

Annual Audit and Evaluation Plan Fiscal Year 2025





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Inspector General's Message to the Board of Directors

I am pleased to present Washington Metropolitan Area Transit Authority (WMATA) Office of Inspector General's (OIG) FY 2025 Annual Audit and Evaluation Plan. The Plan is part of OIG's mission to combat fraud, waste and abuse, safeguard WMATA assets, and promote economy, efficiency, and effectiveness in WMATA's programs and activities.

Last year, impacted by external factors, WMATA faced the prospect of service cuts due to an unprecedented \$750 million budget gap. Even though WMATA, with the assistance of regional investments, was able to avoid drastic service cuts this fiscal year, future financial challenges are still looming. As a result, under my leadership, OIG staff will focus its audits and evaluations on matters that pose the greatest threat to WMATA's finances and operations. Furthermore, ensuring the safety of our riders remains paramount, and we will continue to prioritize audits and evaluations related to safety.

The audits and evaluations identified in this plan will be led by OIG's Office of Audits and Evaluations (OA), comprising three divisions: financial and contract audits, performance audits (performing information technology and administrative audits), and evaluations. OIG is committed to providing WMATA and the Board of Directors (Board) a fair, balanced, and independent view of its WMATA activities and making impactful recommendations that will lead to positive changes.

This Plan sets forth OIG's strategy for identifying priority issues and managing its workload and resources. Our plan generally aligns with WMATA's Strategic Transformation Plan entitled "Your Metro, The Way Forward." Although the Plan is a projection of what OIG would like to accomplish in FY 2025, other issues may rise in importance and require our resources. Our planned work is organized around several focus areas:

- Safety, Reliability, and Convenience
- Financial and Environment Sustainability
- Information Technology and Procurement
- Talented Teams and Asset Management

- Infrastructure Investment and Jobs Act¹ (IIJA) Reporting

OIG sought input in developing the Plan from the General Manager and Chief Executive Officer (GM/CEO), the Board, and the Senior Executive team. Our plan also incorporates ongoing OIG work initiated in the previous period. We considered many suggestions; however, due to staff limitations, we focused on high-impact areas.

I want to thank the Board and WMATA management for their collaborative efforts in developing this Annual Plan and for working with OIG. I look forward to continuing to work with the Board, WMATA management, and other stakeholders to meet our goals, fulfill our mission, and help riders, employees, and contractors travel safely through our system.



Michelle A. Zamarin
Inspector General

¹ 1 Pub. L. No. 117-58, 135 Stat. 429 (2021).

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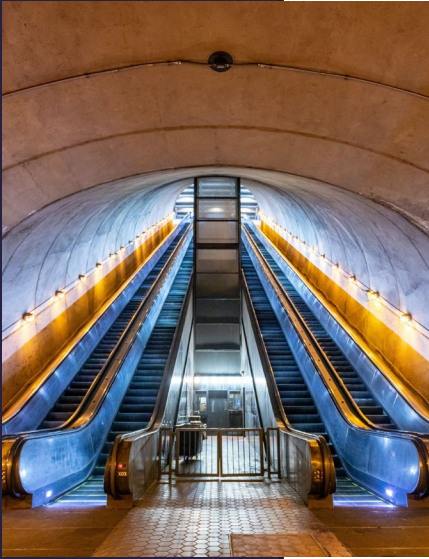


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Summary of Audits and Evaluations for Fiscal Year 2025

This Audit and Evaluation Plan generally aligns with WMATA's Strategic Transformation Plan entitled "Your Metro, The Way Forward." The strategic plan identifies the major challenges and critical risk areas facing WMATA and identifies opportunities for the region to work collaboratively to meet these challenges. This strategic plan was developed by the Board and management to guide WMATA's decision-making. It connects the mission, vision, and goals with actionable initiatives that will drive progress. OIG audit resources will be directed in these areas in an optimum fashion as well as to determine cost savings opportunities and efficiencies.

