ST Express Internal Safety Audit

Report #: 2026-05

Executive Summary

An Internal Safety Audit for ST Express commuter bus service is conducted annually in accordance with federal and state regulations. These audits review agency safety programs to confirm that processes meet the requirements of the Agency Safety Plan (ASP).

Audit Objective

Our audit focused on reviewing safety controls, processes, and procedures to ensure the safe operations, maintenance, and safety oversight of ST Express. King County Metro (KCM), Pierce Transit (PT), and Community Transit (CT) are contracted partners for ST Express operations and maintenance.

Audit criteria included processes and programs captured in the Agency Safety Plan (ASP), based on guidance from the Federal Transit Administration's (FTA's) Safety Management Systems (SMS) framework under 49 CFR Part 673.

The audit period spanned **September 2025 to August 2026.**

Conclusion

From our audit, we identified **no (0) findings** of non-compliance and **two (2) recommendations as opportunities for improvement,** listed below and discussed in more detail beginning on page 5 of this report.

Summary of results:

Ref #	Issue Title
R.1	We recommend that Sound Transit Planning, in coordination ST Safety along with STX partners, establish a formal process to ensure relevant safety reports and identified safety concerns are communicated, reviewed, and considered prior to publishing service changes.
R.2	We recommend implementing a process to promptly review and resolve all reported safety issues. Regularly sharing comprehensive updates with our STX partner will enhance safety at ST bus facilities.

Background

Federal requirements for ST Express Commuter Bus service

In 2018, the FTA published 49 CFR Part 673, requiring regional transit authorities to implement a transit-specific safety management system (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 documentation related to SMS implementation and SMS processes and activities. This rule also requires an annual review of the ASP for updates, corrections, and modifications.

ST Express bus service

As the owner of the ST Express commuter bus service, Sound Transit provides fiscal, performance, management, and safety oversight. Sound Transit contracts with Community Transit, King County Metro, and Pierce Transit to manage operations and maintenance, along with safety processes, under several intergovernmental agreements (IGAs).

For ST Express, four (4) Agency Safety Plans govern bus safety. Each must be reviewed and approved according to local requirements. WSDOT must approve Sound Transit's ASP; however, Sound Transit must review and approve CT's, KCM's, and PT's Agency Safety Plans before they can be approved and adopted.

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 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 in our 3-year audit cycle (2024 – 2026) and covers portions of the elements in the Agency Safety Plan.

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

- Interviewed safety and operations staff to verify their understanding of safety 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 and met with staff at partner agency operations and maintenance bus facilities.

Audit Standards

The Internal Audit Division conducted this internal safety audit in accordance with Internal Audit Division policies & procedures, as governed by our Internal Audit Charter and 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 begins by examining current processes against (1) laws or regulatory requirements, (2) agency policies and procedures, and (3) industry best practices.

During the audit planning phase, we assess engagement-specific conditions and risks to inform and confirm the audit's objectives and scope. Relevant controls to mitigate these risks are reviewed and identified.

The audit fieldwork 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 mitigate the risk (control environment) adequately, we then assess the degree to which the controls mitigate 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, and 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 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 table below summarizes our findings and observations based on the FTA's SMS framework. This final report presents the current safety practices and processes at Sound Transit, CT, KCM, and PT during the audit period.

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

Audit topics reviewed

This section summarizes the audit areas reviewed this cycle by SMS component:

a. Safety Plan

Areas subject to review under this section include:

- Conformance with FTA Guideline
- Regulatory Oversight and Acknowledgement
- Regulatory Review & Updates to the ASP
- Safety Performance Measures and Targets
- Expected Outcomes
- Coordination with Planning Stakeholders

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

- **Staff Interviews:** Met with staff overseeing the review, revision, approval, and implementation of the Agency Safety Plan, including those responsible for contracted partners' plans, ST Express interagency coordination, and safety performance monitoring. Confirmed roles, responsibilities, oversight functions, and compliance processes.

