

SENT VIA EMAIL

May 14th, 2026

Patrick Johnson
Director – Audit Division
Sound Transit

Re: Approval of the 2026 Tacoma Link Light Rail Internal Safety Audit Final Report.

Mr. Johnson,

WSDOT has accepted the 2026 final audit report for Tacoma Link Light Rail Internal Safety Audit (Report # 2026-03).

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
 - d) 1.4 Regulatory Oversight and Acknowledgement 673.15
 - e) 1.6 Review and update of ASP 673.11(a)(5)
 - f) 1.11 Certificate of Compliance 673.13
 - g) 1.12 Coordination Planning with Interested Parties
- 3) 2.0 Safety Management Policy 673.23(a)(B)
 - a) 2.1 Safety Objectives
 - b) 2.2 Safety Management Policy Communication
 - c) 2.4 Plan Implementation
 - d) 2.4.1 Organizational Roles and Responsibilities
 - e) 2.4.2 Operating Contract Relationships
 - f) 2.5 SMS Documentation and Records 673.31
 - g) 2.5.1 Access to SMS Documentation and Records 673.31
- 4) 3.0 Safety Risk Management 673.25
 - a) 3.1 Hazard Identification 673.25(b)(1)(2)
 - b) 3.1.1 Pre-Revenue Hazard Identification
 - c) 3.1.2 Transition to and Through Revenue Service
 - d) 3.2 Safety Risk Assessment 673.25(c)(1)(2)

- e) 3.3 Risk Mitigation 673.25(d)
- f) Accident Prevention Program
- g) 3.5 Transit Asset Management
- h) Drug and Alcohol Program (49 CFR Part 655)
- i) Hazard Materials / Comm Program
- 5) 4.0 Safety Assurance 673.27(a)
 - a) 4.1 Safety Performance Monitoring and Measurement 673.27(b)
 - b) 4.1.1 Safety Risk Management Database
 - c) 4.1.4 Security Database
 - d) 4.1.5 Transit Safety Inspection and Assessments
 - e) 4.1.6 Transit Safety Accident and Incident Investigation
 - f) 4.1.7 Regulatory Investigations
 - g) 4.1.8 Safety Event Reports and Documentation
 - h) 4.1.9 SSO Annual Reporting
 - i) 4.1.10 External Reporting Notification and Thresholds
 - j) 4.2.2 Safety and Security Management and Certification Process
 - k) 4.3 Procurement
 - l) 4.4 Continuous Improvement 673.27 (d)(1)(2)
 - m) 4.4.1 Internal Audit
 - n) 4.4.2 Management Review of Safety Performance
- 6) 5.0 Safety Promotion
 - a) 5.1.2 Chief Safety Officer Training
 - b) 5.2 Safety Communication
 - c) 5.2.1 CSO Executive Briefings
 - d) 5.2.2 Hazard Information and Event-Based Communication
 - e) 5.2.3 Internal Communication
 - f) Safety Culture Assessment

There were two (2) findings associated to this audit.

There were seven (7) recommendations associated to this audit.

Sound Transit has remained on schedule to audit all Agency Safety plan elements and modal safety programs for Tacoma Link Light Rail within the current three-year audit cycle (2025-2027), as required by the Washington State Rail Safety Oversight Program Standard.



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Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Molly Hughes". The signature is written in a cursive style with a horizontal line underneath it.

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Tacoma Link Light Rail Internal Safety Audit

Report #: 2026-03

Executive Summary

Internal Safety Audits for Tacoma Link light rail are required to be completed on an annual basis in accordance with federal and state regulations, including the WSDOT State Safety Oversight (SSO) program standards. 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 evaluated the safety controls, processes, and procedures used to ensure the safe operation, maintenance, and safety oversight of the Tacoma Link light rail system, for which Sound Transit serves as the service owner, operator, and maintainer.

The audit criteria were based on the Agency Safety Plan (ASP) and aligned with the Federal Transit Administration (FTA)'s Safety Management Systems (SMS) framework, as outlined in 49 CFR §673. This framework emphasizes proactive risk management, continuous improvement, and accountability across all levels of transit operations.

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

Conclusion

From our audit, we **reissued one (1) finding** of non-compliance identified in a previous 2023 audit, **one new (1) finding** of non-compliance and **seven (7) recommendations as opportunities for improvement**; listed below and discussed in more detail beginning on page 4 of this report.

