



SPECIAL PROJECT REPORT

September 9, 2021

**REVIEW OF WMATA'S COVID-19 RESPONSE
RELATED TO SOCIAL DISTANCING EFFORTS**

Why OIG Did This Review

At the request of the Washington Metropolitan Area Transit Authority (WMATA) Board of Directors, the Office of Inspector General (OIG) reviewed WMATA's Coronavirus (COVID-19) response related to its social distancing efforts.

In developing this report, OIG conducted interviews with WMATA senior managers and staff; researched Centers for Disease Control and Prevention (CDC) guidelines as well as federal, state, and local guidance and protocols; gathered information from WMATA, the American Public Transportation Association (APTA), and other public sources; and benchmarked other transit agencies.

What OIG Found

OIG reviewed WMATA's response to COVID-19 as it relates to social distancing and found that WMATA has been responsive in mitigating social distancing risk. WMATA's response was similar to that of other transit agencies and aligns with CDC guidelines.

There are instances when social distancing is not possible; and as the region reopens it is likely that there will be increased instances where social distancing is not possible. WMATA has provided tools and guidance for customers to consider when making travel decisions. Wearing a mask, improved air ventilation, and good hand hygiene help mitigate risks when social distancing is not possible.

Background

WMATA encouraged social distancing for its customers, employees, and contractors and has provided guidance and tools so that they may be able to make informed decisions. However, it is the customer who ultimately makes the decision how and when to travel. Social distancing should be practiced in combination with other everyday preventative actions to reduce the spread of COVID-19. It is a shared responsibility among the Authority and the customer.

Throughout the pandemic, WMATA's COVID-19 response has been with the health and safety of its customers, employees, and contractors at the forefront. WMATA provided a critical service to the Capital region while focusing on the safety of customers, employees, and contractors. WMATA has a Pandemic Flu Plan in place and as part of the plan, in January 2020 activated its Pandemic Task Force (PTF). Through 2021, WMATA has continued to engage, monitor, and provide guidance and tools to manage its pandemic response, adjusting schedules and planning and implementing re-entry and recovery strategies to meet the transportation needs of the region.

APTA developed its Health and Safety Commitments Program of which WMATA is a participant. The program is the public transportation agencies' overarching pledge to passengers that transit systems are operating safely as North America recovers from the COVID-19 pandemic.

In the early days of March 2020, each jurisdiction - the District of Columbia, Maryland, and Virginia (DMV) – announced confirmed case(s) of COVID-19.¹ The DMV declared states of emergency, followed by the President declaring COVID-19 a National Emergency.² WMATA issued a message³ for “essential travel only” and continued to monitor ridership on BUS and RAIL. On March 30, 2020, the DMV issued Stay at Home Orders.

As much of the Capital region, including WMATA’s administrative staff, reverted to telework, WMATA focused on providing transportation to “essential workers” and a safe work environment for WMATA employees and its contractors. As the pandemic intensified, WMATA experienced a dramatic decrease in ridership; and has seen only modest recovery. WMATA continues to monitor ridership and adjust schedules to accommodate ridership and mitigate risks. Beginning September 5, 2021 additional service is planned to provide 91 percent of pre-pandemic service levels for rail and 97 percent for bus.

In 2021, as year two of the COVID-19 pandemic began, the best protective efforts in place were to wear a mask, social distance, and wash hands. Currently, a Presidential Executive Order mandating mask-wearing on public transportation has been implemented by various orders of the CDC and the Transportation Security Administration (TSA). TSA has extended these requirements through January 18, 2022.⁴

The COVID-19 response has been fluid. CDC revised and relaxed its guidelines for those fully vaccinated and the DMV lifted restrictions, including capacity limits. The state of emergency’s declared by Maryland and Virginia have been lifted or expired. The District of Columbia ended its Public Health Emergency order and extended its Public Emergency order through October 8, 2021.⁵

In May, CDC updated its interim guidance to include that fully vaccinated people no longer had to wear masks or socially distance in any setting, indoors or outdoors, unless required by federal, state, local, tribal, or territorial laws, rules or regulations. Mask requirements on public transit, aboard buses, rail, and paratransit remain in effect. Further, a June 10, 2021 CDC update in part stated it is amending its Face Mask Order not to require people to wear a mask in outdoor areas of conveyance or while outdoors at transportation hubs.

