



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

April 2, 2026

Mr. Randy Clarke  
General Manager and Chief Executive Officer  
Washington Metropolitan Area Transit Authority  
300 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20024

Dear Mr. Clarke:

The Federal Transit Administration (FTA) conducted a Focused Agency Safety Plan Audit of the Washington Metropolitan Area Transit Authority (WMATA) pursuant to its authority under 49 U.S.C. § 5329(f)(1) and 49 CFR Part 670. FTA notified WMATA of this audit by letter, dated September 19, 2025.

The audit assessed WMATA's implementation of its Agency Safety Plan requirements related to preventing assaults on transit workers. FTA conducted this audit through a combination of virtual and on-site activities, along with an extensive review of documentation provided by WMATA.

Enclosed with this letter is FTA's Focused Agency Safety Plan Audit Final Report for WMATA. The report identifies findings and associated corrective actions that WMATA must take to demonstrate compliance with applicable Federal safety requirements.

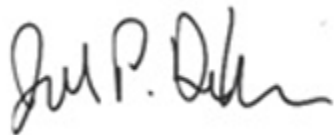
Pursuant to 49 U.S.C. § 5329(f) and 49 CFR § 670.21(c), within 30 days of this letter, WMATA must develop and submit corrective action plans to FTA that address all findings listed in the attached report. FTA will review and approve (with revisions as necessary) WMATA's corrective action plans and will monitor WMATA's progress in resolving each finding and required action. FTA will conduct scheduled meetings with WMATA to review its progress until FTA determines that these meetings are no longer needed or can be conducted less frequently.

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Mr. Randy Clarke

Corrective action plans must include primary points of contact and expected timelines for implementation and completion. Failure to resolve the corrective actions satisfactorily may result in additional oversight or enforcement action, up to and including the withholding of Federal transit funds, as authorized by law. If you have any questions regarding the audit or the requested documentation, please contact Jeremy Furrer, Division Chief for Safety Policy and Promotion, Office of Safety Management, at [jeremy.furrer@dot.gov](mailto:jeremy.furrer@dot.gov), or me at (202) 366-5080 or via email at [joseph.delorenzo@dot.gov](mailto:joseph.delorenzo@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo". The signature is written in a cursive, slightly slanted style.

Joe DeLorenzo  
Associate Administrator for Transit Safety and Oversight and  
Chief Safety Officer

Enclosure: Focused Agency Safety Plan Audit Final Report: Washington Metropolitan Area Transit Authority

cc: David Meyer, Chief Executive Officer, Washington Metrorail Safety Commission

# Focused Agency Safety Plan Audit Final Report: Washington Metropolitan Area Transit Authority (WMATA)

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Office of Transit Safety and Oversight  
Federal Transit Administration

April 2, 2026

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## Executive Summary

In October and November 2025, the Federal Transit Administration (FTA) conducted an audit of the Washington Metropolitan Area Transit Authority's (WMATA) implementation of its Agency Safety Plan (ASP) requirements related to preventing assaults on transit workers. This audit was conducted pursuant to FTA's authority under 49 U.S.C. 5329(f)(1) implementing regulations at 49 CFR Part 670 and pursuant to Section 2(f) of Executive Order 14339, *Additional Measures to Address the Crime Emergency in the District of Columbia* (August 25, 2025).

In a letter to Mr. Randy Clarke, General Manager and CEO, dated September 19, 2025, FTA informed WMATA of the initiation of this audit to address the ongoing risk to WMATA operators of being assaulted while delivering public transit service, including data that demonstrated major assaults on bus operators occurred at a rate nearly twice the national average in 2024.<sup>1</sup>

This audit intends to determine whether conditions exist that endanger transit workers on the WMATA system by assessing WMATA's compliance with 49 CFR Part 673 (Part 673), Public Transportation Agency Safety Plans (PTASP). The audit also includes evaluation of the sufficiency of the agency's responses to FTA's directives and correspondence focused on mitigating the safety risk associated with assaults on transit workers.

The PTASP regulation at Part 673 establishes requirements for transit agencies to address safety concerns, including the risk of assaults on transit workers:

- The PTASP regulation requires transit agencies to establish and implement Safety Management System (SMS) processes to regularly and continually identify hazards and their potential consequences, assess the level of safety risk, implement appropriate safety risk mitigations to lower that safety risk, and assess the effectiveness of the safety risk mitigations over time. Hazards include those associated with assaults on transit workers and personal safety events.
- The PTASP regulation also establishes specific requirements focused on addressing assaults on transit workers, including the role of the joint labor-management safety committee, the implementation of the safety risk reduction program, and the setting of annual performance targets for the number and rate of assaults on transit workers.

Taken together, these regulatory requirements help ensure that transit agencies are effectively mitigating these risks and continually assessing their actions to improve the safety of their systems for workers, passengers, and the general public.

As part of this review, FTA examined materials provided by WMATA, including the ASP required under the PTASP regulation, documentation regarding WMATA's implementation of the

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<sup>1</sup> Data source: National Transit Database

ASP as it relates to assaults on transit workers, and documentation regarding the role and action of WMATA's safety committee and the safety risk reduction program. In addition, FTA conducted virtual and on-site interviews to further understand WMATA's implementation of its ASP and the safety risk reduction program.

As a result of its review, FTA has determined that WMATA is non-compliant with certain Part 673 requirements related to monitoring the effectiveness of safety risk mitigations, annual safety performance assessment, continuous improvement, de-escalation training, and the integration of a joint labor-management safety committee into these processes through the required safety risk reduction program. With this report, FTA is issuing eight findings of non-compliance. [Appendix A](#) of this report lists each finding and the corrective actions required for closeout. In addition, this report provides seven recommendations for WMATA's consideration. Adoption of these recommendations is not mandatory.

## Introduction

### *Federal Requirements and Relevant FTA Actions*

FTA has adopted the principles and methods of SMS as the basis for enhancing the safety of public transportation in the United States. FTA follows the principles and methods of SMS under the authority of 49 U.S.C. 5329 and as established in FTA's Public Transportation Safety Program. See 49 CFR § 673.3.

[Part 673](#) requires operators of public transportation systems that receive Federal funds under the FTA [Urbanized Area Formula Grants \(Section 5307\)](#) and rail transit agencies subject to the FTA [State Safety Oversight \(SSO\) Program](#) to develop an ASP that includes the processes and procedures to implement an SMS, which is a comprehensive, collaborative, and systematic approach to managing safety. SMS brings management and labor together to better control risk, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more precisely.

Since no two public transportation systems are alike, the regulation sets scalable and flexible minimum standards for ASPs, including requirements for the identification, assessment, and mitigation of risk and strategies to minimize exposure to hazards; a comprehensive safety training program; safety performance targets; and a process and timeline for conducting an annual review and update of the ASP.

In 2019, FTA published a [Federal Register Notice](#) highlighting that in cases where a transit agency identifies hazards associated with assaults on transit operators, the PTASP regulation requires the agency to use the SMS Safety Risk Management (SRM) processes documented in its ASP to assess the associated safety risk and, based on the results of the safety risk assessment, identify safety risk mitigations or strategies as necessary to address the safety risk. In 2022, in response to increasing trends in assaults on transit workers, FTA issued Special Directives to nine

transit agencies, including WMATA, requiring each to submit documentation on whether and how they are addressing the risk of assaults on transit workers using their SMS. In 2024, FTA issued General Directive 24-1 to all transit agencies subject to the PTASP regulation, requiring each to conduct a safety risk assessment, identify safety risk mitigations or strategies, and provide information to FTA on how it is assessing, mitigating, and monitoring the safety risk associated with assaults on transit workers.

Beginning in 2023, FTA implemented the new National Transit Database (NTD) requirements of the Infrastructure Investment and Jobs Act (IIJA), which expanded NTD reporting for assaults on transit workers. In April 2024, FTA updated the PTASP regulation to incorporate statutory changes in the IIJA, such as joint labor-management safety committees and safety risk reduction programs, and revised the National Public Transportation Safety Plan (National Safety Plan) to establish new safety performance measures to support required PTASP safety performance target setting, including for the number and rates of assaults on transit workers.

### *WMATA System Overview*

WMATA provides public transportation services in a tri-jurisdictional, large urbanized area, serving a population of approximately 4 million. WMATA's services include fixed-route bus, rail fixed guideway, and paratransit.

Metrobus is the fixed-route bus service covering 1,500 square miles in Washington, D.C., Maryland, and Virginia. Metrobus serves the nation's capital 24 hours a day, 7 days a week, and includes nine regional transit centers in Maryland and Virginia.

Metrorail is the fixed-guideway rail system that serves 98 stations in Virginia, Maryland, and the District of Columbia on 128 miles of track. The Metrorail system has six color-coded rail lines: Red, Orange, Silver, Blue, Yellow, and Green. Metrorail is the second busiest rail system in the United States.

MetroAccess is a shared-ride, door-to-door, complementary paratransit service that provides scheduled trips for eligible customers whose disability prevents them from using WMATA's bus or rail services. MetroAccess provides trips within the metropolitan Transit Zone, which includes the District of Columbia; Montgomery and Prince George's counties in Maryland; Arlington, Fairfax, and Loudoun counties, and the cities of Alexandria, Fairfax, and Falls Church in Virginia.

### *Audit Approach*

FTA's Focused Agency Safety Plan Audit of WMATA verifies compliance with Federal PTASP requirements by auditing WMATA policy and related documentation required by Part 673 and WMATA's implementation of that policy. FTA received and reviewed the WMATA ASP, as well as documentation related to activities for SRM, Safety Assurance, the joint labor-management safety committee, the safety risk reduction program, the transit worker safety reporting program,

safety risk mitigations, and funding prioritization. For a detailed list of materials reviewed, see [Appendix B](#). Of particular note are the following:

- **Agency Policy:** FTA reviewed agency SMS processes and policies (as defined in the ASP and referenced documents) to confirm compliance with the process requirements established by Part 673.
- **Policy Implementation:** FTA reviewed a range of agency records and documentation to verify the agency is carrying out SMS activities as defined in the agency's approved ASP and to confirm how the agency is implementing the SMS processes as they relate to assaults on transit workers.

Following a review of the agency's document submissions, FTA used virtual and on-site audit interviews with key agency personnel to verify SMS implementation activity.

### *Findings and Recommendations*

The findings established in this report identify areas of non-compliance with Part 673 requirements related to monitoring the effectiveness of safety risk mitigations, annual safety performance assessment, continuous improvement, de-escalation training, and the integration of a joint labor-management safety committee into these processes through the required safety risk reduction program. Compliance with these requirements is essential to WMATA's ability to ensure the effectiveness of its safety efforts.

To achieve compliance, WMATA must implement the required corrective actions identified for each finding.

In addition to the eight findings noted, FTA is also making seven recommendations in this report. Recommendations suggest actions that may support and improve WMATA's SMS, but these actions are not mandatory. WMATA may choose whether to implement any of these recommendations. These recommendations are listed in the report below and in [Appendix A](#).

