

March 2, 2006
AUD 06-102

An Internal Audit Report by the Office of Auditor General

• A Review of Customer Access to WMATA Rail Station Restrooms

We anonymously visited 66 of the 86 rail stations (some on more than one occasion) to ascertain whether the Station Manager's were adhering to the WMATA customer restroom access policy, evaluate the level of customer service provided by the Station Manager and ascertain the adherence to Board policy on restroom initiatives.

The results of our visits indicated that the Station Managers were allowing persons access to the restrooms.

We were refused access 7 times. Two of the refusals were due to lack of restroom facilities at 2 Stations. Four of the refusals were due to the restrooms being inaccessible because of construction and one refusal was without explanation but the Manager directed the person to the restroom in a nearby Mall food court

We compared Special Order No. 01-04 with the Directive provided by the Board of Directors and determined that the Station Managers on our visits were in compliance with the SOP. However, in our opinion, the SOP allows more discretion to the Station Manager than the Board Directive.

We have made 4 recommendations for improvement that should be considered as follows:

- The SOP should be revised and updated to be consistent with the Board Directive
- WMATA prepare larger and more visible signs concerning the restroom policy to be displayed at the kiosk.
- Post the revised and updated SOP at the entrance to the door leading to the restroom.
- WMATA should consider a mechanism (such as remote access locking devices) to allow the Station Manager to allow remote access to the restroom facility to enable the Station Manager to permit the customer entry into the restroom without interfering with the Station Manager's other responsibilities and still maintain necessary security.

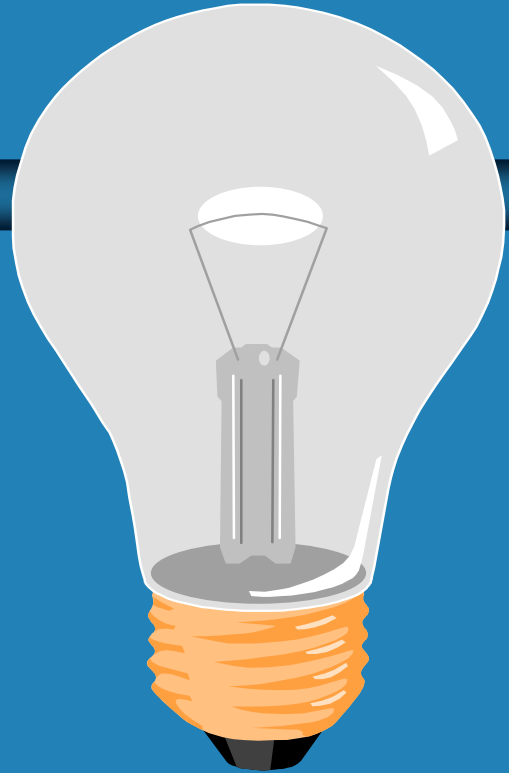
We reviewed this report with representatives of OPER, RAIL and MTPD.

MTPD stated that they have an objection about allowing access to restrooms which are considered to be in areas that should not be accessible to the public.

RAIL stated that they are in compliance with the current SOP and suggested that due to the limited kiosk window space signs should only be posted at the 5 stations where restrooms are inaccessible and not available.

Internal Audit Report No. AUD 06-102

Questions



If you have any questions or comments pertaining to this Internal Audit Report, please contact:

James C.
Stewart
962-1008

M E M O R A N D U M



**SUBJECT: Review of Customer Access to
WMATA Rail Station Restrooms**

DATE: March 2, 2006

FROM: ASOT – James C. Stewart

IN REPLY

REFER TO: AUD 06-102

TO: OPER – James Hughes

Background

At the request of the General Manager, we conducted a review of WMATA's rail customer restroom access to see whether or not the Station Manager's were adhering to the policy as proscribed by the Board of Directors. This review was the result of customer complaints that various Station Managers were not permitting customers access to restrooms facilities upon request. We reviewed WMATA's restroom access policy, which was prepared as a result of the Board of Director's program initiative of November 20, 2003. The "Station Operations Special Order" No. 04-01 dated March 17, 2004 in section 31.1 Scopes and Purposes, states that "the Station Manager on duty has sole discretion to accept or reject customer requests for use of facilities."

WMATA has 86 rail stations, some with multiple entrances and kiosks that support its 110 mile subway system. The rail stations are managed by Station Managers who report to Rail Operations Supervisors. The supervisors, according to the stated policy, "must ensure that restrooms signs are posted at each Metrorail station kiosk." Additionally, the Station Manager must notify the Passenger Operations Supervisor of any unusual situation regarding restrooms facilities.

