



OFFICE *of* INSPECTOR GENERAL
NATIONAL RAILROAD PASSENGER CORPORATION

MAJOR PROGRAMS:

Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals

OIG-A-2023-012 | September 14, 2023

This page intentionally left blank.



Memorandum

To: Stephen Gardner
Chief Executive Officer

Roger Harris
President

From: James Morrison 
Assistant Inspector General, Audits

Date: September 14, 2023

Subject: *Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals (OIG-A-2023-012)*

The Americans with Disabilities Act (ADA), which became law in 1990, required intercity rail station facilities to be accessible to persons with disabilities by July 26, 2010. Amtrak (the company) missed this deadline.¹ In December 2020, the Department of Justice (DOJ) and the company signed a settlement agreement that set milestones for making stations compliant and other matters.²

Beginning in fiscal year (FY) 2022, the Infrastructure Investment and Jobs Act³ (IIJA) requires the company to spend \$50 million annually on ADA compliance. IIJA also provided \$22 billion for capital projects, which could include projects related to ADA compliance. As of May 2023, the company had designated \$1.74 billion of IIJA funds for ADA compliance projects.

Given this substantial investment, the company's statutory mandate, the settlement agreement with DOJ, and the broader importance of making Amtrak more accessible, our objective for this report is to provide the status of the company's progress toward achieving compliance with the ADA and identify any challenges that could delay

¹ We reported in 2010 that Amtrak initiated the Accessible Station Development Program, a precursor to its current ADA program. *Americans with Disabilities Act: Leadership Needed to Help Ensure That Stations Served By Amtrak Are Compliant*, Report No. 109-2010. In June 2015, the Department of Justice concluded that the company still had not complied with its statutory obligations under the ADA.

² The agreement also called for the company to develop customer complaint procedures; maintain an Office of Stations, Property and Accessibility headed by a Vice President; and conduct post-completion ADA assessments for new or altered station facilities.

³ Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 (2021).

*Amtrak Office of Inspector General***Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals**

OIG-A-2023-012, September 14, 2023

progress. This is our fourth report on ADA issues over the past 12 years.⁴ Our scope focused on the company's efforts since our September 2021 report.⁵ For additional details on our scope and methodology, see Appendix A.

SUMMARY OF RESULTS

The company continues to make progress on its ADA program. Since our September 2021 report, the company implemented our recommendations around effectively planning and coordinating its ADA efforts, which has helped improve its progress.⁶ In particular, the company has increased program staff, which improved its pace bringing stations into compliance. The company continues to face challenges, however, in meeting its target completion date for bringing stations into ADA compliance. The greatest challenge, primarily beyond the company's control, is that of coordinating with third parties⁷ such as other station owners, host railroads, and historic preservation offices.

The company's progress and challenges to achieving ADA compliance include the following:

- **Bringing stations into compliance.** The company has brought 117 of the 385 stations it is responsible for (30 percent) into ADA compliance as of July 2023. Although it has increased its pace since our last report, it would still have to more than double its current pace to complete the remaining 268 stations by its target completion date of FY 2029. Coordinating with third parties, however is complex and time-consuming and continues to hinder its progress. Notably, the company must obtain third parties' approval on project designs at

⁴ *Governance: Better Planning and Coordination Could Help the Company Achieve its Aggressive Timeline for ADA Compliance* (OIG-A-2021-012), September 2, 2021; *Train Operations and Business Management: Addressing Management Weaknesses Is Key to Enhancing the Americans with Disabilities Program* (OIG-A-2014-010), August 4, 2014; Report No. 109-2010.

⁵ OIG-A-2021-012.

⁶ For our prior recommendations and the company's responses, see Appendix C.

⁷ As we previously reported, the company must have consent from other parties before it can begin any ADA-related projects at certain stations. For example, if the company leases a station but does not own it, the station owner must agree to any accessibility improvements prior to beginning construction. See: OIG-A-2021-012 and Report No. 109-2010. The settlement agreement with DOJ acknowledges the role of third parties. It also addresses the role of agencies or officials whose approval the Federal Railroad Administration deems necessary or whose authority the company is subject to with respect to station construction.

Amtrak Office of Inspector General

Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals

OIG-A-2023-012, September 14, 2023

206 stations by FY 2024 to stay on schedule. Construction at these stations cannot begin until the company receives these approvals, which could delay its timeline.

