



WMSC Audit of WMATA Rail Operations and Associated Training

Summary of WMATA Management Responses to Draft Report Submitted to WMSC



ID#	SECTION	Page #	Existing Language	WMATA Response
1	Executive Summary	3	Metrorail is not effectively training and certifying personnel authorized to operate trains on all active railcar fleets.	<p>Prior to March 2020 when COVID-19 restrictions were implemented, all employees with Train Operational responsibilities were certified on the legacy (2000, 3000, 6000) car series. The RTRA QA/QC Group was actively developing the Train Operations Certification for the 7000 series (Kawasaki) trains prior to COVID-19, which was approved in June 2020 and implemented in August 2020. ROQT Train Operator refresher training included 7000 series troubleshooting training to bring train operations staff up to date on the RTRA Train Operations Guide and Procedural Checklists book issued to Train Operations staff in February 2020. The refresher training also included refreshers on legacy car series, and this is the method for keeping train operations staff refreshed on all active railcar fleets.</p> <p>At the time of the WMSC Rail Operations audit, the 7000 series certification was only implemented for 14 months. Due to the pandemic restrictions on gatherings and with strict social distance policies, training and certifications activities were placed on hold for approximately six months; further restrictions on rail service severely limited RTRA's ability to certify personnel and ROQT's ability to train personnel in all disciplines.</p>
2	Executive Summary	3	Metrorail also closes internal corrective actions and identified issues, including those related to RTRA QA/QC audits, without fully identifying or completing required improvements or changes.	<p>RTRA QA/QC corrective action requests are not closed until sufficient corrective action plans have been submitted and approved by the QC Officer who performed the observations. Systemic issues identified via RTRA QA/QC audit findings lead to:</p> <ul style="list-style-type: none">• Office-wide and division-specific campaigns• Targeted audits by the RTRA Quality Assurance/Quality Control Group• Safety stand-downs and refresher training programs
3	Finding 1	15	The interlocking operator stated it was simply habit not to ensure handbrakes are applied.	<p>At the time of this audit 7K trains were running exclusively. 7Ks do not require the application of handbrakes. They have automatic holding brakes.</p>
4	Finding 1	16	Metrorail also has the opportunity to more fully utilize available data for supervisory oversight and compliance monitoring. Metrorail does not regularly and consistently review cab video of operators or CCTV video as part of a performance monitoring and hazard identification program outside of safety event investigations.	<p>Train Operator Cab Video (Personal Electronic Device) Audits took place on a regular basis until the 7K trains were removed from service.</p>