The process we used to select and prioritize proposed audits and evaluations was disciplined and risk-based. Factors OIG considered include the following:

1. Mandatory requirements;
2. Critical agency risk areas;
3. Emphasis by the Board, the GM/CEO, or other senior WMATA officials;
4. A program's susceptibility to fraud, manipulation, or other irregularities;
5. Dollar magnitude or resources involved in the proposed review area;
6. Newness, changed conditions, or sensitivity of an organization, program, function, or activities;
7. Prior audit experience, including the adequacy of internal controls; and
8. Availability of resources.

OIG also developed an audit planning assessment process that considers the nature, scope, trends, special problems, vulnerabilities, and inherent risks of WMATA's programs and operations. We concentrated our assessment on the following strategic, operational, and financial criteria:

 **Safety, Regulatory, and Compliance**

 **Financial Exposure**

 **Audit Experience**

 **Information Technology and Cybersecurity**

 **Mission Critical Operations**

 **Reliability and Customer Service**

Next, a score was assigned to each of the criteria above on a scale from 1 (low risk) to 5 (high risk), with a score of 3 representing a moderate risk. Subjective judgment is also part of the process. Our assessment also factored in discussions on review topics with the Board, the GM/CEO, senior WMATA officials, and internal compliance groups. Reviews that were proposed, prioritized, and ultimately selected were based on this assessment process.

Below is a summary of the audits and evaluations to be conducted in FY 2025, along with the associated risk level. A more detailed description follows.

Audits and Evaluations	Organization	Overall Risk Rating
1. Audit of Effectiveness of Business Continuity Plan	Global	5
2. Evaluation of Security Camera Functionality and Operational Effectiveness	Safety, Operations	5
3. Audit of ERP System Pre-Implementation Readiness	Digital Modernization	5
4. Effectiveness of the Track Rehabilitation Program (CIP 0024)	Infrastructure, Finance	5
5. Evaluation of Metro Transit Police Computer Aided Dispatch (CAD) System	Operations	5
6. Audit of Account Payable Payments for Outside Party and Miscellaneous Vendors	Finance	5
7. Audit of Data Center Cost Optimization	Digital Modernization	5
8. Audit of Data Privacy Practices	Digital Modernization, People, Culture, & Inclusion	5
9. Audit of Contract Modifications Process	Procurement, Finance	5
10. Audit of Cybersecurity Controls over WMATA's Network	Digital Modernization	5
11. Audit of WMATA's Contract Closeout Process	Procurement, Finance	5
12. Audit of Procurement Post-Award Contract Process	Procurement, Finance	5
13. Audit of Vendor Master File Controls	Procurement	5
14. Audit of Succession Planning	People, Culture, & Inclusion	5
15. Audit of Real Estate Asset Management	Finance	5
16. Controls Over Monitoring Employee Driver's Licenses	Safety, Operations	4
17. Audit of Travel Expenses	Finance	4
18. Audit of Underground Storage Tanks	Operations, Safety	4

19. Audit of Cloud Computing Strategy	Digital Modernization	4
20. Audit of Digital Modernization Review and Approval Processes for Procurement of IT Goods and Services	Digital Modernization, Procurement	4
21. Audit of Alternative Inventory Practices	Operations	4
22. Audit of Transit Asset Inventory and Conditional Assessment	Infrastructure, Operations, Digital Modernizations	4
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The Audit and Evaluation Plan also includes cyclical audits mandated by federal statute. These reviews include Financial Statement Audits, a Single Audit, and reporting requirements under the IIJA. Because these are required, they were not risk rated.

Safety, Reliability, & Convenience

Safety takes priority at WMATA. Ensuring the safety of WMATA's passengers, employees, stakeholders, and infrastructure remains an ongoing challenge. WMATA's Strategic Transformation Plan strives to deliver safe, reliable, convenient, equitable, accessible, and enjoyable service for customers. OIG has six reviews in this area.

1. Evaluation of Controls Over Monitoring Employee Driver's Licenses (In Process)

When operating WMATA vehicles, employees must comply with all jurisdictional motor vehicle laws, rules, and regulations. The safety of our customers and the public may be at risk when WMATA employees do not have a valid driver's license while operating revenue and non-revenue vehicles. OIG will assess WMATA's process for ensuring WMATA personnel do not have any encumbrances that would prohibit them, by law or policy, from operating WMATA vehicles.