Summary of results:

Ref #	Issue Title	Risk Rating
F.1	Reissued Finding: Sound Transit has not updated its Transit Asset Management (TAM) Plan as previously identified.	4C
F.2	Sound Transit lacks a documented process for updating its TAM Plan every four years, as required by 49 CFR §625.	4C

R.1	Reissued Recommendation: We recommend that Transit Asset Management review the sublevel and component assets in EAMs to ensure property assets and their condition lead to meaningful transit asset financial forecasts.	N/A
R.2	We recommend that the Safety Investigations Team coordinate with Transportation Safety and Security (TSS) to update accident-related hazards and their mitigations in the Hazard Log.	N/A
R.3	We recommend that Safety establish a process to identify hazards in the Hazard Log and document the corresponding hazard IDs in the Corrective Action Plan (CAP) Log.	N/A
R.4	We recommend Sound Transit Safety revise the Corrective Action Plan (CAP) escalation process to ensure effective escalation.	N/A
R.5	We recommend that Employee Health and Safety (EHS) coordinate communication of Job Hazard Assessment (JHA) requirements with agency departments.	N/A
R.6	We recommend that the mandatory Sound Transit Purchase Card training be updated to incorporate Hazard Communication Program requirements for the purchase of approved chemicals.	N/A
R.7	We recommend that Transportation Safety and Security (TSS) coordinate with the Safety Data Analytics Team to develop training and procedures for standardizing safety event data entry.	N/A

Background

Federal requirements for light rail service

In 2018, the FTA published 49 CFR §673, that requires rail 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.

Tacoma Link light rail service

Sound Transit, as the owner, operator, and maintainer of the Tacoma Link light rail service, provides financial, performance, operations management, and safety oversight. The ASP governs light rail safety and must be reviewed and approved according to local requirements. The ASP must also be approved annually by Sound Transit’s Employee Safety Committee, Accountable Executive, the Sound Transit Board of Directors, and WSDOT.

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 third audit from our 3-year audit cycle (2024 – 2026), covering portions of elements contained in the ASP.

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

- Interviewed staff to verify their understanding of safety and operational 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 of Tacoma Link stations and the Tacoma Link operations & maintenance facility.
- Attended Tacoma Link safety meetings and reviewed meeting materials.

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 audit 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 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 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 the FTA's SMS framework. This final report reflects the current state of safety practices and processes with Tacoma Link during the audit period.

SMS Framework	Number of Findings	Number of Recommendations
Safety Plan	0	0
Safety Policy	0	0
Safety Risk Management	2	6
Safety Assurance	0	1
Safety Promotion	0	0
Totals	2	7

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:

- Regulatory Updates to the Agency Safety Plan (ASP)
- Safety Performance Measures and Targets
- Conformance with FTA Guidelines
- Regulatory Oversight and Acknowledgement
- Review & Update of the ASP
- Certification of Compliance
- Coordination with Planning Stakeholders

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

- **Staff Interviews:** Met with staff to review the Agency Safety Plan, ensuring alignment of safety procedures. Assessed how Sound Transit works to update the Agency Safety Plan to meet established targets.
- **Document Review:** Reviewed evidence to verify that the Agency Safety Plan for Sound Transit complies with state, federal, and local regulations. Additionally, evaluated safety performance measures to ensure alignment with the ASP and the Tacoma Link Safety and Security Committee (TLSSC).

Note: The audit was planned and performed based on the September 2024 ASP and the 2025 ASP, signed by the CEO on October 2, 2025. Both ASP versions were reviewed during the audit.

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 recommendations for the Agency Safety Plan.

iii. Section (a) Safety Plan Positive Practices:

During the audit, we observed additional positive practices and continuous improvements including:

- Agency staff assigned to updating the Agency Safety Plan are well versed in the revision process and have a clear understanding of federal requirements.