**Finding 1: WMATA has not implemented a process to monitor its operations to identify any safety risk mitigations that may be ineffective, as required at § 673.27(b)(2).**

**Finding 2: WMATA has not established a process to assess its safety performance annually, as required at § 673.27(d)(1).**

**Finding 3: WMATA has not developed or carried out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment, as required at § 673.27(d)(4).**

**Finding 4: WMATA's ASP approval process is inconsistent with the requirements at §§ 673.11(a)(1)(i).**

**Finding 5: WMATA has not met requirements for the joint labor-management safety committee to identify safety deficiencies for purposes of continuous improvement and for the agency’s annual safety performance assessment process to address the role of the safety committee, as required at §§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii), respectively.**

**Finding 6: WMATA has not met requirements for the joint labor-management safety committee to identify and recommend safety risk mitigations, and to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program as required at §§ 673.19(d)(3)(i) and (ii).**

**Finding 7: WMATA has not met requirements for the safety risk mitigation process to include or incorporate by reference in the ASP any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment, and for the Accountable Executive to implement such mitigations as established at §§ 673.25(d)(5) and 673.23(d)(1)(i).**

**Finding 8: WMATA has not met the requirement for the de-escalation training established at § 673.29(a).**

## Audit Observations and Findings

### *Safety Risk Management*

SRM is a process within a transit agency’s ASP for identifying hazards and analyzing, assessing, and mitigating the safety risk of their potential consequences (§ 673.5). The PTASP regulation defines requirements for SRM processes at § 673.25, including requirements for hazard identification (§ 673.25(b)), safety risk assessment (§ 673.25(c)), and safety risk mitigation (§ 673.25(d)). Transit agencies must develop and implement an SRM process for all elements of their public transportation system (§ 673.25(a)).

### **Hazard Identification**

**Key Takeaway:** FTA issues no findings or recommendations in this area. FTA’s review confirms WMATA is identifying safety hazards within the WMATA system and their potential consequences, as required by § 673.25(b).

**Applicable Requirement:** The PTASP regulation defines requirements for hazard identification at § 673.25(b).

**Audit Observations:** WMATA has designed an organizational structure for SRM that is focused on identifying, assessing, and mitigating hazards with input from departmental subject matter experts. WMATA documents all hazard related information. WMATA defines its methods for identifying hazards in Section 3.1.1 of its ASP, including employee safety reports, inspections and audits, investigations, safety committee meetings, safety performance indicators, data analyses, and industry data.

This approach includes a formal process for identifying and documenting hazards received through a range of transit worker reporting sources. WMATA captures safety concerns submitted by individuals through elements of the WMATA Voluntary Safety Reporting System (VSRP), including VSRP online reporting and phone reporting; verbal reporting to a Facility Safety Committee (FSC) or Department Safety Committee (DSC) member; customer concerns received by the Office of Customer Service, Communications and Marketing (CSCM); internal concerns forwarded by the WMATA Office of Inspector General (OIG) to the Department of Safety; and the Confidential Close Call Reporting Program (C3RP). WMATA also captures hazards identified through its Joint Labor-Management Safety Committee (JLMSC).

Upon receiving a submitted report, the Office of Safety Risk Management reviews the concern and confirms whether the report represents a hazard as defined by Part 673 (any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment), categorizes it accordingly, and records it in Origami, WMATA's platform for managing information related to safety risk. This process "screens" reported safety information to ensure that only true hazards are identified for subsequent processes such as safety risk assessment. In addition, the Office of Safety Risk Management assigns each hazard in Origami to a Safety Risk Coordinator (SRC) responsible for SRM activity within the appropriate WMATA departments (power, rail operations, etc.).

FTA interviews confirmed that WMATA's SRCs are trained in hazard identification, safety risk assessment, safety risk mitigation, and Origami functionality. Once a hazard has been assigned to the appropriate SRC, the SRC is responsible for ensuring the applicable department performs the appropriate SRM processes according to approved WMATA policies and procedures. SRCs participate in DSC meetings to review the hazard with subject matter experts, gather and document the information necessary for safety risk assessment activity, and record associated information in Origami.

In their role, SRCs provide tailored guidance on departmental hazard identification and more broadly on SMS and SRM. SRCs are also charged with promoting employee safety reporting and the mechanisms available for transit workers to report. Further, SRCs facilitate routine DSC and/or FSC meetings and collaborate with the Office of Safety Risk Management and other SRCs, as necessary, on hazards that impact multiple departments. WMATA defines this process,

including SRC roles and responsibilities, in Section 3.1 of the ASP and within the *Safety Risk Coordinator Job Aid (4220-4-08/00)*.

During on-site interviews, WMATA articulated and demonstrated to FTA's audit team how its procedural approach to hazard identification, and more broadly WMATA's SRM processes, provide advantages for agency SRM activities, including (1) efficiency through the identification, assessment, and mitigation of safety risk at the departmental level; (2) assurance through SRC accountability and oversight that SRM activities are carried out according to WMATA's documented policies; (3) informed review and action through the ongoing leveraging of departmental subject matter expertise; (4) extensive and consistent documentation and reporting of all SRM activity through WMATA's use of its Origami system; and (5) effective escalation of concerns to the JLMSC if a hazard cannot be resolved departmentally.

### Safety Risk Assessment

**Key Takeaway:** FTA issues no findings or recommendations in this area. FTA's review confirms WMATA has met regulatory requirements for establishing and implementing processes to assess the safety risk associated with identified hazards.

**Applicable Requirement:** At § 673.25(c), FTA requires a transit agency to “establish methods or processes to assess the safety risk associated with identified hazards” and requires that “a safety risk assessment includes an assessment of the likelihood and severity of the potential consequences of identified hazards, taking into account existing safety risk mitigations, to determine if safety risk mitigation is necessary and to inform prioritization of safety risk mitigations.”

**Audit Observations:** WMATA defines its safety risk assessment processes at Section 3.1.2 of its ASP. WMATA uses safety risk assessment matrices based on the Department of Defense Standard Practice for System Safety (MIL-STD-882E) methodology to assess hazards and establish a risk rating based on likelihood and severity. FTA notes that WMATA's process for screening safety concern information as part of its hazard identification process (discussed above) ensures that WMATA safety risk assessments are assessing the safety risk associated with true hazards as defined by Part 673.

As discussed above, WMATA assigns an SRC to each department to support the management of identified hazards. The SRC coordinates and oversees safety risk assessment activity through coordination with the DSC, which has responsibility for reviewing safety concerns associated with the department, maintaining the department's risk register, and overseeing implementation of safety mitigations. WMATA SRCs serve as departmental subject matter experts for the safety risk assessment process.

To facilitate the safety risk assessment, the SRC first collects data and works with the DSC to identify potential consequences of the hazard. WMATA's process addresses the reality of hazards

having multiple potential consequences, and WMATA specifies in its ASP that potential consequences should be specific enough to be measured on a qualitative and quantitative basis. Next, the SRC leads efforts to determine the likelihood and severity of each potential consequence. The likelihood and severity matrices defined in Section 3.1.2 of WMATA's ASP include criteria for assessing likelihood using both qualitative and quantitative information. The SRC then determines a safety risk rating, which is a composite of the assessed levels of severity and likelihood. In the ASP, WMATA specifies that the highest rating of all the potential consequences associated with a particular hazard will determine the hazard's overall safety risk rating.

Further, SRCs assess both inherent and current safety risk. WMATA's Inherent Risk Rating reflects the level of safety risk associated with a hazard before any safety risk mitigations are implemented. WMATA's Current Risk Rating reflects the level of safety risk that accounts for the existence of mitigations that have already been implemented. After completing a safety risk assessment, the SRC enters the results in Origami to document the Current Risk Rating.

### Safety Risk Mitigation

**Key Takeaway:** FTA issues no findings or recommendations in this area. FTA's review confirms WMATA has met regulatory requirements for identifying safety risk mitigations as required at § 673.25(d)(1) and has implemented a wide range of safety risk mitigations to address safety risk associated with assaults on transit workers.

**Applicable Requirement:** At § 673.25(d)(1), FTA requires transit agencies to “establish methods or processes to identify safety risk mitigations or strategies necessary as a result of the transit agency's safety risk assessment to reduce the likelihood and severity of the potential consequences. For large urbanized area providers, these methods or processes must address the role of the transit agency's Safety Committee.”

**Audit Observations:** WMATA defines its processes for safety risk mitigation in Section 3.1.3 of the ASP. Based on the safety risk assessment process discussed above, the DSC records the risk rating in its risk register, and the SRC conducts research to determine whether there are safety risk mitigations already in place and identifies any related mitigations that may be currently planned or in progress. Building on safety risk assessment conversations with the department stakeholders related to qualitative data, the stakeholders also help the SRCs determine appropriate safety risk mitigations to address the hazard. The SRC prepares a list of proposed mitigations, as well as a current and expected future risk rating (once mitigated). After the SRC identifies appropriate safety risk mitigations, the SRC documents the results of the safety risk assessment and the identified safety risk mitigation(s) in a safety risk assessment report using a formal template. This includes the Current Risk Rating and the Future or Residual Risk Rating (the level of safety risk anticipated to remain after implementing the safety risk mitigation).

The SRC presents this information to the DSC. Through the DSC meeting and review and approval of the safety risk assessment and associated safety risk mitigations, this becomes an official plan of action to address the concern. After the DSC approval, the SRC updates the corresponding record in Origami, including entry of the safety risk mitigation and a record of the safety risk mitigation development or implementation status, and uploads the final safety risk assessment report into Origami.

The SRC serves as project coordinator to monitor the implementation of the mitigations through completion. Until the mitigation is completed, the hazard is reported on during the DSC meetings. Once the safety risk mitigation is completed, the SRC updates Origami accordingly.

Safety risk mitigations requiring additional resources or funding, or that address system-wide concerns, are escalated immediately to the Executive Safety Committee (ESC). When necessary, the ESC will task its subcommittees, for example, the JLMSC, to identify and recommend risk-based mitigations or strategies.

Section 2 of WMATA’s JLMSC Charter also states the JLMSC is responsible for the identification and recommendation of safety risk mitigations.

*Assaults on Transit Workers*

WMATA has developed a range of safety risk mitigations to address risk associated with assaults on transit workers. During document reviews and on-site interviews, FTA reviewed safety risk mitigations, including enhanced bus operator barriers, a revised customer banning policy, fare gate enhancements, targeted bus and rail fare enforcement deployments by the Metropolitan Transit Police Department (MTPD), Special Police Officer (SPO) patrols, bus and rail control center integration, video technology enhancements, revised on-vehicle signage, rail station lighting improvements, and community policing strategies and school outreach programs. FTA confirmed the implementation of a significant number of these mitigations. The following table identifies a range of these safety risk mitigations and observations made by the FTA team on-site as well as feedback collected from WMATA transit workers regarding the impact these mitigations are having on assault risk.

