

Sounder Commuter Rail Internal Safety Audit

Report #: 2025-03

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 Plan (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 **October 2024 to April 2025**.

Conclusion

An internal audit identified **five (5) findings** of non-compliance and **six (6) recommendations**; these are summarized below and discussed in more detail beginning on page 5 of this report. Two (2) prior recommendations from past internal audits will be closed and reopened as findings.

Summary of results:

Ref #	Issue Title	Risk Rating
F.1	Elevation of safety concerns is not consistently applied in accordance with the process described in the SSP. <i>*Upgrade of 2024 observation.</i>	Serious - 2C
F.2	There is inadequate process to assess or document whether contractor maintenance activities consistently meet agency and FRA requirements.	Serious - 2C
F.3	There is insufficient process to ensure consistent and reliable reporting of defective Sounder equipment from BNSF to AMTRAK to Sound Transit.	Serious - 3C

F.4	Contract oversight procedures for maintenance are inconsistently followed by AMTRAK. <i>*Upgrade of 2024 observation.</i>	Medium - 4C
F.5	Some staff's day-to-day duties are different than their prescribed roles and responsibilities defined in the Sounder SSP.	Medium - 4C
R.1	We recommend that the Joint Rail Safety Committee (JRSC) Chair ensure compliance with the SSP by convening meetings or implementing alternative mechanisms to monitor Safety Goals and action items monthly.	n/a
R.2	We recommend that the agency promptly follow up with the FRA to obtain a formal written approval letter for the revised Sounder SSP.	n/a
R.3	We recommend that the agency develop and implement formal minimum staffing level requirements for key Sounder operations and safety oversight roles.	n/a
R.4	We recommend that the agency develop a long-term technology analysis and implementation plan for researching and adopting technologies that mitigate or eliminate hazards and safety risks for the passenger rail operation.	n/a
R.5	We recommend that the agency further document the process for AMTRAK employees to report safety concerns on the Sounder fleet directly to agency management.	n/a
R.6	There are opportunities to strengthen the AMTRAK Maintenance and Repair for Commuter Rail Rolling Stock to better ensure AMTRAK is meeting critical operational and safety expectations. Additionally, there is no consistent process for reviewing and updating the agreement.	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 system (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 first audit from our 3-year audit cycle (2025 – 2027), covering portions of elements contained in the System Safety Plan as required by FRA under 49 CFR 270.303.

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

- Interviewed operations and maintenance staff to verify their understanding of applicable 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 audit's 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	1	2
Safety Policy	0	2
Safety Risk Management	2	1
Safety Assurance	2	1
Safety Promotion	0	0
Totals	5	6

Audit topics reviewed

This section of the report encompasses audit areas we reviewed this audit cycle, referenced by 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

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.

i. Section (a) findings:

F.5 – Some staff’s day-to-day duties are different than their prescribed roles and responsibilities defined in the Sounder System Safety Plan (SSP).

This audit found that some staff are performing duties that do not match their SSP-assigned roles and responsibilities. Additionally, certain responsibilities do not align with job descriptions, and some required SSP roles are missing from SSP Section 0.2.1.

This audit found that this mismatch between daily duties and written responsibilities creates confusion in task assignments and therefore could potentially lead to safety issues, especially in maintenance and contract oversight. The SSP’s established framework is designed to ensure clear accountability and effective safety management. If not adjusted, this mismatch could weaken operational integrity and increase safety risks.

Specific examples include:

- Oversight of contractor agreements is assigned to the Executive Operations Director-Bus, Paratransit, and Commuter Rail. Interviews revealed that this responsibility is handled exclusively by the Deputy Director of Commuter Rail Operations, a role not identified in the SSP as the primary oversight manager. Since operations and maintenance of Sounder are contracted out, it is critical to identify the lead and support roles within contractor oversight.
- Contracts between Sound Transit and AMTRAK outline that AMTRAK is responsible for the safety-critical functions of vehicle maintenance. Implementing and revising these contractual agreements is essential to ensuring safety; but ST Agreements staff are not listed in the SSP under the roles and responsibilities section (0.2.1).
- The ST Mechanical Specialist is currently handling duties assigned to the vacant Commuter Rail Mechanical Manager position. The Commuter Rail Mechanical Manager position, which requires an extensive background in railroad operations and maintenance, has been vacant for 10 months. This may be a temporary arrangement until the position vacancy is filled.
- The SSP assigns the Director of Asset Management to support modal managers in developing asset management plans. The audit team found no evidence that coordination was occurring or that these plans or asset management principles had been implemented.
- While the SSP assigns People & Culture (HR) the limited role of updating organizational charts, the day-to-day responsibilities of HR go beyond this. According to the job descriptions for the HR Business Partner and Senior HR Business Partner, HR is also expected to work closely with department leaders to identify, develop, and manage workforce plans. Additionally, HR is tasked with proactively anticipating business needs and providing strategic HR solutions.

F.1 – Elevation of safety concerns is not consistently applied in accordance with the process described in the Sounder System Safety Plan (SSP). *Upgrade of Observation from 2024 Sounder SSP Internal Safety Audit.*

Federal requirements 270.103(e) and 270.103(p)(k) outline the Sound Transit Safety Committee structure and Line of Authority (SSP Section 0.2.4) and define the Hazard Resolution Process (SSP Section 3.2.4).

According to the SSP, hazards are first raised at the Sounder Joint Rail Safety Committee (JRSC) and recorded in the Sounder Action Item Registry (SAIR). If a hazard is rated as undesirable or if no agreement can be reached on how to address it, the issue is

escalated to the Safety & Security Hazards Oversight Panel (SHOP) for a decision on risk acceptance or mitigation.

Hazards rated as undesirable may require a pause in service or equipment use, while those rated unacceptable must result in a pause until the risk is reduced. In such cases, the CEO must be notified.

We found evidence that this process is not consistently followed and that there is no documented process for determining how long undesirable/unacceptable hazards can have pending mitigations before requiring review by the SHOP or CEO.

Specific examples include:

- The audit found two (2) examples noting hazards such as trespassers. In a specific example of trespassers at B Street Gully, this audit did not find evidence of risk acceptance, though this hazard was listed in the SAIR log (SAIR #J027) in March 2024 as “unacceptable” and escalated to the executive level due to its rating. A follow-up notification was sent to executives in November 2024 with no evidence of any further actions taken.
- This audit found that this remains open on the SAIR log as an unacceptable risk with no mitigation or formal risk acceptance. No actions are recorded that lower the risk from its unacceptable status.
- A ROW (Right-of-Way) trespasser risk notice for areas along the Lakewood Subdivision was added to the SAIR log (#J026) in March 2024. Since then, the audit found no documented risk reduction, escalation, or formal risk acceptance.
- Eleven (11) items on the SAIR Log are rated “Undesirable” or “Unacceptable,” but this audit did not find evidence that SHOP or executive levels committees had formally accepted these risks.

ii. Section (a) recommendations:

R.1– We recommend that the Joint Rail Safety Committee (JRSC) Chair ensure compliance with the SSP by convening meetings or implementing alternative mechanisms to monitor Safety Goals and action items monthly.

49 CFR 270.103(c) establishes the internal process for developing, updating, and monitoring goals and objectives in SSP section 0.3.

- Meetings every two months could potentially delay decision making needed to act upon presented safety data, events, and hazards. Provision should be made for ad-hoc meetings.

b. Section 1.0: Safety Plan

Areas subject to review under this section include:

- Conformance to FRA Guidelines

i. Section (b) findings:

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

ii. Section (b) recommendations:

R.2 – We recommend that the agency promptly follow up with the FRA to obtain a formal written approval letter for the revised Sounder SSP.

49 CFR Part 270.103a describes measures to ensure conformance to FRA guidelines in SSP Section 1.1.

- The current System Safety Program (Revision 3) was signed by the acting Chief Safety Officer (CSO) on June 14, 2024. While the FRA gave verbal approval for this revision, Sound Transit has yet to receive a formal approval letter. As of this audit, the formal letter from the FRA has not been received.

c. Section 2.0: Safety Management Policy

Areas subject to review under this section include:

- Policy Statement and Authority
- Plan Implementation

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:

R.3 – We recommend that the agency develop and implement formal minimum staffing level requirements for key Sounder operations and safety oversight roles.