WMSC Audit of WMATA Rail Operations and Associated Training

Summary of WMATA Management Responses to Draft Report Submitted to WMSC



ID#	SECTION	Page #	Existing Language	WMATA Response
5	Finding 3	21	This computer-based training is very limited, and does not include hands-on familiarization training or knowledge testing that would be part of a meaningful familiarization and territory certification program.	<p>The statement "not assessing knowledge of physical characteristics" is not accurate. Each Line Familiarization / Physical Characteristic CBT has an online assessment at the end. The line familiarization was a CAP from the 2015 FTA SMI and the creation and presentation of each line CBT that has a test to the FTA resulted it being closed by FTA.</p> <p>Due to file size, familiarization trainings are not included – but can be provided upon request.</p>
6	Finding 3	21	Terminal supervisors have no formal training class or instruction, and receive only unstructured on-the-job training...	There is a Rail Supervisor Job Code, which accounts for 113 positions in RTRA; there is a Supervisor Transit Field Jobe Code which accounts for 6 positions in RTRA. There is one 6-month training program for Rail Supervisor, there is no job title/code for "Terminal Supervisor".
7	Finding 4	23	Station managers the WMSC spoke with during this audit stated that they have had similar challenges with new fare gates that were installed in multiple stations without specific training for station managers. They stated that they received a manual, but had to train themselves, including to ensure that they could open the fare gates as required in an emergency. Two station managers asked to demonstrate that function with the new fare gates were able to show that they could open the fare gates in an emergency as required.	<p>The training framework is a "train-the-trainer" model where training materials are developed, including instructor guides, student guides and a series of training aids. The training flow is:</p> <ol style="list-style-type: none">1. Rail Training instructors were trained by the STraffic Trainers at CTF;2. Rail Training Instructors trained the Rail Supervisors at CTF;3. Rail Supervisors are responsible for training the Station Managers at their station - before their station goes live with new faregates.
8	Finding 4	24	RTRA management outlined during audit interviews a series of plans such as changes to training, that the training department (ROQT) personnel separately said in audit interviews that they were unaware of. These challenges are compounded by confusion over who is responsible for setting training requirements and standards.	There is a bi-weekly meeting between ROQT and RTRA management to discuss training needs, changes, etc. to ensure effective communication and consistent understanding.
9	Finding 5 & Side Note	25	Metrorail's railcar operations training and certification is heavily focused on the 7000 Series fleet, with little focus on other "legacy" railcar fleets (2000, 3000 and 6000 Series) that have very different features and system characteristics.	<p>Prior to March 2020 when COVID-19 restrictions were implemented, all employees with Train Operational responsibilities were certified on the legacy (2000, 3000, 6000) car series. The RTRA QA/QC Group was actively developing the Train Operations Certification for the 7000 series (Kawasaki) trains prior to COVID-19, which was approved in June 2020 and implemented in August 2020. ROQT Train Operator refresher training included 7000 series troubleshooting training to bring train operations staff up to date on the RTRA Train Operations Guide and Procedural Checklists book issued to Train Operations staff in February 2020. The refresher training also included refreshers on legacy car series, and this is the method for keeping train operations staff refreshed on all active railcar fleets.</p> <p>At the time of the WMSC Rail Operations audit, the 7000 series certification was only implemented for 14 months. Due to the pandemic restrictions on gatherings and with strict social distance policies, training and certifications activities were placed on hold for approximately six months; further restrictions on rail service severely limited RTRA's ability to certify personnel and ROQT's ability to train personnel in all disciplines.</p>



WMSC Audit of WMATA Rail Operations and Associated Training

Summary of WMATA Management Responses to Draft Report Submitted to WMSC



ID#	SECTION	Page #	Existing Language	WMATA Response
10	Finding 5	25	Personnel interviewed for this audit across multiple roles and levels of the Metrorail organization from train operators and instructors to supervisors and management acknowledged that the lack of ongoing training on legacy fleets has created operational challenges.	<p>The legacy fleet continues to be trained during all initial training and all refresher training. It has not been stopped or reduced.</p> <p>Due to file size, training programs are not included – but were previously submitted to WMSC.</p>
11	Finding 5	26	Even on 7000 Series trains, familiarization courses are a set length, and do not include sufficient opportunities for students who need additional time to get that additional support they require to effectively carry out the tasks on mainline. Several individuals expressed a desire for more training for train operators.	WMATA respectfully disagrees with this statement, and believes WMSC’s characterization of the training program is inaccurate. Training is 20 weeks with 8 weeks in yard rotation working directly with trains and if a student asks for extra help they are provided it by instructors and management.
12	Finding 6	31	A review of September 2021 RSDAR data demonstrated that 12 rides out of 51 documented proficiency rides were shorter than the 20 minutes required by Metrorail policy. In addition, 9 of the 39 rides that were of the proper duration were conducted during peak periods, which is contrary to the requirement that the rides not be conducted during rush hour, special events, and/or unusual occurrences on the mainline	Rail Supervisors are able to combine multiple trips of uninterrupted operation on the mainline to meet the 20 minute requirement. Rail Supervisors are also able to include personal relief trips as proficiency rides as well.
13	Finding 6	31	The records provided for this audit also showed that instructors and 5 of 9 QA/QC personnel did not have current roadway worker protection (RWP) Level IV qualifications as required, even after accounting for a 90-day qualification extension that was issued by Metrorail to account for the training delays linked to the public health emergency.	WMATA respectfully requests the removal of 'instructors' from this statement. Instructors are not required to be RWP Level 4 certified. RTRA QC Officers were required to take the RWP Level 4 requalification course or the RWP Level 4 CBT, depending on their original certification date.
14	Finding 9 <i>Line Platform Instructors (LPIs)</i>	34	“We don’t evaluate the LPI’s performance. We just don’t do it. We don’t do it,” one manager interviewed for this audit stated. Only if a student raises a concern to management would managers gather additional information.	Per the Utility Committee SOP, 'Employees in an RTRA Utility/LPI position shall be evaluated by RTRA Manager Administrative Services or designee and by their division manager 90 days after beginning to work in an Utility/LPI capacity and every 180 days thereafter. LPI's were evaluated February 2021 and October 2021 by Division Managers.'



