.   **Section (a) Recommendations:**

R.1 – We recommend establishing a documented framework to support consistent monitoring and evaluation of police service delivery.

Currently there is no documented governance or review process in place for managing police contract performance. Key concerns include:

- Lack of centralized oversight of police contracts and response protocols

- Turnover in the ST Police leadership positions, hindering continuity and coordination.
- Disproportionate contracted police presence in King County compared to Snohomish and Pierce Counties, without documented justification.
- No involvement by ST in verifying police training or deployment strategies.
- Absence of formal after-action processes following major security incidents (e.g., assaults, robberies, homicides).
- No trespass admonishment program currently in use.
- No process to verify police hours worked via Computer Automated Dispatch (CAD) calls for service or patrol GPS data.
- No authority to directly emphasize patrols or determine areas requiring increased police presence.

These gaps pose risks to public safety, accountability, and equitable service delivery across the transit system.

R.2 – We recommend formal procedures be established to support consistent tracking, analysis, evaluation, and reporting of crime data.

There are no formal procedures for crime reporting, incident follow-up, and trend analysis have not been established. This deficiency undermines the agency's ability to monitor, respond to, and strategically address criminal activity across the transit system.

We recommend developing a formal crime data management framework that includes:

- Standardized procedures for reporting, documenting, and categorizing criminal incidents across all jurisdictions and partners.
- A centralized crime data repository or dashboard to support real-time visibility and historical analysis.
- Establish follow-up protocols for incident resolution and coordination with contracted law enforcement agencies.
- Regular trend analysis reporting to identify emerging risks, repeat offenders, and geographic hotspots.
- A structured after-action review process for major incidents to evaluate response effectiveness and inform future strategies.

Without this framework the agency is unable to demonstrate accountability, measure the impact of security interventions, or provide data-driven insights to stakeholders and oversight authorities.

R.3 – We recommend developing and implementing standardized procedures for alarm response and follow-up.

Formal procedures for responding to and following up on alarm activations have not been established or documented. This includes alarms triggered by intrusion detection systems, emergency call boxes, panic buttons, and other security technologies deployed across the transit system.

We recommend the agency develop and implement standardized procedures for alarm response and follow-up, including:

- Clear roles and responsibilities for initial response, escalation, and resolution.
- Establish documentation requirements for each alarm event, including time of occurrence, type of alarm, actions taken, and final resolution.
- Integration with incident reporting systems to ensure alarms are tracked and reviewed alongside other security events.
- Routine analysis of alarm data to identify patterns, false alarm rates, and opportunities for system optimization.
- Formal coordination protocols with contracted security and law enforcement to ensure.

R.4 – We recommend implementing a formal hazard risk management framework for Security Operations.

Security Operations has not adopted a structured approach to managing hazard-related risk management. This absence limits the agency's ability to proactively identify, assess, and mitigate security-related hazards across its transit environment.

- To help the agency better manage security risks, improve cross-department coordination, and strengthen overall resilience, we recommend that Security Operations:
- Develop and adopt a formal Hazard Risk Management process tailored to security-related threats and vulnerabilities.
- Establish a security-specific risk register to document identified hazards, risk ratings, mitigation measures, and responsible personnel.
- Conduct regular risk assessments using a consistent methodology (e.g., qualitative or quantitative scoring) to evaluate and prioritize threats.
- Integrate security hazard data with agency-wide safety, emergency management, and capital planning efforts.
- Implement a review cycle to update risk assessments and mitigation plans based on operational changes, incident trends, and emerging threats.
- Train relevant staff on hazard identification, risk analysis, and mitigation planning to ensure consistency and accountability.

R.5 – We recommend establishing and operationalizing a framework to guide the strategic deployment of security personnel.

A documented risk assessment process to guide the allocation of security resources across service locations has not been established. According to Public Safety, current deployment decisions are primarily based on station design characteristics (e.g., subterranean, elevated, or at-grade), rather than a comprehensive analysis of security risks specific to each location.

We recommend adopting a framework to enhance the agency's ability to allocate resources strategically, improve public safety outcomes, and demonstrate accountability in its security operations. This framework should include:

- Use of CAP Index reports and other crime forecasting tools to assess relative risk levels at each station and service location.
- Integration of historical security incident data, including assaults, thefts, vandalism, and trespassing, to identify hotspots and trends.
- Consideration of station design features, such as visibility, access points, and isolation, as part of a broader risk profile.
- Development of a documented staffing model that aligns security coverage with assessed risk levels and operational needs.
- Routine reassessment and adjustment of deployment strategies based on updated data, seasonal trends, and service changes.
- Cross-functional collaboration between Security Operations, Public Safety, and Data Analytics to ensure decisions are evidence-based and transparent.

