

ST Express Internal Safety Audit

Report #: 2024-06

Executive Summary

Internal Safety Audits are required to be completed annually by federal regulations for ST Express commuter bus service. These safety audits periodically review agency safety programs to assure that processes are being performed as intended and required under 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 commuter bus service by Sound Transit, as service owner, King County Metro (KCM), Pierce Transit (PT) and, Community Transit (CT) as the contracted operators.

Audit work included reviewing processes and programs captured by the Agency Safety Plan (ASP) under guidance by the Federal Transit Administration (FTA's) Safety Management Systems (SMS) framework under 49 CFR Part 673.

The audit period spanned **March 2023 to September 2024**.

Conclusion

From our audit, we identified no **(0) findings** of non-compliance and **five (5) observations**; listed below and discussed in more detail beginning on page 7 of this report.

Summary of results:

Ref #	Title of Issue	Risk Rating
O.1	Work instructions used to perform partner agency ASP reviews do not include steps to review revision dates or how to document when they are out of compliance.	n/a
O.2	It is unclear how discrepancies (Hazards) are communicated from ST Facilities to the Joint Bus Safety Committee (JBSC) for tracking purposes.	n/a
O.3	Personnel outside of Facilities are not trained to navigate EAMS for status tracking purposes.	n/a
O.4	The Station Safety & Security Inspections SOP, referenced in safety manuals, procedures, and checklists as TSS-SOP-TSS18 is misnumbered as TSS27.	n/a
O.5	There are no written procedures to define the process of the new incident notification software (Everbridge).	n/a

Background

Federal requirements for ST Express Commuter Bus service

In 2018, the Federal Transit Administration (FTA) published 49 CFR Part 673, that requires bus properties to develop and use transit-specific safety management systems (SMS) framework through public transportation agency safety plans (ASP) for the oversight of safety processes.

The 673 rule also requires agencies to maintain documentation set forth in their respective agency safety plan, including those related to the implementation of SMS, and documentation resulting from SMS processes and activities. This rule also requires an annually review the ASP for updates, corrections, and modifications.

ST Express bus service

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

For ST Express, there are four (4) Agency Safety Plans governing bus safety. Each must be reviewed and approved according to local requirements. Sound Transit's ASP must be approved by WSDOT; however, KCM's, PT's and, CT's Agency Safety Plans only need to be reviewed and approved by Sound Transit prior to approval and adoption.

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 first audit from our 3-year audit cycle (2024 – 2026), covering portions of elements contained 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' contents against

state and federal requirements.

- Sampled and reviewed records for each audit area to assess compliance.

Audit Standards

We conducted our internal safety audit according to Audit Division policies & procedures, which are governed by our Audit Charter; and meets several sets of 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. We believe that the evidence we obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Also, the Audit Division is committed to following safety oversight standards set forth by the Federal Transit Administration (FTA), Federal Railroad Administration (FRA), and all other relevant auditing requirements or standards.

Audit Results

The following table summarizes of our findings and observations using the FTA's SMS framework. This final report reflects the current state of safety practices and processes at Sound Transit, KCM, PT and, CT during the audit period.

SMS Framework	Number of findings	Number of observations
Safety Plan	0	0
Safety Policy	0	1
Safety Risk Management	0	0
Safety Assurance	0	3
Safety Promotion	0	1
Totals	0	5

Audit Phases

Our audits are risk-based and focus on the areas with the highest potential risk impacts or likelihood at the time of the audit. Each audit starts by examining the current processes in place relative to (1) laws or regulatory requirements, (2) agency policies and procedures and (3) industry best practices.

During the audit “planning” phase, we assess the engagement-specific conditions and risk, informing and confirming the audits’ objectives and scope. Also, relevant controls to mitigate these risks are also 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 observations.

- **Findings** are non-compliant conditions, supported by evidence, that are not in compliance with an audit criteria, such as a policy, procedure, manual, standard, or industry best practice.
- **Observations** are conditions that may be compliant with requirements; however, the auditor has determined that they pose the potential risk of becoming a finding in the future if recommended changes are not put in place to prevent their occurrence.