2. Audit of Effectiveness of Business Continuity Plan

The purpose of the business continuity plan (BCP) is to enable an organization to continue offering critical services in the event of an unplanned disaster. An effective BCP considers the critical operations necessary for the organization's survival and the resources that support those operations. Service disruptions can be caused by natural events such as earthquakes, severe thunderstorms, floods, tornadoes, and fires. Service disruptions can also result from system malfunctions or be caused by human actions, such as terrorist attacks, hacker attacks, viruses, or human error.

The audit objective is to assess the effectiveness of the business continuity plan and evaluate the enterprise's preparedness in the event of a major business disruption.

3. Evaluation of Security Camera Functionality and Operational Effectiveness

WMATA is piloting enhancements to the Metro Integrated Command and Communications Control Center to improve situational awareness of operating conditions. These modernization efforts may include upgrades such as intrusion detection and access control systems, new intercoms, communication equipment, and the necessary supporting infrastructure. The capital improvement project (CIP) 0145—Facility Security Monitoring Equipment Program aims to enhance safety, deter crime, and ensure proper functioning of monitoring equipment by overseeing stations and facilities both inside and outside, while also advancing communication with customers, employees, and public service announcements.

The objective of the evaluation is to assess the functionality and operational effectiveness of security cameras installed on WMATA buses, rail cars, bus divisions, and stations.

4. Audit of ERP System Pre-Implementation Readiness

WMATA currently utilizes PeopleSoft as the primary system of record for its Financial (FIN), Human Capital Management (HCM), Enterprise Learning Management (ELM), and other critical operational activities, supporting over 14,000 users across the organization. WMATA plans to implement a new enterprise resource planning (ERP) system to enhance operational efficiency and improve financial reporting. This initiative aims to deploy an integrated suite of enterprise solutions designed to elevate service delivery, adopt best practices, and significantly boost the efficiency and effectiveness of WMATA's customer service and business processes.

According to the FY 2025 Budget Book, WMATA has already invested \$8.4 million in this project, with a projected total expenditure of approximately \$218.3 million for FY 2024–2027 (refer to CIP0331).

The objective of this audit is to assess WMATA's pre-implementation readiness for the new ERP system and ensure that a sound project management framework is in place to support an effective and efficient implementation process.

5. Effectiveness of the Track Rehabilitation Program (CIP 0024)

This program replaces, rehabilitates, and provides preventative maintenance for rail systems to maintain a state of good repair. This includes rail replacement, stray current mitigation, track bed cleaning, drain rodding, vegetation control, and other related activities. The program aims to prevent potential safety incidents and minimize disruptions to service, as measured by the Rail Infrastructure performance target of ≤3.0% of track unavailable.

The audit/evaluation objective is to assess whether WMATA has effectively utilized jurisdictional funding to address this major CIP. The evaluation will focus on WMATA's ability to:

- Effectively manage the CIP project.
- Meet the requirements of the related contract.
- Achieve CIP milestones.
- Adhere to the planned CIP budget.

6. Evaluation of Metro Transit Police Computer Aided Dispatch (CAD) System

CAD systems allow public safety operations and communications to be augmented, assisted, or partially controlled by an automated system. It can include, among other capabilities, computer-controlled emergency vehicle dispatching, vehicle status, incident reporting, and management information. All aspects of a CAD system must be optimized for rapid response time and system reliability.

Key areas of focus include the system's ability to manage call loads, prioritize emergency responses, and ensure the accuracy and timeliness of data flow between dispatchers, field units, and other law enforcement agencies. This evaluation aims to identify any gaps in system performance, data integrity, or user interface that could impact public safety and resource deployment. It will also determine if the CAD system meets the department's operational needs and complies with relevant standards and regulations. The evaluation objective is to assess the efficacy and reliability of Metro Transit Police's CAD System.