- **Installing accessible boarding technologies (ABT).** The company deployed 330 of its planned 360 bridge plates (90 percent) and 93 of its planned 364 ramps (26 percent) as of May 2023. The ADA Stations team⁸ and Mechanical department are currently addressing a minor structural defect with the ramps. If they are not able to correct this defect by FY 2024, however, the company is not likely to install the remaining 271 ramps by its FY 2025 target completion date.
- **Installing Passenger Information Display Systems (PIDS).** The company completed 96 of its planned 119 PIDS installations (81 percent), which will integrate audio and visual messaging to passengers, as of July 2023. The company is on pace to complete an additional 21 PIDS installations by its FY 2024 target completion date. Installations at two of the remaining stations, however, are contingent on other entities' decisions about the potential relocation of these stations.

Because the company already implemented our prior recommendations and is actively attempting to mitigate current challenges, we are not making any new recommendations in this report. For management's response, see Appendix B.

BACKGROUND

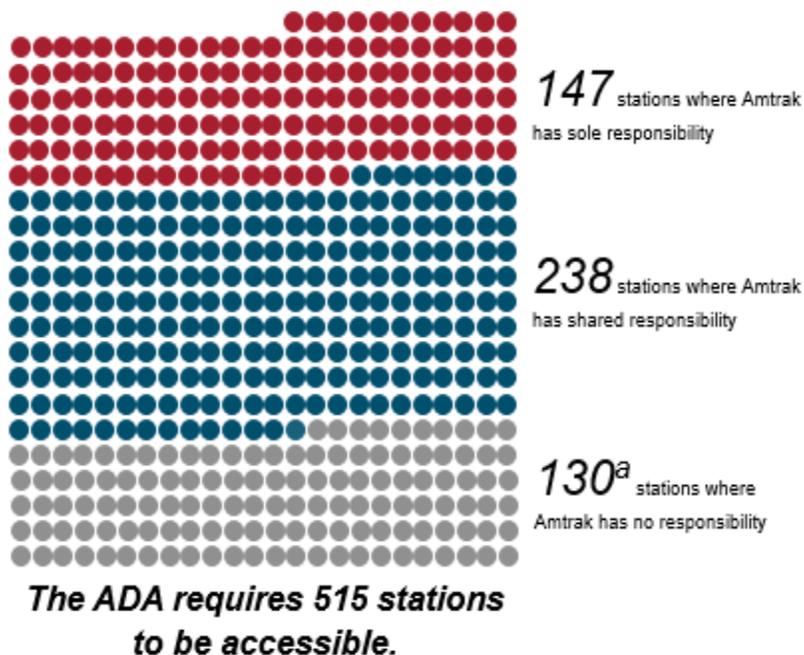
Company officials reported that ADA requires 515 stations across its rail network in the United States to be compliant, as of July 2023. Based on a federal regulation and lease agreements with third parties such as host railroads or local governments, the company determined that it has sole or shared responsibility for 385 of these stations, as Figure 1 shows.⁹

⁸ This team manages the ADA Stations program, which focuses on projects to bring station components into compliance. It also manages the ABT program.

⁹ 49 C.F.R. § 37.49 assigns ADA responsibility based on ownership. If more than 50 percent of a station component is owned by a public entity, that public entity has 100 percent of the ADA responsibility for that component. If more than 50 percent of a station component is owned by a private entity, then the company and the commuter railroads that serve that station have 100 percent of the ADA responsibility for that component; responsibility amongst the railroads is proportional based on passenger boardings. At stations where the company has sole responsibility it must complete all three components if they exist; at stations where it has shared responsibility, it must complete only one or two components.

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
 OIG-A-2023-012, September 14, 2023

Figure 1. Distribution of ADA Responsibility Across Amtrak Network



Source: Office of Inspector General (OIG) analysis of company documents

Note:

^a Company executives, a Federal Railroad Administration (FRA) official, and a DOJ official stated that the company may undertake projects at the 130 stations, but its priority is the stations where it has determined it has sole or shared responsibility for ADA compliance.

The company is responsible for making various station components ADA-compliant at individual stations, including the parking lot, station structure, and train platform, as Figure 2 shows. At stations where the company has shared responsibility, it must make at least one component compliant; at sole responsibility stations, it must do so for all components present.

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
 OIG-A-2023-012, September 14, 2023