Audit topics reviewed

This section of the report encompasses audit areas we reviewed this audit cycle, and are organized by each component of SMS:

a. Safety Plan

Federal and state regulations require transit agencies to develop agency safety plans that describe their SMS. Implementation processes and plans must include the following:

- Safety Management Policy – Senior management’s formal commitment to safety. Also defines the methods, processes, and organization structure to meet safety goals.
- Safety Risk Management – Determines the need for and adequacy of new or revised risk controls based on the assessment of acceptable risks.
- Safety Assurance – Activities and functions that ensure the effectiveness of implemented safety risk mitigations.
- Safety Promotion – Combination of training and communication of safety information to support a positive safety culture throughout the agency.

i. Evidence requested and reviewed:

To evaluate Agency Safety Plans for Sound Transit and each contracted partner the audit team:

- Interviewed staff who are responsible for direction and oversight of the ASP:
 - Deputy Director of Safety Business Processes & Projects, Manager of Security & Safety Management System, and the Senior Specialist of Safety Management System.

- Reviewed the following documents:
 - The 2023 Sound Transit (ST) Agency Safety Plan and supporting documents:
 - Memo, Employee Safety Committee approval of ASP, 2023
 - Signed Board Approval Motion, 1/26/2023.
 - Signed Board Approval Motion Revision, 10/2023.
 - WSDOT Memo: ASP Review and Approval, 2023.
 - The 2023 Sound Transit Agency Safety Plans was found to be compliant with 49 CFR 673.11.
 - The ASP was approved by the employee safety committee, the ST Rider Experience and Operations (REO) Committee and the Board of Directors. Sound Transit’s CEO signs all revisions of the ASP on the Policy Statement embedded in the ASP.
 - Once approved and signed, the ASP is sent to all operating partners, The Board of Directors, Washington Department of Transportation State Safety Oversight, Puget Sound Regional Council, and the FTA.

***NOTE*: The audit team did not review the 2024 ASP during this audit cycle. That version was not published until the end of our fieldwork portion of the audit in September 2024.**

ii. Section (a) findings:

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

iii. Section (b) observations:

We found no opportunities for improvement with the Agency Safety Plan

b. Safety Policy

Transit agencies must establish its organizational accountabilities and responsibilities and have a written statement of safety management policy that includes the agency's safety objectives. The policy statement must be communicated throughout the agency and signed by the accountable executive. Additionally, the agency must establish a process that allows employees to report safety conditions to senior management. Areas subject to review under this section include:

- Safety Management Policy Communication – The safety management policy must be communicated throughout the agency's organization.
- Operating Contract Relationships – The ASP refers to the Intergovernmental Agreement (IGA) for each contracted operating partner. The IGAs detail the day-to-day activities for

operation, safety, and maintenance for three agencies (Pierce Transit, Community Transit, and King County Metro).

- SMS Implementation – The ASP must document the processes and activities related to the Safety Management System (SMS) implementation. Additionally, each ASP will incorporate SMS principles and methods tailored to the size, complexity, and scope of the public transportation system and the environment in which it operates.

iv. Evidence requested and reviewed:

To evaluate the ST and each contracted partner’s ASP, the audit team:

- Interviewed staff who are responsible for direction and oversight of the ASP:
 - Deputy Director of Safety Business Processes & Projects, Manager of Security & Safety Management System, and the Senior Specialist of Safety Management System.
- Reviewed:
 - Agency Safety Plans for each partner agency performing operation and maintenance of ST Express bus service. We reviewed the ASP Annual Partner Review Process (WI-001), ASP Partner Workbook, and the signed Memo documenting that ST Transportation Safety and Security (TSS) reviewed and approved each ASP per the WI-001.
 - Each ASP was found to be compliant with 49 CFR 673.11.
 - The King County Metro (KCM) Transit Agency Safety Plan (ASP) was:
 - Effective May 2024.
 - Reviewed, approved, and signed by the ASP Review Committee prior to the formal approval and signature of the Chief Safety Officer, Accountable Executive (General Manager) and Board of Directors.
 - Reviewed and accepted annually by Sound Transit Manager of Security & Safety Management System.
 - A Memo was retained as a record in the ST TSS SharePoint, dated June 2024.
 - The Community Transit (CT) ASP was:
 - Effective January 2023.
 - Approved, by the CT Safety Committee, the Board of Directors and FTA TrAMS system prior to the formal approval and signature of the Accountable Executive (CEO).
 - Reviewed and accepted annually by Sound Transit Manager of Security & Safety Management System.