- Contractor ASP compliance language is built into the contracts that Sound Transit issues ensuring that contractors hold the same safety standards.

b. Safety Management Policy

Areas subject to review under this section include:

- Safety Objectives
- Safety Management Policy Communication
- Plan Implementation
- Organizational Roles and Responsibilities
- Operating Contract Relationships
- SMS Documentation and Records
- Access to SMS Documentation and Records

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

- **Staff Interviews:** Met with Sound Transit staff to clarify safety roles and assigned responsibilities. Reviewed safety policy and procedure updates.
- **Document Review:** Reviewed the SMS Policy Statement to evaluate its approval and communication processes. Examined organizational charts for accuracy and completeness. A review of agency organizational charts found that the February 2026 changes for Transportation Safety and Security (TSS) have yet to be updated on the agency HUB. While not a formal recommendation, Internal Audit will provide People & Culture additional time to complete these updates prior to issuing an audit recommendation.
- **Field Observation:** Participated in the monthly TLSSC meeting to evaluate communication between Sound Transit and Operations and Safety regarding system safety. Additionally, we conducted site visits to the Tacoma Link Operation Maintenance Facilities (OMF) and multiple Tacoma Link stations.

i. Section (b) Findings:

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

ii. Section (b) Recommendations:

There are no recommended revisions for the Safety Management Policy.

iii. Section (b) Safety Management Policy Positive Practices:

During the audit, we observed additional positive practices and continuous improvements including:

- The agency's safety policy is communicated to Tacoma Link employees via multiple safety committees and operational meetings. Tacoma Link management takes an

active role in communicating safety policy and creating psychological safety within the work environment.

c. Safety Risk Management

Areas subject to review under this section include:

- Hazard Identification
- Pre-Revenue Hazard Identification
- Transition to and Through Revenue Service
- Safety Risk Assessment
- Risk Mitigation
- Accident Prevention Program (APP)
- Transit Asset Management (TAM) Plan
- Drug and Alcohol Program
- Hazardous Materials

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

- **Staff Interviews:** We met with staff responsible for Sound Transit's asset management strategy and policy, as well as staff overseeing processes such as the Drug and Alcohol Program, Hazardous Communication (HAZCOM), Accident Prevention Plan (APP), Safety Certification and Hazard Risk Management.
 - Internal Audit also communicated with WSDOT staff regarding oversight of the Agency TAM Plan. Auditors coordinated with WSDOT State Safety Oversight concerning the approval of Sound Transit's submission of the Strategic Asset Management Plan (SAMP) in lieu of a TAM Plan. According to WSDOT, the FTA has direct oversight responsibility for agency TAM Plans, and WSDOT does not review or approve them.
- **Document Review:** Internal Audit reviewed a range of documents related to safety hazard management, including CAP Logs, Hazard Logs, Employee Health and Safety (EHS) Agency plans, inspection reports, job safety training profiles, Employee Safety Reporting Tool (ESRT) reports, drug and alcohol policies and annual reports, the Hazardous Communication program, and the SSCVR.
 - We also reviewed the Sound Transit SAMP, including the inventory and condition rating worksheets, Board Resolution No 205-32 and 33, and Sound Transit training records.
- **Field Observation:** We participated in the monthly TLSSC meeting to evaluate communication between Sound Transit and Operations and Safety regarding system safety. Additionally, we conducted site visits to the Tacoma Link Operation Maintenance Facilities (OMF) and multiple Tacoma Link stations.

I. Section (c) Findings:

F.1 – Reissued Finding: Sound Transit has not updated its Transit Asset Management (TAM) Plan as previously identified. This finding is being reissued from the 2023 Evaluating State of Good Repair Procedures and Assessments for Northgate Link Extension audit (2023-09). The previous finding found that Sound Transit’s Strategic Asset Management Plan (SAMP) did not meet the requirements of a TAM Plan as set forth by CFR §625.25 parts C&D. The prior Management Response Form noted management’s agreement with the audit finding and indicated that Sound Transit would complete a TAM Plan by **Q2 2024**.

- As a direct recipient of federal funds, Sound Transit is required to have an FTA TAM Plan in accordance with 49 CFR §625.25.
- Per FTA requirement, Tier 1 and II agencies must comply with key elements of the TAM Plan to include an inventory of assets, condition assessment of inventoried assets, description of a decision support tool, and a prioritized list of investments.
- It was learned during the audit that Sound Transit has yet to implement a formal TAM Plan, however, the agency has hired a consultant to create one.

At the time of this audit, Sound Transit does not have a completed TAM Plan. As a result of internal interviews and document review, Internal Audit is reissuing the previous 2023 audit finding.