The appearance of inconsistencies, inaccessibility and the public perception that Metro customers are not allowed access to available restroom facilities has caused confusion among not only the public but within Metro's management. Therefore, this evaluation was conducted to review access to the restrooms based on our requests of Station Managers to use restroom facilities without identifying ourselves as WMATA employees.

Objectives, Scope and Methodology

The objectives of our review were to: (1) ensure whether the Station Managers were adhering to the WMATA customer restroom access policy, (2) evaluate the level of customer service provided by the Station Manager, (3) inspect the restroom facilities for cleanliness, and (4) ascertain the adherence to Board policy on restroom initiatives.

The scope of our review included all 86 WMATA rail stations, including those stations with more than one entrance and kiosk. The review was conducted between November 15, 2005 and December 31, 2005.

We were to visit each of the 86 stations and ask the Station Manager on duty to use the restroom. Each Station Manager was asked the same question derived from a prepared script. If we were allowed access to the restroom, we inspected the facility for cleanliness. We also evaluated the level of customer service the Station Managers provided by assessing their response, body language, the tone of their voice and other factors. The level of the Station Manager's customer service was evaluated whether or not we were allowed access to the restrooms.

Visits to the stations were conducted twice, once during the morning hours and once during the evening hours. This was done in an attempt to ensure that a different Station Manager was on duty during each visit even though we were aware that Station Managers rotate their assignments. The visits were spread out over the course of approximately 45 days to ensure that each kiosk at each station was surveyed.

Visits to the restrooms were conducted anonymously by AUDT staff. We asked to use the restrooms without identifying ourselves as WMATA employees. However, we were unable to complete visits to all 86 stations because we were informed that the Station Managers became aware of our assignment. As a result, we were only able to conduct 94 visits to 66 (or 77 percent) of the 86 stations.

On November 20, 2003, the Board of Directors approved "New Programmatic Restroom Initiatives." The presentation to the Board included the following initiatives:

- Station restrooms will be converted from men and women's restrooms to Customer and Employee restrooms.
- SOP's will be framed and mounted on or near Ancillary doors leading to restroom entrance ways and kiosk signs/decals will be fabricated as shown in the presentation.
- The presentation stated that Station Managers can refuse restroom use only if one of the following criteria is met:
 - The Station Manager's personal safety is at risk
 - There is an ongoing emergency on a train, in the station or on the right-of-way requiring the Station Manager's immediate attention
 - The presentation stated that emergencies include sick customers, station overcrowding, widespread fare equipment failure or a person on the track bed.

- The presentation stated that customers will be advised of the revised procedures by:
 - Posted signs regarding restroom availability in the kiosk, along with Metro's customer service telephone number
 - Posting revised procedures on or near Ancillary doors
 - Updating Metro's internet website to inform customers of restroom initiatives.

As a result, on March 12, 2004, WMATA Station Operations Special Order 04-01 was issued to all personnel. Special Order 04-01 modified Special Order 03-02 and SSOP 31 pertaining to the use of restrooms in Metrorail passenger stations. The Special Order showing "bold and underlined" sections and "strikeouts" delineating the changes to the procedures.

The Special Order states that "The Station Manager on duty has sole discretion to accept or reject customer requests for use of facilities." The Special Order also states that WMATA's "policy is to make a restroom available to customers in limited circumstances. The limitation is necessary to control crime and maintain security." The Special Order provides that 5 stations will have no restrooms available to customers. The 5 stations are Pentagon, Vienna, Rhode Island Avenue, Addison Road and Congress Heights.

The Special Order also specified the circumstances under which the restrooms will be made available to customers as follows:

- in an emergency situation
- for children
- for customers who are elderly or physically disabled.

The Special Order specifies the circumstances under which restrooms will not be made available to customers as follows:

- Department of Homeland Security Alert level status Orange or Red
- Metro Transit Police Chief determines, based on contemporary intelligence provided by FBI, DHS, FTA or other agency, of a potential threat to transit operations
- Terrorist attack occurs in the United States or in another country which would normally raise WMATA's preparedness levels.

The Special Order also stated that:

"The Station Manager must escort the customer to the ancillary hallway where the restroom is located and direct him/her to the Customer's Restroom, then return to normal duties. Customers will be allowed to exit the restroom, without the Station Manager's assistance, through the ancillary hallway door. After the customer exits the hallway, the Station Manager shall ensure that the ancillary hallway door is secured.