Figure 2. Station Components That Must be Made ADA Compliant

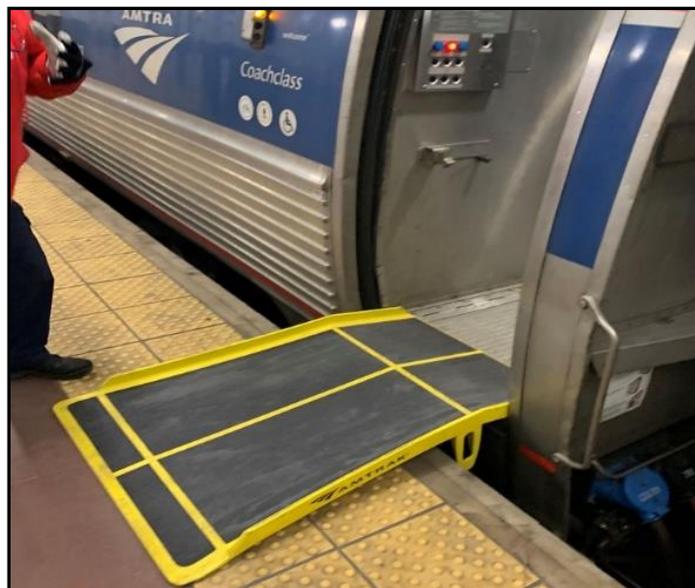


Source: OIG analysis of company documents

The company's ADA program addresses two other station components, which are tracked separately from the stations themselves:

- **Accessible boarding technologies (ABT) program.** The company took the initiative to create the ABT program to identify opportunities for its infrastructure and stations to further assist passengers when boarding trains. Based on the ADA Stations team's assessment, the company developed plans to deploy 360 bridge plates and 364 ramps. Figure 3 shows a bridge plate.

Figure 3. Bridge Plate at 30th Street Station, Philadelphia



Source: OIG, March 2021

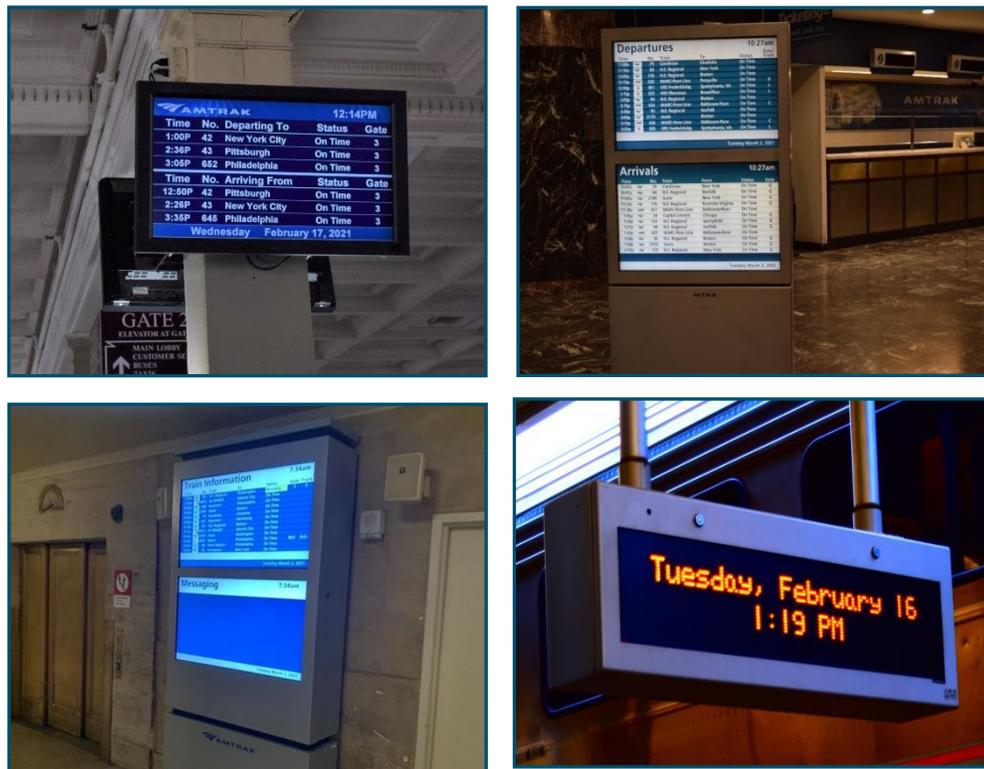
Amtrak Office of Inspector General

Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals

OIG-A-2023-012, September 14, 2023

- PIDS program.** The company created the PIDS program to comply with the law¹⁰ and to address known or potential deficiencies integrating audio and visual messaging systems in stations.¹¹ The company's Digital Technology and Innovation department is responsible for the design and installation of PIDS and manages this program in coordination with the ADA Stations team. Figure 4 shows the visual component of four types of PIDS.

Figure 4. Four Types of PIDS at Amtrak Stations



Source: OIG, February and March 2021

Since 2010, the company has spent about \$916 million on ADA compliance.¹² FRA is responsible for administering federal grants to the company, including grants related to

¹⁰ 36 C.F.R. Part 1191, App. D, 810.7 (2004).

¹¹ In 2024, the company plans to upgrade all of its PIDS nationwide, which will allow it to centralize control of its audio and visual messaging. According to a senior director in the Digital Technology and Innovation department, this effort will not affect the installation of PIDS to achieve ADA compliance.