We will close the previous finding and re-issue the finding as part of this audit report.

F.2 – Sound Transit lacks a documented process for updating its TAM Plan every four years, as required by 49 CFR §625.

The FTA required transit agencies to complete an initial compliant TAM Plan by October 2018. Under 49 CFR §625.25, agencies must update their TAM Plans at least once every four years, with the next update due in October 2026.

- Internal Audit found that Sound Transit does not currently maintain a formal TAM Plan. Instead, the agency has relied on the State of Good Repair and Strategic Asset Management Plan (SAMP) in lieu of a TAM Plan. This item was also found in 2023 Evaluating State of Good Repair Procedures and Assessments for Northgate Link Extension audit (2023-09).
- As part of developing the TAM Plan, Sound Transit also must develop a documented process or defined roles and responsibilities for creating, updating, reviewing, and approving a compliant TAM Plan on the federally mandated cycle.
- A formal TAM Plan requires review and approval, including the CEO’s signature as the Accountable Executive.

The absence of a compliant TAM Plan and an associated update process places Sound Transit at risk of:

- Continued noncompliance with 49 CFR §625.25,
- Reduced transparency in asset condition and performance management.
- Inadequate documentation of the Accountable Executive’s review and approval.

- Potential impacts on federal oversight, federal funding, or future grant considerations.

We recommend that Sound Transit develop and implement a formal, documented process for maintaining and updating a compliant TAM Plan every four years. The process should include:

- Clear roles and responsibilities for TAM Plan development and updates.
- Required coordination across responsible departments.
- A documented review and approval process, including Accountable Executive signature.

Establishing this process will help ensure Sound Transit maintains compliance with 49 CFR §625 once a formal TAM Plan has been created.

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

R.1 – Reissued Recommendation: *Previous Audit 2023-09*. EAMS asset hierarchy can be improved to align better with Federal Guidelines and Industry Standards.

We recommend that staff responsible for Asset Management review the sublevel and component assets in EAMs to ensure property assets and their condition lead to meaningful transit asset financial forecasts.

- Internal Audit conducted interviews with agency staff responsible for transit asset management. It was reported that agency assets may not be available in the Sound Transit Enterprise Asset Management System (EAMs).
- An asset hierarchy organizes assets into logical parent-child relationships (e.g., system, subsystem, component) to support structured maintenance, tracking, and reporting within an asset management system.

R.2 – We recommend that the Safety Investigations Team coordinate with Transportation Safety and Security (TSS) to update accident-related hazards and their mitigations in the Hazard Log.

The Safety Investigations Team is responsible for developing corrective action plans (CAPs) resulting from reportable safety events. These CAPs frequently identify hazard mitigations that TSS is responsible for tracking in the Hazard Log.

- Internal Audit's review of Tacoma Link accident reports determined that mitigations documented in CAPs as a result of an accident were not consistently incorporated into the corresponding hazards within the Tacoma Link Hazard Log.
- Roles, responsibilities, and coordination processes for updating the Hazard Log based on completed CAPs have not been clearly defined or consistently applied between the Safety Investigations Team and TSS.
- Failure to update the Hazard Log with implemented CAP mitigations may result in incomplete or outdated hazard information. This increases the risk that hazard tracking does not fully reflect current mitigation strategies, potentially limiting the effectiveness of risk monitoring and safety oversight.

We recommend that the Safety Investigations Team coordinate with Transportation Safety and Security (TSS) to ensure that accident-related hazards and corresponding mitigations are identified through collaborative root cause analyses and corrective action plans (CAPs), and that resulting hazard mitigations are accurately documented in the Hazard Log.

R.3 – We recommend that Safety establish a process to identify hazards in the Hazard Log and document the corresponding hazard IDs in the Corrective Action Plan (CAP) Log.

Sound Transit is required to conduct Safety Risk Assessments in accordance with 49 CFR §673.25, which requires transit agencies to establish and implement methods or processes to assess safety risks. This includes evaluating the likelihood and severity of potential consequences associated with identified hazards, considering existing safety risk mitigations, determining whether additional mitigations are necessary, and prioritizing safety risk mitigation activities to reduce risk to the lowest practicable level.