Safety Risk Mitigations	Observations
Bus barriers and upgrade efforts	<ul style="list-style-type: none"> <li>• WMATA buses are currently outfitted with bus operator barriers that limit the ability of customers to interfere with operators and help reduce the likelihood of physical assault.</li> <li>• Based on feedback from operators and research performed by WMATA, the agency has begun retrofitting buses with new operator barriers that extend all the way to the bus windshield and the bus ceiling. These new barriers are intended to prevent a potential assailant from being able to make any contact</li> </ul>

Safety Risk Mitigations	Observations
	<p>with a bus operator.</p> <ul style="list-style-type: none"> <li>• FTA confirmed that WMATA has begun to replace existing barriers with the new version and will continue this integration for 100 percent of its bus fleet.</li> <li>• FTA gathered anecdotal evidence from operators that they prefer the new barrier models and believe they offer improved protection from assault risk.</li> </ul>
Revised banning policy	<ul style="list-style-type: none"> <li>• <b>Banning repeat and certain offenders:</b> On June 2, 2025, WMATA implemented a new banning policy. A June 2025 staff notice explains that the policy “aims to improve the safety and security of Metro’s [WMATA’s] employees, contractors, and customers by increasing the length of time Metro can ban persons from the Metro [WMATA] system, facilities, and property for committing offenses in the following categories: (1) Sex crimes (including indecent exposure and lewd conduct); (2) Assaults of any kind on WMATA employees or WMATA contractors while working; and (3) Assaults of any kind on customers. Ban periods increase for repeat offenders up to 365 days for three or more offenses.”</li> <li>• Before changes enacted by local jurisdictions enabled this WMATA policy change, only a judge could ban offenders from the station in which the offense occurred for a maximum of 30 days. These court orders were usually limited in duration and scope, often lasting just a few weeks, and generally only prohibited access to one Metro bus line or one Metrorail station where the criminal offense occurred.</li> </ul>
Fare gate enhancements	<ul style="list-style-type: none"> <li>• Starting in July 2023, WMATA began to retrofit more than 1,200 fare gates at all Metrorail stations to improve the physical security of the system and deter fare evasion. These five-foot-tall fare gates and fences are designed to make it more difficult for someone to enter or exit the system without paying their fare. Since project completion WMATA reports fare evasion is down 82 percent.</li> </ul>
Fare enforcement deployments	<ul style="list-style-type: none"> <li>• In addition to standard patrols, MTPD regularly deploys fare enforcement patrols at Metrorail and bus stations with higher rates of fare evasion. WMATA reports MTPD issued more than 15,000 summons/citations and made almost 1,000 arrests for fare evasion in calendar year 2024, an increase of 148 percent and 67 percent respectively over calendar year 2023. These citations and arrests also resulted in the recovery of 16 illegal guns and the arrest of more than 250 attempted fare evaders with open warrants. MTPD also targets bus fare enforcement: a December 2024 surge checked more than 2,400 buses, resulting in 1,610 fare evasions deterred, 758 fare evasion citations, 36 fare evasion arrests, and 14 arrests on outstanding warrants.</li> </ul>

Safety Risk Mitigations	Observations
	<ul style="list-style-type: none"> <li>The ESC meeting presentation (January 2025) states WMATA “[i]nitiating a major fare enforcement campaign on Metrobus, focusing on reducing fare evasion and ensuring compliance without involving bus operators in enforcement activities.” ESC meeting minutes for the February 2025 meeting state Randy Clarke “noted that there was a large drop in safety related events starting in September” when the organization increased its fare enforcement campaign.</li> </ul>
MTPD staffing and Police Academy	<ul style="list-style-type: none"> <li>MTPD is facing recruiting challenges compounded by the requirement for officers to meet the differing police qualifications in three jurisdictions (District of Columbia, Maryland, and Virginia). MTPD currently has 548 officers and civilian staff. Historically, recruiting efforts were further impacted by reliance on training capacity at the Northern Virginia Criminal Justice Training Academy. To streamline the training pipeline and get more officers on the street quickly, WMATA created an in-house police training academy, which WMATA projects will double training capacity, shorten training by seven weeks per class, and save WMATA approximately \$1 million dollars annually in operating costs. The first in-house class completed training in May 2025.</li> </ul>
Special Police Officer (SPO) patrols	<ul style="list-style-type: none"> <li>WMATA has contracted 180 SPOs to supplement the MTPD presence throughout the system. These private security officers are primarily assigned to on-board patrols of trains and stations to deter illegal activity and enhance the security of customers and staff.</li> </ul>
Metro Integrated Command and Communications Center (MICC)	<ul style="list-style-type: none"> <li>In October 2023, WMATA integrated bus and rail control centers to streamline bus, rail, maintenance, and security operations. The newly created Video Operations Department combines operations and police video teams to increase the number of staff focused on using the system to help with real-time operations. The team provides 24-hour coverage as WMATA continues to invest in the expansion of its video monitoring capacity of over 30,000 cameras across the system. This team is co-located with the MTPD Communications Division to aid in the timely dispatch of police resources during incidents, investigations, compliance audits, and law enforcement details.</li> </ul>

Safety Risk Mitigations	Observations
Video technology enhancements	<ul style="list-style-type: none"> <li>• WMATA is investing more than \$80 million in the modernization and expansion of video systems and monitoring capabilities. WMATA believes this software and hardware modernization capitalizes on the latest technology that will more efficiently search systemwide video cameras for suspects and suspicious or dangerous objects. Further, WMATA believes that this new software positions WMATA and law enforcement partners across jurisdictions to take advantage of ongoing advances in video analytical tools and artificial intelligence to continuously improve security measures. In addition, WMATA is enhancing real-time video live look-ins on its railcar fleet. In 2024, WMATA completed technology upgrades to its Metrobus fleet for live video access. All new buses and trains will be equipped with this technology.</li> </ul>
Improved on-vehicle signage	<ul style="list-style-type: none"> <li>• WMATA performed a behavioral analysis study on bus decals installed on buses and station manager kiosks that warn customers they are under camera surveillance and alert them of consequences related to assaulting a bus operator. The study evaluated the impact of the signage as a deterrent.</li> <li>• The study concluded that the original design, which consisted of a stop sign with cartoon eyes, was a less effective deterrent than an alternative design that featured a photograph of human eyes.</li> <li>• Based on the study, WMATA installed updated decals that featured the photograph with revised language: “Assaulting an operator can lead to jail time.”</li> </ul>
Rail station lighting improvements	<ul style="list-style-type: none"> <li>• WMATA established enhanced lighting configurations, including at the Potomac Yard station that opened May 19, 2023, and made modifications to station lighting at certain underground stations, such as L’Enfant Plaza station, to improve existing lighting and deter criminal activity.</li> </ul>
Community Policing and Outreach Strategies	<ul style="list-style-type: none"> <li>• <b>Crisis Intervention Specialists:</b> WMATA employs crisis intervention specialists to support customers in need of critical services, allowing law enforcement personnel to focus resources on reducing crime in the system. In 2024, there were 23 specialists who interacted with 9,000 individuals to provide resources and support. WMATA provides literature and information on housing opportunities, runs events to distribute food, and offers support to provide mental health resources to those in need. MTPD officers reach out directly to the crisis intervention team to arrange the distribution of donated clothing to community members in need.</li> <li>• <b>School relationships:</b> WMATA has developed relationships with local schools, enabling MTPD officers to visit local schools and talk to students about</li> </ul>

Safety Risk Mitigations	Observations
	<p>WMATA fare policies and safe use of the WMATA system. Through these efforts:</p> <ul style="list-style-type: none"> <li>○ WMATA has carried out mentoring and mediation efforts and believes this work has helped shift the perspective that students have of Metro and MTPD officers.</li> <li>○ MTPD schedules events at local schools where they bring a transit bus and WMATA bus operators demonstrate how the bus works. These events offer an opportunity for students to meet and interact with MTPD officers and operators.</li> <li>○ WMATA facilitates a back-to-school backpack giveaway and offers children free haircuts in preparation for the school year. WMATA notes that targeted locations have shown a reduction in criminal activity.</li> </ul> <ul style="list-style-type: none"> <li>● <b>Holiday Buses:</b> Around major holidays, WMATA decorates a bus and goes to designated locations to facilitate a meet-and-greet between the public and WMATA operators and MTPD officers.</li> <li>● <b>Youth Advisory Program:</b> WMATA holds a monthly youth advisory event at WMATA’s L’Enfant Plaza offices attended by students from the area. Participating students earn community service hours. The events include guest speakers, summer employment information support, information on college programs, military career advice, and information on job opportunities at WMATA.</li> <li>● <b>Police Cadet Program:</b> MTPD runs a police cadet program for youth aged 17 to 22. Participants in the program are employed by WMATA while getting their associate’s degree.</li> <li>● <b>Youth Basketball Team:</b> The MTPD sponsors a youth basketball team for children 8 to 11 years old. MTPD officers coach teams and work directly with local youth to build relationships.</li> </ul>

***Safety Assurance***

Transit agencies must develop and implement a Safety Assurance process (§ 673.27(a)). Safety Assurance is a set of processes within a transit agency’s SMS that functions to ensure the implementation and effectiveness of safety risk mitigations and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information (§ 673.5). The PTASP regulation defines requirements for Safety Assurance processes at § 673.27, including requirements for safety performance monitoring and

measurement (§ 673.27(b)), management of change (§ 673.27(c)), and continuous improvement (§ 673.27(d)). Safety Assurance activities serve as a check on the SRM of a transit agency.

### Monitoring the Effectiveness of Safety Risk Mitigations

**Key Takeaway:** FTA’s review of WMATA’s policies and implementation identified non-compliance with the requirement to monitor the effectiveness of safety risk mitigations established at § 673.27(b)(2). To achieve compliance, WMATA must carry out the process defined in its ASP for monitoring the effectiveness of its safety risk mitigations. FTA recommends WMATA add mitigation effectiveness criteria to the safety risk mitigation records in Origami, offering the agency a consistent method for monitoring both safety risk mitigation implementation and effectiveness.

**Applicable Requirement:** At § 673.27(b)(2), FTA requires each transit agency to establish activities to “monitor its operations to identify any safety risk mitigations that may be ineffective.”

**Audit Observations:** WMATA defines processes related to safety risk mitigation monitoring in Section 4.1.2 of its ASP. According to the ASP, the “Department of Safety’s Safety Data Analytics team works with the SRCs to determine how the effectiveness of risk mitigations will be measured. Each risk will have KPIs [Key Performance Indicators] that inform whether mitigations are working as intended or if additional action needs to be taken. At a minimum, the Department of Safety holds a monthly meeting with SRCs where lessons learned from Safety Risk Management implementation are discussed, which include but are not limited to determining KPIs, safety target setting, and interpreting changes in KPI performance.”

However, FTA’s document reviews and virtual and on-site interviews confirmed WMATA is not establishing KPIs for each safety risk as described in its ASP. Instead, FTA confirmed that WMATA monitors more general and high-level safety KPIs. FTA notes that these KPIs are not tied to a specific safety risk or safety risk mitigation and often address more general safety concerns than those addressed by a specific safety risk mitigation. As such, WMATA’s activity does not allow WMATA to consistently identify safety risk mitigations that are ineffective and does not follow the process articulated in the WMATA ASP.

FTA confirmed WMATA has monitored the effectiveness of some of its safety risk mitigations. For example, during on-site interviews, representatives from the MTPD presented FTA with an analysis using a Power BI dashboard developed for the MTPD that allows the department to actively monitor safety performance data related to concerns associated with assaults on transit workers and serious crimes. This analysis showed trends in serious crimes and trends in fare evasion citations correlated with the initiation of fare enforcement in the District of Columbia following a period when such fare enforcement had been prohibited. The data indicate a correlation of the initiation of fare enforcement in transit vehicles in the District of Columbia

with an increase in fare enforcement citations and a simultaneous decrease in the number of violent crimes. WMATA representatives told the FTA audit team this information strengthened MTPD's and WMATA's confidence in the effectiveness of its fare enforcement actions and has supported efforts to launch High Intensity Target Enforcement initiatives to target fare evasion based on information collected by MTPD related to known fare evasion "hot spots." However, FTA notes these indicators were not identified as KPIs for the associated safety risk mitigation as described in the WMATA ASP, and this type of safety risk mitigation effectiveness monitoring is not carried out for all safety risk mitigations.

**Finding 1: WMATA has not implemented a process to monitor its operations to identify any safety risk mitigations that may be ineffective, as required at § 673.27(b)(2).**

**Actions required for closeout:**

- WMATA must submit documentation that confirms it is carrying out the process defined in its ASP to monitor the effectiveness of each safety risk mitigation submitted in response to General Directive 24-1 and any new safety risk mitigations established to address the safety risk associated with assaults on transit workers.

During virtual and on-site interviews, WMATA representatives stated they do not formally monitor the effectiveness of specific safety risk mitigations due to challenges determining effectiveness with certainty, given the inability to reach a scientifically supported conclusion through randomized control trials or other scientifically based evaluation models.

Section 673.27(b)(2) does not require randomized control trials or other approaches aimed at scientific certainty. Instead, transit agencies can use a process that provides them with an informed understanding of safety risk mitigation effectiveness. Transit agencies may accomplish this using analysis of quantitative data (counts and rates of assaults, among others) and/or qualitative information (frontline worker feedback, customer feedback, etc.) to establish an understanding of safety risk mitigation effectiveness.