¹² This amount includes funding provided under the company's Mobility First program (a program it initiated to improve access to stations for persons using wheelchairs), its annual grant, and through the American Recovery and Reinvestment Act and IIJA.

*Amtrak Office of Inspector General***Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals**

OIG-A-2023-012, September 14, 2023

ADA compliance. In addition, once the company completes ADA projects at a station, FRA is responsible for inspecting the work and determining whether the projects are ADA-compliant.

COMPANY MAKING PROGRESS TOWARD COMPLYING WITH ADA, BUT CHALLENGES REMAIN

The company has made progress toward achieving ADA compliance, but some of the challenges we have reported on in the past persist—particularly the difficulties coordinating with third parties and obtaining their approvals on project designs.

The ADA Stations program improved pace, but coordinating with third parties continues to hinder progress. As of July 2023, the company is ADA-compliant at 57 stations where it has sole responsibility for compliance and 60 stations where it has shared responsibility—a total of 117 compliant stations out of 385 (30 percent). Although the company has increased its completion rate since we last reported, bringing the remaining 268 stations into compliance by FY 2029 will require it to more than double its current pace.

In our 2021 report,¹³ we recommended that the company develop, document, and implement a plan to assess the current and future resources the ADA program needed to implement its timeline and identify actions to address any shortfalls. The company agreed with our recommendation and, in response, developed a resource plan and increased its ADA program staffing by 9 full-time and 33 contractor positions—a total of 17 full-time and 79 contractor positions. ADA Stations team officials told us the staffing increase was instrumental in achieving the current completion rate.

The company's greatest challenge is coordinating with third parties. This includes other station owners—such as state and local governments—as well as historic preservation offices, environmental regulators, utilities, labor unions, and others whose property or legal interests may be affected by the proposed work, such as host railroads. At most

¹³ We reported in 2021 that the company could not reasonably expect to execute its aggressive plan to achieve compliance at the remaining 312 stations over the next 6 years until it developed the requisite planning to achieve its timeline. Although the company appeared fully committed to achieving ADA compliance, it acknowledged that it currently did not have enough staff to manage additional projects or monitor the contractors it hired to support them. Specifically, it had not conducted and documented a comprehensive resource assessment that correlated its staffing needs to projects and contractor oversight. See: OIG-A-2021-012.

*Amtrak Office of Inspector General***Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals**

OIG-A-2023-012, September 14, 2023

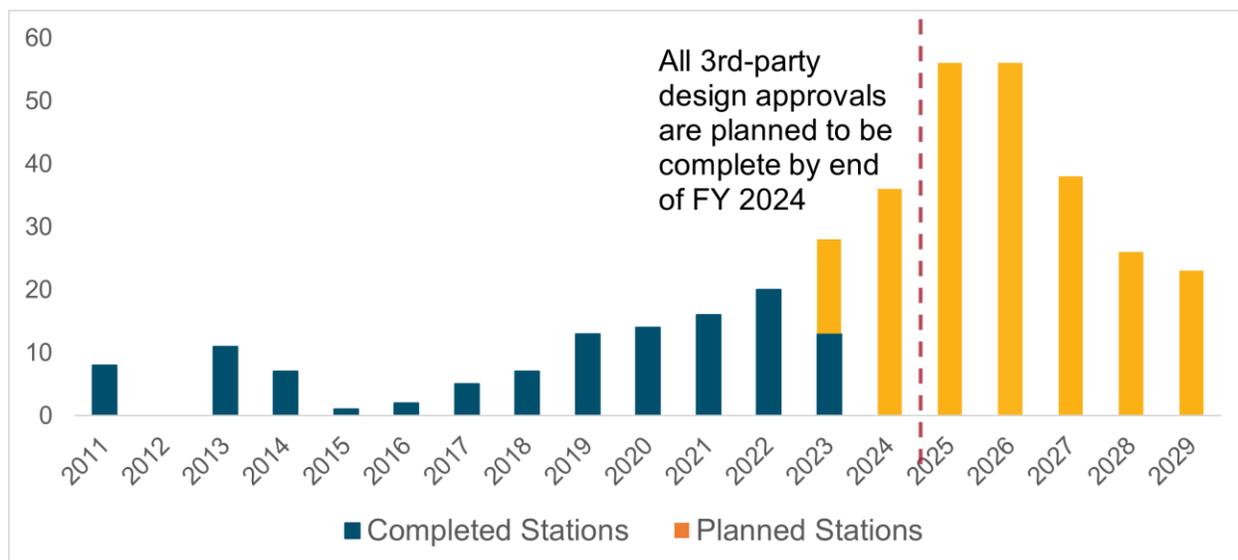
stations, the company must seek approval from a mix of these types of third parties before beginning construction.¹⁴ This work is inherently time-consuming because of the complex, sometimes overlapping relationships at some stations and the significant number of locations where this complexity occurs. It is even more time-consuming at stations the company does not own. Company officials reported that as of May 2023 they completed 203 design approvals, and an additional 206 await third-party approvals.¹⁵ According to the Vice President, Stations Properties, and Accessibility, the company must complete all the design approvals by the end of FY 2024 to meet the FY 2029 completion date. Once third parties approve the remaining designs, construction can proceed at a faster pace than in previous years (1) because of the staffing increase and (2) because the company has contracted with construction firms across the country to complete ADA projects. These efforts increased the company's capabilities to work toward design approvals and quickly start construction after plans have been approved, as Figure 5 shows.