Financial and Environmental Sustainability

WMATA's FY 2025 operating and capital budget totals \$5 billion and remains grounded in Metro's commitment to enhancing system safety, reliability, and financial accountability. To improve controls and ensure that expense and capital dollars are spent efficiently and effectively, OIG will continue to conduct audits in fiscal areas. We have eight reviews in this area.

1. Contract Audits (Continuous)

OIG performs cost or pricing analyses at the request of contracting officers to assist the procurement department in contract negotiations. The objective of these audits is to determine whether the contractor's proposal is based upon current, accurate, and complete pricing data; whether the contractor complies with Buy America Act requirements; and prospective contractors on major contracts are in sound financial condition and have sufficient resources to perform the contract. In FY 2024, OIG completed 34 contract audits and currently has 26 others to complete, with a growing list in the new fiscal year.

2. Fiscal Year 2024 Financial Statements Audit (In Process)

The WMATA Compact, Section 70, states that an audit shall be made of the financial accounts of WMATA, shall be prepared in accordance with generally accepted accounting principles, and shall be filed with the Chairman and other officers as the Board shall direct." The Board, through the adoption of Board Resolution #2006-18, vested in OIG the responsibility for oversight of WMATA's annual independent audit of financial statements. The objectives of this audit are to:

- Express opinions on WMATA's financial statements;
- Review compliance with applicable laws and regulations;
- Review the controls in WMATA's computer systems that are significant to the financial statements; and
- Assess WMATA's compliance with the Office of Management and Budget's Uniform Guidance.

3. Fiscal Year 2025 Financial Statements Audit

See paragraph 2 above for the audit requirements and objectives.

4. Fiscal Year 2024 Single Audit (In Process)

The Single Audit Act, as amended, requires an independent external auditor to annually audit WMATA's federal awards in accordance with applicable standards. The objective

of the audit is to ensure that a recipient of federal funds is following the federal program's requirements. OIG is responsible for overseeing WMATA's Single Audit.

5. SmarTrip Regional Partners Billing Statements Audit

The Operations Funding Agreement between the participating jurisdictions requires an independent external auditor to conduct an audit annually. The objective of the audit is to determine whether the audited entity's Billing Statements are free of material misstatements. OIG is responsible for overseeing WMATA's SmarTrip Regional Partner Comparative Billing Statements Audit.

6. Audit of Travel Expenses (In Process)

Travel expenses consist of reimbursable meals, lodging, mileage, transportation, parking, and miscellaneous expenses related to official WMATA business travel. The audit will evaluate if internal controls for WMATA's travel expense program are effective and efficient.

7. Audit of Accounts Payable Payments for Outside Party and Miscellaneous Vendors (In Process)

WMATA's accounts payable team is responsible for ensuring payments to vendors, third parties, jurisdictions, and reimbursements to employees are processed timely, accurately, efficiently, and in compliance with policies and regulations. The objective of this audit is to assess the adequacy of controls over payments.

8. Audit of Underground Storage Tanks (In Process)

The Office of Environmental Management oversees WMATA's environmental management programs and compliance with federal, state, and local environmental laws and regulations. WMATA has 20 facilities with underground storage tanks (USTs) that contain diesel or unleaded gasoline. USTs are used to store hazardous substances or petroleum and are regulated by the U.S. Environmental Protection Agency. The average life expectancy of USTs is around 20 years. Aging USTs can become hazardous to the environment due to corrosion and possible leaks that could contaminate groundwater, which is the source of drinking water for many Americans. OIG will assess WMATA's USTs replacement program and practices to ensure that effective internal controls are in place to mitigate environmental risks, including leaks, overfills, and corrosion. The objective of the audit is to determine the effectiveness of managing the program for USTs.

Information Technology and Procurement

Information security concerns make it paramount that IT assets are effectively and efficiently managed across WMATA. Likewise, procurements are also critical to WMATA's programs and operations. We have nine reviews in these areas.