Emergency Management

Areas subject to review under this section include:

- Emergency Response, Objectives and Roles and Responsibilities
- Drills and Exercises
- After Action Reports

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

- **Staff Interviews:** Met with staff overseeing Emergency Management policies, procedures, and processes to understand how the program is implemented and coordinated.
- **Document Review:** Examined documented evidence of emergency drills, exercises, and training activities to assess preparedness and compliance with established protocols.

- **Field Observation:** Observed a full-scale exercise conducted on Tacoma Link, involving Sound Transit staff and local fire departments to evaluate interagency coordination and real-time response capabilities.

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

F.2 – Sound Transit lacks a formal Agency Continuity Plan that outlines the continuation of essential services in the event of a significant operational disruption.

The Agency Continuity Plan has not yet been developed at the time of the audit, despite being referenced in multiple sections of the Sound Transit Emergency Operations Plan, Rev 0 (August 2025)—specifically sections 1.1C, 1.3C, 3.5, and 5.8.

This absence of a formal Agency Continuity Plan presents a potential risk to organizational resilience. Continuity planning is critical for sustaining essential operations during and after disruptive events. Without a formalized plan, the agency may face challenges in effectively responding to prolonged service interruptions, infrastructure failures, or other emergencies that require extended recovery efforts.

We recommend Sound Transit prioritize the development and formal adoption of an Agency Continuity Plan to align with its Emergency Operations Plan and strengthen preparedness across all operational areas.

* Upgrade of Recommendation from 2024 Security & Emergency Management Internal Safety Audit.

F.3 – Emergency Exercise Program Procedure (EM08) contains incorrect regulatory references and administrative errors.

The Emergency Exercise Program Procedure (EM08) contains outdated regulatory references and terminology inconsistencies that may impact clarity and compliance:

- Section 6.3.2 - Link Light Rail: The procedure references 49 CFR 659, which was rendered obsolete in 2022. The correct regulatory citation is 49 CFR 674, which governs State Safety Oversight for rail transit systems.
- Section 6.4.1 - Safety and Certification Related Exercises: The procedure uses the term "bi-annual" to describe exercise frequency. This term is ambiguous and may be misinterpreted as either twice per year or once every two years. A review is recommended to confirm the intended frequency and revise the language accordingly (e.g., "semiannual" for twice per year or "biennial" for once every two years).

We recommend Emergency Management review and update all procedures to reflect current federal regulations and clarify terminology to ensure consistency, reduce confusion, and maintain alignment with industry standards and oversight expectations.

F.4 – Outdated training requirements remain referenced in the Integrated Preparedness Plan.

The Integrated Preparedness Plan (IPP) references weekly readiness training under Exercise Requirements (Page 19). These drills, lasting between 30 to 60 minutes, aim to familiarize personnel with emergency response plans, their roles and responsibilities, and standard operating procedures (SOPs). The exercises also cover crisis management concepts, decision-making processes for internal communications, and response to service disruptions.

Weekly readiness training has not been conducted since October 2024 because program leadership determined that the training does not add measurable value to the Emergency Management and Security programs. However, the activity remains referenced in the IPP.

Maintaining outdated or inactive requirements in formal planning documents may lead to confusion, misaligned expectations, or unnecessary resource allocation.

We recommend Emergency Management remove the Weekly Readiness Training reference from the Integrated Preparedness Plan to ensure alignment between documented preparedness activities and current program priorities.

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

R.6 – We recommend Emergency Management update drill and exercise procedures to include a notification process for WSDOT SSO when activities are scheduled or conducted.

WSDOT SSO plays a critical role in overseeing safety compliance for rail transit systems. Their involvement in exercises enhances transparency, regulatory alignment, and interagency coordination. The absence of a formal notification and invitation process may result in missed opportunities for oversight engagement and feedback.

- The Emergency Exercise Program Procedure (EM08) does not include a defined process for notifying the Washington State Department of Transportation (WSDOT) State Safety Oversight (SSO) of drills and exercises conducted for Link Light Rail and Tacoma Link.

- Update EM08 to incorporate a defined procedure for notifying WSDOT SSO of scheduled drills and exercises. When applicable, include provisions for inviting WSDOT SSO representatives to observe or participate in these activities to enhance collaborative safety oversight.

R.7 – We recommend Emergency Management personnel should complete formal Homeland Security Exercise and Evaluation Program (HSEEP) training.