¹⁴ We reported in 2021 that obtaining cooperation from third parties at stations where the company has sole or shared responsibility presented hurdles to timely completion of ADA work. We recommended that the company develop and implement guidance for the ADA Stations team that lays out the internal steps the team can take when they reach a stalemate. See: OIG-A-2021-012.

¹⁵ These designs are for the parking lot, stations, and platforms at specific stations.

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
 OIG-A-2023-012, September 14, 2023

Figure 5. ADA-Compliant Stations and Planned Completions Through Fiscal Year 2029^a



Source: OIG analysis of company documents as of July 2023

Note:

^a Twenty-two stations are part of the settlement agreement, but due to ongoing revitalization efforts, the company plans to include ADA compliance as part of this work.

ADA Stations team officials told us that, since 2021, they have not experienced any significant stalemates with third parties that required escalation to the company's ADA Executive Oversight Committee,¹⁶ but the continuing need to coordinate with third parties before station work begins remains a significant program delivery risk that the team is working to mitigate.¹⁷ Because the company already implemented our prior recommendation concerning developing and implementing guidance for resolving stalemates with third parties and is not currently experiencing any, we are not making new recommendations in this area.

The company also faces another challenge: at three stations, other entities completed ADA projects on the company's behalf, but the resulting work did not comply with the ADA. For example, at one location the state's transportation department completed

¹⁶ We reported in 2021 that this committee includes members of the company's executive leadership team, approves plans and budgets and also consults with the ADA Stations team on difficult matters. This committee meets on a monthly basis. See: OIG-A-2021-012.

¹⁷ *Stations Program Five Year Strategic Plan, FY 2023 through FY 2027*, May 2022.

*Amtrak Office of Inspector General***Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals**

OIG-A-2023-012, September 14, 2023

ADA-related work on the station, platform, and parking lot on the company's behalf. After it completed the project, however, the ADA Stations team identified a total of 191 deficiencies and determined that the work was not ADA-compliant. As of June 2023, a total of 129 deficiencies of 191 remain. Although the company entered into an agreement for the department to complete this work, the company remains responsible for ensuring ADA compliance. According to an FRA official, completing the work necessary to bring these stations into compliance will require additional funds. The company is now in negotiations with the department about the work and funding needed to correct these deficiencies.

ADA Stations team officials told us they are working on a strategy for avoiding similar incidents; for example, they are considering periodically monitoring construction when others complete ADA projects on their behalf. If these challenges continue, the company will likely not meet its target completion date of FY 2029. Because FRA and the company are already working to mitigate this challenge, however, we are not making recommendations in this area.

ABT program progressing, but structural defect may impact progress. As of May 2023, the company had deployed 330 of its planned 360 bridge plates (90 percent) and installed 93 of its planned 364 ramps (26 percent). All of the ramps' handrails, however, have a minor structural defect that the company did not identify until it began installing them. This defect can make the handrails on the ramps feel unstable although they are not actually at risk of failure, according to the ADA Stations team. Nevertheless, the company has committed itself to fixing this perceived stability issue. We determined that addressing this defect by 2024 is necessary for the company to complete the remaining 271 ramps by its FY 2025 target completion date. The ADA Stations team estimated the total cost of removing, correcting, and reinstalling all handrails at \$194,000 to \$365,000. Because the ADA Stations team already began working with the Mechanical department to address this defect, we are not making recommendations in this area.

