New York State Office of the State Comptroller
Thomas P. DiNapoli

Division of State Government Accountability

Selected Aspects of Subway Station Safety

Metropolitan Transportation Authority
New York City Transit

Report 2016-S-11 June 2017

Executive Summary

Purpose

To determine if the Metropolitan Transportation Authority's New York City Transit - Division of Station Environment and Operations has taken appropriate steps to make all of its subway stations safe, and whether "Help Points" and "Customer Assistance Intercoms" are operational and accessible to all. This audit covers the period January 1, 2014 to July 5, 2016.

Background

New York City Transit (Transit) is responsible for providing public transportation in New York City, carrying an average of 5.65 million passengers per day. Maintaining safety and cleanliness for the daily riders who use its 469 subway stations is one of Transit's essential duties. This is the responsibility of Transit's Division of Station Environment and Operations (Division) whose stated mission is to "provide a clean, orderly and well-maintained, customer-oriented station environment." The Division has five operating units with 6,207 employees who maintain the safety and cleanliness of station areas such as stairs, platforms, mezzanines, and walkways.

The Division's Operations Training Manual requires Station Supervisors to inspect subway stations at least once every 72 hours. The Division's Bulletin No. 15-12, released May 18, 2012, places defects into five categories, including 'A' defects, 'B' defects, 'C' defects, 'P' defects, and Signage defects, defined as follows:

- 'A' defects – Affects safety, security, and revenue-related issues, and must be made safe or repaired within 24 hours;
- 'B' defects – Any 'A' defects that are made safe but are not completed, all non-safety and public employee toilet defects, and all non-safety service booth defects. These defects must be faxed to the Maintenance Service Call Center (MSCC) and are to be repaired within 30 days;
- 'C' defects are non-safety, non-security, and non-revenue-related issues. These defects must also be faxed to the MSCC, and they are to be repaired within 60 days;
- 'P' defects are non-safety project type work requiring longer duration and planning to complete; and
- 'Signage' defects (including missing, damaged, vandalized, or incorrect messages) should be reported to the Office of Station Signage immediately. This can be done in one of three ways: station signage web portal, email, or fax.

Key Findings

The Division often did not take sufficient and/or timely actions to identify and address safety-related defects. The audit's more significant findings are as follows:

- We identified 66 defects, including 21 Priority 'A' defects, at 12 of the 25 subway stations we inspected. However, 20 of the 21 Priority 'A' defects were not identified by Station Supervisors during required station inspections within three days before and after our site visits.
- Once identified, defects were not always addressed within the required time frames. For a random sample of 10 Priority 'A' defects, records showed that only three (of the 10) were

addressed or made safe within 24 hours, as otherwise required. For five of these defects, the Division took between 6 and 92 days to address/repair the defects. For two other defects, the information was incomplete and, consequently, we could not determine when the defects were addressed/repaired.

- For Priority 'B' defects, the Division took from 55 days to 836 days (or over two years) to repair 19 of the 30 defects examined, far in excess of the prescribed limit of 30 days.
- Officials could not provide written records supporting 9 of the 82 sample test calls for Help Points/Customer Assistance Intercoms (CAIs). Without an adequate audit trail of such tests, Transit has limited assurance that these systems work properly.

Key Recommendations

- Revisit the subway stations where auditors identified the defects, determine the current conditions, and take appropriate action. If actions are not required, document the reasons why.
- Require Station Supervisors and other Division personnel, as appropriate, to attend refresher training courses emphasizing the importance of conducting thorough subway station inspections.
- Ensure that defects are addressed/repaired according to Division bulletins/guidelines.
- Develop and implement formal procedures to document how tests of Help Points/CAIs are to be performed and documented by non-supervisors.