- **Document Review:** Reviewed documentation to confirm that Sound Transit and its contracted partners maintain Agency Safety Plans in compliance with state and federal requirements. Verified that these plans are reviewed and approved by Sound Transit, and that safety performance measures and targets are consistently defined, monitored, and assessed to ensure effective oversight, regulatory compliance, and continuous improvement.

i. Section (a) findings:

We found no instances of non-compliance requiring revision to the Agency Safety Plan.

ii. Section (a) recommendations:

No revisions are recommended for the Agency Safety Plan.

b. Safety Policy

Areas subject to review under this section include:

- Safety Objectives
- Employee Reporting Program and Feedback

The audit team used the following methods for this evaluation:

Staff Interviews: Met with personnel responsible for safety policy implementation and ST Express operations to confirm safety roles, responsibilities, and contractual relationships with partner agencies. Interviews addressed governance structures, oversight, and coordination between Sound Transit and its contracted partners.

- **Document Review:** Reviewed the SMS Policy statement, approval documentation, related communications, and Sound Transit oversight program plans and procedures to confirm formal approval, communication, and implementation of the agency's safety policy. Assessed oversight of ST Express operations and contracted partners to evaluate the effectiveness of safety management and oversight activities.

- **Field Observation:** Assessed operating contract relationships by attending Joint Bus Safety Committee (JBSC) and ST Express partner agency coordination meetings, and by visiting ST Express operations and maintenance facilities for Pierce Transit in Lakewood to confirm how the relationship functions in practice.

i. Section (b) findings:

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

ii. Section (b) recommendations:

R.1 – We recommend that Sound Transit Planning, in coordination with ST Safety and STX partners, establish a formal process to ensure relevant safety reports and concerns are communicated, reviewed, and considered before service changes are published.

Interviews and meeting documentation show that ST Express shares safety information, including Corrective Action Plan (CAP) updates, during scheduled Joint Bus Safety Committee (JBSC) meetings and as issues arise. However, routine safety communication between meetings is limited. Without a standardized approach, stakeholders may lack a consistent understanding of CAP status, ownership, priorities, or required actions.

ST Express partner agencies manage daily operations, maintenance, and safety of Sound Transit buses and are directly affected by service changes. King County Metro Safety reported in an interview that it was not involved in planning recent ST Express service changes and did not have the opportunity to review potential safety impacts before implementation. Without a structured communication and review process, key stakeholders may not receive timely information needed to assess risks, prepare resources, coordinate training, or implement safety mitigations.

Formalizing routine safety and CAP communications, and establishing a documented communication plan for service changes, would improve stakeholder awareness, coordination, and accountability. The plan should identify affected stakeholders, define communication responsibilities and timelines, and provide advance notice to support safety reviews, operational planning, and informed decision-making.

c. Safety Risk Management

Areas subject to review under this section include:

- Drug and Alcohol Program 49 CFR Part 655

The audit team used the following methods for this evaluation:

- **Staff Interviews:** Met with Sound Transit and partner agency staff responsible for the Drug and Alcohol Program. Confirmed roles, oversight activities, reporting requirements, and coordination processes to ensure effective implementation and regulatory compliance.
- **Document Review:** Reviewed Sound Transit's Drug and Alcohol Policy, partner agency policies, program procedures, reporting documentation, and communication protocols. Assessed compliance with regulatory requirements and evaluated program administration, reporting, and oversight processes.

i. Section (c) findings:

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

ii. Section (c) recommendations:

There are no recommended revisions for Safety Risk Management.

d. Safety Assurance

Areas subject to review under this section include:

- Safety Data
- Transit Safety Inspections and Assessments
- Transit Safety Event Investigations
- External Reporting Notifications and Thresholds
- Corrective Action Plans

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

- **Staff Interviews:** Met with Sound Transit and partner agency staff responsible for ST Express operations, operational oversight, service planning, and safety management. Confirmed roles and responsibilities related to operating procedures, oversight activities, interagency coordination, and the collection, analysis, and use of safety culture assessment data to inform safety performance and continuous improvement efforts.
- **Document Review:** Reviewed Sound Transit oversight procedures governing ST Express operations, partner agency operating and maintenance procedures, safety

data and performance reports exchanged between Sound Transit and partner agencies. Assessed the effectiveness of oversight processes, safety reporting and information sharing practices, and efforts to promote and monitor a positive safety culture across ST Express operations.

i. Section (d) findings:

No revisions are recommended for Safety Risk Management.

ii. Section (d) observations:

R.2 – We recommend implementing a process to promptly review and resolve reported safety issues. Regularly providing comprehensive updates to our STX partner will help improve safety at ST bus facilities.