PIDS program improved pace and made significant progress. As of July 2023, the company had completed PIDS installations at 96 of its planned 119 locations

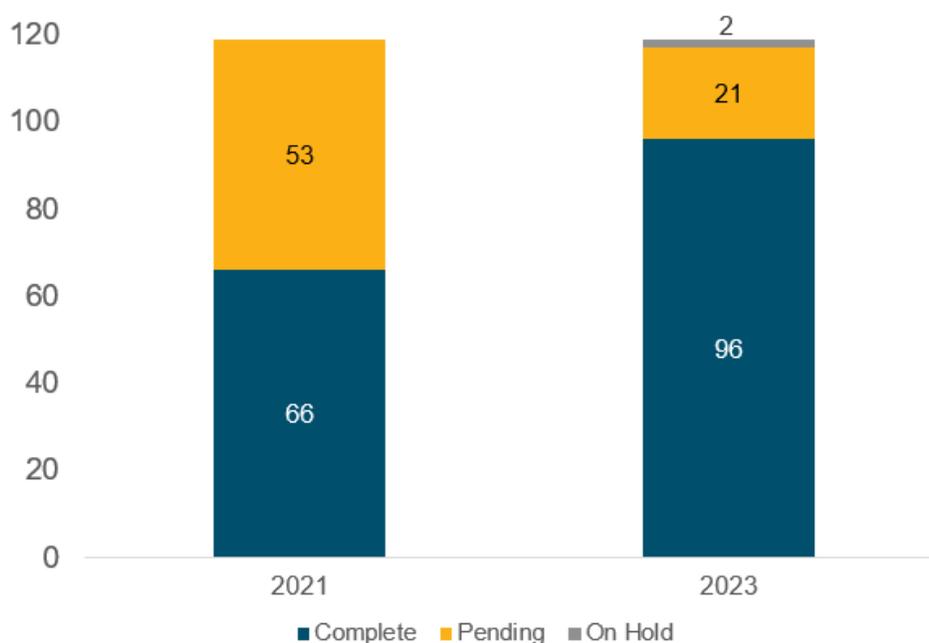
Amtrak Office of Inspector General

Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals

OIG-A-2023-012, September 14, 2023

(81 percent). In our 2021 report,¹⁸ we recommended that the Vice President of Accessibility ensure that the ADA Stations team and Digital Technology and Innovation department coordinate to ensure that installations are compliant and reporting is consistent and accurate. According to senior officials in the department, coordination has greatly improved. The improved coordination and the staff increases on the ADA program have contributed to the company's significant progress—an additional 30 PIDS installations completed in two years, as Figure 6 shows.

Figure 6. Improved Pace of PIDS Installations



Source: OIG analysis of company documents as of July 2023

The company is on track to complete 21 of the remaining 23 PIDS planned installations by the FY 2024 target completion date. The two remaining stations where the company

¹⁸ We reported in 2021 that ADA program officials told us that when they completed station assessments after all ADA work was complete, they found that some of the contractors the Information Technology department (now known as the Digital Technology and Innovation department) had not correctly installed the PIDS. This occurred because the Information Technology department and ADA Stations team did not coordinate to ensure that PIDS installations were compliant. In addition, we found that the Information Technology department and the ADA Stations team did not effectively coordinate to ensure that they were tracking the same number of stations at which the company is responsible for PIDS. See: OIG-A-2021-012.

*Amtrak Office of Inspector General***Major Programs: *Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals***

OIG-A-2023-012, September 14, 2023

plans to install PIDS¹⁹ are on hold, however, because the stations may be relocated. According to the Vice President, Digital Technology and Technology Operations, these two stations are not likely to delay the FY 2024 completion date because the PIDS do not take significant time to install. Because other parties are responsible for decisions about these potential station relocations, this challenge is outside the company's control; therefore, we are not making recommendations in this area.

CONCLUSIONS

The company is improving its progress toward achieving ADA compliance at the 385 stations where it has sole or shared responsibilities, but some of the challenges we have reported on in the past are more difficult for the company to overcome—particularly coordinating with third parties and obtaining their approvals on project designs. The company has implemented our prior related recommendations, which helped it accelerate its progress, and it is taking other mitigating actions to address current challenges. Accordingly, we are not making new recommendations in this report.

MANAGEMENT COMMENTS AND OIG ANALYSIS

In commenting on a draft of our report, the President of Amtrak acknowledged that there were no recommendations to address and thanked us for our review. For management's complete response, see Appendix B.

¹⁹ These two stations are Atlanta, Georgia; and Detroit, Michigan.

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
OIG-A-2023-012, September 14, 2023

APPENDIX A

Objective, Scope, and Methodology

This report provides the results of our audit of Amtrak's ADA program. Our objective was to provide the status of the company's progress toward achieving compliance with the ADA and to identify any challenges that could delay its completion goals. Our scope focused on the company's progress on its stations, ABT, and PIDS programs from FY 2021 through June 2023. We performed our audit work from May through July 2023 in Washington, D.C.