State of New York
Office of the State Comptroller

Division of State Government Accountability

June 15, 2017

Mr. Fernando Ferrer
Interim Chairman
Metropolitan Transportation Authority
2 Broadway
New York, NY 10004

Dear Mr. Ferrer:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Selected Aspects of Subway Station Safety*. This audit was performed pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the State Constitution and Section 2803 of the Public Authorities Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Office of the State Comptroller
Division of State Government Accountability

Table of Contents

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Background

New York City Transit (Transit) operates and maintains one of the largest mass transit systems in the world that provides 24-hour daily service throughout the year. Safety and cleanliness at subway stations are the responsibility of Transit's Division of Station Environment and Operations (Division). The stated mission of the Division is to "provide a clean, orderly, and well-maintained customer-oriented station environment." To meet these responsibilities, the Division has issued Bulletins which set forth the guidelines/procedures to identify, report, and timely address/ repair any observed defects at subway stations. These guidelines must be followed by Station Supervisors and Managers.

The Operations Training Manual requires Station Supervisors to inspect subway stations at least once every 72 hours. Supervisors use the Supervisory Log - Station Inspection Report (Supervisory Log) to document defects identified during the inspection of assigned subway stations. These defects are also electronically entered into the Station Handheld Inspection Program (SHIP) system (a database system used to record defects and repairs). The Division's Bulletin No. 15-12 (Bulletin), issued on May 18, 2012, groups defects into five categories, including 'A' defects, 'B' defects, 'C' defects, 'P' defects, and Signage defects, defined as follows:

- 'A' defects – Affects safety, security, and revenue-related issues, and must be made safe or repaired within 24 hours;
- 'B' defects – Any 'A' defects that are made safe but are not completed, all non-safety and public employee toilet defects, and all non-safety service booth defects. These defects must be faxed to the Maintenance Service Call Center (MSCC) and are to be repaired within 30 days;
- 'C' defects are non-safety, non-security, and non-revenue-related issues. These defects must also be faxed to the MSCC, and they are to be repaired within 60 days;
- 'P' defects are non-safety project type work requiring longer duration and planning to complete; and
- 'Signage' defects (including missing, damaged, vandalized, or incorrect messages) should be reported to the Office of Station Signage immediately. This can be done in one of three ways: station signage web portal, email, or fax.

When identified, Priority 'A' defects are immediately called in to the MSCC, while Priority 'B' defects are entered into SHIP by the designated Station Supervisors at the repair shop at the end of their shifts. All completed Service Call Notification Forms are to be reviewed by Operations Managers and Maintenance Superintendents prior to being faxed to the MSCC to ensure safety defects are not incorrectly listed, and previously submitted defects are not resubmitted, which would result in duplicate service calls. Previously, defects were generally entered at the MSCC. However, at the time of our audit fieldwork, Station Supervisors entered defects for the stations they were responsible for.

Station defects are repaired by maintenance teams and documented on Work Orders/Service Call Tickets and Station Environment Maintenance Payroll and Production Sheets. Additionally, the

repair status of reported defects is updated in the SHIP system. Both SHIP, and the Production database include information such as the work performed, time taken, manpower used, and completion status (such as "Repaired" or "Closed Unfounded"). Documentation for repaired defects is sent to MSCC for validation with the information entered in SHIP and the Production database. The documents are filed at the MSCC, and a copy is also maintained at the shops.

From January 1, 2014 through March 31, 2016, Transit reported that there were 12,167 Priority 'A' defects and 37,545 Priority 'B' defects.

Audit Findings and Recommendations

As noted previously, Division policy requires Station Supervisors to inspect subway stations every 72 hours. However, our visits to 25 stations identified 66 defects that included 21 Priority 'A' defects at 12 of the stations inspected, and 20 of them were not recorded in the Division's records. We also found two Priority 'B' defects at two different stations that were not identified. Transit's Department of Subways has established formal procedures to address defects, including benchmark standards for when repairs should be completed. However, Transit did not always comply with established benchmarks for making repairs.

Also, Transit officials could not provide written records supporting 9 of 82 sampled calls that were made by Station Supervisors to test the Help Points/Customer Assistance Intercoms (CAIs) during station inspections. For seven (of the nine) where Transit officials could not provide a written record, they indicated that the employee who did the test was probably not a supervisor, and therefore, the employee was not required to leave an audit trail. However, without supporting documentation, Transit had limited assurance that tests were actually performed and Help Points/CAIs worked properly.

