

# Sounder Accident/Incident Reporting

Report #: 2025-13

## Executive Summary

Internal Safety Audits must be performed annually under federal regulations to ensure Sound Transit and our contracted partners comply with FRA 49 CFR Part 225 standards for reporting accidents and incidents.

### Audit Objective

Our audit focused on reviewing controls, processes, and procedures to ensure accidents and incident reporting is documented according to the 225 rule and any self-imposed requirements.

Audit criteria included reviewing processes and programs captured by Sounder Commuter Rail's Internal Control Plan (ICP), Transportation Safety & Security (TSS) Division SOPs for reporting accidents and incidents, Sounder Commuter Rail SOPs for accident reporting and reports submitted to the FRA.

The audit focused on Sounder accident & incident reports that have been submitted between **January 2024 to March 2025**.

### Conclusion

An internal audit identified **no (0) findings** of non-compliance and **one (1) recommendation**; these are summarized below and discussed in more detail beginning on page 5 of this report. One (1) prior recommendation from past internal audits will be closed.

Summary of results:

Ref #	Issue Title	Risk Rating
R.1	We recommend documented accident reporting procedures be enhanced to include internal reviews of Sounder accidents and incidents.	N/A

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# Background

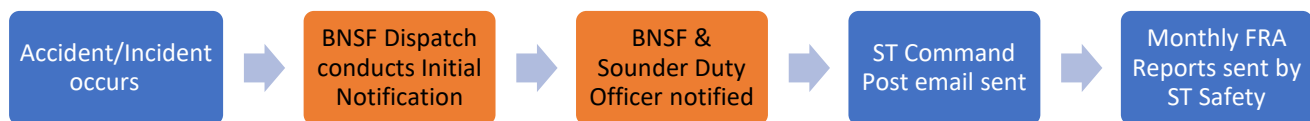
## Federal requirements for Sounder Commuter Rail service

FRA rule 49 CFR 225.33(9) (the “225 rule”), which requires that railroad properties provide a statement in their Internal Control Plan (ICP) to describe its’ audit process and how frequently they are completed (not less than once per calendar year).

This regulation requires Sound Transit, as the railroad owner, to conduct annual internal audits of the Sounder Commuter Rail’s Accident and Incident reporting process.

## Accident / Incident Reporting process

The flow chart below shows the accident and incident reporting process from the moment an event occurs to the submission of monthly reports:



## Methods of evaluation and verification

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

- Interviewed Safety Department and Sounder Operations staff to verify their understanding of accident & incident reporting processes.
- Compared agency safety program-related procedures and plans against federal requirements. Reviewed previous FRA 225 internal audit results.
- Sampled and reviewed accident and incident reports.

## 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 meet 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 our audit objectives.

Also, the Internal Audit Division is committed to following safety oversight standards set forth by the FTA, FRA, and all other relevant auditing requirements or 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 were 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 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, standard, or industry best practices.
- **Recommendations** are issues that may be compliant with requirements; however, 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 Response Form” 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. This final report reflects the current state of practices and processes at Sound Transit during the audit period.

Audit Topic	Number of findings	Number of recommendations
Incident Control Plan	0	1
Accident and Incident Notification	0	0
<b>Totals</b>	0	1

**Audit topics reviewed**

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

**a. Incident Control Plan (ICP):**

The Sounder ICP, Revision 13 effective in February 2025, was found compliant. The Federal Railroad Administration (FRA) requires that Sounder Commuter Rail adopt and comply with a written ICP for reporting incidents and accidents. This document outlines

Sounder Commuter Rail's compliance with requirements and components found in the 225 rules.

What we found:

- Over the past 16 months, the ST Senior Safety Specialist (from Transportation Safety & Security who serves as the FRA Reporting Officer) consistently submitted monthly reports to the FRA. Auditors found reports exceeded the FRA's requirements by categorizing the types of incidents and accidents for the agency, improving data trend analysis by identifying and mitigating risks in the Lakewood Subdivision.
- Despite a clear reporting process between Sound Transit and the FRA, we did observe that processes to review incidents and accident investigations coming from our operating partners is informal.

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

We found no instances of non-compliance with the ICP.

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

**R.1 – We recommend documented accident reporting procedures be enhanced to include internal reviews of Sounder accidents and incidents.**

The Investigations & Assessments team within the Safety Division has developed an accident Standard Operating Procedure (SOP); however, it is limited in scope, addressing only Link and Tacoma Link accidents and incidents excluding Sounder incidents and related investigations.

**b. Accident and Incident Notification Guidelines:**

Notification and reporting requirements for accidents meets the intent of the regulatory requirements set forth by the FRA, the internal regulatory requirements of the Sounder System Safety Plan (SSP), and the Sounder Commuter Rail ICP. We verified the consistency of documented processes along with the timeliness and accuracy of the reports. Safety Division procedures and Sounder Notification Guidelines ensure a consistent process is documented and followed according to the 225 rules.

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

We found no instances of non-compliance with the Accident and Incident Notification Guidelines.

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

We found no opportunities for improvement with the Accident and Incident Notification Guidelines.

## Audit issues reviewed

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

Review of prior open findings and recommendations:

Issue ID	Status	Description	Actions Taken	Next Steps
O-225-24-01	Closed	The Sounder Incident Control Plan (ICP) does not provide guidance on reviewing the report before submission to the FRA.	Reviewed ICP on process review to FRA.	Issue Closure Letter / update audit database

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# Appendices

## Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their Sounder Accident/Incident FRA 225 Reporting audit. Staff will be listed by position titles only:

- Sound Transit
  - Deputy Director, Sounder Commuter Rail
  - Sr. Program Manager, Commuter Rail Transportation
  - Manager, Transportation Safety & Security (TSS)
  - Senior Transportation Safety & Security (TSS) Specialist
- BNSF
  - Superintendent of Suburban Operations
- Amtrak
  - Rolling Stock Technician(s)
- HallCon Corporation
  - Station Agent

## Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records during the Sounder Accident/Incident Reporting audit.

- **Sound Transit documentation and records**
  - Sounder Internal Control Plan (ICP); February 2025, Revision 13
  - Monthly submitted FRA reports between January 2024 - March 2025
  - Multimodal accident/incident notifications between January 2024 – March 2025
  - Sounder incident and accident investigations reports between January 2024-March 2025.
  - TSS SOP-01: Agency Safety Plan review & approval process
  - Sounder Notification Guidelines and Matrix
  - Sounder Safety Incident Notification Procedure (SCR.SOP-10003)
  - TSS-SOP-IA01-INCID-ACCID-INVST-PGM (R1.0 2023)

## 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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