The Special Order allows for the following reasons that a Station Manager may refuse access, including the following:

- A. Employee’s personal safety, and the specific reason (s) therefore
- B. Station/train emergencies in progress in the station
- C. Assisting sick customer at the station
- D. Severe overcrowding of the station
- E. Fare equipment malfunctions which require the Station Manager to assist customers.
- F. VRE, MARC or Amtrak service disruptions which require the Station Manager to direct customers to locations to continue their trips at affected station only.
- G. Any track wayside incident taking place in the station.
- H. A medical emergency in the station or on a train in the station.
- I. A police situation

In January 2006, we visited all Rail Stations and Kiosks to determine whether the Kiosk had bathroom signage and whether the SOP was posted at the bathroom entrance door. The results of our visits were as follows:

	<u>Yes</u>	<u>No</u>
Visible Signs	31	73
SOP Posted	71	27

Conclusion

Because we were unable to visit all stations as intended, we were only able to conduct 94 visits at 66 (or 77 percent) of the 86 stations. However, the results from the completed visits provided us with sufficient data to evaluate the access to restrooms. The results of our survey indicated that the Station Managers were allowing persons access to the restrooms. Furthermore most of the Station Managers were courteous and provided acceptable customer service when responding to our requests.

We reviewed Station Operations Special Order No. 04-01 dated March 17, 2004 and the Board of Director’s Minutes of November 20, 2003, Item C, “Approval of New Programmatic Restroom Initiatives,” and concluded that, based upon the results of our survey; the Station Managers were adhering to the stated policy during our visits

Our review of the Board Policy and the SOP discloses that the written SOP is more “open” than the Board Policy in that it gives the Station Manager more discretion in allowing customers to use the Restrooms than the Policy anticipated.

Results of Audit

We were able to conduct 94 visits at 66 (77 percent) of the 86 stations before we terminated the review because the Station Managers were aware of our visits. The results of our survey are summarized in Schedule 1.

The results of our survey indicate that of the 94 visits conducted, Station Managers refused us access seven times. Of the seven refusals, two refusals were because the stations did not have public restrooms (Addison Road and Vienna). These two stations were, according to the Station Operations Special Order No. 04-01 paragraph 31.2 “Background,” an exception because they were found to “have no restroom available to customers.” Four of the refusals were because the restrooms were inaccessible because of construction to the restroom, or because the restroom was out-of-service [New Carrollton, Stadium-Armory and Ballston (two visits to Ballston)]. In each of these visits, the Station Managers were courteous and explained reasons for their refusal. And one refusal (Pentagon City) the Station Manager failed to provide an explanation but directed us to use the restroom in the mall’s food court. We noted that six of the seven reasons for refusal were acceptable reasons.

We have also compared the Special Order No. 01-04 with the directive provided by the Board of Directors and determined that the Station Managers on our visits were in compliance with them. However, the SOP allows more discretion to the Station Manager than the directive.

Recommendations

As a result of our review of the Board’s direction, the Special Review and the result of our survey of the Rail Stations and their restrooms, we recommend the following:

- **The SOP be revised and updated to be consistent with the Board Directive and eliminate the strikeouts in the SOP.**
- **WMATA prepare larger and more visible signs concerning the restroom policy to be displayed at the Kiosk.**
- **Post the revised and updated SOP at the entrance to the door leading to the restroom.**
- **WMATA should consider a mechanism (such as remote access locking devices) to allow the Station Manager to allow remote access to the restroom facility to enable the Manager to permit the customer entry without interfering with the Station Manager’s other responsibilities and still maintain necessary security.**

We have reviewed this report with representatives of OPER, RAIL and MTPD and requested their comments.

MTPD stated that they have an objection about allowing access to restrooms which are considered to be in areas that should not be accessible to the public.

RAIL responded by restating they are in compliance with the current SOP and suggested that, due to the limited kiosk window space, signs should only be posted at the 5 stations where restrooms are inaccessible and not available. They also state that the SOPs that have been posted do not have the strikeouts on them.

RAIL also stated that Anacostia, Naylor Road and West Hyattsville Stations should be included as exceptions to the open policy on restrooms. RAIL suggests that the type of toilet that was installed at Huntington Station be installed at Anacostia Station since security is a factor at the customer's restroom.

James C. Stewart
Auditor General

cc: GM – Dan Tangherlini
CHOS – Emeka Moneme
SECT – Harold Bartlett
RAIL – Steve Feil
MTPD – Polly Hanson