We recommend that Transit ensure: Division personnel clearly and accurately document the results of their station inspections; repairs of defects be done timely; and database information for the repair of safety-related defects be thorough and complete.

Subway Station Inspections

We inspected 25 subway stations to assess the safety of the stations in accordance with stated requirements in the Bulletin. We identified 66 defects that included 21 Priority 'A' defects at 12 (of the 25) stations. Subsequently, we reviewed the Division's Supervisory Logs, completed within 72 hours before and after the auditors' inspections, to determine if the defects were reported and scheduled to be addressed or repaired. We determined that only 1 of the 21 Priority 'A' defects was identified by Station Supervisors. The 20 defects that were not reported were identified at 12 stations and included the conditions summarized in Table 1.

Table 1

Defect	Number Identified	Stations Involved*
Water	8	6
Platform	3	2
Sharp Object	4	3
Splintered Wood	1	1
Unglued Bird Spikes	1	1
Loose Stairway Tread	1	1
Missing Tactile	1	1
Oil Leak on Platform	1	1

*Four stations had two defects. One station had three defects.

We also identified three Priority 'B' defects at three stations: one that was identified by a Station Supervisor and two that were not. In addition, we found 42 lower-priority defects, including 25 Priority 'C' defects, 16 Priority 'P' defects, and one Signage defect. Our review of Supervisory Logs 72 hours before and/or after our site visits found that 5 of the 25 Priority 'C' defects, 2 of 16 Priority 'P' defects, and the Signage defect were not identified by Station Supervisors during their inspections.

When these conditions were brought to their attention, Division officials stated that they are "currently in the process of visiting all stations identified in the auditors findings to access [sic] the current conditions and will take appropriate actions if warranted." They stated that water, the most prevalent defect identified, is one of their biggest challenges, adding: "since we cannot stop the flow of water, we try to control it either through chemical grouting or through the use of drip pans … Water also migrates from one location to another and sometimes may stop altogether, so it is not always evident during our inspections." Moreover, Division officials agreed on the "importance of performing a thorough station inspection to properly identify and classify defects" and stated that these topics "will be emphasized in the school of instruction, refresher training as well as reinforced during every monthly staff meeting with field supervision."

Concerns pertaining to incomplete station inspections were brought to the attention of MTA management previously. Specifically, in March 2013, the MTA's Office of the Auditor General issued a report on station safety that covered the period January 2012 to October 2012. In that report, the Auditor General identified defects at 22 stations that were not previously reported and defects that were reported, but not correctly classified as Priority 'A' defects. Thus, our findings and those of the Auditor General were quite similar. If stations are not inspected or are not inspected properly, there is increased risk of significant and persistent defects that could compromise the health and safety of MTA passengers.

Recommendations

1. Revisit the subway stations where auditors identified defects, determine the current conditions, and take appropriate actions. If actions are not required, document the reasons why.

2. Require Station Supervisors attend training or refresher courses emphasizing the importance of conducting thorough subway station inspections.

Addressing Defects

Priority 'A' Defects

The Bulletin defines Priority 'A' defects as those affecting safety, security, and revenue-related issues. They must be made safe or repaired within 24 hours. We reviewed the Trouble Call tickets for a sample of ten Priority 'A' defects to determine if they were addressed or made safe within 24 hours, as required. However, of the ten selected defects, the Division addressed/repaired only

three within 24 hours. The Division took from 6 days to 92 days to address or repair five of the ten Priority 'A' defects. For the remaining two Priority 'A' defects, the documentation was incomplete (i.e., the completion dates were not provided), and as a result, we could not determine the status of efforts to address those defects. Table 2 details the ten defects, including their nature and the amount of time taken to repair/correct them.

