

Sounder Commuter Rail Internal Safety Audit

Report #: 2026-01

Executive Summary

Internal Safety Audits must be performed annually by federal regulations for Sounder Commuter Rail service, and pursuant to FRA 49 CFR 270 program standards. These safety audits review agency safety programs to ensure that processes are being performed as intended and required under the System Safety Program (SSP).

Audit Objective

Our audit focused on reviewing safety controls, processes, and procedures designed to ensure the safe operations, maintenance, and safety oversight of Sounder Commuter Rail service by Sound Transit as a service owner, by AMTRAK as the contracted mechanical maintainer, and by BNSF as the contracted operator.

Audit criteria included processes and programs captured by the System Safety Program (SSP) based on guidance from the Federal Railroad Administration’s (FRA) Safety Management Systems (SMS) framework under 49 CFR Part 270.

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

Conclusion

An internal audit identified **no (0) findings** of non-compliance and **no (0) recommendations**; these are summarized below and discussed in more detail beginning on page 5 of this report.

Summary of results:

Ref #	Issue Title	Risk Rating
N/A	No findings.	N/A
N/A	No recommendations.	N/A

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Background

Federal requirements for Sounder Commuter Rail service

In 2018, the FRA promulgated 49 CFR Part 270 (the “270 rule”), which requires rail properties to develop and use transit-specific safety management systems (SMS) framework through a public transportation SSP to oversee safety processes.

The 270 rule also requires agencies to maintain documentation outlined in their respective system safety program plans, including those related to SMS implementation and documentation resulting from SMS processes and activities. This rule also requires an annual review of the SSP for updates, corrections, and modifications.

For Sounder Commuter Rail, revisions to the SSP must be submitted to the FRA for review and approval.

Sounder Commuter Rail Service

Sound Transit, as the owner of Sounder Commuter Rail Service, provides fiscal, performance, management, and safety oversight and contracts with AMTRAK, BNSF, and Stacy Witbeck for the management of operations and maintenance and safety processes under intergovernmental agreements (IGAs) or contracts.

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 SSP, 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 (2025 – 2027), covering portions of elements contained in the SSP as required by FRA under 49 CFR 270.303.

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

- Interviewed safety, operations and maintenance staff to verify their understanding of safety processes.
- Compared agency safety program-related procedures and plans against federal requirements.
- Sampled and reviewed records.
- Conducted maintenance and operations field visits.

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.

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	0	0
Safety Policy	0	0
Safety Risk Management	0	0
Safety Assurance	0	0
Safety Promotion	0	0
Totals	0	0

Audit topics reviewed

This section of the report encompasses audit areas we reviewed this audit cycle, referenced by System Safety Plan (SSP) sections, and applicable SMS principles:

a. Section 0.0: SSP Introduction

Areas subject to review under this section include:

- Background
- Management and Organizational Structure
- Goals and objectives

This audit was conducted using the June 2024 SSP, which is the most current approved version. The 2025 SSP has been completed and is pending FRA approval.

As required by 49 CFR Part 270.103(e), SSP Section 0.2.1 outlines the essential roles and responsibilities critical to developing, implementing, and updating the safety plan.

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

- **Staff Interviews:** Met with staff to review, update, and approve the SSP per safety procedures. Evaluated Sound Transit’s coordination with Sounder Commuter Rail partners to improve collaboration and manage safety performance against targets.
- **Document Review:** Reviewed evidence to confirm the agency’s SSP complies with state, federal, and local regulations. Evaluated safety performance measures to ensure alignment with partner roles, regulatory requirements, and SSP objectives.

i. Section (a) findings:

There were no areas of non-compliance found within the Introduction section of the SSP.

ii. Section (a) recommendations:

We made no recommendations with the Introduction section of the SSP.

b. Section 1.0: Safety Plan

Areas subject to review under this section include:

- Conformance to FRA Guidelines

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

- **Staff Interviews:** Met with staff to confirm Sound Transit's collaboration with Sounder Commuter Rail partners on the review, update, and approval of the SSP and related procedures. We also evaluated how Sounder Commuter Rail staff support the management of safety performance and progress toward established safety targets.
- **Document Review:** Reviewed evidence to confirm the agency's SSP for Sounder Commuter Rail and its partners complied with state, federal, and local regulations. We also assessed how Sounder staff developed and monitored safety performance measures.
- **Field Observation:** Attended the bi-monthly Joint Rail Safety Committee (JRSC) meeting to assess communication of safety concerns between Sound Transit and Sounder Commuter Rail partners. Reviewed operating contract relationships during a site visit to Amtrak's Holgate Yard.

i. Section (b) findings:

There were no areas of non-compliance found within the Safety Plan section of the SSP.

ii. Section (b) recommendations:

We made no recommendations with the Safety Plan section of the SSP.

c. Section 2.0: Safety Management Policy

Areas subject to review under this section include:

- Policy Statement and Authority
- Safety Management Policy and Communication
- Review and Control of the System Safety Plan
- Access to System Safety Program Documentation and Records

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

- **Staff Interviews:** Met with staff to verify adherence to assigned safety roles, clarify responsibilities, and discuss Sound Transit’s management of operating contracts with its service partners.
- **Document Review:** Reviewed the SSP Safety Management Policy, including its approval and communication processes. Examined organizational charts and job descriptions for accuracy and completeness. Assessed Sound Transit’s oversight plans and procedures for Sounder Commuter Rail operations.

i. Section (c) findings:

There were no areas of non-compliance found within the Safety Management Policy section of the SSP.

ii. Section (c) recommendations:

We made no recommendations with the Safety Management Policy section of the SSP.

d. Section 3.0: Safety Risk Management

Areas subject to review under this section include:

- Technology Analysis and Implementation Plan
 - Identification
 - Analysis

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

- **Staff Interviews:** Met with staff to evaluate safety risk management for Sounder Commuter Rail operations, including those responsible for the Technology Analysis and Implementation Plan and documenting technology improvements in the Sounder Fleet Maintenance Plan.
- **Document Review:** Reviewed evidence to confirm the Sounder Technology Analysis and Improvement Plan includes oversight of safety procedures for Sounder operations. Also reviewed partner agreements and responsibilities outlined in the plan.

ii. Section (d) findings:

There were no areas of non-compliance found within the Safety Risk Management section of the SSP.

iii. Section (d) recommendations:

We made no recommendations with the Safety Risk Management section of the SSP.

e. Section 4.0: Safety Assurance

Areas subject to review under this section include:

- Safety Data Acquisition
- Rules Compliance Procedures Review
- Operational Reviews and Testing
- Verification

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

- **Staff Interviews:** Met with staff to assess the processes used to review, update, and approve safety procedures in alignment with the SSP. Also examined how Sound Transit coordinates with Sounder Commuter Rail partners to strengthen safety-risk management and improve accident and incident reporting.
- **Document Review:** Reviewed evidence to confirm that the SSP and Sounder Commuter Rail partners complied with applicable state, federal, and local regulations. We also assessed how safety data is tracked, analyzed, and applied to hazard mitigation efforts.

i. Section (e) findings:

There were no areas of non-compliance found within the Safety Assurance section of the SSP.

ii. Section (e) recommendations:

We made no recommendations with the Safety Assurance section of the SSP.

f. Section 5.0: Safety Promotion

Areas subject to review under this section include:

- Safety Culture
- Employee and Contractor Training
- Safety Outreach Program

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

- **Staff Interviews:** Met with staff to review Safety Promotion and ensure safety procedures align with the SSP. Evaluated how Sound Transit coordinates with Sounder Commuter Rail partners to improve collaboration and manage safety performance to meet targets.
- **Document Review:** Reviewed evidence to confirm the SSP and Sounder Commuter Rail partners comply with Sound Transit values. We also assessed how Sounder staff promote and monitor training for ST staff and contracted partners.

i. Section (f) findings:

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

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

We made no recommendations with the Safety Promotion section of the SSP.