With the recent increase in COVID-19 cases and the concerns related to the rate of transmission of the delta variant, there is increased uncertainty about the pace of the pandemic recovery. CDC guidance for fully vaccinated people has changed. On July 27, 2021, CDC added a recommendation for fully vaccinated people to wear a mask in public indoor settings in areas of substantial or high transmission. WMATA continues to require employees, customers, and contractors to wear masks in its railcars, buses, MetroAccess, and facilities and masks are required under federal mandate on buses, trains, and indoor stations.

¹ March 12, 2020

² March 13, 2020

³ Limited service for essential trips only: public urged to stay at home: use Metro only if no other options are available.

⁴ See emergency amendment and security directives of August 20, 2021, at <https://www.tsa.gov/sd-and-ea>.

⁵ Public Health Emergency Order 2020-046; Public Emergency Order 2020-045

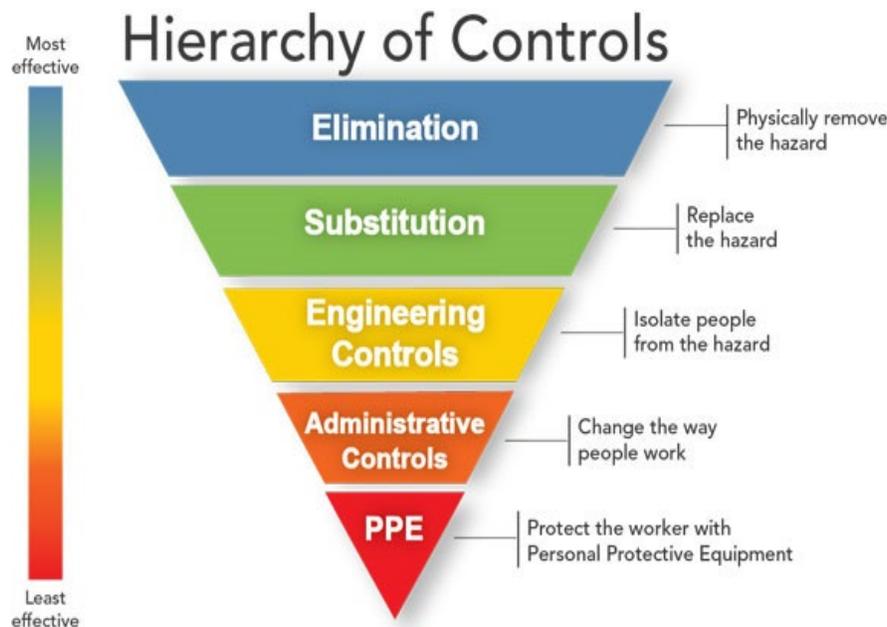
WMATA's Pandemic Flu Plan 2018

WMATA has a Pandemic Flu Plan in place. The custody of WMATA's Pandemic Flu Plan was transferred to the System Safety and Environmental Management Department (SAFE) in January 2020. This plan was used to guide WMATA through the COVID-19 pandemic during 2020 and 2021.

There are four phases within the Pandemic Flu Plan, each with associated tasks. The initial phase focused on monitoring and preparedness. Phase II placed Metro on a readiness mode to respond quickly in the event of an outbreak in the region. Phase III responded to a regional pandemic and second wave, and currently, Phase IV is the recovery phase. During phase IV, WMATA will turn its efforts towards revising the plan. Lessons learned will be integrated into the revised plan to better position WMATA for future pandemic events.

WMATA activated the PTF on January 29, 2020, based on early reports of a new coronavirus that had the potential to reach pandemic status. Chaired by the Chief Safety Officer, and supported by WMATA's in-house medical staff, the PTF is comprised of an agency-wide team of senior level officials from key departments at WMATA. This approach has assisted WMATA with focusing on timely decisions that have aided the DMV and has allowed them to pivot as circumstances of the pandemic changed.

CDC suggests the use of a combination of controls to limit the spread of the virus that causes COVID-19, using a hierarchy of controls.