Table 2

Station	Defect	Component Type	Sub-component Type	Date Received	Date Completed	Time Taken to Make Repair
7th Avenue	Clog	Drain	Floor	11/06/15	02/06/16	92 Days
Simpson Street	Snow	Station	Emergency Response	01/21/14	03/05/14	43 Days
42nd Street	Other	Water Line	Water Lines	02/12/14	02/24/14	12 Days
Franklin Avenue	Other	Station	Emergency Response	02/05/15	02/12/15	7 Days
14 St-Union Square	Missing Full Unit	Floor	Tile	06/15/15	06/21/15	6 Days
Classon Avenue	Loose Fixture	Platform	Rubbing Board	10/09/14	10/09/14	Within 24 Hours
Metropolitan Avenue	Loose Fixture	Stairway	Handrail stainless steel	01/16/15	01/16/15	Within 24 Hours
149th St-Gr Concourse (LL)	Flooding	Station	Water Condition	03/14/15	No Date Provided	Information Incomplete
Fordham Road	Other	Light	Fluorescent	11/17/14	11/17/14	Within 24 Hours
34th Street	Other	Station	Emergency Response	03/11/16	No Date Provided	Information Incomplete

Priority 'B' Defects

According to the Bulletin, Priority 'B' defects include: an 'A' defect made safe, but the repair is not completed; all non-safety and public employee toilet defects; and all non-safety service booth defects. Priority 'B' defects should be repaired within 30 days. Also, 'B' defects should be data entered by designated Station Supervisors at the repair shops using the Supervisory Log as their source document. Only limited individuals have access rights to input information in the SHIP system.

We reviewed a sample of 30 Priority 'B' defects to determine whether they were repaired or addressed within 30 days, as required. We determined that four Priority 'B' defects were repaired within the 30 days, but 19 Priority 'B' defects (about 63 percent of the sample) were not repaired within the 30-day limit. For example, two defects were loose stairway handrails and another two were on the platform running board to "fill gap." The seven remaining defects had Work Orders that were not dated, and therefore, we could not determine if the repairs were completed on time.

Many of the aforementioned repairs took substantially longer than the 30-day standard to complete. For example, the Division took more than one year to repair three Priority 'B' defects: 637 days at 86th Street, 396 days at Pennsylvania Avenue, and 376 days for 7th Avenue. In the case taking the most time, the repair of a Priority 'B' defect at Jay Street took 836 days (or more than two years). The defect was reported as a leaking ceiling-water condition. Additional lengthy delays occurred at the Park Place and Newkirk Avenue stations, where repairs took 243 days and 218 days, respectively, to complete.

For both Priority 'A' and 'B' defects, the Division does not have written guidelines or protocols to follow when defects are not addressed in a timely manner, including a process to follow up on defects for which repairs are overdue for completion. This likely contributed to conditions that remained uncorrected for significantly longer than the established time frames and increased risk to passenger safety.

Supervisory Logs

The Division's Training Manual states that "Supervisors are required to report all defects and document their findings during these inspections on the Station Supervisory Log-Station Inspection Report daily." We requested the Supervisory Logs for the 30 sampled Priority 'B' defects. The Division did not provide five of the Supervisory Logs. Based on SHIP data, we determined that four logs were prepared by Station Supervisors, and one by a Station Superintendent. We were advised the four Supervisors inadvertently forgot to record the defect on the Supervisory Logs and one was reported by a Superintendent, who is not required to prepare a Supervisory Log.

Division guidelines require that the location and description of identified defects be recorded on the back of the Supervisory Log. Such details are needed to promptly locate and repair or address the defect within the required time frame. However, we determined that 11 of the 25 Supervisory Logs did not include defect descriptions. Further, of the defects that were identified, two involved Platform/Rubbing Boards, and another pertained to Stairway/Handrail conditions. Both conditions are considered Priority 'A' defects according to Attachment 1 of the Bulletin, and as such, the two defects should have been repaired within 24 hours. However, they were not, likely because they were not reported on the Supervisory Log.

Similarly, a Priority 'A' defect (Ceiling/Drip Pan at DeKalb Avenue) reported by a Station Superintendent should have been repaired within 24 hours, but was not. Again, the repair was not timely (taking 300 days), likely because the defect was not reported as a Priority 'A' defect. We were advised that Superintendents are not required to report defects and normally do not prepare a Supervisory Log, the document prescribed for Station Supervisors to report defects. Consequently, the Superintendent might have been unfamiliar with the classification protocol for defect reporting.

