

Metro's Summary Response to WMSC's Emergency Management Audit

On December 30, 2021, WMSC shared with Metro for comment the draft audit of Metrorail's emergency management, emergency preparedness, and fire-life safety practices. The draft audit contained 14 findings and five recommendations.

Metro is already drafting the Corrective Action Plans for approval by WMSC, and has taken a number of management actions, including implementing quality assurance processes to remedy many of the issues raised before receipt of the draft audit. WMSC was apprised of the following improvements to address the audit findings prior to the publication of the audit:

- Metro has restructured the management and accountability structures covering emergency management and fire life safety functions for the agency. A new Office of Emergency Preparedness was launched with a significantly enhanced, highly-qualified staff to implement FEMA's emergency management lifecycle and the agency's Safety Management System.
- In the Fall, the General Manager established the Incident Management Framework initiative to improve the urgency, consistency and flexibility of the agency's management of incidents across all modes, which will align Metro's incident management framework more closely to FEMA's national incident management system. These changes are due to launch in October 2022.
- A new Prevention & Mitigation team – dedicated solely to the prevention and mitigation of incidents across the agency - has implemented a new improved system to manage the identification, assessment, and tracking of all hazards relating to Fire Life Safety, and to ensure the assignment and execution of the mitigations to reduce the risk of those hazards.
- The Incident Management Official in the ROCC has been replaced with the Mission Assurance Coordinator. The position remains the Chief Safety Officer's 24/7 representative in the ROCC to ensure safer management of incidents, but has improved, formalized procedures, standards and training to enhance and professionalize the role.
- Metro introduced three additional specialist senior managers to enhance and support the Fire Marshal function and improve the management and coordination of fire life safety hazards.

Additionally, prior to the January 31, 2022 deadline for comments, Metro provided the WMSC 16 comments with 28 supporting documents. Among the comments were those to correct factual inaccuracies or provide context to conclusions where data may have been missed. Examples of the sixteen comments include:

- WMSC stated that the role and responsibilities of the Fire Marshal and Incident Management Official (IMO) in the ROCC were not defined or communicated. To correct, Metro provided the relevant job descriptions, procedures and guidelines to WMSC as well as training records of the IMO staff.
- WMSC was critical of the design and implementation of the Incident Management Official (IMO). Metro expressed concern that WMSC did not raise objections or concerns earlier, despite WMSC management being fully engaged in an oversight capacity throughout the position's first eight months in design and operation. WMSC staff were engaged with Metro management on a bi-

weekly basis, were provided documentation, and engaged with the IMOs on a near-daily basis in WMSC's oversight capacity.

- WMSC stated there are no procedures or records of inspections of tunnel lighting or fire extinguishers. Such inspections do occur, so Metro provided the Preventative Maintenance Inspection documentation and records.
- WMSC stated that Metro is not compliant with FEMA's National Incident Management System. However, current practices do align with NIMS, as evidenced by the official FEMA guidance to WMSC to ensure an accurate, shared interpretation of the principles of Unified Command and the Incident Command System.
- It was misrepresented that the cause of a reduction in emergency management training provided by Metro to jurisdictional fire and police departments was due to staffing of the IMO positions. The primary reason was a severe reduction in demand during COVID.