- The Safety Department maintains a Hazard Log that documents known hazards and their corresponding mitigations. The log includes both a preliminary risk assessment and a residual risk assessment after mitigations are implemented. The Hazard Log is intended to track the lifecycle of a hazard, from identification through mitigation and ultimate risk reduction.
- The Safety Department also maintains a Corrective Action Plan (CAP) Log, which is used to track corrective actions arising from a variety of sources, including safety event investigations, identification of unsafe or unacceptable conditions, hazards that remain open for more than six months without significant risk reduction, audit findings, emergency response drills or exercises, after-action reviews, and other events at the discretion of Transit Safety and Security (TSS) Management.
- During the Tacoma Link audit, Internal Audit observed that both the Hazard Log and CAP Log are used to track known hazards and mitigation activities. However, hazard mitigations documented in the CAP Log are not consistently linked back to their corresponding hazard entries in the Hazard Log. As a result, planned or ongoing mitigations captured in CAPs are not always reflected in hazard risk assessments or used to update residual risk ratings in the Hazard Log.

The lack of consistent linkage between the Hazard Log and the CAP Log reduces traceability and may limit management's ability to effectively assess whether identified hazards are being mitigated in a timely manner and to the lowest practicable level, as required by federal regulations.

We recommend Safety establish and apply a consistent methodology to systematically identify hazards documented in the hazard log and to reference the associated hazard identification (ID) numbers within the CAP Log. This practice will improve traceability, support risk management oversight, and ensure alignment between identified hazards and corresponding corrective actions.

R.4 – We recommend Sound Transit Safety revise the Corrective Action Plan (CAP) escalation process to ensure effective escalation.

In May of 2025, the Safety Director’s Office issued a new safety procedure, SDO-SOP-SFT02 Safety Risk Escalation Process outlining the process for escalation of CAPs. Criteria for escalation includes:

Must meet one of the following:

1. CAP, SAIR or BAIR is **open more than nine months**
2. CAP has **more than one requested extension on file**
3. CAP, SAIR or BAIR is **open more than three months with minimal updates**, with no prior arrangements
4. CAP was not submitted to SSO for approval by estimated completion date and is considered late
5. Item is related to a high visibility event or has impact to the reputation of the agency, as determined by safety leadership
6. Item had an initial risk rating of unacceptable (red) and was immediately mitigated
7. SAIR or BAIR was unable to meet consensus on risk (yellow) acceptance

SDO-SOP-SFT02 states that “escalation reporting will occur during the first week of each month. Monthly reports will be stored on SharePoint in the Corrective Action Plan Library Safety Risk Leadership Folder.”

Internal Audit reviewed the Safety Risk Leadership Folder and identified only one (1) escalation report, dated June 2025. No escalation reports were submitted beyond the single report noted. As of April 2026, four Tacoma Link CAPs (CAPs 47, 48, 49, and 50) have been open for more than nine months, meeting the escalation threshold defined in SDO-SOP-SFT02. One CAP (CAP 47) received three approved extensions, also meeting the SOP escalation criteria.

- Without consistent escalation reporting, Safety leadership may not receive timely visibility into overdue or high-risk CAPs. This limits management’s ability to intervene, allocate resources, or take corrective action, increasing the risk that safety issues remain unresolved and weakening governance over the CAP process.

In April of 2026, prior to the close of the audit, Internal Audit became aware that SOP SDO-SOP-SFT02 was revised by Safety Leadership on March 26, 2026. The revisions changed the monthly escalation report to an escalation notification via email. Notification is now required only when CAPs meet the escalation threshold.

“Upon identification that the applicable triggering criteria have been met, the SOP-SFT02- CAP, SAIR, BAIR Escalation Process responsible Administrator shall provide notification to the respective Director and DED as early as possible, and no later than five (5) business days following the triggering event.”

We recommend that Safety revise the procedure, reporting methods to implement internal controls and governance for consistent and timely escalation reporting of CAPs. Changing a monthly report to an email notification increases the risk of notifications being overlooked. Email

does not provide reliable tracking, accountability or escalation and may be stored inconsistently or outside approved systems.

R.5 – We recommend that Employee Health and Safety (EHS) coordinate communication of Job Hazard Assessment (JHA) requirements with agency departments based on identified safety hazards.