Transit officials agreed with our preliminary audit findings and recommendations and stated they will "reinforce the recommendations" in the preliminary findings. Further, Transit officials are working to replace SHIP with a new computer system that they believe will improve the tracking of defects identified and the status of efforts to correct them.

Recommendations

3. Ensure that defects are addressed/repaired according to Division bulletins/guidelines. In particular, develop procedures to identify and follow up on defects for which the completion of repair work is overdue.

4. Require Station Supervisors and Superintendents to document subway station inspections adequately.

Help Points/Customer Assistance Intercoms

According to the MTA, Help Points/CAIs are intended to provide customers with access to the Rail Control Center (RCC) to report an emergency or to the station booth for customer assistance. Thus, they should be working properly at all times. Further, Station Supervisors are required to include CAI operability as part of their station inspections. The Station Supervisor Level 1 Inductee Training Program Manual includes specific procedures for testing Help Points/CAIs, including conducting test calls.

Calls from the Help Point/CAI generally result in an audit trail. When Station Supervisors make a test call as part of an inspection, they record their name. If the call is received at the RCC, it is logged and recorded on paper or electronically. If a call is initiated at the Transit Information Center through a Help Point/CAI, it is stored electronically and can be traced. However, if a booth agent answers the Help Point/CAI, there is no record.

Transit officials could not provide written records supporting 9 of the 82 test calls sampled. For eight of the nine, Transit officials also could not provide a Supervisory Log. For the one remaining test, the Supervisory Log indicated 'not inspected' for the CAI area, but the RCC had a record of a Station Supervisor reporting a test at a subway station. For seven of the nine test calls without documentation, Transit officials indicated that the employee who did the test was probably not a Station Supervisor. Consequently, there was no documentation of the test. Only Station Supervisors are required to complete a Supervisory Log to document their review of a station. If an employee who is not a Supervisor tested a Help Point/CAI, there was generally no record that a test was performed because such employees are not required to leave an audit trail with the RCC.

Although Transit officials advised us that the Help Point system has some self-diagnostic features, test calls are still necessary to ensure the system is working appropriately. However, without an audit trail, Transit has limited assurance that all Help Points/CAIs are working properly.

Recommendations

5. Develop and implement formal procedures to document how tests of Help Points/CAIs are to be performed and documented by non-supervisors.

6. Improve the documentation of tests of Help Points/CAIs by recording the pass number of the employee who conducts such tests.

Audit Scope, Objectives, and Methodology

To determine if Transit's Division of Station Environment has taken appropriate steps to make all of its 469 subway stations safe for its customers, and whether "Help Points" and "Customer Assistance Intercoms" are operational and accessible to all. This audit covered the period January 1, 2014 through July 5, 2016.

To accomplish our objectives, we reviewed policies, procedures, and guidelines related to the processes for addressing safety-related defects identified at the subway stations. We interviewed Transit officials and employees to obtain an understanding of the internal controls related to these areas. We randomly selected a sample of 24 subway stations (including four in the Bronx, nine in Brooklyn, seven in Manhattan, and four in Queens). Based on our observation of its condition we added one station in Manhattan to the sample. We visited the stations to assess the safety and cleanliness of the stations in accordance with stated requirements in the Bulletin. Auditors used descriptions in the Bulletin, Attachments 1 and 2, to determine the priorities for the defects that were identified during the inspections. We made our visits from March 15, 2016 to July 5, 2016.

In addition, for 18 (of the 25 selected) stations, we compared subway station defects we identified to the results of inspections made by Station Supervisors within 72 hours before and/or after the our inspections to determine if they identified the same defects.

To determine whether the defects were addressed timely as required by the Bulletin, we reviewed the Trouble Call tickets for a sample of 10 Priority 'A' defects from the 12,167 reported by Transit from January 1, 2014 to March 31, 2016. We also randomly selected a sample of 30 Priority 'B' defects from the 37,545 reported by Transit from January 1, 2014 to March, 31, 2016 to determine whether the defects were repaired within 30 days, as required. Also, we visited 10 stations where five Priority 'A' and five Priority 'B' defects were reported to determine whether the repairs were actually made.