All Emergency Management personnel should complete formal Homeland Security Exercise and Evaluation Program (HSEEP) training to ensure alignment with national standards, enhance exercise planning and evaluation capabilities, and strengthen overall preparedness across the agency.

- Emergency Management procedures state that all Exercises and Drill will be performed in accordance with HSEEP procedures.

- Sound Transit Emergency Management personnel have not completed formal training on HSEEP. HSEEP provides standardized guidance for designing, conducting, and evaluating exercises, and is widely recognized as a best practice framework for emergency preparedness.

R.8 – We recommend establishing standardized procedures for reuniting ADA passengers with mobility devices post-emergency egress.

Sound Transit should collaborate with Service Delivery and contracted operating partners to develop and implement standardized procedures that ensure ADA passengers are safely reunited with their personal mobility devices following emergency evacuations.

While there is currently no requirement for transit agencies to incorporate such procedures, reunification practices are critical to maintaining accessibility, dignity, and safety for passengers with disabilities during and after emergency events. This request has also come before the board during public comment as a request from a member of the Sound Transit Citizens Accessibility Advisory Committee.

Audit topics reviewed

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.3	Closed	Target Date Planning for Agency Continuity Plan (COOP) completion	Reviewed the Emergency Operations Plan	Elevated to a Finding
O.4	Open	ST Public Safety; limited SOPs, job aids, and training documents	Reviewed SOPs, work instructions and training documents	Under Review

Appendices

Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their Security and Emergency Management Internal Audit. Staff will be listed by position titles only:

- Sound Transit
    - Director, Emergency Management
    - Senior Specialist, Emergency Management
    - Superintendent, Light Rail Transportation
    - Manager, Public Safety & Security Field Activity
    - Manager, Security Operations
    - Superintendent, Light Rail Transportation

- King County Metro
    - Rail Operations Communications Superintendent

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Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records during Security and Emergency Management Internal Audit.

Sound Transit documentation and records

- **Emergency Management**

    - Resolution No. R2017-14, Adopting a Security, Law Enforcement, and Emergency Management Policy, version dated April 2017
    - Sound Transit Agency Safety Plan, version dated September 2024
    - Sounder Commuter Rail System Safety Program, Rev 3.0, version dated June 2024
    - Washington State Rail Safety Oversight Program Standard, version dated February 2024, V7.0
    - Emergency Operations Plan, Rev 0, version dated August 2025
    - Emergency Exercise Program Procedure, EM08, Rev 3.0, version dated April 2025
    - Integrated Preparedness Plan, version dated January 2024
    - After Action Reports, PS-SOP-EM04-AAR, version dated May 2024, Rev1.0
    - Passenger Train Emergency Preparedness Plan, Version 1.7, version dated December 2024
    - Email Distribution: Emergency Operations Plan, version dated August 18, 2024
    - Daily Safety Message: Emergency Operations Plan published, version dated August 18, 2025
    - First Responder Agency Training, Rev 0.0, version dated September 2024

- **Public Safety/Security**

    - FAST Work Instructions:
        - Contract Inspections, version dated March 2025, v1.4
        - Critical Incident Response, version dated May 2025, v1.3
        - Field Training Evaluation Program, version dated January 2025, v1.1
        - Roles and Responsibilities, version dated January 2025, v1.2
        - Suspicious and Unattended Items, version dated December 2024, v1.0
    - FAST Training Checklist v1.0
    - FAST Training Records, 100%, 12 of 12 employees
    - FAST Contractor Inspection Tracker/Dashboard, v1.4
    - FAST Incident Reports; sampled 15% (93 of 625), October 2024-July 2025
    - Contract RP 0004-22, Public Safety & Security Services:
        - Sound Transit and Inter-Con Security Systems, Inc

- - - Sound Transit and Universal Protection Service, LP dba Allied Universal Security Services
    - Sound Transit and PalAmerican Security
    - Sound Transit and PPC Solutions, Inc.
  - FTA General Directive 24-1, Agency Response to Required Actions Regarding Assaults on Transit Workers, version dated November 2024
  - Work Instruction, Opiod Overdose and Naloxone Administration, v1.0 January 2025
  - Transit Security SOP, Physical Removals, version dated August 2023
  - Security Contractor Service Failure Dashboard/Tracker, version dated January-August 2025
  - Security Use of Force reports, sampled 15% (20 of 127), January-August 2025
  - Post Orders, sampled 15% (15 of 98), October 2024-August 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**;

- 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:

_____
Deanna Anthony, Senior Compliance Auditor

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Jim Ottman, Compliance Audit Manager (Lead Auditor)

Approved for release by:

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Patrick Johnson, Deputy Executive Director, Audit Division