WMATA's Pandemic response includes actions consistent with the Hierarchy of Controls⁶. Examples include⁷:

- Elimination – Remote work, closed stations and rest rooms;
- Substitution – 3rd party provider for MetroAccess; Covid-19+ passengers – third party disinfection for facilities with COVID-19+ reports;
- Engineering Controls – Partitioning workspaces to separate people; increased cleaning;
- Administrative Controls – Modified schedules; manage team sizes; change work practices; face coverings, hand hygiene; and
- PPE – Personal Protective Equipment.

Benchmarking and Research Efforts

The majority of WMATA's benchmarking is done through the Community of Metros (COMET) international benchmarking group of which WMATA is a member. COMET's benchmarking focus is RAIL and provided WMATA opportunities to benchmark against other transit agencies – both domestic and international for information on COVID-19.

Benchmarking for BUS is more challenging in that two of the best sources, International Bus Benchmarking Group (IBBG) and the American Bus Benchmarking Group (ABBG), both require membership, which is limited by the two groups. WMATA is pursuing membership in these groups. For the purposes of OIG's request for benchmarking information on COVID-19 social distancing related to BUS, WMATA was able to obtain an "anonymized" summary of social distancing on BUS from both groups and more detailed information for RAIL.

Communication Efforts, Updates and Outreach

Throughout the pandemic response, WMATA communication efforts provided critical information to customers, employees, and stakeholders. WMATA has provided COVID-19 updates to WMATA's Board of Directors; updates and tools to its customers through social media, news releases, website, and other communication channels; and weekly messages from the General Manager/Chief Executive Officer and operations updates to its employees. WMATA established an online COVID-19 dashboard, and has provided information through Metro Voices, a periodic electronic newsletter for employees. Throughout the COVID-19 response, WMATA continued its customer research and outreach efforts and engaged with local businesses, jurisdictions, and federal environs to understand the region's plans, and to assist WMATA in the formulation of its "re-entry plan" and associated schedules. Feedback received through WMATA's outreach is reviewed and integrated into its COVID-19 response.

⁶ Hierarchy of Control definitions: Elimination–Completely eliminating exposure to the hazard; Substitution–Replacing the hazard with a non-hazardous object, device, or substance; Engineering Controls–isolate people from hazards through physical or mechanical means; Administrative Controls–change made to the way people work; PPE–Equipment worn by the person to protect themselves from real or potential hazards.

⁷ Board Presentation, July 23, 2020 COVID-19 Recovery Plan and Budget Update.

Social Distancing and Crowding

Over the course of the pandemic, WMATA implemented various actions to promote social distancing. Over time, these actions were, and continue to be, revised as the DMV moves into various phases of COVID-19 recovery and re-entry.

WMATA provided guidance on crowding conditions for BUS and RAIL. Crowding information is shown in one of three categories.⁸ Current thresholds are listed below.

Category	Bus	Rail
Not crowded	< 40% occupied	< 50% occupied
Some crowding	Between 40-75% occupied	Between 50-85% occupied
Crowded	= to or > 75% occupied	= to or > 85% occupied

WMATA has taken steps to promote social distancing on Metro, including but not limited to:

- Buses through December 31, 2020, required entry through the rear door and suspended fares;
- Through June 10, 2021, provided BUS operators discretion to bypass stops when bus was at 50 percent capacity;
- Shields were placed on buses to protect the operators;
- Signage and communication throughout the system to raise awareness of the requirement of social distancing and other COVID-19 safety measures;
- Develops and provides real time bus crowding information to its customers;
- Provides data on RAIL ridership patterns for customers to consider when making travel decisions;
- Adjusted schedules to provide more capacity and frequency to address crowding⁹ and continues to expand service as the region re-opens;
- Continues to monitor conditions and adjust service in front of demand;
- Implemented protective ventilation strategies;
- Implemented contactless pay;
- Provided hand-sanitizer stations in Metro stations;
- Continues its cleaning and disinfecting practices;
- Offered various COVID-19 testing opportunities to its employees;
- WMATA supported the community vaccination effort, using one of its Metrorail stations as a vaccination site;
- In the Fall of 2021, WMATA plans to implement an on-line tool for RAIL to monitor crowding; and
- Adjusted office space and limited capacity in facilities; and developed plan to allow for social distancing for workforce re-entry.