To assess progress and identify any challenges, we interviewed senior officials from the following departments: Operating and Commercial, Digital Technology and Innovation, Law, Government Affairs, and Finance. We also interviewed FRA and DOJ officials to obtain their perspectives on the company's progress and challenges. Additionally, we reviewed the company's ADA Stations Program Chief Executive Officer Update, the ADA Stations program's FY 2023–FY 2027 strategic plan, the June 2023 ADA Stations Program Sunset Plan, FRA documents, and the settlement agreement between the company and DOJ.

We conducted this 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 objective. We believe that the evidence obtained provided a reasonable basis for our findings and conclusions based on our audit objectives.

Internal Controls

Our audit reviewed the extent to which the company had internal controls in place to assess progress and identify challenges associated with management of the ADA program. We specifically assessed the internal control components and underlying principles and determined that the following two of the five internal control areas were significant to our audit objective:

- **Information and communication.** Management should provide quality information to achieve the entity's objectives. Quality information is important to both internal and external stakeholders.

Amtrak Office of Inspector General

Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals

OIG-A-2023-012, September 14, 2023

- **Monitoring.** Management should assess the quality of performance over time and address identified issues.

We developed audit work to assess each of these control areas, including (1) assessing the quality and completeness of ADA stations, ABT, and PIDS data to verify that reporting provided to company and external stakeholders was accurate, and (2) reviewing the company's planning and monitoring documents and other communications to confirm that it is monitoring the ADA program performance over time and addressing prior and current issues associated with challenges that it identified. Because we focused our review on these internal control components and underlying principles, it may not have disclosed all the internal control deficiencies that may have existed at the time of this audit.

Computer-processed Data

We obtained actual cumulative expenditures for the ADA, ABT, and PIDS programs and related ADA activities from inception through September 30, 2022, from the company's financial statements. For October 1, 2022, through April 2023, we obtained ADA-related expenditures from the company's SAP system and confirmed that it agreed with the total the company reported on its Enterprise Portfolio Dashboard. We determined that the analysis and underlying data were sufficient for our purposes.

Prior Reports

In conducting our analysis, we reviewed and used information from the following OIG reports:

- *Governance: Better Planning and Coordination Could Help the Company Achieve its Aggressive Timeline for ADA Compliance* (OIG-A-2021-012), September 2, 2021
- *Train Operations and Business Management: Addressing Management Weaknesses Is Key to Enhancing the Americans with Disabilities Program* (OIG-A-2014-010), August 4, 2014
- *Americans With Disabilities Act: Leadership Needed to Help Ensure That Stations Served by Amtrak Are Compliant* (Report No.109-2010), September 29, 2011

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
 OIG-A-2023-012, September 14, 2023

APPENDIX B

Management Comments

NATIONAL RAILROAD PASSENGER CORPORATION

Memo



Date:	September 5, 2023	From:	Roger Harris, President
To:	Jim Morrison, Assistant Inspector General, Audits	Department	President's Office
		cc	Stephen Gardner, CEO Eleanor Acheson, EVP General Counsel Robert Grasty, EVP CHRO David Handera, VP Accessibility, Stns, & Facs, CAO Laura Mason, EVP Capital Delivery Lonnie Murray, Sr Dir Portfolio Management Dennis Newman, EVP Strategy & Planning Michael Phillips, Dir Portfolio Management Steven Predmore, EVP CSO Gerhard Williams, SVP Service & Delivery Ops Tracie Winbigler, EVP CFO Christian Zacariassen, EVP CIO

Subject: Management Response to **Major Programs: Americans with Disabilities Act Program Progressing but Faces Some Challenges to Meeting Completion Goals** (Draft Audit Report for Project No. 011-2023).

This memorandum provides Amtrak's response to the draft interim audit report titled, "*Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals*". Although there were no recommendations contained in the report for Amtrak to address, management appreciates the opportunity to provide a response to the audit report.

Management Response:

Management would like to thank the OIG for the thorough report on this important topic. We appreciate the review and insights the OIG provided on the advancement of the ADA Stations Program and highlighting that we have already implemented the OIG's previous recommendations. While third party approvals are challenging, we agree with the OIG observation that the team is working to mitigate those challenges.

