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STATE OF NEW YORK  
OFFICE OF THE STATE COMPTROLLER

February 20, 2020

Mr. Patrick J. Foye  
Chairman  
Metropolitan Transportation Authority  
2 Broadway  
New York, NY 10004

Re: Selected Aspects of Subway  
Station Safety  
Report 2019-F-15

Dear Mr. Foye:

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, we have followed up on the actions taken by officials of the Metropolitan Transportation Authority to implement the recommendations contained in our audit report *Selected Aspects of Subway Station Safety* (Report [2016-S-11](#)).

**Background, Scope, and Objective**

New York City Transit (Transit) is responsible for providing public transportation in New York City, carrying an average of 5.4 million passengers per day. Maintaining safety and cleanliness for the daily riders who use its 472 subway stations is one of Transit's essential duties. Within Transit, the Division of Station Environment and Operations (Division) is responsible for ensuring the cleanliness, maintenance, and safety of subway stations. The Division has six operating units with 6,024 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 (supervisors) to perform mandatory weekly station inspections and daily inspections for the top 25 slip, trip, and fall risks in subway stations. During the inspections, supervisors are to identify defects in need of repair (e.g., loose/missing handrails and stair treads, platform edges, uneven floor surfaces, holes, water conditions, clogged drains, broken wall and floor tiles, graffiti surfaces) and ensure the cleanliness of each station.

Subsequent to our initial audit, Transit replaced its Station Handheld Inspection Program system, previously used to report station defects, with the Infor Enterprise Asset Management system (EAM). EAM is the reporting and tracking mechanism for all

nonconformities (NCs) (formerly known as defects) and the recording tool for all station inspections. EAM is used by all supervisors and managers.

According to the Division's Bulletin No. 034-19, dated August 27, 2019, NCs are grouped into five categories based on severity, as follows:

- Severity 1 – Any catastrophic hazards, which must be addressed within three hours and require “6-wire”<sup>1</sup> notification.
- Severity 2 – Affects safety, security, and revenue-related issues and must be made safe or repaired within 24 hours.
- Severity 3 – Includes Severity 2 NCs that are made safe but where the work is not completed, all non-safety and public employee toilet defects, and all non-safety service booth defects. These defects must be completed within 30 days.
- Severity 4 – Any NCs that do not constitute Severity 1, 2, 3, or 5. These defects must be completed within 60 days.
- Severity 5 – Any non-safety project-type work requiring longer duration and planning to complete. These items are entered into EAM system by a manager or maintenance supervisor only.

All signage NCs (including missing, damaged, vandalized, or incorrect messages) must be reported to the Office of Station Signage immediately. This can be done either through the station signage web portal or by faxing a Signage Request form.

We issued our initial audit report on June 15, 2017. The audit found that the Division often did not take sufficient and/or timely action to identify and address safety-related defects. Auditors identified 66 defects, including 21 Priority A defects, as classified under the previous system (affects safety, security, and revenue-related issues and must be made safe within 24 hours), at 12 of the 25 subway stations inspected. Twenty of the 21 Priority A defects were not identified by supervisors during required station inspections that occurred within three days before and after our site visits. Once identified, defects were not always addressed within the required time frames.

The objective of our follow-up was to assess the extent of implementation, as of January 9, 2020, of the six recommendations included in our initial audit report.

### **Summary Conclusions and Status of Audit Recommendations**

MTA–Transit officials made progress in addressing the problems we identified in the initial audit report. Of the six audit recommendations, five were partially implemented and one was implemented.

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<sup>1</sup> Transit's Rail Control Center supervisors are in contact with major Subways units, such as Maintenance of Way, and certain external organizations, such as the Transit Police, through the use of the “6 wire,” which is an open radio connection that is monitored simultaneously by these operating departments and agencies.

## **Follow-Up Observations**

### **Recommendation 1**

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

Status – Partially Implemented

Agency Action – Transit officials claimed that they resolved the 20 defects at the 12 stations identified in the report. However, we reviewed the records supplied by Transit and found they visited just 5 of the 12 stations and corrected 8 of the 20 defects.

### **Recommendation 2**

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

Status – Partially Implemented

Agency Action – Transit officials claimed they appropriately trained their supervisors. They provided rosters for induction training, refresher training, and EAM training.

We noted that 19 of the 38 supervisors who should have attended induction training were not listed on the rosters. Division management provided additional supporting documentation for 15 supervisors and claimed that the training records for the remaining 4 had been destroyed.

For refresher training, we selected a judgmental sample of 20 of the 39 supervisors. Eight were not listed on the training rosters. Division officials agreed that five should have been on the roster and provided reasons the other three supervisors were not listed.

For EAM training, we found that 19 of 58 supervisors were not listed on the rosters. Division management replied that only five were still supervisors (as of December 26, 2019). However, the Division did not provide an explanation of why these five were not listed on the rosters.