Audit issues reviewed

This section outlines the open prior audit findings 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
F-SCR-24-01	Open	Process to ensure safety equipment is up-to-date and properly maintained was not followed.	Reviewed Emergency Preparedness Plan. Further inspections and verifications are required. Expected to be completed by June 2026.	In Progress
F-SCR-25-01	Open	Elevation of safety concerns per SSP process.	Reviewed SAIR Log & SHOP Hazard Tracking Log. Further monitoring is required to ensure all safety concerns are elevated per SSP. Expected to be completed by December 2026.	In Progress
F-SCR-25-02	Open	Contractor maintenance activities inconsistent with agency and FRA requirements.	Procedures are under development and expected to be completed by September 2026	In Progress
F-SCR-25-03	Open	Reporting of defective Sounder equipment between BNSF, Amtrak, and ST.	Procedures are under development. Estimated completion: September 2026	In Progress
F-SCR-25-04	Open	Contract oversight for Amtrak maintenance inconsistently followed.	Reviewed current maintenance oversight records/procedures. Further monitoring is required to ensure consistent reviews are performed. Expected to be completed by December 2026.	In Progress
F-SCR-25-05	Open	Staff operating outside SSP roles.	SSP updated with appropriate Roles and Responsibilities. Awaiting FRA final approval. Expected to be completed by December 2026.	In Progress

Appendices

Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their Sounder Commuter Rail Internal Safety Audit. Staff will be listed by position titles only:

- Sound Transit
 - Transit Operations Department
 - Deputy Director, Sounder Commuter Rail Operations
 - Manager, Commuter Rail Mechanical
 - Sr. Program Manager, Commuter Rail Transportation
 - Project Manager, Commuter Rail, Bus & Paratransit
 - Mechanical Specialist, Commuter Rail
 - BNSF
 - Superintendent of Suburban Operations
 - AMTRAK
 - Road Foreman of Engines – Student Coordinator
- Program Management Office (PMO)
 - Safety Division
 - Manager, Transportation Safety & Security (TSS)
 - Sr. Transportation Safety & Security (TSS) Specialist

Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records during the Sounder Commuter Rail Internal Safety Audit.

- **Sound Transit documentation and records**

- Sounder Commuter Rail System Safety Program (SSP), Revision 3.0, version dated June 2024
- Sounder Internal Control Plan (ICP); version 13, February 2025
- Sounder incident and accident investigations, from January 2025 - January 2026
- Sounder Safety Incident Notification Procedure SOP No.10003
- Sounder Technology Analysis & Implementation Plan Draft, December 2025
- Fatigue Risk Management Plan (FRMP) and SSP Consultation Statements, version dated June 2024
- Sounder Maintenance Contract Oversight of Amtrak Deliverables, January 2026
- Sounder Notice to Review Sounder Fleet Preventative Maintenance Forms, version dated May 2025
- Sounder Notice of Live Observation on Sounder Preventative Maintenance, version dated May 2025
- Sounder Fleet Management Plan 2022-2031, version dated April 2023
- Sounder Notice to Conduct Vehicle Surveillance, version dated June 2025
- BNSF System Special Instructions, version dated August 2022
- BNSF PTC Implementation Plan, version dated September 2017
- BNSF PTC 4th Amendment, version dated June 2016
- BNSF Commuter Rail Agreement, version dated September 2016
- BNSF crew training matrix, version dated Oct 2024
- BNSF General Code of Operating Rules (GCOR), Amended, version dated April 2020
- BNSF Seattle Passenger Operations Manual No. 3, version dated March 2022
- BNSF Crew Meeting Minutes (January 2025 - January 2026)
- AMTRAK Coordination Meeting Minutes (2025)
- AMTRAK crew qualification matrix, version dated January 2026
- JRSC Meeting Minutes from May 2025 – January 2026)
- Job Descriptions for SSP identified roles (ST Payfactors.com site; March 2025)
- Sounder Action Item Request (SAIR) tracking logs (January 2025-January 2026)
- Safety Metrics reports from May 2025 through January 2026

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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