Section 4.5 of the Accident Prevention Program (APP) describes the purpose of a JHA and describes it as a “process to identify hazards before they occur. A task-specific JHA focuses on the relationship between a worker, the task, the tools, and the work environment to identify potential hazards, and to implement steps to eliminate or reduce them to an acceptable risk level before work begins.”

Section 4.5 B and C state that EHS developed a Task-Specific JHA form noting that “Divisions and Departments must conduct their own individual task-specific job hazard analysis and document on the JHA form. EHS is available to assist in conducting a JHA and documenting on the JHA form or reviewing a completed JHA form and making recommendations.”

- Internal Audit reviewed the Job Hazard Assessment process within Tacoma Link Operations and did not find documented evidence demonstrating that task-specific JHAs were conducted or documented in accordance with APP Section 4.5.
- Without clearly documented and consistently applied JHAs, job-specific hazards may not be systematically identified or mitigated prior to work activities.

We recommend that Employee Health and Safety coordinate with agency department leadership to clarify roles, responsibilities, and expectations for conducting and documenting task-specific JHAs. Ensure agency departments complete and maintain JHAs using the approved JHA form in accordance with the APP and establish a review or oversight mechanism to confirm JHAs are current, documented, and consistently applied.

R.6 – We recommend that the mandatory Sound Transit purchasing card (P-Card) training be updated to incorporate Hazard Communication Program requirements for the purchase of approved chemicals.

Section 2.2 of Sound Transit’s Chemical Hazardous Communication Plan (HAZCOM) states that employees will “Check chemical inventory prior to requesting approval for a new chemical and submit the Safety Data Sheet (SDS) for all new chemical products in the SDS management system for approval by EHS and Environmental Compliance before purchasing chemical products.”

SDS documentation and approval is required for all chemicals.

These requirements are intended to ensure that hazardous chemicals are reviewed, approved, and properly managed before introduction into the workplace.

Internal Audit reviewed the chemical approval and purchasing process with Employee Health and Safety (EHS) and identified the following:

- Employees holding Sound Transit P-Cards can purchase chemical products without completing the SDS submission and approval process required by the HAZCOM program.
- Purchase card holders are not required to complete Sound Transit Hazard Communication (HAZCOM) training as part of mandatory purchase card user training.
- The Sound Transit Purchase Card Program Manager acknowledged this control gap and recommended incorporating hazardous chemical and SDS approval requirements into mandatory purchase card training.

We recommend Sound Transit update the mandatory purchase card user training to include Hazard Communication Program requirements, including SDS submission and approval expectations for chemical purchases and implement preventive controls or guidance to reduce the likelihood of chemical purchases occurring outside the approved SDS review process.

Note: During the audit, EHS coordinated with the Sound Transit purchase card program manager to update mandatory purchase card training to include agency HAZCOM requirements for chemical purchases. As of April 1, 2026, this recommendation has been fully implemented.

iii. Section (c) Safety Risk Management Positive Practices

During the audit, we observed additional positive practices and continuous improvements including:

- The contractor utilized for Tacoma Link collection of drug and alcohol specimens responds 24/7 to Sound Transit property ensuring that testing can be conducted at any time of day in accordance with state and federal regulations.

d. Safety Assurance

Areas subject to review under this section include:

- Safety Performance Monitoring and Measurement
- Safety Risk Management Databases
- Security Databases (not applicable for this audit)
- Transit Safety Inspections and Assessments
- Transit Safety Accident and Incident Investigation
- Regulatory Investigations
- Safety Event Reports and Documentation
- SSO Annual Reporting
- External Reporting Notification and Thresholds
- Safety and Security Management and Certification Process
- Procurement
- Management Review of Safety Performance

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

- **Staff Interviews:** Met with personnel responsible for maintaining Tacoma Link light rail safety data and overseeing related regulatory reporting. Additional discussions involved staff responsible for safety accident investigations and management review of safety performance.
- **Document Review:** Internal Audit assessed Tacoma Link accident investigation and reporting documentation, and safety data management.

i. Section (d) Findings:

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

ii. Section (d) Recommendations:

R.7 – We recommend that Transportation Safety and Security (TSS) coordinate with the Safety Data Analytics Team to develop training and procedures for standardizing safety event data entry.