WMSC Audit of WMATA Rail Operations and Associated Training

Summary of WMATA Management Responses to Draft Report Submitted to WMSC



ID#	SECTION	Page #	Existing Language	WMATA Response
15	Finding 9 <i>Terminal Supervisors, Interlocking Operators</i>	35	Interlocking operators expressed concern that they do not receive adequate training on third rail power energization and de-energization, including due to the unstructured nature of on-the-job training.	The comment has already been addressed. The Training Department has included a higher focus on power in the classroom training.
16	Finding 11	37	QC personnel interviewed for this audit described the threshold for removing someone from service as being something "egregious," and described the decision as knowing it when they see it, but did not have any written reference for such a threshold.	Please review <i>206-01 RTRA QA/QC Internal Auditing Procedures</i> , clause 6.2.8
17	Finding 11	37	A review of audits submitted by those two QC officers from January through August 2021 identified that, when working alone, each reported 100 percent or nearly 100 percent compliance for each audit, with issues identified only on audits where they worked in a team with other QC officers.	WMATA strongly disagrees with this statement and requests its removal as it is subjective and calls the integrity and objectivity of all RTRA QC officers into question.
18	Finding 14	41	Supervisors visit classroom sessions, but do not regularly oversee field training such as yard practical training. There is no documented standard for the evaluation of instructors or required frequency of supervisory assessments and monitoring.	The OPMS SOP identifies the form and the frequency for Supervisors to evaluate the instructors.
19	Recommendation 3	43	<p>3. Interlocking operators are authorized to hand crank switches, but are not certified to take this action.</p> <p>Metrorail rules state that rail operations supervisors, interlocking operators, qualified Track and Structures supervisors and ATC Maintenance personnel are qualified to hand crank a switch or derail. Of that group, only interlocking operators are not certified to crank switches.</p> <p>Cranking a switch is manually throwing the switch from one position to the other.</p> <p>Utility and full-time rail supervisors must crank a switch during their certification process, but interlocking operators do not. Interlocking operators receive some hand cranking training in initial classes, but are not required to have further training on cranking a switch no matter how long they remain an interlocking operator.</p> <p>Interlocking operators do not crank switches frequently and tend to do it only when ATC personnel are not available in the yard and a switch needs to be manually realigned to allow a train to exit the mainline.</p>	Please review <i>Performance Standardization Program Manual: Interlocking Operations - May 2020</i> , page 14 Manual Switch Operations



WMSC Audit of WMATA Rail Operations and Associated Training

Summary of WMATA Management Responses to Draft Report Submitted to WMSC



ID#	SECTION	Page #	Existing Language	WMATA Response
20	Other Observations	45	During site visits for this audit, the WMSC observed two violations of Metrorail’s electronic device policy. A supervisor correctly identified that a station manager was improperly using a cell phone in the station kiosk. An elevator/escalator contractor at Minnesota Ave Station was also observed with earbuds in while working at the bottom of an escalator.	WMATA respectfully requests removal of this statement as the operator mentioned is an ELES employee not an RTRA staff person.
21	Various	Various	In its written comments to the draft audit report, WMATA requested that certain information and data be removed from the final, publicly-available version of the report to protect the privacy interests of individual WMATA employees or its customers, to protect sensitive safety or security information, and/or to protect information that may be otherwise confidential or sensitive in nature. The final report does not incorporate these requests.	