

Sounder Accident/Incident Reporting

Report #: 2026-02

Executive Summary

Internal Safety Audits must be performed annually under Federal Railroad Administration (FRA) regulations to ensure Sound Transit, and our contracted partners comply FRA 49 CFR Part 225 standards for reporting accidents and incidents.

Audit Objective

Our audit focused on evaluating 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) SOPs for reporting accidents and incidents, Sounder Commuter Rail SOPs for accident reporting and reports submitted to the FRA.

The audit period spanned **January 2025 to January 2026**.

Conclusion

From our audit, we identified **no (0) findings** of non-compliance and **one (1) recommendation** as an opportunity for improvement. The results are summarized below and discussed in more detail on page 5 of this report.

Summary of results:

Ref #	Issue Title	Risk Rating
R.1	We recommend establishing a formal, documented training program for new ST FRA Reporting Officers to support accurate, consistent review and submission of all FRA 225 reports.	N/A

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Background

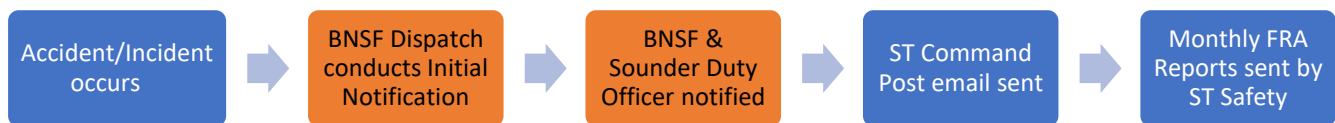
Federal requirements for Sounder Commuter Rail service

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 and procedures, which are governed by our Internal Audit Charter; and meet applicable federal, state, and local auditing standards.

These standards require us to plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions relative to the audit objectives. The evidence obtained provides a reasonable basis for our conclusions based on our audit objectives.

Also, the Internal Audit Division is committed to adhering to safety oversight standards established by the FTA, FRA, and all other relevant auditing requirements and standards.

Audit Phases

Each internal audit 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 engagement-specific conditions and risks, informing and confirming the audits’ objectives and scope. Also, relevant controls to mitigate these risks are also identified and reviewed.

The audit *fieldwork* phase then examines the design of the identified controls to determine if the intent meets applicable regulations, policies, and requirements. 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 risks (control activities). Any area identified where the control environment or activities do not adequately mitigate the identified risk are listed as exceptions.

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 responsible parties to consider appropriate actions in response to the recommendations. Submitting 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
Totals	0	1

Audit topics reviewed

This section of the report encompasses audit areas we reviewed this audit cycle, and are organized by CFR 225:

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 12 months, the ST Senior Safety Specialist (FRA Reporting Officer) consistently submitted monthly reports to the FRA as required by 49 CFR 225. 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 observed that the process to review incidents and accident investigations from our operating partners remains informal.
- A recommendation was issued during the 2025 audit for the ST Safety Investigations & Assessments team to integrate Sounder investigations into their existing investigation procedures for Link and Tacoma Link.

i. Section (a) findings:

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

ii. Section (a) recommendations:

R.1 – We recommend establishing a formal, documented training program for new ST FRA Reporting Officers to support accurate, consistent review and submission of all FRA 225 reports.

- Establishing a documented training program ensures that every Sound Transit FRA Reporting Officer receives standardized, comprehensive instruction that covers each regulatory requirement under CFR 225.
- The FRA currently does not provide training to support accurate reporting. As staff transition into new roles or move between departments, the absence of a formalized training program may lead to knowledge gaps and inconsistent reporting practices.

b. Accident and Incident Notification Guidelines:

FRA reporting requirements for accident and incident notifications are being met in alignment with FRA requirements, as well as the internal requirements outlined in the ICP.

We reviewed the documented processes and verified that the reports are prepared accurately and submitted on time, in accordance with FRA regulations.

ST Safety procedures and Sounder Notification Guidelines provide a consistent, documented framework that ensures compliance with the reporting standards outlined in 49 CFR 225.

i. Section (b) findings:

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

ii. 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 findings reviewed during this audit. There were no (0) open issues requiring follow-up at the time of our review.

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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
 - Transit Operations Department
 - Deputy Director, Sounder Commuter Rail
 - Sr. Program Manager, Commuter Rail Transportation
 - BNSF
 - Superintendent of Suburban Operations
 - Program Management Office (PMO)
 - Safety Division
 - Manager, Transportation Safety & Security (TSS)
 - Sr. Transportation Safety & Security (TSS) Specialist

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Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records during the Sounder Accident/Incident FRA 225 Reporting audit.

- **Sound Transit documentation and records**
 - Sounder Internal Control Plan (ICP); February 2025, Revision 13
 - Submitted monthly FRA Reports between January 2025 - January 2026
 - Sounder incident and accident investigation reports between January 2025 - January 2026
 - TSS-SOP-TSS02: FRA Reporting; August 2025, Revision 2.0
 - Sounder Notification Guidelines and Matrix
 - Sounder Safety Incident Notification Procedure (SCR.SOP-10003); February 2025, Revision 2.0.
 - Sampled multimodal incident/accident notifications between January 2025 - January 2026.
 - FRA Training Module V: Internal Control Plan – Part 225 Training; version dated August 2017

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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.

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