FTA notes WMATA has already developed a robust process in its Origami system for tracking the implementation of safety risk mitigations and encourages WMATA to consider adding mitigation effectiveness criteria within the safety risk mitigation records in Origami, offering the agency a consistent method for monitoring both safety risk mitigation implementation and effectiveness. By establishing criteria for safety risk mitigations and documenting these criteria as part of WMATA's formal process for monitoring the effectiveness of safety risk mitigations, WMATA can effectively determine whether its safety risk mitigations are working to address the associated safety risk as intended.

### **Recommendation 1:**

FTA recommends WMATA add mitigation effectiveness criteria to the safety risk mitigation records in Origami, offering the agency a consistent method for monitoring both safety risk mitigation implementation and effectiveness.

### **Continuous Improvement**

**Key Takeaway:** FTA’s review of WMATA’s policies and implementation identified non-compliance with certain Part 673 requirements related to continuous improvement. To achieve compliance, WMATA must revise the ASP to define a process to assess its safety performance annually as required at § 673.27(d)(1) and to develop and carry out a plan to address any deficiencies identified through the annual safety performance assessment, as required by § 673.27(d)(4). FTA recommends WMATA document in its ASP a formal process that builds off its ongoing safety performance monitoring efforts to document, at year end, whether or not each annual safety performance target was met. FTA also recommends WMATA revise its ASP to define in greater detail its process for developing and carrying out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment.

#### *Safety Performance Targets*

**Applicable Requirement:** Section 673.11(a)(3) requires that a transit agency’s ASP “must include annual safety performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.”

The National Safety Plan establishes 14 general safety performance measures for which transit agencies must set safety performance targets. Transit agencies must set targets for the different modes of transit service they provide.

**Audit Observations:** FTA did not identify any findings of non-compliance related to setting general safety performance targets and documenting them in the ASP as required at § 673.11(a)(3). WMATA has developed a formal program for setting general safety performance targets and providing status updates during the year on safety performance against established safety performance targets. The Department of Safety and Office of Performance and Global Benchmarking (Performance Office), within WMATA’s Department of Planning and Performance, works with Metro leadership to develop recommendations for safety performance targets, factoring in previous performance, the strategic priorities for the coming fiscal year, external trends, and available resources. Annually, WMATA develops a document that describes in detail its approach for developing the annual safety performance targets.

The Performance Office coordinates with the Department of Safety in April each year to draft safety performance targets for the following fiscal year, including the establishment of up to three options for each safety performance target. In May and June, Metrorail, Metrobus, and MetroAccess, the JLMSC, and the ESC review and approve safety performance targets.

The Performance Office, in coordination with the Department of Safety, develops extensive documentation that defines the suggested options for each safety performance target, with charts that illustrate detailed safety performance trends for each safety performance measure. This documentation is used by committees to support the finalization of safety performance targets.

*Annual Performance Assessment – Identifying Deficiencies in the Agency’s SMS and Deficiencies in Performance against Safety Performance Targets*

**Applicable Requirements:** Section 673.27(d)(1) requires transit agencies to “establish a process to assess its safety performance annually.” This annual performance assessment must include (1) the identification of deficiencies in the transit agency’s SMS; and (2) deficiencies in the transit agency’s performance against required safety performance targets (§ 673.27(d)(1)(i)). For rail transit agencies, the process “must also address any specific internal safety review requirements established by their State Safety Oversight Agency” (§ 673.27(d)(1)(iii)).

**Audit Observations (Identifying Deficiencies in the Agency’s SMS):** Section 4.1.2 of the WMATA ASP states that “each department and functional area is responsible for conducting an annual audit of its own SMS compliance. The purpose of this audit is to verify that hazards are being appropriately identified, assessed, and mitigated through the SRM process.” The ASP says that while the SRCs are responsible for the establishment of their department’s internal assessment process, the Safety Risk Management Team from the Department of Safety works with each SRC to ensure these processes are of high-quality and are consistent across the Authority. However, during document reviews and on-site interviews, FTA confirmed that WMATA has not conducted this annual audit as described in the ASP. FTA notes that as described in the ASP, this audit process alone would not meet the requirements established at § 673.27(d)(1), because its scope is limited to Safety Risk Management and it does not address other components of the WMATA SMS, including Safety Management Policy, Safety Assurance, and Safety Promotion.

At Section 4.3, the WMATA ASP describes WMATA’s approach to continuous improvement. Although the ASP refers to “multiple internal safety reviews to monitor compliance with its SMS” and “annual performance evaluations,” this section of the ASP does not specifically define an annual process for identifying deficiencies related to WMATA’s SMS.

According to the ASP, WMATA’s Department of Quality Assurance, Internal Compliance and Oversight conducts internal safety audits as part of the continuous improvement process and as required by WMATA’s SSOA, the Washington Metropolitan Safety Commission (WMSC). This process is described in the *QICO-PRO P01 Internal Safety Review Notification and Reporting*

*Procedure.* According to the ASP, internal safety reviews are conducted by each department on the local level to verify SMS compliance. These audits verify that hazards are being appropriately identified, assessed, and mitigated through WMATA's SRM process and follow the required three-year cycle for auditing implementation of each element of the WMATA ASP once every three years. Section 673.27(d)(1)(iii) requires transit agencies to address internal safety review requirements established by their State Safety Oversight Agency. However, FTA notes this requirement is in addition to the annual performance assessment requirements at § 673.27(d)(1)(i) related to identifying deficiencies in the SMS. The SSOA-required reviews examine ASP implementation over a three-year period. These internal safety reviews alone are insufficient to address the PTASP requirement for transit agencies to assess their safety performance to identify deficiencies in their SMS annually.

During on-site interviews, WMATA personnel confirmed that the agency addresses the requirement for the annual performance assessment of its SMS through the execution of its annual ASP update process. However, FTA notes the current documented WMATA processes related to the annual ASP update are insufficient to address the regulatory requirement at § 673.27(d)(1)(i) because they do not define an annual process to identify deficiencies in the transit agency's SMS. To achieve compliance, WMATA must define and carry out an annual process, which may be associated with its ASP review and update cycle, that defines how WMATA will identify any deficiencies in its SMS.

**Finding 2: WMATA has not established a process to assess its safety performance annually, as required at § 673.27(d)(1).**

*Note: FTA has issued a related finding regarding the JLMSC's role in supporting this activity (Finding 5).*

**Actions required for closeout:**

- WMATA must document a process in its ASP for conducting an annual performance assessment as required at § 673.27(d)(1), including a process for how WMATA identifies deficiencies in its SMS.
- WMATA must submit documentation that confirms it has conducted the annual performance assessment required at § 673.27(d)(1), including the identification of any deficiencies.

**Audit Observations (Identifying Deficiencies in Performance against Safety Performance Targets):** The WMATA ASP states that the Safety Data Analytics team measures and reports on WMATA's performance targets and analyzes data to inform priorities. FTA confirmed through review of committee meeting materials that through ongoing support from WMATA's Safety Data Analytics team, WMATA reviews progress toward annual safety performance targets monthly and shares these status updates with its DSCs, the JLMSC, and the ESC. While the

WMATA ASP establishes a process for setting safety performance targets for the 14 general safety performance targets, monitoring performance against targets during the year, the ASP does not specifically describe how WMATA conducts and documents a final, end-of-year determination of whether an annual safety performance target was met.

**Recommendation 2:**

FTA recommends WMATA document in its ASP a formal process that builds on its ongoing safety performance monitoring efforts to document, at year end, whether or not each annual safety performance target was met.

*Annual Performance Assessment – Plan to Address Deficiencies*

**Applicable Requirement:** Section 673.27(d)(4) requires a transit agency to “develop and carry out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the safety performance assessment” required at § 673.27(d)(1).

**Audit Observations:** WMATA’s ASP states that WMATA’s “assessment of safety performance includes developing and carrying out a plan (or plans), under the direction of the Accountable Executive, to address safety deficiencies identified during safety performance assessment” and establishes that the Office of Safety Assurance in the Department of Safety is responsible for this activity. The WMATA ASP does not document in further detail how WMATA will develop and carry out this plan. FTA confirmed through interviews that, to date, WMATA has not developed or carried out the plan as required.

**Finding 3: WMATA has not developed or carried out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment, as required at § 673.27(d)(4).**

**Actions required for closeout:**

- WMATA must submit a plan to address any deficiencies identified through the annual safety performance assessment conducted pursuant to Finding 2, including any deficiencies associated with the comprehensive safety training program required under § 673.29(a).
- WMATA must submit documentation that confirms it has carried out the plan described above.

**Recommendation 3:**

FTA recommends WMATA revise its ASP to define in greater detail its process for developing and carrying out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment.

### ***Safety Committee and the Safety Risk Reduction Program***

**Applicable Requirements:** Transit agencies that serve an urbanized area with a population of 200,000 or more (large urbanized area providers) must establish a safety committee that is appropriately scaled to the size, scope, and complexity of the transit agency, and is convened by a joint labor-management process. (§ 673.19(a))

The safety committee must consist of an equal number of frontline transit worker representatives and management representatives. The labor organization that represents the plurality of the transit agency's frontline transit workers must select frontline transit worker representatives for the safety committee. (§ 673.19(b))

Each large urbanized area provider must include or incorporate by reference in its ASP procedures regarding the composition, responsibilities, and operations of the safety committee. (§ 673.19(c))

The safety committee must undertake the following activities to oversee the transit agency's safety performance: (1) review and approve the ASP and any updates to the ASP; (2) set annual safety performance targets for the safety risk reduction program; and (3) support the transit agency's SMS by identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment; identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended; and identifying safety deficiencies for purposes of continuous improvement. (§ 673.19(d))

### **Establishment/Membership**

**Key Takeaway:** FTA issues no findings or recommendations in this area. FTA confirmed WMATA has established a joint labor-management safety committee that meets the membership requirements at §§ 673.19(a) and (b).

**Audit Observations:** WMATA describes its JLMSC in Section 2.4.5 of its ASP. FTA document reviews and interviews confirmed the JLMSC was convened by a joint labor-management process and is comprised of an equal number of frontline transit worker representatives and management representatives. FTA conducted interviews with JLMSC members and discussed member experiences supporting the JLMSC. Frontline transit worker representatives confirmed they were appointed to the JLMSC by the union president. JLMSC frontline worker representatives told auditors they feel the JLMSC has established a collaborative structure for identifying and addressing frontline worker concerns. Members also expressed that, through the JLMSC, the union and WMATA have achieved the best working relationship they have had in many years. Frontline worker representatives confirmed that through the JLMSC, they believe frontline worker concerns will be heard and addressed.

## Safety Committee Procedures

**Key Takeaway:** FTA issues no findings in this area. FTA confirmed WMATA uses three policy documents to define the responsibilities and processes of the JLMSC: the ASP, the JLMSC Charter, and the Safety Risk Reduction Plan. FTA recommends WMATA consider the development of additional training or onboarding materials that address the JLMSC activities required by the PTASP regulation.

**Audit Observations:** The WMATA ASP restates regulatory requirements for the safety committee, including the requirements that the JLMSC reviews and approves the ASP, sets safety performance targets for the safety risk reduction program, identifies and recommends safety risk mitigations, identifies safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, and identifies safety deficiencies for the purposes of continuous improvement. The ASP references the JLMSC Charter to address specific JLMSC processes. The ASP also describes other safety committees (ESC and DSC) that monitor KPIs, perform compliance monitoring, monitor the organization for potential hazards, and identify safety risk mitigations. The ASP notes that all safety committees shall be chartered, and that the charter documents the committee members, their roles and responsibilities, and meeting frequency. WMATA defines processes related to the JLMSC and the safety risk reduction program through two additional policy documents: the JLMSC Charter and the *Safety Risk Reduction Plan (4800-2-12/01)* (both referenced in the ASP).