Safety issues and Corrective Action Plans (CAPs) are routinely communicated through the JBSC. However, partner agencies have noted that some corrective actions require significant time to implement. Addressing hazards at Sound Transit-owned facilities often involves coordination among several departments, such as Transit Operations, Facilities, Finance, Procurement, Safety, and Legal. Although this coordination is essential, the necessary stakeholders, reviews, and approvals are not always identified early in the process.

As a result, corrective actions may be delayed, extending timelines and postponing the resolution of safety concerns. Implementing a structured process to identify legal and administrative requirements early in the hazard review would improve planning, clarify expectations, and increase transparency about timelines. This approach would support timely resolution of safety concerns while maintaining oversight and compliance.

e. Safety Promotion

Areas subject to review under this section include:

- Hazard Information and Event-Based Communication

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

- **Staff Interviews:** Interviewed Sound Transit and partner agency staff to clarify training requirements, expectations, and to assess progress in implementing the event-based communication protocol for ST Express.
- **Document Review:** Reviewed safety meeting minutes, internal communications, safety campaign materials, and other distributed communications to evaluate the effectiveness of safety communication, training support, and stakeholder engagement.

i. Section (e) findings:

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

ii. Section (d) observations:

No revisions are recommended for the Safety Promotion.

Status of Prior Audit Results

There are no outstanding findings from the previous audit for ST Express.

Appendices

Appendix A: List of interviewed staff

During the ST Express safety audit, the audit team interviewed the following individuals. Staff are listed by position title only:

Sound Transit

- Director, Bus
- Deputy Director, Bus
- Superintendent, Bus Operations
- Manager, Paratransit & Accessibility Services
- Manager, Security & SMS
- Manager, Safety Assurance
- Manager, Transportation Safety and Security
- Specialist, Transportation Safety and Security

King County Metro

- Operations Superintendent
- Safety Manager
- SMS Program Manager
- Transit Safety Administrator

Community Transit

- Manager of Environmental Health and Safety
- Sr. Analyst – Safety

Pierce Transit

- Safety Technician
- Contracted Services Administrator

Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records for the safety audit.

Sound Transit documentation and records

- 2024 Agency Safety Plan, September 2024

- 2026 ASP Review Spreadsheet,
- SMS Policy Statement, October 4, 2024
- Board Motion No. M2025-41, ASP Approval
- WI-001-ASP Annual Partner Review Process, R1-January 2025
- TSS-SOP-TSS18-Station Safety & Security Inspections, 2024
- Transportation Safety and Security Facility Inspection Checklist, November 2024
- Joint Bus Safety Committee Meeting Minutes (September 2025 – August 2026)
- JBSC Monthly Event and Hazard Logs (September 2025 – August 2026)
- TSS-SOP-TSS08-NTD Annual Reporting, September 2026
- ST Express KPI and Safety Performance Tracking, September 2026
- ST Express Bus Operations Oversight Program (STX-PLN-10001), Rev 1.0, 12/13/2021
- 2026 ASP Review Tracker, August 2026
- ASP Performance Targets Presentation, June 2026
- Emails – 2026 ST ASP review for partner agencies, June 2026
- Facilities Supporting Staff List, October 2025
- TSS Facility Inspection Check List, November 2024
- ST Daily Safety Messages, Sep 2025 - August 2026
- ST Emergency Alerts, June 2026 – August 2026
- ST Everbridge Alerts – Drill, June 2026
- ST SOP Template, August 2026
- ST ASP Performance Targets Work Instruction, May 2026
- ST SOP EHS03 – Employee Safety Reporting Tool (R 2.0), May 2025
- ST SOP SI01 – Safety Event Investigation Procedures, June 2025
- ST SOP TSS07 – WSDOT Annual Reporting, June 2026
- ST SOP TSS08 – NTD Annual Report and Setup, September 2025
- ST SOP TSS14 – Operational Hazard Analysis Process, June 2026
- ST SOP TSS18 – Safety and Security Facility Inspections, December 2024
- ST/KCM SMS Meeting Tracker, August 2026
- ST SOP 10004 – Fit for Duty, April 2026
- ST SOP TSS03 – NTD Monthly Reporting Process, October 2025
- ST WI 001 – ASP Annual Partner Review Process, October 2025
- ST WI 002 – ASP Signature Distribution Process, October 2025
- ST WI 003 – ASP Board Approval Process, October 2025
- ST WI 004 – ASP ESC Approval Process, September 2025
- ST WI 005 – ASP Annual Revision, September 2025
- ST WSDOT Safety Event Initial Report From, January 2026
- ST WSTIP Driver Assault Mitigation Best Practices, March 2026
- ST FTA Transit Worker Assault Topics, June 2026
- ST FTA General Directive 24-1: Assaults on Transit Workers. June 2026