BUS experienced a higher level of ridership than RAIL during the pandemic and it has been more prone to crowded conditions. Rail ridership was such that rail crowding was isolated and riders could spread out amongst the rail cars. WMATA continues to monitor ridership and

⁸ WMATA.com Bus and Rail Crowding Information, August 20, 2021.

⁹ WMATA.com June 7, 2020 *Metro to reopen 15 stations, reallocate bus service to address crowding, starting Sunday.*

adjust schedules to accommodate ridership and mitigate risks; and in December 2020 introduced real time bus crowding information to its riders. Even with these tools in place, and acknowledged in focus groups, customers will take convenience of a bus in hand and tolerate crowding rather than wait.

Bus schedules and arrival times vary as buses share space with other vehicles – traffic conditions can impede arrival times, customers may choose to take a bus that has arrived and may be crowded – not knowing when the next bus will get through. The use of exclusive bus lanes that are not controlled by WMATA would better position buses to be able to stay on schedule.

Recently, CDC provided guidance that in most circumstances fully vaccinated individuals can resume activities without wearing a mask or physical distancing, except where required by federal, state, local, tribal, or territorial laws, rules and regulations, including local business and workplace guidance. Currently, federal law requires masks on public transportation, which will continue to mitigate some of the related social distancing challenges. Masking, hand washing and using hand sanitizer are specific actions that each individual can take; however, social distancing – given the unknown travel decisions of others – may continue to be more challenging as COVID-19 restrictions are eased, CDC guidelines are updated, vaccinations are administered, and people return to more normal activities and regain the confidence to begin using Metro again.

In response to CDC relaxing its guidelines, many businesses and event venues are not requiring masks for those fully vaccinated and have returned to full capacity. In response, WMATA has adjusted its schedule to accommodate those attending the events and choosing Metro as their mode of travel.

Some transit agencies have eased their capacity limits. For example, effective June 1, 2021:

- All Miami-Dade County transit modes have been restored to full capacity on vehicles and have reinstated front boarding.¹⁰
- SEPTA announced its plan to remove COVID-19 capacity limits, stating that “removing capacity limits to meet increased ridership demand is a major step in the region’s recovery,” and announced a new online tool that gives customers a virtual look on-board vehicles while planning trips, currently available for most bus routes, but will expand to cover all modes. Mask requirements are still in place.

Other examples include:

- New Jersey transit lifted its capacity restrictions in July 2020;
- Amtrak, in April 2021 announced it was lifting all capacity restrictions on May 23, 2021.
- The Port Authority of Allegheny County lifted capacity limits on all vehicles as of June 20, 2021.¹¹
- Chicago Transit Authority removed its capacity restrictions on all buses and trains, effective June 11, 2021.

¹⁰ MiamiDade.gov, Transit Service Updates, COVID-19 Miami-Dade Transit Services.

¹¹ PortAuthority.org, Coronavirus (COVID-19) Updates, viewed June 23, 2021

- Virginia Railway Express (VRE) has relaxed its capacity limits on platforms and railcars and indicated that social distancing is no longer required but can still be observed while ridership is low. It has also relaxed its face mask requirements outdoors on station platforms. Face masks are still required inside stations and in railcars, in accordance with federal mandates¹²

WMATA lifted capacity restrictions on BUS, effective June 11, 2021 and no longer authorizes the bus operator to bypass stations when buses are at 50 percent capacity. In addition, WMATA issued SA 21-06¹³, Revised Facial Covering and Occupancy Limits. The June 18, 2021, weekly Message from the General Manager provided the following quick reference chart:

CDC/Pandemic Task Force Update	Employees	Customer
Mask required outdoors (outside stations/bus shelters)	NO	NO
Masks required indoors (rail cars, buses, MetroAccess, facilities)	YES	YES
Occupancy Limits inside Metro Facilities*	NO	NO

* In response to re-opening plans of the DMV and the Federal Government

Social distancing should be encouraged and practiced in combination with other everyday preventive actions to reduce the spread of COVID-19. WMATA provided guidance and tools to its customers to make informed decisions; however, it is the customer who then makes the final decision on how and when to travel.