Transportation Safety and Security collects safety event data from multiple sources, which is entered and maintained in QuickBase, the agency’s safety database. Multiple users are responsible for data entry; however, standardized data entry guidance and training have not been formally established. As a result, safety events have been recorded inconsistently, leading to data quality concerns. Internal Audit reviewed email communication and interviewed staff regarding this issue.

- This issue was identified by WSDOT in January of 2026 and dated back to July 2025. Several months of safety data entry for Tacoma Link were entered inconsistently leading to discrepancies between QuickBase data and Key Performance Indicators (KPI) data. Safety data has since been corrected by a TSS Senior Specialist familiar with data entry quality control.
- Standardized data entry protocols, decision trees, and formal training have not been developed or consistently implemented for users entering safety event data into QuickBase. Current data entry practices rely primarily on institutional knowledge rather than documented procedures. If key staff leave the agency, their knowledge of safety data quality control will be lost.
- Inconsistent data entry increases the risk that safety event data is unreliable, incomplete, or skewed. This limits TSS’s ability to perform accurate trend analysis, assess safety risks, and make data-driven decisions.

We recommend TSS collaborate with the Safety Data Analytics Team to:

- Define standardized safety event categories and clear criteria for their use.
- Develop documented procedures and reference guidance for data entry.
- Provide training to staff responsible for entering safety event data.

Formalizing data entry standards would improve data consistency, reliability, and the overall effectiveness of safety reporting and analysis, leading to better data driven decision making in safety.

iii. Section (d) Safety Assurance Positive Practices:

During the audit, we observed additional positive practices and continuous improvements including:

- The Chief Safety Officer (CSO) is engaged in safety risks and communicates them to the CEO during monthly meetings.
- Transit safety accident and incident notification and investigations are completed in accordance with the WSDOT Rail Program Standard.

e. Safety Promotion

Areas subject to review under this section include:

- Chief Safety Officer (CSO) Training
- Safety Communication
- CSO Executive Briefings
- Hazard Information and Event-Based Communication
- Internal Communication
- Safety Culture Assessment

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

- **Staff Interviews:** Met with staff responsible for the safety culture assessment as well as safety staff who report directly to the CEO.
- **Documents Reviewed:** Internal Audit reviewed training records for staff as well as meeting agendas and communication between the CSO and CEO regarding safety hazards. We also reviewed the safety culture assessment process with staff via email communications.

i. Section (e) Findings:

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

ii. Section (e) Recommendations:

There are no recommendations for safety promotion.

iii. Section (e) Safety Promotion Positive Practices:

During the audit, we observed additional positive practices and continuous improvements including:

- Tacoma Link Operations has demonstrated commitment to safety culture where employees feel supported in communicating safety concerns to management.

- The Safety Assurance Team distributes safety messages every workday. Safety messages are relevant and applicable to working conditions throughout the year. They also provide additional communication to the agency regarding safety policy changes and updates.

Status of Prior Audit Results

There are no open findings from previous audits for Tacoma Link.

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Appendices

Appendix A: List of interviewed staff

The audit team interviewed and coordinated with the following individuals during their safety audit of Tacoma Link light rail. Staff will be listed by position titles only:

- Sound Transit
 - Chief Safety Officer
 - Executive Operations Director, Tacoma Light Rail
 - Executive Director, Finance
 - Director, Asset Management Headquarters
 - Deputy Director, Tacoma Light Rail
 - Deputy Director, Transit Assets
 - Deputy Director, Safety Promotion
 - Deputy Director, Enterprise Asset Management
 - Deputy Executive Director, Board Administration
 - Manager, Tacoma Link Transportation
 - Manager, Light Rail Systems Maintenance
 - Manager, Health and Safety
 - Manager, Transportation Safety and Security
 - Manager, Security & Safety Management System
 - Manager, Program Manager, Safety Assurance
 - Manager, Environmental Safety
 - Manager, Safety Analytics
 - Program Manager, Safety & Security Data
 - Senior Technical Training, Tacoma Link
 - Senior Transportation Safety & Security Specialist
 - Senior Program Manager, Purchase Card, FBA Materials
 - Senior Program Manager, Substance Abuse Prevention
 - Senior Specialist, Safety Investigations
 - Learning Business Partner, Learning and Development