In addition, we randomly selected a sample of 82 tests of Help Points/CAIs. We selected nine days to sample, based on dates when we made observations of safety-related items at the 33 stations. We used CAI records from Transit's RCC and traced them to Station Inspection Reports filed by a Station Supervisor.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to

certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the State Constitution and Section 2803 of the Public Authorities Law.

Reporting Requirements

We provided a draft copy of this report to MTA-Transit officials for their review and formal comment. We considered officials' comments in preparing this final report and attached them in their entirety to it. In their response, MTA officials asserted that the audit did not fairly represent the MTA's performance regarding the repair of defects in subway stations. Also, the MTA's response specifically addressed only four of the report's six recommendations. Our rejoinders to certain MTA comments are included in the report's State Comptroller's Comments.

Within 90 days after the final release of this report, as required by Section 170 of the Executive Law, the Chairman of the Metropolitan Transportation Authority shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees advising what steps were taken to implement the recommendations contained herein, and where the recommendations were not implemented, the reasons why.

Contributors to This Report

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Vision

A team of accountability experts respected for providing information that decision makers value.

Mission

To improve government operations by conducting independent audits, reviews and evaluations of New York State and New York City taxpayer financed programs.

Agency Comments

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Veronique Hakim
Interim Executive Director

Metropolitan Transportation Authority
State of New York

March 24, 2017

Ms. Carmen Maldonado
Audit Director
The Office of the State Comptroller
Division of State Government Accountability
59 Maiden Lane, 21st Floor
New York, NY 10038

Re: Draft Report #2016-S-11 (New York City Transit – Selected Aspects of Subway Station Safety)

Dear Ms. Maldonado:

This is in reply to your letter requesting a response to the above-referenced draft report.

I have attached for your information the comments of Darryl C. Irick, Acting President, NYC Transit, which address this report.

Sincerely,

Veronique Hakim
Interim Executive Director

c: Donna M. Evans, MTA Chief of Staff
Michael J. Fucilli, Auditor General, MTA Audit Services

Attachments

Memorandum

New York City Transit

Date March 24, 2017

To Veronique Hakim, Interim Executive Director, MTA

From Darryl C. Irick, Acting President, New York City Transit

Re **NYCT Response: New York State Comptroller Report #2016-S-11 – Selected Aspects of Subway Station Safety (the "Report")**

This information is being provided in response to the State Comptroller's audit report on Selected Aspects of Subway Station Safety (2016-S-11), which covers the period from January 1, 2014 – July 5, 2016. The stated purpose of the audit was to determine whether the Division of Station Environment and Operations has taken appropriate steps to make all of its subway stations safe and whether Help Point and Customer Assistance Intercoms ("CAIs") are operational and accessible to all.

The audit is representative of neither the total scope of subway stations in the New York City Transit System, nor NYCT's performance in addressing defects over the course of an entire year. There are 472 stations in the NYCT subway system; this audit only considered 25, or 5% of all stations. Furthermore, defects of any kind were found at only 12 stations, less than half the audit's sample and less than 3% of all stations. Safety is the top priority at all MTA agencies, and that priority is reflected in NYCT's actual performance: in 2016, 99.8% of the highest priority safety defects at subway stations ("A" defects) were repaired within 24 hours of their reporting.

* Comments 1, 2

Recommendation #1: Revisit the subway stations where auditors identified the defects, determine the current condition and take appropriate action. If actions are not required, document the reason why.

Response: On average, 422 "A" defects were reported each month in 2016, and NYCT has sustained a near-perfect rate for more than three years, repairing close to 100% of these defects within the target 24 hours. In 2016, NYCT repaired 51,410 priority B and C defects, repairing 84% and 76% of these non-safety items within the goal of 30 and 60 days respectively.

* Comment 2

Appropriate action has been taken to address all but two of the defects (relating to leaks) identified in the audit, for which NYCT did not find any evidence. If leaks are evident, NYCT controls them through either chemical grouting or drip pans. However, leaks are not always evident, even after a few hours because water migrates, and leaks may appear only during or immediately after heavy precipitation. Of the 45 non-safety related items

* Comment 3

*See State Comptroller's Comments, page 18.

identified in the audit, 25 were repaired and nine are in repair. The remaining 11 items are aesthetic (e.g., hairline cracks in concrete floor or wall tile) and do not pose hazards to our customers or employees. While these items were not addressed immediately, they are monitored closely to ensure their condition remains constant.