49 CFR Part 270.103(f), SSP Section 2.2.2 defines the roles and responsibilities for implementation of the System Safety Program. Sound Transit has not set minimum staffing levels for critical Sounder operations and safety oversight functions, nor is there a clear definition of the minimum staffing levels needed.

There is an opportunity for Sound Transit to identify the essential positions for daily tasks and the required full-time equivalent (FTEs) to fulfill those responsibilities.

Specific examples include:

- Auditors did not find a documented process for HR to determine minimum staffing needs for critical operations and safety functions or to prioritize staffing based on an established criteria to prevent understaffing, even when department leads have not explicitly requested additional staff.
- The agency's critical roles list (from July 2024) includes one safety position (industrial hygienist), while the Chief Safety Officer is required per FTA regulations. Although the FRA has less stringent requirements for safety-critical roles, essential Sounder positions are not classified as critical.

R.4 – We recommend that the agency develop a long-term technology analysis and implementation plan for researching and adopting technologies that mitigate or eliminate hazards and safety risks for the passenger rail operation.

As required in 49 CFR Part 270.103(r)(4) and SSP Section 2.3.3, Sound Transit must develop a long-term technology analysis and implementation plan.

Specific example:

- While some specific projects have implementation schedules, a comprehensive technology analysis and implementation plan would better prioritize and schedule all planned Sounder technology projects.

d. Section 3.0: Safety Risk Management

Areas subject to review under this section include:

- Risk Based Hazard Management
- Risk Based Hazard Analysis
- Fatigue Management

ii. Section (d) findings:

F.3 – There is insufficient process to ensure consistent and reliable reporting of defective Sounder equipment from BNSF to AMTRAK to Sound Transit.

49 CFR Part 270.103(p)(k) and SSP 3.1.1 require implementation of a comprehensive risk-based hazard management program.

Specific examples include:

- BNSF crews do not have a clear and documented process to report Sounder passenger car defects to ST. Specific forms, such as the Maintenance Analysis Program (MAP) 21A & 100 forms must be used to document defects found in daily safety inspection of equipment, and to ensure repairs are work ordered and performed.

- MAP 21A forms for coach cars are not being used by BNSF for documenting maintenance defects and instead crews are using non-formal communication to the Commuter Rail Maintenance Specialist.
- Maintenance Analysis Program Equipment Condition Reports for cab/control cars (MAP 100) are used to document defects for locomotive and cab car (control car units). Reporting of locomotive and control car defects using the MAP 100 forms is occurring but documented inconsistently.

iii. **Section (d) recommendations:**

R.5 – We recommend that the agency further document the process for AMTRAK employees to report safety concerns on the Sounder fleet directly to agency management.

SSP section 3.1.1 Risk Based Hazard Management and 49 CFR 270.103 (p)(k) requires identifying and mitigating hazards based on risk and employee involvement in continuous internal safety assessments.

Specific example:

- AMTRAK employees do not have a clear process or method to report safety concerns to Sounder or Sound Transit involving the commuter rail fleet. Some informal communications are directed to the Commuter Rail Mechanical Specialist, but they are often verbal and not formally documented.

e. Section 4.0: Safety Assurance

Areas subject to review under this section include:

- Rules Compliance Procedures Review
- Contract Procurement

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

F.4* – Contract oversight procedures for maintenance are inconsistently followed by AMTRAK. **Upgrade of Observation from 2024 Sounder SSP Internal Safety Audit.*

49 CFR Part 270.103(h) and SSP 4.5.2 set out requirements for maintenance rules compliance. Maintenance of Sounder equipment is performed by AMTRAK under a maintenance agreement.

It is important for Sound Transit to have regular and easy access to records and reports necessary to conduct oversight of maintenance activities including oversight activities required by procedure SCR-SOP-10017 AMTRAK Mechanical Contract Oversight (Rev 1.1, Nov 2024). In this audit, these were not always easy to locate.