WMATA continues to monitor and respond to changes in guidelines from CDC, state, and local jurisdictions, and continues to engage and obtain feedback from customers, focus groups, private businesses, and the federal government to consider in its decision-making. As the Capital region relaxes its requirements and guidelines, and as people resume “normal” activities, social distancing will continue to be a challenge.

Risk mitigation will be to reduce crowding, increase ventilation, expand disinfection regimens, and mask usage.¹⁴ Most systems will need to find a way to use their capacity better, measure occupancy, redistribute capacity and flatten the peak – making real time information available to guide customers in making good travel choices.

Mask Requirements

On January 21, 2021, President Biden issued his Executive Order on Promoting COVID-19 Safety in Domestic and International Travel.¹⁵ The order directed TSA and other Federal agencies with appropriate regulatory authority to develop requirements for mask-wearing on domestic and international modes of public transportation.

¹² VRE.org, Coronavirus Health and Safety Guidance

¹³ SA-21-06, June 2021, *Pandemic Re-Entry Revised Facial Coverings and Occupancy Limits Lifted*

¹⁴ New York Times, *Returning to Work on the Subway? Here's What You Need to Know*, published May 3, 2020 and updated May 3, 2021.

¹⁵ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/21/executive-order-promoting-covid-19-safety-in-domestic-and-international-travel/>.

Pursuant to the Executive Order, the CDC issued an order¹⁶ on January 29, 2021, requiring the wearing of masks by people on public transportation conveyances or on the premises of transportation hubs to prevent spread of the virus that causes COVID-19. The order became effective February 1, 2021.¹⁷

Pursuant to the Executive Order and in support of the CDC order, the TSA issued an emergency amendment and three security directives requiring the wearing of masks at airports, on domestic and international flights, and on various modes of public surface transportation, effective as of February 1, 2021.¹⁸ The TSA has extended these mask mandates through January 18, 2022.¹⁹

The Federal mask mandate requiring masks on public transportation, along with good hand hygiene, should continue to mitigate risk even if social distancing is not possible. To the extent practicable every person should exercise these steps as CDC and the Capital Region relax the COVID-19 restrictions, and customers, once again return to Metro and day-to-day activities.

A CDC update, June 10, 2021, in part states it is amending its face mask order to not require people to wear a mask in outdoor areas of conveyance or while outdoors at transportation hubs. CDC continues to recommend wearing of masks in these areas by people who are not fully vaccinated to protect themselves and others.²⁰ Staying 6 feet away from others is often difficult on public transportation conveyances. People may not be able to distance themselves the recommended 6 feet from other people seated nearby or from those standing in or passing through aisles on airplanes, trains, and buses. Mask wearing that completely covers the mouth and nose reduces the spread of COVID-19 to others and protects the wearer²¹.

While keeping the mask requirement on public transportation for all riders, CDC relaxed its mask requirements for fully vaccinated people; however given the recent surge in COVID-19 and the increased transmissibility of the Delta variant, CDC updated its interim guidance on July 27, 2021, adding a recommendation that fully vaccinated people wear a mask in indoor public settings in areas of substantial or high transmission.

COVID-19 Air Quality and Ventilation Improvements

WMATA has communicated its commitment to air quality and ventilation improvements as it prepares for the return of riders to the Metro system and of employees to work.

WMATA continues its efforts to improve the air quality in BUS, RAIL, stations, and facilities, working to increase filtration levels and airflow and reduce the potential for aerosol transmission

¹⁶ Order under section 361 of the Public Health Service Act (42 U.S.C. 264) and 42 CFR 70.2,71.31(b),71.32(b), Requirement for Persons to Wear Masks While on Conveyances and at Transportation Hubs.

¹⁷ CDC.gov.

¹⁸ <https://www.transportation.gov/safety/mask-travel-guidance>. These and subsequent TSA emergency amendments and security directives are at <https://www.tsa.gov/sd-and-ea>.

¹⁹ See emergency amendment and security directives of August 20, 2021, at <https://www.tsa.gov/sd-and-ea>.