***NOTE*: At the time of the audit, CT's 2024 ASP was under internal technical review. The audit team was unable to verify its' completion and acceptance by Sound Transit, see observation O.1.**

- The Pierce Transit (PT) ASP was:
 - Effective June 2024.
 - Approved, by the PT Safety Committee, the Pierce Transit Board and prior to the formal approval and signature of the Accountable Executive (CEO).
 - Reviewed and accepted annually by Sound Transit Manager of Security & Safety Management System.
 - A Memo was retained as a record in the ST TSS SharePoint, dated June 2024.
- Additionally, we reviewed the ST Express Bus Operations Oversight Program (STX-PLN-10001) and Interagency Agreements (IGAs) between contracted partners and Sound Transit for ST Express Bus Service Operations and Maintenance to ensure consistent safety standards and regulatory adherence across all agencies.
 - King County Metro, 2019
 - Community Transit, 2021
 - Pierce Transit, 2021
- The audit team is currently tracking open observations relating to the IGAs from the 2022 and 2023 ST Express audits. These items were reviewed during this audit, remain open, and will continue to be tracked until completion.

v. Section (a) findings:

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

vi. Section (b) observations:

O.1 – Although ST performs an annual review of partner agencies' ASPs and provide a memo of acceptance, TSS's work instruction to perform the review lacks clear procedures for ensuring partners meet annual revision dates and documenting when an ASP is overdue for revisions or review.

We recommend updating the work instruction (WI-001-ASP-Annual-Partner-Review-Process) to define clear criteria when revisions should be submitted for review and include a process for documenting non-compliance.

c. Safety Risk Management

Sound Transit must develop and implement a Safety Risk Management (SRM) process for the transit system to ensure hazardous conditions are identified, assessed, and mitigated risk to an acceptable level. Areas subject to review under this section include:

- Safety hazard identification – Identify methods or processes to identify hazards and consequences before they escalate into safety events. This includes how the agency will collect, identify, track, and trend hazards.
- Safety risk assessment – Determine the safety risk level associated with the hazard and determine the likelihood and severity rating using a risk scoring method to determine prioritization of effort to mitigate the hazard.
- Safety risk treatment – The analysis and corrective action taken to reduce the risk associated with an identified hazard to the lowest practical level.

i. Evidence requested and reviewed:

To evaluate safety risk management processes, the audit team:

- Interviewed staff who are responsible for direction and oversight of risk management including:
 - Managers and senior staff of Transportation Safety & Security (TSS), Executive Operations Director for Commuter Bus & Paratransit, and the Deputy Director-Bus & Paratransit.
- Reviewed:
 - The Joint Bus Safety and Security Committee (JBSC) Committee Goals, meeting agendas and minutes. Additionally, we reviewed safety performance metrics, hazard, and event logs to ensure risks were tracked and communicated internally and externally.
 - We reviewed the National Transit Database data to ensure safety and security risks were tracked and reported as required per National Transit Database Monthly Reporting procedures (TSS-03).
 - To verify the safety risk assessment process, we reviewed the Safety & Security Assessment procedures (TSS15) along with Safety Risk Assessments conducted for improved lighting at the Puyallup Bus Station and Mercer Island Park and Ride.

ii. Section (a) findings:

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

iii. Section (b.) observations:

We found no opportunities for improvement with Safety Risk Management.

d. Safety Assurance

Safety assurance includes the requirement of Sound Transit and partner agency's SMS to have processes in place to conduct safety reviews, safety investigations, evaluations, internal safety audits, change management, corrective action plans (CAPs), and inspections to monitor compliance with established procedures for operations and maintenance.

Safety assurance processes also ensure that the agency implements appropriate and effective mitigations and monitors safety performance. Areas subject to review under this section include:

- Transit Safety Inspection and Assessments – proactively apply an all-hazard approach to assess safety hazards or security vulnerabilities within the operating system before they result in harm or damage.
- External Reporting Notification and Thresholds – guidelines for all notification requirements and reporting to state and federal regulatory bodies.
- Management of Change – systematic approach to preventing or mitigating risk to the agency, including degradation of safety, health, or environment.
- Configuration Management and System Modification –

i. Evidence requested and reviewed:

To evaluate safety assurance processes, the audit team:

- Interviewed staff who are responsible for direction and oversight of risk management including:
 - Managers and senior staff of Transportation Safety & Security (TSS), Executive Operations Director for Commuter Bus and Paratransit, and the Deputy Director-Bus & Paratransit. Additionally, we interviewed the Director of Facilities Services Delivery and the Deputy Director of Facilities Maintenance.
- Reviewed:
 - The Hazard Management Manual (dated April 2024), TSS Station Safety & Security Inspections procedures (TSS18), and Safety & Security Assessment procedures (TSS15). Additionally, we reviewed Station Safety and Security checklists to verify a that a standardized format was used.
 - We performed a field surveillance at the Federal Way Transit Center and compared visible safety hazards with the Bus Station Inspection Results tracking sheet from the 3rd quarter 2024 inspections (September 2024). Additionally, we

reviewed Enterprise Asset Management (EAMS) to verify discrepancies were documented and tracked by ST Facilities.

- We reviewed Safety Performance Metrics (Power Bi), and monthly department meeting presentations to ensure data is tracked and communicated internally and externally with contracted partners.
- JBSC meeting minutes and ST Express Events, Condition and Hazard Logs, and email correspondence to ensure safety data is tracked and reported.

ii. Section (a) findings:

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

iii. Section (b) observations:

O.2 – While Sound Transit performs quarterly facility inspections per SOP TSS18, it is unclear how discrepancies (Hazards) are communicated from ST Facilities to the JBSC for tracking purposes. We recommend develop procedures for Facilities to report the status of items tracked in EAMS.

O.3 – Personnel outside of Facilities are not trained to navigate EAMS for status tracking purposes. We recommend developing training for staff members outside of Facilities to know how to navigate EAMS to review the status of items being repaired/replaced.

O.4 – The Station Safety & Security Inspections SOP is referenced in the Agency Safety Plan and Hazard Management Manual as TSS-SOP-TSS18 is misnumbered as TSS27. We recommend changing the SOP number to eliminate confusion and to align with safety plans and manuals.

e. Safety Promotion

The safety promotion element of SMS requires that Sound Transit describe the responsibilities of staff to the safety program and encourages others to follow established safety practices.

Areas subject to review under this section include:

- Hazard Information and Event-Based Communication – Key incidents and hazard information are shared during safety briefings throughout the organization as well as to and from operating partners through safety committees.
- Safety Communication – Structured methods that communicate any safety event to agency leadership and required affected staff. Additionally, safety communications include communicating safety performance information throughout the agency and externally; as well as critical or regulatory safety information that employees need to

know. Lastly, safety communication can be observed through management responses to employee safety reporting processes and documented actions taken.

i. Evidence requested and reviewed:

To evaluate safety promotion processes, the audit team:

- Interviewed staff who are responsible for direction and oversight of safety promotion including:
 - Managers and senior staff of Transportation Safety & Security (TSS), Executive Operations Director for Commuter Bus and Paratransit, and the Deputy Director-Bus & Paratransit, Additionally, we interviewed and received documentation from key safety staff from operating partners.
- Reviewed:
 - The Joint Bus Safety and Security meeting agendas, minutes, monthly REO Safety Reports and email correspondence from Mar 2023-Sep 2024.
 - We reviewed the Operations Incident/Event Notification procedures (EXD-SOP-10005) and Command Post emails for service impact issues involving ST Express bus service.
 - During interviews we learned that a new software (Everbridge) will be introduced in the coming months that will streamline the notification process. **At the time of the audit, no procedures were written to define the new process. See observation O.5 below.**
 - Auditors reviewed ESRT Reports from January – September 2024. We only found one (1) reported item that related to ST Express. The item was focused on the Lynnwood Transit Center parking garage which is a shared space for Link Light Rail and ST Express.
 - Safety coordinates with ST Communications to share required safety information. We reviewed the ST HUB to ensure Daily Safety Messages and the Employee Safety Reporting Tool (ESRT) are available and functionable to the agency. Messages are also sent via ST email and uploaded onto the HUB as necessary.

ii. Section (a) findings:

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

iii. Section (b) observations:

O.5 – There are no written procedures for using the new incident notification software (Everbridge) to inform agency staff on incidents involving ST Express and all other

modes. We recommend creating standard operating procedures before implementing the new software.