Specific examples include:

- This audit did not find a formal process for requesting, reviewing, and analyzing safety & maintenance records from partner agencies.
- Without a work order system for AMTRAK maintenance, ST oversight relies on reviewing paper documentation, reducing the effectiveness of ST oversight. Meanwhile, AMTRAK uses their own computer-based work order system for other contracts, such as WSDOT's AMTRAK Cascades service.
- Paper records were found to be inconsistently delivered to Sound Transit.
- Sounder maintenance paper records were removed by AMTRAK for use in their internal investigation in February 2025 (with no duplicate records available to ST in the meantime). To date, these records have not been returned to the Holgate location for ST review/use.

F.2 – There is inadequate process to assess or document whether contractor maintenance activities consistently meet agency and FRA requirements.

49 CFR Part 270.103(h) and SSP 4.5.2 set out requirements for compliance with maintenance procedures. Sound Transit has the contractual right to determine if AMTRAK maintenance work meets the agency's maintenance standards and requirements, or that controls are in place to prevent gaps in preventative and corrective maintenance.

Specific examples include:

- This audit did not find documented oversight to ensure AMTRAK maintenance work adheres to maintenance agreement requirements and procedures and established best practices.
- Sound Transit Sounder Operations staff are not co-located at the Holgate Yard to oversee AMTRAK Maintenance.
- Sound Transit's Safety Division's rules compliance oversight of safety critical maintenance tasks could be strengthened for efficacy. ST monthly maintenance audits of AMTRAK are conducted and recorded; however, AMTRAK is unresponsive until many months later and with limited details (reviewed 2024 and 2025 reporting).
- Original Equipment Manufacturer (OEM) wheel truing specifications were not found to not be followed by AMTRAK for Sounder; rather, this audit found AMTRAK uses wheel specifications on ST Sounder vehicles that are less restrictive than the manufacturers' recommendations.
- Work order procedures are not always followed by AMTRAK. This can result in vehicles not designated for use during revenue service being used while other Sounder designated vehicles are out of service for unexpected use/repair.

- Some out of service Sounder train cars are being stripped of parts by AMTRAK to fix other cars, which violates official maintenance procedures, the contract between ST and AMTRAK, inventory protocols, and cost tracking rules. Some of these parts are interchangeable and can also be used for AMTRAK vehicle maintenance.

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

R.6 – There are opportunities to strengthen the AMTRAK Maintenance and Repair for Commuter Rail Rolling Stock to better ensure AMTRAK is meeting critical operational and safety expectations. Additionally, there is no consistent process for reviewing and updating the agreement.

Sound Transit contracts maintenance of the Sounder fleet to AMTRAK under a maintenance agreement. The language of this agreement obligates AMTRAK to maintain Sounder equipment at or above minimum safety standards. Additionally, oversight requires enforcement of agreement clauses, when safety-critical maintenance tasks are not performed, as specified.

Specific examples include:

- The current agreement allows AMTRAK to receive a small bonus even when 49% of rolling stock causes negative impacts of service due to delayed or poor maintenance. Although penalties offset the annual bonus, AMTRAK has received this bonus annually except for one year, despite ongoing maintenance performance issues. The disincentives do not appear to be strong enough to ensure on-time maintenance performance.
- The original agreement of September 2000 had seven amendments, in addition to the temporary agreement letters. These amendments have made significant changes to the terms of the agreement. However, the original September 2000 agreement has never been revised.
- Three (3) temporary agreement letters have been issued to AMTRAK until more formal maintenance agreement amendments are made. These letters have not been incorporated into amendments, nor into the updated maintenance agreement.
- In some instances, we found a workaround staff are performing where staff whose roles require understanding and interpretation of the maintenance agreement have marked up the original agreement with notes and red lines. This helps them identify which original agreement terms still apply, and which have been replaced with language from one of the three side letters or one of the seven amendments. This process can lead to critical misinterpretations of the current contractual agreement terms.

