WHAT WE DO

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IMPROVE · OVERSEE · ASSURE · M

What is QICO?

The Office of Quality Assurance, Internal Compliance & Oversight is an internal management function that partners with other departments to provide an objective review. Authorized by the General Manager as outlined in the Quality Management System Plan (QMSP).

Why QICO Performed These Reviews?

These internal reviews are intended to provide Metro senior management with an assessment of the following areas:

- Silver Line Safety Certification & Oversight
- Car Track Equipment Maintenance
- Engineering Modification Instruction
- Structures Maintenance Leak Mitigation Process

QICO's Methodology:

- Develop relevant review activities by identifying and assessing risks to policies, procedures & standards, quality & compliance, and traceability.
- Review documentation, observe processes, and interview key personnel.

Review findings and required actions are rated based on level of risk, which ranges on a scale from "Insignificant" to "High."

Note: An itemized internal Corrective and Preventive Action (iCAPA) is developed for each required action to achieve effective and measurable resolution of identified concerns. To check the status of iCAPA implementation go to: wmata.com/initiatives/transparency/.

WHAT WE FOUND | CY22 Q2-Q3 INTERNAL REVIEWS   *March 2023*

(6) Silver Line Safety Certification & Oversight   *Service Delivery*

Areas for Improvement Identified During Review:

- Performing quality audits promotes compliance with requirements, provides consistency of performance, and helps identify improvement opportunities.
- Establishing and implementing processes to oversee and monitor SAFE's contractor K&J performance would provide a standard, promote efficiency, and assist in maintaining compliance throughout the life of the project.
- Creating detailed work instructions describing the Certifiable Item List approval/rejection process would reduce rework and waste while encouraging consistency of work performed.
- Having a master repository of all project documents is essential in storing, organizing, tracing, and accessing project data.
- Developing and maintaining the required training matrix for each safety and security certification position allows for uniformity and promotes compliance with all training requirements.

(7) Car Track Equipment Maintenance (CTEM)   *Internal Safety Review*

Wins:

CTEM management compliance with safety observations/conversations program exceeds the established goal, promoting a positive safety culture.

Items Resolved During Review:

Complying with the established safety protocols and processes promotes risk mitigation in the workplace.

Areas for Improvement Identified During Review:

- The utilization of a fall protection system supports a proactive safety management system and compliance with regulatory standards.
- The inspection of fire extinguishers inside the Roadway Maintenance Machines (RMMs) promotes risk mitigation and compliance with regulatory standards.
- The creation and usage of standardized maintenance instruction manuals for all equipment will promote safe maintenance practices.
- Conducting regular and thorough inspections of maintenance facilities strengthens the ongoing risk management process and ensures compliance with OSHA requirements.
- Performing shelf-life inspections as outlined in the internal procedure prevents utilizing expired parts and materials (Repeat Finding).
- The presence of a designated Deputy Compliance Officer (DCO) will enhance compliance with existing environmental management policies.
- A Maintenance Control Plan (MCP) is essential for consistency and traceability of maintenance activities.
- Completing Maximo work orders with specific data element promotes maintenance data accuracy and safety performance reporting.

WHAT WE WILL DO MOVING FORWARD

(6) Key Takeaway:

Developing controlled work processes, strengthening contractor oversight, and regularly performing audits would provide assurance and transparency.

Required Actions:

- **QICO- SLSC -22-01:** Enforce implementation of quality control audits and establish departmental controls to include contractor oversight as well as detailed work instructions for item review and approval.
- **QICO- SLSC -22-02:** Create and maintain a master repository throughout the project life cycle for all safety certification documents and records.
- **QICO-SLSC-22-03:** Develop a training matrix for all safety and security certification positions.

(7) Key Takeaway:

Increasing employee awareness of the PTASP and aligning the core elements with departmental processes will provide shared understanding and collaboration for a smooth implementation of a proactive safety management system (SMS).

Required Actions:

- **QICO-CTEM-22-01:** Implement a fall protection system, which includes approved equipment, documented procedures, training, storage, and preventive maintenance requirements in all CTEM facilities.
- **QICO-CTEM-22-02:** Develop and implement a plan to maintain compliance with safety and environmental regulations as it pertains to fire extinguisher inspections, facility safety inspections, and designation of compliance officers.
- **QICO-CTEM-22-03:** Establish and implement a comprehensive maintenance control plan and standardized manuals for all equipment.
- **QICO-CTEM-22-04:** Develop a plan to maintain compliance with established shelf-life procedures.
- **QICO-CTEM-22-05:** Develop and implement a process to improve work order data capture in Maximo for accuracy and consistency.

(8) Engineering Modification Instruction (ENGA/MOWE)
Engineering & Maintenance

Areas for Improvement Identified During Review:

- Having well-defined criteria necessitating the utilization of an EMI and aligning the EMI SOP with governing P/Is would support process consistency.
- Adherence to established processes for emergency repair enhances process compliance and reduces potential safety risks.
- Adherence to the established record storage process assures compliance and traceability of documents.
- Establishing a training and certification matrix for personnel promotes proper skill management (Repeat Finding).
- Updating Policy Instructions and governing documents within the required frequency assures accuracy and efficiency.

(8) Key Takeaway:

Including clear criteria for when an engineering design change should be addressed through an EMI in departmental governing procedures and adhering to established guidelines for emergency repairs would promote consistent and efficient execution of engineering solutions.

Required Actions:

- **QICO-EMI-22-01:** Update SOP 114-02 to include clear circumstances of when an EMI is required and enforce adherence to P/I 4.14/3 instructions for emergency repairs.
- **QICO-EMI-22-02:** Enforce adherence to EMI record archive according to existing guidance of SOP 114-02 and ATC 4000.
- **QICO-EMI-22-03:** Develop a training matrix for all ENGA and MOWE roles.
- **QICO-EMI-22-04:** Enforce revision of Policy Instructions and governing documents in accordance with the required revision periodicity and enforce implementation of SOP 121-10 document control guidelines.

(9) Structures Maintenance Leak Mitigation Process
Engineering & Maintenance

Items Resolved During Review:

- Following established safety protocols and procedures when transporting, storing, and disposing of chemicals reduces the risk to employee exposure.
- Establishing a pressure range while performing grout injection would create a uniform process and help prevent damage.
- Following required PPE Work Instruction guidelines helps protect employees from inhaling dust particles, prevents injury and promotes a safety culture.

Areas for Improvement Identified During Review:

- Defect reporting into the appropriate system of record in accordance with the Standard Operating Procedures supports accurate tracking and timely scheduling of leak mitigation activities.
- Regularly reviewing, tracking, investigating, and documenting the status of aged work plans would promote on-time completion of scheduled work providing a good state of repair.
- Following leak mitigation Work Instructions would support quality work, produce consistent results, and may prevent employee injury (Repeat Finding).
- Performing tool and equipment inspections prior to utilization enhances work production and decreases job hazards.
- Reviewing and updating governing documents within the required frequency optimizes applicability and incorporates changes in a timely manner.

(9) Key Takeaway:

Adhering to Standard Operating Procedures (SOPs) and Work Instructions (WIs) would enhance the quality of work, improve work efficiency, and create a safer work environment.

Required Actions:

- **QICO-STLM-22-01:** Appropriately reporting defects into the system of records, eliminating any duplicate work orders, performing regular reviews, and evaluating the status of aged work plans for accurate traceability.
- **QICO-STLM-22-02:** Follow the guidance provided in the Standard Operating Procedures and Work Instructions when performing job functions.
- **QICO-STLM-22-03:** Perform inspections and assure the removal of defective tools to avoid use at job locations.