The JLMSC Charter, approved November 19, 2025, defines the committee characteristics, components, and committee processes, including organizational structure; Chairperson, required JLMSC training; administrative processes; compensation policy; decision-making; subject matter experts and the transit worker safety reporting program; and communication with the Board of Directors and the Accountable Executive.

The charter defines how the committee will coordinate and communicate with the Board of Directors and Accountable Executive. The JLMSC charter describes an escalation process to elevate issues to the ESC. The JLMSC voting members will designate member(s) responsible for developing and presenting materials to the ESC for consideration, including recommendations.

The *Safety Risk Reduction Plan (4800-2-12/01)* outlines the responsibilities of the JLMSC related to the safety risk reduction program:

- Participating in developing mitigations after reviewing safety risk assessment results
- Establishing project plans for implementation of recommendations
- Reviewing the efficacy of mitigations and escalating any hazards not sufficiently mitigated to the ESC
- Establishing KPIs based on safety performance targets to measure the effectiveness of recommended mitigations

Through on-site interviews, FTA confirmed the JLMSC plays an active role in addressing concerns related to assaults on transit workers, including the establishment and support of the JLMSC's transit worker assault subcommittee (Transit Worker Assaults Working Group) that focuses attention on concerns related to assaults on transit workers, monitoring safety performance related to assaults on transit workers, and discussion of safety risk mitigations that address the safety risk associated with assaults on transit workers. FTA notes during interviews JLMSC representatives were well-versed in WMATA safety concerns and shared evidence of active participation in the discussion of specific safety concerns, including topics related to assaults on transit workers. They were less familiar, however, with the specific responsibilities required by the PTASP regulation, including ASP review and approval, setting targets for the safety risk reduction program, recommending safety risk mitigations (including in response to a missed safety risk reduction program annual safety performance target), and documenting mitigations relating to the safety risk reduction program in the ASP.

**Recommendation 4:**

FTA recommends WMATA develop training or onboarding content for JLMSC members that focuses on the safety committee duties and related requirements established by Part 673, including:

- Review and approval of the ASP,
- Setting safety performance targets for the safety risk reduction program,
- Identifying safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program,
- Identifying and recommending safety risk mitigations, including mitigations associated with instances of a missed safety performance target for the safety risk reduction program,
- Documenting safety risk mitigations for the safety risk reduction program in the ASP, and
- Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

## Safety Committee Responsibilities and the Safety Risk Reduction Program

### *Review and Approval of the ASP (§§ 673.11(a)(1)(i) and 673.19(d)(1))*

**Key Takeaway:** FTA’s review of WMATA policies and practices identified non-compliance with Part 673 requirements related to JLMSC approval of the ASP. FTA confirmed WMATA has established a process for the JLMSC to review and approve the ASP annually. However, the process includes additional review and approval steps for the ESC and the Accountable Executive after the JLMSC’s approval, which impermissibly allow management to exercise veto power over the approved ASP.

**Applicable Requirements:** The ASP must be signed by the Accountable Executive and approved by the joint labor-management safety committee, followed by the transit agency’s Board of Directors or an equivalent entity. (§§ 673.11(a)(1)(i))

**Audit Observations:** WMATA defines its ASP review and update process in Section 1.2 of its ASP:

- **March 1 to April 15:** The Director of Safety Policy and Promotion performs a general review of the ASP to confirm that policy changes and changes from other inputs are addressed.
- **April 15 to May 15:** WMATA posts the draft ASP on the Metro intranet for all employees to review and comment. Also, the draft ASP is reviewed with the JLMSC during this phase.
- **May 1 to May 30:** The Director of Safety Policy and Promotion prepares a revised draft of the ASP and initiates review cycles with WMSC staff to obtain “Conditional Approval.”
- **June 1 to June 30:** WMATA supports continued review cycles with WMSC staff to obtain “Conditional Approval.”
- **July 1 to July 31:** The Director of Safety Policy and Promotion conducts a final review to ensure all feedback has been addressed. Conditional approval from WMSC is secured at the end of this review period and no further material changes are made.
- **August 1 to August 31:** The JLMSC approves the ASP by August 15. This is followed by the ESC review and approval.
- **September 1 to September 30:** The GM and CEO reviews and approves the ASP and then the ASP is submitted to the WMATA Board of Directors for review and approval.
- **October 1 to October 31:** After WMATA Board of Directors approval, WMATA sends the ASP to WMSC for approval.

- **November 1 to December 31:** Upon WMSC approval, the Director of Safety Policy and Promotion distributes and promotes the latest ASP and ensures SMS training, new employee orientation, etc., are updated.

WMATA’s documented sequencing for ASP review and approval does not meet the regulatory requirements established in § 673.11(a). FTA clarifies the ASP review sequence in the preamble to the April 2024 PTASP final rule ([89 FR 25715](#)): “The Accountable Executive signs the ASP, followed by review and approval by the joint labor-management safety committee, then review and approval by the transit agency Board of Directors or equivalent entity, and finally review and approval by the SSOA. In the preamble, FTA reiterates the role of the Accountable Executive, as it pertains to ASP updates, is to sign the ASP. FTA states in the preamble that the regulation “does not establish Accountable Executive veto power over the contents of the ASP, because that would be inconsistent with statutory requirements relating to the composition of safety committees, as well as the statutory requirement that the safety committee and Board of Directors must approve the ASP—not the Accountable Executive.” WMATA’s ASP review and update process, which allows the Accountable Executive to approve or disapprove the ASP, impermissibly enables the Accountable Executive to exercise veto power over the ASP.

In addition, the ASP states that the JLMSC is a subcommittee of the ESC. However, the ESC does not contain frontline worker representation and is comprised of WMATA management representatives. Based on current WMATA policy, WMATA’s ESC conducts a review and approval of the ASP after the JLMSC’s review and approval of the ASP. This process permits WMATA management to veto the ASP after it is approved by the JLMSC. This structure gives management and the Accountable Executive approval authority not permitted by Section 5329 and Part 673.

**Finding 4: WMATA’s ASP approval process is inconsistent with the requirements at §§ 673.11(a)(1)(i).**

**Actions required for closeout:**

- WMATA must revise its ASP review, update, and approval process to ensure that the ESC and Accountable Executive may not veto the ASP after it has been approved by the JLMSC.
- WMATA must revise its ASP to document this updated process and submit the revised ASP that has been approved based on the revised, compliant process.

*Setting Annual Safety Performance Targets for the Safety Risk Reduction Program  
(§§ 673.11(a)(7)(iii) and 673.19(d)(2))*

**Key Takeaway:** FTA issues no findings in this area. FTA confirmed the JLMSC sets safety performance targets for the safety risk reduction program through the review and approval of the WMATA ASP. FTA recommends the JLMSC set safety performance targets for the safety risk reduction program that reflect a reduction from the three-year rolling average of NTD data.

**Applicable Requirements:** PTASP regulation requires safety committees to set annual safety performance targets for the eight safety risk reduction program performance measures established in the National Safety Plan. (§§ 673.19(d)(2) and 673.11(a)(7)(iii))

In addition, targets must be “based on the level of detail the large urbanized area provider is required to report to the NTD. The safety committee is not required to set a target for a performance measure until the large urbanized area provider has been required to report three years of data to the NTD corresponding to such performance measure.” (§ 673.11(a)(7)(iii)(C))

**Audit Observations:** As discussed in greater detail above, WMATA has developed a formal program for setting safety performance targets led by the Office of Performance in coordination with WMATA leadership to develop recommendations for safety performance targets. WMATA’s ASP identifies annual safety performance targets for the safety performance measures established by the National Public Transportation Safety Plan, including the 14 general safety performance measures and the eight safety performance measures for the safety risk reduction program. The safety risk reduction program safety performance targets carry different requirements than the general safety performance targets, such as who sets them, how they are set, and the consequences of failing to meet a target.

FTA notes that there is overlap between the 14 general safety performance measures and the eight safety performance measures for the safety risk reduction program.

The WMATA ASP does not distinguish between the 14 required general safety performance targets and the eight required targets set by the safety committee for the safety risk reduction program and instead lists all safety performance targets together in one list.

WMATA confirmed during virtual and on-site interviews that in instances of overlap, WMATA uses the same safety performance target for both the required general safety performance target and the safety risk reduction program safety performance target.

FTA confirmed the safety risk reduction program safety performance targets are developed based on a three-year rolling average of data that WMATA reported to the NTD, established for all modes of WMATA’s public transportation service, and set by the JLMSC through a review and approval process.

As noted by WMATA within the document describing the Fiscal Year (FY) 2026 safety performance target process, the agency and the JLMSC aim to set realistic safety performance

targets for the safety risk reduction program by considering historical performance, current safety goals, and projected operational circumstances. In practice, this means that, in addition to basing a safety performance target on recent safety performance, the JLMSC sets safety performance targets for the safety risk reduction program that take into account anticipated operational changes that can have a direct impact on performance related to a specific safety performance target.

For example, when considering annual safety performance targets for the count and rate of injuries, WMATA has identified and considered changes in service levels that can directly drive the related performance outcome. WMATA's recent target setting activities identified that vehicle revenue miles have remained relatively stable over recent years (an approximate increase between three and five percent) while ridership (boardings) has increased much more significantly (up approximately 33 percent over the same period). The Performance Office recognized that this trend results in higher passenger loads for each vehicle revenue mile. In turn, WMATA representatives stated this will likely translate to higher counts of injuries and higher rates of injuries per vehicle revenue mile, simply based on the natural impact of increasing ridership. As a result, WMATA explained to the FTA audit team that maintaining injury rates at levels experienced over the past three years may be a difficult challenge and proposed options for safety performance targets responsive to these operational changes and that may not represent an actual reduction in a count or a rate as compared to previous years. During interviews, WMATA representatives noted the value this approach offers their organization, including avoiding situations where the agency sets a safety performance target that is so difficult to meet that key stakeholders do not pay attention to it, eliminating the opportunity for meaningful discussion related to performance improvement.

Annually, WMATA's Performance Office, in coordination with the Department of Safety, presents to the JLMSC background and options for each safety risk reduction program safety performance target based on a three-year rolling average of data that WMATA has reported to the NTD. The JLMSC reviews this information and provides recommendations on which option to use. Ultimately, these recommendations are incorporated into the draft WMATA ASP, and the JLMSC formally sets the safety performance targets for the safety risk reduction program through its annual review and approval of the ASP.

At § 673.11(a)(7), states the safety risk reduction program is intended "to improve safety performance by reducing the number and rates of safety events, injuries, and assaults on transit workers." In the preamble to the April 2024 PTASP final rule, FTA clarifies expectations about how safety committees should set these safety performance targets, stating "to reflect an annual reduction, the safety performance target must be set below the three-year rolling average. However, Safety Committees have flexibility regarding the amount of annual reduction defined by their targets, as long as the methodology uses a three-year rolling average of data reported to the NTD and the targets reflect an annual reduction."

In practice the JLMSC may set a safety performance target for the safety risk reduction program that does not represent a reduction from the three-year rolling average. FTA confirmed this outcome for several safety risk reduction program safety performance targets for FY 2026 documented in the latest WMATA ASP, including bus collision rate, bus major event rate, bus injury rate, rail injury rate, and bus worker assault rate.

**Recommendation 5:**

As a best practice, FTA recommends the WMATA JLMSC set safety performance targets for the safety risk reduction program that reflect an annual reduction by setting the safety performance target below the three-year rolling average of associated data reported to the NTD.