King County Metro documentation and records

- Agency Safety Plan, March 2026
- KCM Comms Topics Spreadsheet, August 2026
- KCM Transit Operations Policies and Procedures Index, January 2024

- KCM Drug & Alcohol Policy: 2021-0004, January 2021
- KCM Accident Prevention Program, September 2017
- KCM Safety & Security Update: Operator Safety, April 2026
- KCM Transit Safety Task Force – Emails, June 2026
- KCM Operator Training Roster, June 2026
- KCM Manager Training Roster, June 2026
- KCM Preventable Accident Review System, January 2019
- KCM Regional Transit Safety Task Force – Recommended Solutions, February 2026
- KCM Safety Reporting Resolution SOP (V.1), August 2025
- KCM/ST SMS Meeting Tracker, June 2026
- KCM CAP Tracker Spreadsheet, August 2026
- KCM SSaM Safety Common Questions flyer, August 2026
- KCM Safety & Security Reporting QR Code flyer, August 2026
- KCM SOP 2024-06, July 2024

Community Transit documentation and records

- Agency Safety Plan, January 2026
- FTA Drug & Alcohol Compliance Auditing Program-Final Audit Report (of Community Transit), June 2018
- CSO Quarterly Report, July 2025
- CSO Quarterly Report, October 2025
- Safety, Security & Sustainability Quarterly Report, February 2025
- Behind The Wheel Newsletter, June 2025
- Post-Accident Training Procedures, October 2024
- Retraining Requirements Notification to Trainer Form (09/25/17)
- Operator Evaluation Form, January 2018
- EHS SharePoint, August 2026
- Emails – NTD Coordination PT/ST, August 2026
- IGA between CT and ST, January 2014
- Coach Operator Door Committee Recommendation, August 2026
- Safety Committee: Request for Agenda Item, September 2025
- Safety, Security & Sustainability Dashboard, June 2026
- Safety Committee Charter & Mission, 2025
- Transit Safety Investigation Workflow, August 2026
- WAC 296-27-031, August 2026

Pierce Transit documentation and records

- Agency Safety Plan, July 2025
- 2025 -2026 PTASP (Rev 030325), June 2025
- Policy 4.16 – Reporting On-The-Job Injuries, March 2026
- Policy 2.16 – Drug and Alcohol Abuse Policy
- Policy 2.11 – Safety Bulletin Training Presentation, June 2026

- PRO-3320.17 – General Safety Communication, January 2026
- Safety Committee Meeting Minutes, September 2025 – August 2026
- Corrective Action Log, Sep 2025 – August 2026
- Accident Prevention Policy (V 2.1), September 2024
- Employee Safety Memo, January 2026
- Operator Alert, July 2026
- Safety Alert, July 2026
- Safety Message, July 2026
- PT/STX SMS Tracker Spreadsheet, July 2026
- FTA Acceptance Memo, FTA Drug & Alcohol Compliance Auditing Program, May 2025
- Sample ST/PT email communications regarding FTA DMAIS submittal, 2025
- FTA Memo, FTA Drug & Alcohol Program Compliance Letter, May 2025
- Sample Training Curriculum, Materials and Tracking, July 2025

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:

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Patrick Johnson, Deputy Executive Director, Internal Audit Division