* Comment 3

Recommendation #2: Require Station Supervisors and other Division personnel, as appropriate, to attend refresher training courses emphasizing the importance of conducting thorough subway inspections.

Response: NYCT continues to emphasize the importance of thoroughly inspecting stations in our introductory training, refresher training every three years, in regular staff meetings, and in bulletins that are updated when needed (see below).

Recommendation #3: Ensure that defects are addressed/repaired according to Division bulletins/guidelines.

Response: NYCT emphasizes the repair and reporting of defects in guidelines, staff meetings and bulletins. Bulletin 001-17: *Reporting Station Defects* was issued on January 5, 2017 as an update to NYCT's guidelines and a reminder to our employees.

Recommendation #4: Develop and implement formal procedures to document how tests of Help Points/CAIs are to be performed and documented.

Response: Formal procedures for testing Help Point/CAIs have been in place and documented as part of the station inspection procedure since September 2009 (earlier for CAIs) and were updated in 2011 for the introduction of Help Points. (*See* Bulletin 11-12: *Universal Supervisory Log*).

* Comment 4

cc: C. Davis
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J. Kuhls
S. Librera
P. Presvelis
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R. Richardson

State Comptroller's Comments

1. A sample by its nature does not cover the entire population, and thus, the MTA's assertion that "defects of any kind were found at only 12 stations, less than half the audit's sample and less than 3% of all stations" is misleading. In fact, defects were found at 48 percent of the sampled stations, and 21 of the defects were Priority "A" defects. If safety is genuinely a high priority at all MTA agencies, it is unclear how MTA officials can downplay the fact that nearly half of our sampled stations had safety-related defects that were not corrected in a timely manner.
2. There is material risk that Transit's performance statistics are not accurate. The MTA bases its performance metrics on the SHIP data. When this data was provided to the audit team, the MTA cautioned that the data could not be relied upon because of duplicate entries and deficiencies in updating ticket data. Moreover, on September 27, 2016, the MTA confirmed concerns about SHIP data reliability, stating in a response to preliminary findings: "We realize that the current SHIP system has its limitations, and we are working on transitioning to the new Infor Enterprise Asset Management system. The Infor system will provide us with the capability to have better controls in identifying and resolving duplicate entries by cross referencing dates and with the inclusion of photos. This feature will drastically reduce the duplication of entries as well as reconcile resolved and unresolved defects." Due to these data reliability problems, we chose a random sample of "A" tickets and requested the documentation to support the information in SHIP. As stated in our report, only 3 of 10 tickets were addressed within 24 hours. Also, for "B" tickets, only 4 of 30 were repaired in the required time frame.
3. We are pleased that Transit asserts that actions have been taken to address 19 of the 21 "A" safety-related defects and 34 (25 repaired and 9 under repair) of the 45 non-safety-related defects identified by our audit's site visits of stations. Nonetheless, we question Transit's data and analysis because Transit documentation showed that only 7 of the 40 selected "A" and "B" defects were repaired within the MTA-prescribed time frames at the time of our audit fieldwork. Also at the time of our fieldwork, records indicated that only 1 of the 21 "A" defects we identified were also identified by MTA Station Supervisors. Moreover, the core issue is that the MTA needs to improve efforts to identify and correct defects in a timely manner.
4. MTA's comment appears to relate to Recommendation No. 5 (and not to Recommendation No. 4). Further, Bulletin No. 11-12 does not sufficiently address Recommendation No. 5 because it does not prescribe the formal procedures necessary for non-supervisors to perform and document tests of Help Points/CAIs. Specifically, the Bulletin states that supervisors are required to use one of the following applicable ratings/codes on the front of the log. For CAI/HPI, they are: W-Working; NW-Not Working; and N/A–Not Applicable. However, the Bulletin does not prescribe the steps that should be taken to report the condition of the CAIs/HPIs, if the tests are conducted by non-supervisors.