*Supporting the Transit Agency's SMS and the Safety Risk Reduction Program (§§ 673.11(a)(7) and 673.19(d))*

**Key Takeaway:** FTA's review of WMATA policies and implementation identified non-compliance with certain Part 673 requirements related to the JLMSC's role in supporting WMATA's SMS. Specifically, FTA has determined:

- WMATA has not met requirements for the joint labor-management safety committee to support the transit agency's SMS by: (1) identifying safety deficiencies for purposes of continuous improvement; (2) identifying and recommending safety risk mitigations to address instances of a missed safety performance target set for the safety risk reduction program); and (3) identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program (§ 673.19(d)(3)(i)-(iii)); and
- WMATA has not established a compliant process to incorporate safety risk mitigations identified and recommended by the JLMSC for the safety risk reduction program into the ASP for implementation (§ 673.11(a)(7)(iv)).

In addition, FTA recommends WMATA work to increase frontline transit worker awareness of the JLMSC and how concerns can be shared with the JLMSC. FTA further recommends WMATA revise its ASP, Safety Risk Reduction Plan, and/or JLMSC Charter to clarify and formalize how the JLMSC monitors the effectiveness of safety risk mitigations, including safety risk mitigations established through the safety risk reduction program.

**Applicable Requirement:** Section 673.19(d)(3)(iii) requires joint labor-management safety committees to support the operation of the transit agency's SMS by "[i]dentifying safety deficiencies for purposes of continuous improvement as required at § 673.27(d), including any

instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.”

Section 673.27(d)(1)(ii) requires that for large urbanized area providers, the agency’s annual safety performance assessment process must address the role of the safety committee.

**Audit Observations:** As discussed earlier, WMATA uses three policy documents to define the responsibilities and processes of the JLMSC: the ASP, the JLMSC Charter, and the Safety Risk Reduction Plan. The WMATA ASP and referenced policy documents restate the responsibility required in § 673.19(d)(3)(iii) for the JLMSC to identify safety deficiencies for the purposes of continuous improvement. However, as discussed in Finding 2, WMATA’s ASP does not define a process to assess the agency’s safety performance annually. Accordingly, the ASP also does not meet the requirement at § 673.27(d)(1)(ii) for such process to address the role of the safety committee.

FTA document reviews confirmed that neither the ASP, the JLMSC Charter, nor the Safety Risk Reduction Plan define processes for how the JLMSC supports the annual continuous improvement process to identify deficiencies in the agency’s performance, including instances where WMATA fails to meet an annual safety performance target set by the JLMSC for the safety risk reduction program.

**Finding 5: WMATA has not met requirements for the joint labor-management safety committee to identify safety deficiencies for purposes of continuous improvement and for the agency’s annual safety performance assessment process to address the role of the safety committee, as required at §§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii), respectively.**

**Actions required for closeout:**

- WMATA must revise its ASP, Safety Risk Reduction Plan, and JLMSC Charter to define the process by which the JLMSC will identify safety deficiencies for purposes of continuous improvement as required at § 673.27(d)(1)(ii).
- WMATA must submit documentation that confirms the joint labor-management safety committee is performing its required role to identify safety deficiencies for purposes of continuous improvement, including any instance where WMATA has not met an annual safety performance target set for the safety risk reduction program.

**Applicable Requirement:** Section 673.19(d)(3)(i) requires joint labor-management safety committees to support the operation of the transit agency’s SMS by “[i]dentifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency’s safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.”

In addition, § 673.19(d)(3)(ii) requires joint labor-management safety committees to support the operation of the transit agency's SMS by "[i]dentifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program."

**Audit Observations:** On-site interviews confirmed that the JLMSC has not recommended safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program. Further, on-site interviews confirmed that the JLMSC has not identified safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

The *Safety Risk Reduction Plan (4800-2-12/01)* states that the JLMSC will establish KPIs based on safety performance targets to measure the effectiveness of recommended mitigations. However, JLMSC members were not aware of this responsibility and to date the JLMSC has not established any such KPIs to monitor the effectiveness of recommended safety risk mitigations.

**Finding 6: WMATA has not met requirements for the joint labor-management safety committee to identify and recommend safety risk mitigations, and to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program as required at §§ 673.19(d)(3)(i) and (ii).**

**Actions required for closeout:**

- WMATA must revise its ASP, Safety Risk Reduction Plan, and JLMSC Charter to define the process by which the JLMSC will identify safety risk mitigations, and identify safety mitigations that may be ineffective, inappropriate, or were not implemented as intended, in response to instances where WMATA has missed a safety performance target set by the JLMSC for the safety risk reduction program.
- WMATA must submit the revised ASP to FTA.
- WMATA must submit documentation that confirms the JLMSC has recommended safety risk mitigations to address any instance where WMATA has not met a safety performance target in the safety risk reduction program and has identified safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

**Applicable Requirement:** Section 673.25(d)(5) requires that when the joint labor-management safety committee, “as part of the transit agency's safety risk reduction program, identifies and recommends under § 673.19(c)(6) safety risk mitigations, including mitigations relating to vehicular and pedestrian safety events involving transit vehicles or assaults on transit workers, based on a safety risk assessment conducted under § 673.25(c), the transit agency must include or incorporate by reference these safety risk mitigations in its ASP pursuant to § 673.11(a)(7)(iv).”

Per § 673.23(d)(1)(i), the Accountable Executive of a large urbanized area provider must implement safety risk mitigations for the safety risk reduction program that are included in the Agency Safety Plan under § 673.11(a)(7)(iv).

**Audit Observations:** FTA reviews of the WMATA ASP, JLMSC Charter, and the Safety Risk Reduction Plan confirm WMATA has established a formal committee structure comprised of the ESC, the DSCs and the Facility Safety Committees (FSCs). According to the WMATA ASP, the ESC is the governing body responsible for overseeing the development and implementation of SMS as outlined in the ASP. The JLMSC is established as a subcommittee of the ESC.

The JLMSC Charter provides additional context on the relationship between the JLMSC, the ESC, and the Accountable Executive. The JLMSC Charter specifies that the JLMSC will coordinate and communicate with the Board of Directors and Accountable Executive through the escalation of recommendations to the ESC. Further, the JLMSC Charter states that the WMATA Accountable Executive is the ultimate decision-making authority associated with WMATA’s safety program.

WMATA’s Safety Risk Reduction Plan states that the ESC is responsible for approving recommendations (including safety risk mitigations) escalated from the JLMSC. The Safety Risk Reduction Plan also notes at Section 5.3.1.2 that if the ESC does not approve a JLMSC recommendation as part of the safety risk reduction program, a management representative will provide the rationale for not approving the recommendation at a subsequent JLMSC meeting.

This process is inconsistent with the requirements at §, 673.25(d)(5) and 673.23(d)(1)(i), which require transit agencies to document or incorporate by reference in the ASP any safety risk mitigations identified and recommended by the joint labor-management safety committee based on a safety risk assessment, and for the Accountable Executive to implement such mitigations. FTA’s review of WMATA’s ASP, JLMSC Charter, and Safety Risk Reduction Plan and on-site interviews confirm that WMATA’s process does not ensure mitigations recommended by the JLMSC for the safety risk reduction program are included in the ASP. Instead, the process allows for such safety risk mitigations to be subject to approval and potential veto by the ESC and the Accountable Executive through ongoing safety risk reduction program activity and during the ASP review and approval process discussed earlier in this report.

In the preamble to the April 2024 PTASP final rule, FTA states “while FTA acknowledges that the Accountable Executive has discretion over the human and capital resources needed to carry out the ASP under § 673.5, the Accountable Executive does not have authority to decline to implement elements of an ASP that has been duly approved by the agency's Safety Committee and Board of Directors.” Further, FTA states that Part 673 “does not establish Accountable Executive veto power over the contents of the ASP, because that would be inconsistent with statutory requirements relating to the composition of safety committees, as well as the statutory requirement that the safety committee and Board of Directors must approve the ASP—not the Accountable Executive.”

During on-site interviews with JLMSC members, FTA confirmed that based on current working relationships and recent JLMSC activity, frontline worker representatives on the JLMSC have not experienced a situation where WMATA management or the Accountable Executive has rejected a recommended safety risk mitigation approved by the JLMSC for the safety risk reduction program. In addition, JLMSC frontline worker representatives told FTA they did not believe any recommendations would be rejected. However, during on-site interviews, WMATA management representatives confirmed the possibility of the ESC or Accountable Executive rejecting a safety risk mitigation for the safety risk reduction program approved by the JLMSC in certain situations based on funding concerns or other constraints.

Accordingly, WMATA’s process is non-compliant because it allows for the ESC or Accountable Executive to reject a safety risk mitigation recommended by the JLMSC. To achieve compliance with Part 673, WMATA must revise its policy documents to ensure that when the Safety Committee, as part of the safety risk reduction program, identifies and recommends a mitigation based on a risk assessment, WMATA must include or incorporate by reference the mitigation in its ASP. The Accountable Executive must implement safety risk mitigations for the safety risk reduction program that are included in the ASP. The ESC and/or the Accountable Executive may not reject a safety risk mitigation for the safety risk reduction program approved by the JLMSC and included in the ASP.

**Finding 7: WMATA has not met requirements for the safety risk mitigation process to include or incorporate by reference in the ASP any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment, and for the Accountable Executive to implement such mitigations as established at §§ 673.25(d)(5) and 673.23(d)(1)(i).**

**Actions required for closeout:**

- WMATA must revise its ASP, and any applicable referenced documents, to define the process by which WMATA will include or incorporate by reference in the ASP any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk

assessment, and for the Accountable Executive to implement such mitigations. WMATA's revised policies must ensure that the safety risk mitigations identified and approved by the JLMSC for the safety risk reduction program are not subject to potential veto by the ESC or the WMATA Accountable Executive.

- WMATA must submit these revised materials.

Audit interviews confirmed JLMSC frontline transit worker representatives work together with JLMSC management representatives, as well as representatives from WMATA's Department of Safety and subject matter experts to address safety concerns escalated to the JLMSC.

However, during interviews with frontline workers and supervisors from WMATA's bus and rail divisions, the individuals interviewed were largely unaware of the JLMSC and its role in supporting the agency's SMS, including the JLMSC's role in reporting hazards and the identification of safety risk mitigations. Individuals did not know who the JLMSC frontline worker representatives are and how safety concerns from frontline workers could be provided to JLMSC frontline worker representatives to support JLMSC safety activities.

#### **Recommendation 6:**

FTA recommends WMATA and the JLMSC work to increase frontline worker awareness of the JLMSC and the mechanisms and channels available to escalate the concerns transit workers face within the transit system related to assaults on transit workers.

### ***Transit Worker Safety Reporting Program***

**Key Takeaway:** FTA did not identify any findings of non-compliance in this area. WMATA has defined processes for transit workers to report safety concerns, to review these concerns, and to manage them through WMATA's established SRM processes. However, FTA recommends WMATA evaluate how its transit workers use the WMATA transit worker safety reporting program to confirm that workers understand how to report safety concerns, including assaults on transit workers.

**Applicable Requirement:** Section 673.23(b) requires transit agencies to "establish and implement a process that allows transit workers to report safety concerns, including assaults on transit workers, near-misses, and unsafe acts and conditions to senior management." The process must include "protections for transit workers who report" and "a description of transit worker behaviors that may result in disciplinary action."

**Audit Observations:** WMATA describes its transit worker safety reporting program in Sections 2.2 and 5.2.3 of its ASP. The process defined in the ASP offers protection for transit workers submitting reports, outlining the different processes employees can take if they believe retaliation has occurred because of safety concern reporting. WMATA documentation defines multiple

avenues for employees and contractors to report safety concerns, including online reporting, verbal reporting, phone reporting, customer concern reporting, and internal concern reporting.