- In addition to Sound Transit’s Legal review and support to the team, the agency's Procurement, Contracts, & Agreements Division provides limited support for negotiating proposed agreement amendments.
- Sound Transit could use minimum standards or documented procedures for developing and updating intergovernmental agreements.

f. Section 5.0: Safety Promotion

Areas subject to review under this section include:

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

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 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
F-SCR-24-01	Open	The process to ensure safety equipment is up to date.	Reviewed procedures	Under review
O-SCR-20-13	Closed	Process for inputting maintenance data in both Rail Docs and EAMS	Reviewed current maintenance data management process	Issue Closure Letter / update audit database
O-SCR-23-03	Closed	Tracking of Sounder Safety Committee Safety Goals	Reviewed safety goals tracking tool.	Issue Closure Letter / update audit database
O-SCR-24-01	Open	Process to indicate spare locomotive requirements	Reviewed current policy and requirements	Under review
O-SCR-24-01	Closed	Review Safety & Maintenance records from contract partners	Reviewed current maintenance oversight records/procedures.	Elevated to a Finding
O-SCR-24-02	Open	Documenting Labor Shortages	Reviewed Sounder SOP for Service Plan Communication	Under review

Issue ID	Status	Description	Actions Taken	Next Steps
O-SCR-24-03	Closed	Sounder Action Item Request (SAIR) LOG Escalation Process	Reviewed SAIR Log & JRSC/SHOP logs	Elevated to a Finding

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
 - Service Delivery Department (SDD)
 - Asset Management Division
 - Director, Vehicle Asset Management
 - Deputy Director, Sounder Commuter Rail
 - Manager, Service Operations
 - Sr. Program Manager, Commuter Rail Transportation
 - Commuter Rail Mechanical Specialist
 - Commuter Rail Specialist
 - MOW Superintendent
 - Sr. Executive Assistant, Operations
 - BNSF
 - Superintendent of Suburban Operations
 - AMTRAK
 - Rolling Stock Technician(s)
 - Hallcon Corporation
 - Station Agent
 - Finance and Business Administration Department (FBA)
 - Procurement, Contracts, and Agreements Division (PCA)
 - Director, Agreements
 - Deputy Director, Procurement Services
 - Agency Oversight Department (AOD)
 - Safety Division
 - Deputy Director, Safety Culture & Programs
 - Manager, Transportation Safety & Security (TSS)
 - Sr. Transportation Safety & Security Specialist
 - Sr. Safety Specialist, Safety Management Systems (SMS)
 - Transportation Safety & Security (TSS) Specialist

- People & Culture Department (PCD)
 - People Division
 - Executive Director, ST People
 - Deputy Director, HR Strategic Impact & Improvement

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 Internal Control Plan (ICP), version dated February 2025
 - Sounder incident and accident investigations performed between January 2024 - March 2025
 - Sounder Notification Guidelines and Matrix
 - Sounder Safety Incident Notification SOP No. 10003
 - Fatigue Risk Management Plan (FRMP) and SSP Consultation Statements, version dated May 2024
 - BNSF System Special Instructions, version dated August 2022
 - BNSF crew training matrix, version dated October 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 (October 2024-March 2025)
 - Right-Of-Way (ROW) Protection Committee Presentation, version dated 2024
 - AMTRAK Coordination Meeting Minutes (2024)
 - AMTRAK crew qualification matrix
 - Monthly AMTRAK quarterly maintenance audits (January 2024-March 2025)
 - AMTRAK Mechanical Contract Oversight SOP, version 1.1 dated Nov 2024
 - Sounder Fleet Management Plan 2022-2031, version dated April 2023
 - JRSC Meeting Minutes (January 2024 - March 2025)
 - Job Descriptions for SSP identified roles (ST Payfactors.com site; version sampled dated March 2025)
 - Sounder Action Item Request (SAIR) tracking logs (January 2024-March 2025)
 - Safety Metrics reports from Feb 2025
 - Hazard Assessment Presentations (January-December 2024)
 - Safety & Security Hazard Oversight Panel (SHOP) meeting minutes (January 2024–March 2025)
 - Sounder Goal Tracking Memo (Q1 2024)
 - Sounder Safety Engagement Plan and Schedule, version dated April 2025
 - Sounder High School Safety Presentation
 - Monthly Chief Safety Officer (CSO) briefings (January 2024-March 2025)
 - MAP21a and MAP100 records (sampled for on-site equipment)

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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