²⁰ CDC.gov Summary of Recent Changes, Updates as of June 10.

²¹ CDC.gov June 10, 2021 update.

of COVID-19. WMATA has upgraded air filters moving to a higher MERV²² rating. WMATA is using MERV-13 and is piloting the use of MERV-15 filtration levels in stations and facilities. On buses and trains, WMATA has upgraded to a MERV-7 and 9, respectively and is piloting the use of higher graded MERV filters and UVC sanitization systems on buses and trains.

Vaccinations and Variants

Throughout the pandemic, WMATA has offered testing for its employees and encourages employees to become vaccinated. A COVID-19 dashboard was developed to keep employees informed. WMATA used one of its Metrorail stations as a vaccination site in support of community vaccination efforts.

Additionally, WMATA monitors the aggregate vaccination rate among WMATA employees. WMATA has promoted an incentive for vaccinations by offering a \$100 gift card to each employee who uploads proof of vaccination on the COVID-19 dashboard.

Beginning in December 2020, the first vaccines were administered in the United States and with its rollout, millions of people have become fully vaccinated. As of August 10, 2021, over 65 percent of adults are reported to be fully vaccinated in Maryland, Virginia, and the District of Columbia²³. WMATA has and will continue to review its guidance and adjust its requirements accordingly. WMATA PTF continues to monitor vaccination rates, including employee vaccination rates, using it as one data point in its decision-making.

As the region re-opens, COVID-19 variants are still a concern. According to CDC, the Delta variant is now the dominant strain of the virus in the United States. While there are other variants being tracked, the Delta variant is considered highly transmissible and presents a greater risk for those not vaccinated. As a result of the new information, CDC and state and local guidance is beginning to change. As new information becomes available, WMATA continues to assess and monitor changes in guidance.

Response to the pandemic is fluid, and recent changes in CDC guidance, overall COVID-19 pandemic fatigue, and new information on variants and infection rates all add to the uncertainty of the pace of the recovery and ridership return; and with that the continued ability to manage social distancing and/or mitigate the risk.

Closing Comments

WMATA's response to COVID-19 has been aligned with CDC guidelines and consistent with other transit agencies. WMATA remains agile in its response, continues to monitor trends, and adjust plans. On September 5, 2021, WMATA will increase service levels for both BUS and RAIL and will provide more service throughout the day, not only during rush hour. These changes will bring service levels to 97 percent of pre-pandemic service on Metrobus and 91 percent of pre-pandemic service levels for Metrorail.

²² MERV, Minimum Efficiency Reporting Value, with higher the MERV value the more efficient the filter will be in trapping airborne particles.

²³ WTOP, latest COVID-19 vaccination numbers in DC, Maryland and Virginia, chart updated August 9, 2021

Maintaining and monitoring social distancing is a challenge for transit agencies both here and abroad. Social distancing should be practiced in conjunction with other everyday preventive actions. The best efforts for transit continue to be in place and are modified as new information becomes available. WMATA has developed tools for customers to monitor crowding on BUS and RAIL to assist in their travel planning, provided guidance and signage on social distancing and other COVID-19 requirements, empowered bus operators to bypass stops when crowding occurs,²⁴ and improved its air ventilation filtration on BUS, RAIL, and in its stations and facilities. WMATA continues the cleaning and sanitization protocols, aligns its practices with the updated CDC guidance, performs outreach to understand customer priorities, and engages with business groups and the Federal government within the region to understand their return to work plans and philosophies.

WMATA encourages and has implemented social distancing measures and acknowledges that there are, and will continue to be, challenges since much of the decision-making is by individuals. Wearing a mask,²⁵ good hand washing hygiene, and enhanced ventilation help mitigate instances where social distancing is not possible.

Moving forward, OIG encourages WMATA to continue to monitor and respond to the changing COVID-19 profile and changing guidance and integrate lessons learned into its Pandemic Flu Plan.

²⁴ As of June 11, 2021, capacity restriction has been lifted and bus operators are no longer authorized to bypass stops due to crowded conditions.

²⁵ Masks are required on Metro by Federal mandate. The Federal mandate has been extended through January 18, 2022.

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