### **Recommendation 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.*

Status – Partially Implemented

Agency Action – Transit implemented new safety guidelines for inspections (Bulletins issued August 27, 2019 and September 11, 2019), which changed the requirement for frequency of inspections and classification of conditions found at the subway stations.

We tested a sample of 15 cancelled and 48 resolved NCs to determine if they were in compliance with the Bulletins. We found that 5 of the 15 were not properly cancelled. For example, NCs were cancelled as duplicates. However, in some cases, the NC descriptions were not the same, and in others the original NC was cancelled so the date when the NC was first observed was incorrect. For the 48 resolved NCs covering Severity 1 to 5, we determined that 17 were not resolved in a timely manner based on the time frames in Bulletin No. 034-19. For example, six were catastrophic, including a clogged toilet in the only employee restroom and lights out in stairway, and require a response in three hours, but the time frames were not met. Another eight, such as chipped/cracked ceiling tiles in the mezzanine, were Severity 3 and 4, but took more than the 30 and 60 days, respectively, allowed in the Bulletin.

We also visited 16 subway stations between November 18, 2019 and November 22, 2019 to identify NCs and determine whether they were listed in EAM. We found 145 NCs that were also listed in EAM. However, only 45 issues had a resolution date; of these, 39 were resolved timely (within guidelines) and 6 were not.

A review of the remaining 100 NCs without a resolution date revealed that, as of December 5, 2019, 49 had a revised status of “resolved” based on the information in the work order. However, EAM did not always reflect what work was actually performed. For example, for 24 of the 49 NCs with a revised “resolved” status, EAM did not contain a description of the work done.

When we visited four stations (Church Avenue, Nevins Street [2, 3, 4, and 5 lines], Main Street Flushing [7 line], and 23rd Street [F line]) along with the supervisors, we noted inconsistencies/discrepancies in the process; some supervisors based their inspections on the existing list of NCs, while others investigated the items on the list in addition to performing a thorough inspection. There was also a lack of standard descriptions, making it difficult to identify comparable defects in EAM.

#### **Recommendation 4**

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

Status – Partially Implemented

Agency Action – Although Transit uses EAM for documenting all inspections done by supervisors, when general and district managers perform in-depth station inspections, their observations are documented in a different place and not entered in EAM. In-depth inspections are done to ensure supervisors are performing inspections and documenting the information according to guidelines. The guidance does not make any reference to superintendents with regard to station inspections.

Additionally, we determined that supervisors do not have a consistent methodology for recording observations. Some supervisors record their observations in an unofficial document referred to as a “butcher book,” while others use alternative

methods, such as recording observations at the bottom of the NC list, on a blank pad, or on a cell phone. These observations are entered directly into EAM at the end of their tour.

We visited and inspected 16 stations according to Transit's guidelines between October 23, 2019 and November 5, 2019. We noted several NCs that did not appear to be recorded in EAM. We provided Transit officials with pictures for 11 NCs and asked why the pictured NCs were not recorded in EAM. Transit officials addressed two NCs in their district. They explained that change management is an ongoing process, and attributed the differences in EAM implementation to:

- A learning curve for various staff in learning the new system;
- Adjustment to change and discomfort in adapting to an electronic system; and
- Ongoing system development to address deficiencies in the system (e.g., making some fields mandatory so management would have enough information to assess discrepancies).

#### **Recommendation 5**

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

Status – Partially Implemented

Agency Action – Transit stated that this recommendation is not applicable because the Help Points (HPs) are self-reporting and do not require testing. However, the process in place does not report physical defects that do not interfere with the software, such as problems with button pressing to request assistance or information.

We checked for physical defects on 17 HPs and Customer Assistance Intercoms (CAIs) and tested 15 of the 17. Twenty percent (3 of 15) were defective. However, there is no guidance in the manuals on HPs and CAIs. Additionally, the forms used to record conditions do not include physical testing.

Supervisors were unclear about whether HPs/CAIs should be tested. Of the four we accompanied during station visits, two tested the HPs and two did not. Also, one tested the CAIs but did not test the HPs. Transit has not adequately communicated its policies and procedures regarding HP/CAI physical testing.

#### **Recommendation 6**

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

Status – Implemented

Agency Action – During our observations of the stations inspections, we observed the pass numbers were key punched into Transit's information system.

Contributors to this report were Robert C. Mehrhoff, Joseph F. Smith, Netash Phull, Susan Gordon, Menard Petit-Phar, and Altagracia Rodriguez.

We would appreciate your response to this report within 30 days, indicating any actions planned to address the unresolved issues discussed in this report. We thank the management and staff of Metropolitan Transportation Authority–New York City Transit for the courtesies and cooperation extended to our auditors during this review.

Very truly yours,

Carmen Maldonado  
Audit Director

cc: M. Woods, MTA  
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Division of the Budget