FTA reviewed safety report documentation tracked in WMATA's Origami platform. These reports include a hazard title, hazard statement, hazard status, report details, implemented mitigations, and emails informing the reporter on the status of the report. The transit worker safety reporting program documentation WMATA provided includes only three reports between January 1, 2022, and September 19, 2025, related to transit worker assault. During on-site interviews with WMATA frontline workers, individuals shared experiences about daily WMATA duties and the challenges they faced interacting with the public and noted a range of concerns and hazards related to assaults on transit workers. The frontline workers said that they had not reported any of these concerns through WMATA's transit worker safety reporting program. Based on this feedback, it is unclear if WMATA's transit worker safety reporting program sufficiently encourages transit workers to report their safety concerns related to assaults on transit workers and whether transit workers are aware of how to report such concerns.

#### **Recommendation 7:**

FTA recommends WMATA evaluate how its transit workers use the WMATA transit worker safety reporting program to confirm that workers understand how to report safety concerns, including assaults on transit workers.

### ***De-Escalation Training***

**Key Takeaway:** FTA's review of WMATA policies and implementation identified non-compliance with § 673.29(a) requirements related to de-escalation training. While WMATA has incorporated de-escalation training into its comprehensive safety training program, it has not demonstrated that it has implemented its de-escalation training program for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety.

**Applicable Requirements:** At § 673.29(a)(1), FTA requires a transit agency to “establish and implement a comprehensive safety training program that includes de-escalation training, safety concern identification and reporting training, and refresher training for all operations transit workers and transit workers directly responsible for safety in the transit agency's public transportation system. The training program must include refresher training, as necessary.” At § 673.29(a)(2), FTA further requires that “large urbanized area providers must include maintenance transit workers in the safety training program.”

**Audit Observations:** WMATA defines its comprehensive safety training program in Section 5.1 of its ASP, which includes de-escalation training. The MTPD is responsible for delivering de-escalation training to transit workers. These trainings include breakout groups, lessons on local laws and ordinances, de-escalation strategies, and scenario role-playing. The MTPD works with

the Transit Worker Assaults Working Group (a subcommittee of the JLMSC) to ensure the training is effective for all participants.

WMATA's current policies do not require de-escalation training for maintenance personnel or individuals directly responsible for safety, as required by § 673.29(a). WMATA's documentation confirms that the initial focus for de-escalation training has been on bus operators and that the agency is working to expand de-escalation training to all transit workers and is in the process of developing a refresher training plan for de-escalation training. WMATA provided FTA with training statistics shared with the JLMSC that indicate increasing levels of de-escalation training completion.

Through FTA's virtual interviews, WMATA clarified that de-escalation training is required for all "customer-facing" personnel in bus and rail operations. FTA notes that § 673.29(a) requires de-escalation training for all operations personnel, not a subset of operations personnel designated as "customer facing." In addition, § 673.29(a) also requires de-escalation training for all maintenance personnel and all individuals directly responsible for safety. As stated above, WMATA's current policies do not require de-escalation training for maintenance personnel or individuals directly responsible for safety.

**Finding 8: WMATA has not met the requirement for the de-escalation training established at § 673.29(a).**

**Actions required for closeout:**

- WMATA must revise its ASP to require, as part of its comprehensive safety training program, de-escalation training for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety and submit the revised ASP.
- WMATA must submit a plan, including projected completion timelines, for implementing its de-escalation training for all operations personnel, maintenance personnel, and individuals directly responsible for safety.

***Use of Funds for Safety and Security Program and Improvements***

**Key Takeaway:** FTA's review confirmed compliance with safety set-aside process requirements established at 49 U.S.C. 5329(d)(4)(B), 49 U.S.C. 5307(c)(1)(J), and 49 CFR 673.27(d)(3)(iii).

**Applicable Requirement:**

**Security Set-aside:** A recipient of Section 5307 funds must certify that it either: (1) will expend for each fiscal year for public transportation security projects ... at least 1 percent of the amount the recipient receives for each fiscal year under [49 U.S.C. 5336]; or (2) has decided that the expenditure for security projects is not necessary. (49 U.S.C. 5307(c)(1)(J))

**Safety Set-aside:** Large urbanized area providers must allocate at least 0.75 percent of their Section 5307 funds to safety-related projects eligible under 49 U.S.C. 5307. (49 U.S.C. 5329(d)(4)(B))

Section 673.27(d)(3)(iii) requires a large urbanized area provider that does not meet an established annual safety performance target set by the safety committee for the safety risk reduction program to “allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to assist the transit agency in meeting the safety performance target in the future.”

**Audit Observations:** Prior to FTA’s Focused ASP Audit of WMATA, on March 6, 2025, USDOT Secretary Duffy sent a letter to WMATA CEO, Randy Clarke, directing WMATA to provide information about agency safety practices and expenditures. On March 19, 2025, WMATA sent a response that provided this requested information. FTA Region 3 personnel reviewed the WMATA submission and found it satisfactory.

During on-site interviews with WMATA representatives, FTA reviewed coordination processes between the WMATA Finance Department and the WMATA Department of Safety. WMATA collects a budget from each department and holds a budget call every year with each department to review their budgets in detail. For capital budgeting, WMATA develops a six-year capital forecast. For operations, WMATA develops a one-year budget and a forecast for subsequent years, currently through 2029.

WMATA interviews confirmed that in situations where WMATA would need to fund a safety risk mitigation using the safety set-aside, WMATA Finance would coordinate with the Department of Safety to incorporate the funds into the current budgeting process or, if needed due to timing constraints, WMATA can process an out-of-cycle budget change.

FTA has confirmed that WMATA has met its requirements for safety set-aside and security set-aside spending at 49 U.S.C. 5329(d)(4)(B) and 49 U.S.C. 5307(c)(1)(J).

## Appendix A: Findings and Recommendations

### *Findings and Actions Required for Closeout*

FTA issues the following eight findings of non-compliance and the associated actions required for the closeout of each finding.

**Finding 1: WMATA has not implemented a process to monitor its operations to identify any safety risk mitigations that may be ineffective, as required at § 673.27(b)(2).**

**Actions required for closeout:**

- WMATA must submit documentation that confirms it is carrying out the process defined in its ASP to monitor the effectiveness of each safety risk mitigation submitted in response to General Directive 24-1 and any new safety risk mitigations established to address the safety risk associated with assaults on transit workers.

**Finding 2: WMATA has not established a process to assess its safety performance annually, as required at § 673.27(d)(1).**

*Note: FTA has issued a related finding regarding the JLMSC's role in supporting this activity (Finding 5).*

**Actions required for closeout:**

- WMATA must document a process in its ASP for conducting an annual performance assessment as required at § 673.27(d)(1), including a process for how WMATA identifies deficiencies in its SMS.
- WMATA must submit documentation that confirms it has conducted the annual performance assessment required at § 673.27(d)(1), including the identification of any deficiencies.

**Finding 3: WMATA has not developed or carried out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment, as required at § 673.27(d)(4).**

**Actions required for closeout:**

- WMATA must submit a plan to address any deficiencies identified through the annual safety performance assessment conducted pursuant to Finding 2, including any deficiencies associated with the comprehensive safety training program required under § 673.29(a).
- WMATA must submit documentation that confirms it has carried out the plan described above.

**Finding 4: WMATA's ASP approval process is inconsistent with the requirements at §§ 673.11(a)(1)(i).**

**Actions required for closeout:**

- WMATA must revise its ASP review, update, and approval process to ensure that the ESC and Accountable Executive may not veto the ASP after it has been approved by the JLMSC.
- WMATA must revise its ASP to document this updated process and submit the revised ASP that has been approved based on the revised, compliant process.

**Finding 5: WMATA has not met requirements for the joint labor-management safety committee to identify safety deficiencies for purposes of continuous improvement and for the agency's annual safety performance assessment process to address the role of the safety committee, as required at §§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii), respectively.**

**Actions required for closeout:**

- WMATA must revise its ASP, Safety Risk Reduction Plan, and JLMSC Charter to define the process by which the JLMSC will identify safety deficiencies for purposes of continuous improvement as required at § 673.27(d)(1)(ii).
- WMATA must submit documentation that confirms the joint labor-management safety committee is performing its required role to identify safety deficiencies for purposes of continuous improvement, including any instance where WMATA has not met an annual safety performance target set for the safety risk reduction program.

**Finding 6: WMATA has not met requirements for the joint labor-management safety committee to identify and recommend safety risk mitigations, and to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program as required at §§ 673.19(d)(3)(i) and (ii).**

**Actions required for closeout:**

- WMATA must revise its ASP, Safety Risk Reduction Plan, and JLMSC Charter to define the process by which the JLMSC will identify safety risk mitigations, and identify safety mitigations that may be ineffective, inappropriate, or were not implemented as intended, in response to instances where WMATA has missed a safety performance target set by the JLMSC for the safety risk reduction program.
- WMATA must submit the revised ASP to FTA.
- WMATA must submit documentation that confirms the JLMSC has recommended safety risk mitigations to address any instance where WMATA has not met a safety performance target in the safety risk reduction program and has identified safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

**Finding 7: WMATA has not met requirements for the safety risk mitigation process to include or incorporate by reference in the ASP any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment, and for the Accountable Executive to implement such mitigations as established at §§ 673.25(d)(5) and 673.23(d)(1)(i).**

**Actions required for closeout:**

- WMATA must revise its ASP, and any applicable referenced documents, to define the process by which WMATA will include or incorporate by reference in the ASP any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment, and for the Accountable Executive to implement such mitigations. WMATA's revised policies must ensure that the safety risk mitigations identified and approved by the JLMSC for the safety risk reduction program are not subject to potential veto by the ESC or the WMATA Accountable Executive.
- WMATA must submit these revised materials.

**Finding 8: WMATA has not met the requirement for the de-escalation training established at § 673.29(a).**

**Actions required for closeout:**

- WMATA must revise its ASP to require, as part of its comprehensive safety training program, de-escalation training for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety and submit the revised ASP.
- WMATA must submit a plan, including projected completion timelines, for implementing its de-escalation training for all operations personnel, maintenance personnel, and individuals directly responsible for safety.

***Recommendations***

FTA also issues the following six recommendations to WMATA. These suggestions, based on audit observations, would enhance and strengthen WMATA's current SMS processes. WMATA may decide whether to implement these recommendations.

**Recommendation 1:**

FTA recommends WMATA add mitigation effectiveness criteria to the safety risk mitigation records in Origami, offering the agency a consistent method for monitoring both safety risk mitigation implementation and effectiveness.

**Recommendation 2:**

FTA recommends WMATA document in its ASP a formal process that builds on its ongoing safety performance monitoring efforts to document, at year end, whether or not each annual safety performance target was met.

**Recommendation 3:**

FTA recommends WMATA revise its ASP to define in greater detail its process for developing and carrying out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment.

**Recommendation 4:**

FTA recommends WMATA develop training or onboarding content for JLMSC members that focuses on the safety committee duties and related requirements established by Part 673, including:

- Review and approval of the ASP,
- Setting safety performance targets for the safety risk reduction program,
- Identifying safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program,
- Identifying and recommending safety risk mitigations, including mitigations associated with instances of a missed safety performance target for the safety risk reduction program,
- Documenting safety risk mitigations for the safety risk reduction program in the ASP, and
- Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

**Recommendation 5:**

As a best practice, FTA recommends the WMATA JLMSC set safety performance targets for the safety risk reduction program that reflect an annual reduction by setting the safety performance target below the three-year rolling average of associated data reported to the NTD.