Appendix B: List of key 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
- Agency Safety Plan (ASP), August 2025
- Memo: Employee Safety Committee Approval of 2025 ASP, June 2025
- Board Approval of ASP, Board Presentation, September 2025
- WSDOT PTASP Concurrence Letter, December 2025
- Washington State Rail Safety Oversight Program Standard, July 2025
- Previous Internal Audits
 - AUD_CA_2025-01_AuditReport_TacomaLink
 - AUD_PA_2023-09_Evaluating State of Good Repair Procedures: Northgate
- Agency Safety and Security Certification Plan, August 2025
- Agency Safety and Security Management Plan, June 2025
- Agency SSMP Hazard Matrix, February 2017
- CSO-CEO Meeting Agenda, January 2026
- CSO-CEO 2025 NTD Reporting Certification Notes
- Sound Transit Chief Safety Officer job posting
- Email communication with ST Training Staff regarding training records
- Resolution-R2023023, Tacoma Link Substance Abuse Policy
- Tacoma Link Light Rail Manual, September 2023
- Sound Transit FTA Annual Drug and Alcohol Testing MIS Data (2023-2025)
- Tacoma Link Personnel Drug and Alcohol Training records, March 2026
- Accident Prevention Plan, February 2026
- Accident Prevention Plan, February 2025
- Chemical Hazard Communication Program (HazCom), July 2024
- Pre-Task Playbook (JHA) User Guide and Worksheet
- Tacoma Link OMF Employee Health and Safety Inspection, November 2025
- Employee Health and Safety: Chemical Hazard Communication Online Training, June 2025
- Respirable Crystalline Silica Program, January 2025
- Fall Protection Program, March 2025
- Bloodborne Pathogens Exposure Control Plan, September 2025
- Confined Space Entry Program, March 2025
- Energy Control Program (LOTO), February 2025
- Ladder Safety Program, September 2025
- WSDOT Transit Roadway Worker Protection Program Review Acceptance Letter, December 2025
- FTA Rail Transit Roadway Worker Protection Program Checklist, May 2025
- Tacoma Link Incident/Accident Investigation SOP, March 2023
- Transit Safety Data Handling Manual, July 2020

- Tacoma Link Accident Reports and Notifications, August 2025-December 2025
- Safety Investigations Team Training records, March 2026
- Tacoma Link Safety and Security Committee Meeting Minutes and Agendas, February 2025 and March 2025
- Transit Asset Management email communication, March 2026
- 2025 Annual Asset Inventory Forms
- 2025 Annual Asset Report
- 2026 Proposed Budget Financial Plan
- Agency Policy 610-Asset Management, March 2022
- Sound Transit Strategic Asset Management Plan, February 2021
- Draft TAM Plan, June 2024
- Asset Critical Impact Rating Standard, March 2024
- Board Resolution R20150-32: Establishing an Asset Management Policy, December 2015
- State of Good Repair Forecast Review, June 2023
- FTA TAM Facility Performance Measure Reporting Guidebook: Condition Assessment Calculation, March 2018
- WSDOT communication regarding Sound Transit TAM Plan, March 2026
- Safety Training Program SOP, January 2025
- Safety Risk Escalation Process SOP, May 2025
- TSS Corrective Action Plan Process SOP, May 2025
- WSDOT SSOA Report for Announced Inspection of T Line Event Log Document Review, February 2026
- 2025 Tacoma Link Annual WSDOT Report
- WSDOT HTLE SSCVR Closeout Concurrence Letter, February 2026
- Tacoma Link Hazard Log, January 2026
- Tacoma Link CAP Log, January 2026
- Tacoma Link KPIs, January 2026
- Safety and Security Verification Report SOP, November 2025
- Hazard Management Manual, March 2025
- Transportation Safety and Security Facility Inspection Checklist, November 2024
- TSS Facilities Inspections Tracker, October 2025
- Safety and Security Facility Inspection SOP, December 2024

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 Digitally signed by Deanna Anthony
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Deanna Anthony, Sr. Compliance Auditor (Lead Auditor)

Reviewed (QA/QC) by:

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Jim Ottman, Compliance Audit Manager, Internal Audit Division

Approved for release by:

Patrick Johnson Digitally signed by Patrick Johnson
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Patrick Johnson, Deputy Executive Director, Internal Audit Division