Thank you

Roger Harris |
President

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
 OIG-A-2023-012, September 14, 2023

APPENDIX C

Prior Recommendations and Amtrak's Response

Prior Recommendation	OIG Closure Status
1. Assign ADA programmatic responsibility to the official with the greatest responsibility for ADA program components, most likely the Vice President, Operations. (Report 109-2010)	Not implemented with management assuming the risk on June 10, 2013
2. Provide the ADA program director position with the authority to manage all ADA program components and related funding resources. (Report 109-2010)	Not implemented with management assuming the risk on June 10, 2013
3. Direct the Program Director to: (Report 109-2010) <ul style="list-style-type: none"> a. develop a detailed spending plan to support the FY 2012 budget request b. develop and provide the Congress an order of magnitude cost estimate for completing all ADA programs by the goal date and periodically update the estimate as more precise data becomes available c. continue to work with other parties to develop a strategy for achieving ADA compliance for stations Amtrak serves but does not have ADA-compliance responsibility 	Not implemented with management assuming the risk on April 15, 2020
4. Consider realigning ADA program responsibility to the executive with the greatest responsibility for ADA program components, most likely the Vice President, Operations. (Report OIG-A-2014-010)	Implemented on October 15, 2014
5. Develop a written strategic plan for achieving ADA compliance that: provides a clear vision and policy for the ADA program; assigns program and project accountability; establishes criteria for selecting projects to fund; identifies project and program cost estimates; creates annual performance metrics; sets a target date for all stations to become ADA-compliant. (Report OIG-A-2014-010)	Implemented on October 5, 2015

Amtrak Office of Inspector General
Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals
 OIG-A-2023-012, September 14, 2023

Prior Recommendation	OIG Closure Status
6. Consider establishing an ADA Advisory Panel that includes members from the disabled community to advise the ADA management team on ADA-related issues. (Report OIG-A-2014-010)	Implemented on February 2, 2016
7. Develop, document, and implement a resource plan that assesses the current and future resources the ADA program needs to implement its timeline, including resources from other groups, and identifies actions to address any shortfalls. (Report OIG-A-2021-012)	Implemented on November 16, 2021
8. Ensure that the ADA Stations team takes the following actions: <ul style="list-style-type: none"> a. Review contractor timesheets and invoices for the identified program management services contractor more thoroughly going forward. b. To the extent that it is cost-effective and practical to do so, reconcile contractor timesheets and invoices from FY 2015 through FY 2020 to ensure they reflect the services provided, and, if applicable, recover any costs from the program management services contractor. (Report OIG-A-2021-012) 	<p>Implemented on February 8, 2022</p> <p>Not implemented with management assuming the risk on February 8, 2022</p>
9. Develop and implement guidance for the ADA Stations team that lays out the internal steps the team can take when they reach a stalemate and what they should document. (Report OIG-A-2021-012)	Implemented on November 2, 2021
10. Require that the Vice President of Accessibility take and document actions to ensure that the ADA Stations team and IT department are coordinating so installations are compliant and reporting is consistent and accurate. (Report OIG-A-2021-012)	Implemented on December 8, 2021

Source: OIG analysis of prior recommendations and closure status

Amtrak Office of Inspector General
**Major Programs: *Americans with Disabilities Act* Program Progressing, but Faces Some
Challenges to Meeting Completion Goals**
OIG-A-2023-012, September 14, 2023

APPENDIX D

Abbreviations

ABT	Accessible Boarding Technologies
ADA	Americans with Disabilities Act
DOJ	Department of Justice
FRA	Federal Railroad Administration
FY	fiscal year
IIJA	Infrastructure Investment and Jobs Act
OIG	Amtrak Office of Inspector General
PIDS	Passenger Information Display Systems
the company	Amtrak

Amtrak Office of Inspector General
Major Programs: *Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals*
OIG-A-2023-012, September 14, 2023

APPENDIX E

OIG Team Members

J.J. Marzullo, Deputy Assistant Inspector General, Audits

Dorian Herring, Director

Alejandra Rodriguez, Senior Manager, Data Analytics

Joseph Zammarella, Senior Auditor, Lead

Gabriel Picinini, Senior Auditor

Leisha Goel, Auditor

Alison O'Neill, Communications Analyst

Frank Mazurek, Counsel to the Inspector General

Nadine Bennett, Associate Legal Counsel

Clark Carpenter, Congressional and Public Affairs Officer

Sid Schwartz, Contractor

OIG MISSION AND CONTACT INFORMATION

Mission

The Amtrak OIG's mission is to provide independent, objective oversight of Amtrak's programs and operations through audits and investigations focused on recommending improvements to Amtrak's economy, efficiency, and effectiveness; preventing and detecting fraud, waste, and abuse; and providing Congress, Amtrak management, and Amtrak's Board of Directors with timely information about problems and deficiencies relating to Amtrak's programs and operations.

Obtaining Copies of Reports and Testimony

Available at our website www.amtrakoig.gov

Reporting Fraud, Waste, and Abuse

Report suspicious or illegal activities to the OIG Hotline

www.amtrakoig.gov/hotline

or

800-468-5469

Contact Information

Jim Morrison

Assistant Inspector General

Mail: Amtrak OIG
10 G Street NE, 3W-300
Washington, D.C. 20002
Phone: 202-906-4600