**Recommendation 6:**

FTA recommends WMATA and the JLMSC work to increase frontline worker awareness of the JLMSC and the mechanisms and channels available to escalate the concerns transit workers face within the transit system related to assaults on transit workers.

**Recommendation 7:**

FTA recommends WMATA evaluate how its transit workers use the WMATA transit worker safety reporting program to confirm that workers understand how to report safety concerns, including assaults on transit workers.

## Appendix B: Materials Reviewed

As part of this audit, FTA received and reviewed the following documentation:

- 2025.10.03 WMATA Response Letter to Associate Administrator DeLorenzo.pdf<sup>2</sup>
- Organizational Charts:
  - 2025.10.03-WMATA Org Chart.pdf
- Agency Safety Plan:
  - 2025.10.03\_20241231-WMATA Agency Safety Plan Rev. 5\_2025.pdf
  - 2025.10.03\_20251231\_WMATA Agency Safety Plan Rev. 6\_2026.pdf
- Safety Performance Targets:
  - 2025.10.03\_202506-JLMSC Presentation.pptx
  - 2025.10.03\_20251231\_WMATA Agency Safety Plan Rev. 6\_2026.pdf
  - 2025.10.03-WMATA Agency Safety Plan Rev. 2\_2022.pdf
  - 2025.10.03-WMATA Agency Safety Plan Rev. 3\_2023.pdf
  - 2025.10.03-WMATA Agency Safety Plan Rev. 4\_2024.pdf
  - 2025.10.03-WMATA Agency Safety Plan Rev. 5\_2025.pdf
- Safety Risk Reduction Program Implementation:
  - 2025.10.03 WMATA Response Letter to Associate Administrator DeLorenzo.pdf
  - 2025.10.03\_20241118-CUTR-WMATA-TransitWorkerAssaultCaseStudyDRAFT.pdf
  - 2025.10.03\_20241231-WMATA Agency Safety Plan Rev. 5\_2025.pdf
  - 2025.10.03\_20250124-Safety Risk Reduction Plan.pdf
  - 2025.10.03\_20250326-Personal Security Working Group\_PPT.pdf
  - 2025.10.03\_20250925-TWA Working Group\_.pptx
  - 2025.10.03\_20251231\_WMATA Agency Safety Plan Rev. 6\_2026.pdf
  - 2025.10.03-EMI\_WABTEC Fully Enclosed Driver Barrier.pdf
  - 2025.10.03-Transit Worker Assault Mitigations 2.0.docx
  - 2025.10.03-WMATA Agency Safety Plan Rev. 3\_2023.pdf
  - 2025.10.03-WMATA Agency Safety Plan Rev. 4\_2024.pdf
- Safety Risk Assessment:
  - 2025.10.03\_20241122-Station Manager Kiosk\_Risk Assessment.pdf
  - 2025.10.03\_20241213-Transit Worker Assaults\_Risk Assessment.pdf
  - 2025.10.03\_20250319-JLMSC Presentation.pptx
  - 2025.10.03\_20250618-JLMSC Presentation.pptx
- Employee Safety Reporting:
  - 2025.10.03\_20241231-WMATA Agency Safety Plan Rev. 5\_2025.pdf

<sup>2</sup> File names were updated upon submission to include submission date and, at times, clarify content

Appendix B

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- 2025.10.03\_20250925-Operator Assaults.xlsx
- 2025.10.03\_20251231\_WMATA Agency Safety Plan Rev. 6\_2026.pdf
- 2025.10.03\_335-EmployeeandPassengerAssaults\_DisorderlyandCriminalActivity.pdf
- 2025.10.03\_758-DispatchingPoliceDuringPassengerAssaults.pdf
- 2025.10.03\_79-TransitWorkerAssaults.pdf
- 2025.10.03-Assaults on Police Data 2025.xlsx
- 2025.10.03-Employee Assaults Data \_2022\_2025.xlsx
- De-escalation Training:
  - 2025.10.03\_2019 S.M.A.R.T. Powerpoint Presentation.pdf
  - 2025.10.03\_20230301-CustomerExperienceLiaison-InitialTrainingProgram\_AboutThisCourse\_Rev.2.pdf
  - 2025.10.03\_20241216-Minutes-Personal Security\_DeEscalation Training.docx
  - 2025.10.03\_2025-014\_Banning Policy\_WMATA Tariff.pdf
  - 2025.10.03-49 CFR 673.29 (up to date as of 9-25-2025).pdf
  - 2025.10.03-APTA-SS-SEM-RP-020-25.pdf
  - 2025.10.03-Assault Reduction Course MTPD.pdf
  - 2025.10.03-De Escalation Training\_nb\_FINAL\_v5.mp4
  - 2025.10.03-Deescalate and Investigation CBT Project Training Strategy.pdf
  - 2025.10.03-De-escalation Training Numbers.docx
  - 2025.10.03-Deescalation\_Memo.pdf
  - 2025.10.03-DeEscalation-FacilitatorsGuide.pdf
  - 2025.10.03-Updating DeEscalation.pptx
- Safety Committee – Safety Risk Mitigation:
  - 2025.10.03\_20241023-Transit Worker Assaults Mitigation Status Table.xlsx
  - 2025.10.03\_20250128-ESC.pdf
  - 2025.10.03\_20250604-Bus Operator & Passenger Assaults SOP.pdf
  - 2025.10.03\_20250826-SafetyManagementSystemReport.xlsx
  - 2025.10.03\_335-EmployeeandPassengerAssaults\_DisorderlyandCriminalActivity.pdf
  - 2025.10.03\_758-DispatchingPoliceDuringPassengerAssaults.pdf
  - 2025.10.03\_79-TransitWorkerAssaults.pdf
  - 2025.10.03-Bus-Operator-Assault-Decal.pdf
  - 2025.10.03-NTO-17-30\_Avoiding Customer Conflict.pdf
  - 2025.10.03-NTOo-26-00\_RequestToTalk(RTT)PriorityRequestToTalk(PRTT)EmergencySilentAlarm.pdf
  - 2025.10.03-NTOr08-00\_CustomersPosingThreat.pdf
  - 2025.10.03-Transit-Worker-Assault-Decal.pdf
- Safety Committee – Monitoring Effectiveness:
  - Bus-Dept-Safety-Committee (Folder includes meeting minutes and presentation)

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- Executive-Safety-Committee (Folder includes documentation from 2022, 2023, 2024, and 2025)
- Joint-Labor-Management-Safety-Committee (Folder includes documentation from 2022, 2023, 2024, and 2025)
- MTPD-Dept-Safety-Committee (Folder includes meeting minutes and presentation)
- Personal-Security-Subcommittee (Folder includes documentation for 2023, 2024, and 2025)
- Transit-Worker-Assaults-Working-Group (Folder includes meeting minutes and presentation)
- 2025.10.03-Bus\_Operator\_Passenger\_Assaults\_Procedure\_MICC.pdf
- 2025.10.03-Bus-Operator-Passenger-Assaults-Procedure \_BTRA.pdf
- 2025.10.03-Metrobus 2020 Standard Operating Procedures.pdf
- 2025.20.03-21.PI-7.8.3 Workplace Violence.pdf
- Actions to Address Secretary Duffy March 2025 Letter:
  - 2025.03.06 - USDOT-Letter to WMATA.pdf
  - 2025.03.19 - WMATA Letter to Secretary Duffy.pdf
  - 2025.10.03\_2025-014\_Banning Policy\_WMATA Tariff.pdf
  - 2025.10.03\_Transit Worker Assaults Mitigation Status Table\_09302025.xlsx
  - FTA Follow Up Response-WMATA-03282025.pdf
  - WMATA Safety Letter-Second Round of Informational Request\_Regions\_3-28-25.pdf
- Special Directive 22-18 Mitigations:
  - 2025.10.03\_Transit Worker Assaults Mitigation Status Table\_09302025.xlsx
- General Directive 24-1 Mitigations:
  - 2025.10.03 WMATA Response Letter to Associate Administrator DeLorenzo.pdf
  - 2025.10.03\_20250925-TWA Working Group\_.pptx
  - 2025.10.03\_20250926-Cutsheet\_EnterpriseVideoSystem\_FINAL.pdf
  - 2025.10.03\_Transit Worker Assaults Mitigation Status Table\_09302025.xlsx
- Virtual Meeting Document Requests:
  - De-escalation Training (folder)
    - Action Item 1\_De-Escalation Training.pdf
    - WMATA de-escalation questions to email.docx
  - Safety Risk Management (folder)
    - Action Item 3.1\_Safety Risk Reporting Process - Voluntary Safety Reporting Process.pdf
    - Action Item 3.2\_SRC August 2025 Meeting\_Employee Safety Concerns.pdf
    - Action Item 3.3\_Safety Risk Coordinators Job Aid.pdf
  - Management of Change-Continuous Improvement (folder)

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- Action Item 4\_Management of Change and Continuous Improvement.pdf
- JLMSC-Example Escalation (folder)
  - Action Item 5\_June ESC 2024 - Example\_Potomac Yard End Gate Escalation.pdf
- JLMSC Charter (folder)
  - Action Item 6\_WMATA JLMSC Charter 2025 – signed.pdf
- SPTs (folder)
  - Action Item 7.1\_FY25 Target Setting - Final Recommendations (2026 ASP).pdf
  - Action Item 7.2\_FY26 Target Setting - Joint Labor and Safety Committee (2026 ASP).pdf
  - Action Item 7.3\_WMATA\_safety baselines and target options\_FY25 (2025 ASP).xlsx
  - Action Item 7.4\_WMATA\_safety baselines and target options\_FY26 (2026 ASP).xlsx
  - Action Item 7.5\_FY25 Target Setting - Final Recommendations (2026 ASP).pdf
  - Action Item 7.6\_FY26 Target Setting - Joint Labor and Safety Committee (2026 ASP).pdf
  - Action Item 7.7\_WMATA\_Memo Attachment\_FY25Targets Details (2025 ASP).pdf
  - Action Item 7.8\_WMATA\_Memo Attachment\_FY26 Targets Details (2026 ASP).pdf
  - Action Item 7.9\_FY25 Target Setting - Joint Labor and Safety Committee (2025 ASP).pdf
  - Action Item 7.10\_FY26 Target Setting - Joint Labor and Safety Committee (2026 ASP).pdf
- Safety Set-Aside (folder)
  - Action Item 8.1\_594 Bus Operator Shields PCR Acknowledgement Form 2025-04-16.pdf
  - Action Item 8.2\_October ESC PPT - Transit Worker Assault Actions Taken.pdf
  - Action Item 8.3\_June 2025 JLMSC Presentation - Missed Bus Transit Worker Assault Targets.pdf
  - Action Item 8.4\_FY26 Target Setting - Joint Labor and Safety Committee.pdf
  - Action Item 8.5\_ASP Comments in the Safety Risk Reduction Plan.pdf
- Transit Worker Assault (JLMSC (folder))
  - Action Item 9.1\_Transit Worker Assaults Working Group\_10292025 - Read-Only.pdf
  - Action Item 9.2\_November 2024 JLMSC PPT - Risk Reduction Plan Engagement.pdf

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- Action Item 9.3\_Updating De escalation - Personal Security Working Group.pdf
- Action Item 9.4\_Personal Security\_DeEscalation Training\_12162024\_Minutes.pdf
- On-Site Document Requests:
  - 2025.12.17 Metro Response\_FTA Follow Up #1\_Annual Performance Assessment.pdf
  - 2025.12.17 Metro Response\_FTA Follow Up #2\_MPTD Power BI Dashboard\_Screenshot\_2025.12.05.pdf
  - 2025.12.17 Metro Response\_FTA Follow Up #3\_De-Escalation Training Progress\_Implementation Plan.pdf
  - 2025.12.17-WMATA-Follow-up-Submission-Email.pdf