Appendices

Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their safety audit of ST Express Staff will be listed by position titles only:

- Sound Transit
 - Executive Operations Director, Commuter Rail, Bus & Paratransit
 - Deputy Director, Bus & Paratransit Executive Operations Director, Link light rail
 - Manager, Transportation Safety & Security
 - Senior Transportation Safety & Security Specialist
 - Director, Facilities Services Delivery - Operations
 - Deputy Director, Facilities Services Delivery – Operations
 - Manager, Security & Safety Management System
- King County Metro
 - Transit Safety Superintendent
 - Transit Safety Administrator
 - Contract Oversight
- Community Transit
 - Senior Director Safety, Security & Sustainability
 - Manager of Environmental Health and Safety
 - Safety Analyst
 - Contract Oversight Services
- Pierce Transit
 - Chief Safety Officer
 - Safety Coordinator
 - Contract Oversight

Appendix B: List of documents and records reviewed

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

- **Sound Transit documentation and records**
 - 2023 Agency Safety Plan, and records of approval
 - Board Motion No. M2023-06, ASP Approval
 - Board Motion No. M2023-85, ASP Revision Approval
 - Resolution No. R2018-41, Board Committee Responsibilities
 - WI-002-ASP-Signature Distribution Process, 01/2024
 - WI-003-ASP-Board Approval Process, 01/2024
 - WI-004-ASP-ESC Approval Process, 01/2024
 - Memo, ESC approval of ASP, 2023
 - Memo, ASP Partner Review, 2023/2024
 - Work Instruction, WI-001 ASP Annual Partner Review Process, 2023
 - Revised Code of Washington Ch. 81.112, Regional Transportation Authorities
 - WAC 468-550-040, Requirements for agency safety plans
 - Interagency Agreement between King County Metro and Sound Transit for ST Express Bus Service Operations and Maintenance, 2019
 - Interagency Agreement between Community Transit and Sound Transit for ST Express Bus Service Operations and Maintenance, 2021
 - Interagency Agreement between Pierce Transit and Sound Transit for ST Express Bus Service Operations and Maintenance, 2021
 - TSS-MNL-TSS02-Safety Data Manual, 2020
 - TSS-MNL-TSS01-Hazard Management Manual, 2024
 - ESRT Reports from January – September 2024
 - Joint Bus Safety Committee (JBSC)
 - Charter
 - Meeting Minutes (Mar 2023-Sep 2024)
 - Event Log
 - Hazard Log
 - TSS-SOP-TSS03-NTD Monthly Reporting, 2024
 - 2023 NTD Safety & Security Quick Reference Guide – Non-Rail Mode Reporting
 - 2024 NTD Safety & Security Quick Reference Guide – Non-Rail Mode Reporting
 - 2024 NTD Full Reporting Policy Manual
 - ST Express KPI Calculations ASP Targets-Performance-Goals Tracker, 2024
 - TSS-SOP-TSS18-Station Safety & Security Inspections, 2022
 - Bus Station Inspection Results, Tracker, 2024
 - Sound Transit Station Safety Inspection Checklist (online form/SharePoint)
 - Major Safety Event Log, NTD Reporting (SS 40 Major STX-2023-2024)
 - Non-Major Safety Event Log, NTD Reporting (SS 50 Major STX-2023-2024)
 - TSS-SOP-TSS15-Safety & Security Assessment, 2022
 - Safety Risk Assessment, Puyallup Station Bus Bay Lighting, 2024

- Safety Risk Assessment, Mercer Island Park & Ride, 2024
- ST Express Daily Operation Logs, Jan-Sep 2024
- ST Express Bus Operations Oversight Program (STX-PLN-10001), Rev 1.0, 12/13/2021
- ESRT Reports/Employee Safety Committee Meeting minutes, Jan-Sep 2024
- King County Metro documentation and records
 - 2024 Agency Safety Plan, and records of approval.
- Community Transit documentation and records
 - 2023 Agency Safety Plan, and records of approval.
- Pierce Transit documentation and records
 - 2024 Agency Safety Plan, and records of approval.

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Sound Transit's Title VI notice of rights

Sound Transit conducts Title VI equity analyses for service and fare decisions to ensure they are made as equitably as possible.

More information on Sound Transit's Title VI notice of rights and the procedures to file a complaint may be obtained by:

- Phone: 888-889-6368; TTY Relay 711;
- Email: stdiscriminationcomplaint@soundtransit.org;
- Mailing to Sound Transit, Attn: Customer Service, 401 S. Jackson St. Seattle, Washington 98104-2826; or
- Visiting our offices located at 401 S. Jackson St. Seattle, Washington 98104.

A complaint may be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call 888-446-4511.

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