1. Audit of Data Center Cost Optimization (In Process)

Data center cost optimization involves identifying and implementing strategies to reduce expenses while maintaining or improving the efficiency and performance of the data center. The Office of Infrastructure & Operations manages the Data Center Infrastructure, which is responsible for designing, building, maintaining, and monitoring a robust, state-of-the-art IT infrastructure, enabling WMATA to deliver safe, reliable, and efficient transit services. With MetroMoves², a new data center is being built to replace the Jackson Graham Building (JGB) data center, and the other facility is being upgraded. Additionally, an Equinix data center is being leased to temporarily replace JGB. OIG will assess whether WMATA has implemented data center cost reduction initiatives or strategies.

2. Audit of Data Privacy Practices (In Process)

Data privacy and the use of personal information are issues of increasing concern for many organizations as a result of digital transformation and global regulations. Data privacy is a crucial aspect of business continuity. It is also an organization's greatest risk and potentially one of its biggest liabilities if mishandled. The audit will assess WMATA's compliance with applicable data protection laws, regulations, and privacy standards.

3. Audit of Cloud Computing Strategy (In Process)

Cloud computing provides on-demand access to a shared pool of computing resources. The adoption of cloud computing has become mainstream by large enterprises because it provides benefits such as: (1) potential cost savings, (2) improved delivery, ease of scalability, and procurement efficiencies, and (3) operational efficiencies and security. WMATA has a limited presence in cloud computing. The objective of the audit is to assess the strategy and plan for migrating applications to the cloud.

4. Audit of Contract Modifications Process (In Process)

According to WMATA's Procurement Best Practices Manual, a contract modification is

² WMATA moved from its prior headquarters (Jackson Graham Building) to multiple offices across D.C., Maryland, and Virginia.

any written alteration of specification, delivery point, frequency of delivery, period of performance, price, quantity, or other contract provisions. The objective of the audit is to determine the effectiveness and efficiency of the internal controls for WMATA's contract change order and modification process. The audit will assess whether change orders were in accordance with the contract terms and conditions. The audit objective will also include verifying cumulative change order amounts as a percentage of original contract amounts and benchmarking to available industry standards.

5. Audit of Cybersecurity Controls over WMATA's Network

The WMATA wide area network connects all networked information technology resources and authorized WMATA employees, contractors, and vendors. Network security controls are essential to ensure the confidentiality, integrity, and availability of WMATA's networks. Assessing the effectiveness of controls over firewalls, encryption protocols, and access management is crucial for WMATA to identify potential vulnerabilities in its network infrastructure. Additionally, it is imperative that WMATA provides timely remediation and complies with relevant regulations and best practices following the identification of any vulnerabilities.

The audit objective is to determine whether WMATA's network security controls and practices are adequately implemented to protect information assets and network infrastructure.

6. Audit of Digital Modernization Review and Approval Processes for Procurement of IT Goods and Services

This audit will evaluate the adequacy of controls in the procurement process for IT goods and services, focusing on ensuring that all IT-related procurements are subject to appropriate review and approval by Digital Modernization (DM). The review will assess whether existing procedures effectively identify procurements that require IT involvement and determine if any procurements bypassed DM's review process. The audit aims to ensure compliance with policies governing IT procurement and to identify any gaps in the review and approval processes.

7. Audit of the Contract Closeout Process

A contract closeout occurs when all contract terms have been fulfilled, all administrative actions have been completed, disputes have been resolved, and the final payment has been made. Closing contracts within the expected time frame can help minimize WMATA's exposure to financial risks by identifying and recovering improper payments. Timely closeout also allows agencies to deobligate and reallocate funds from completed contracts.

The audit objective is to determine whether WMATA had adequate controls in place to ensure that service contracts were closed out timely and accurately and that funds were properly deobligated.

8. Audit of Procurement Post-Award Contract Process

These reviews will assess the integrity and compliance of procurement activities by conducting comprehensive reviews of post-award contracts. By reviewing contract administration, the audit aims to identify and address financial risks associated with contract non-compliance, improper payments, or unauthorized contract modifications. This helps prevent financial losses, overpayments, and potential fraud.

9. Audit of Vendor Master File Controls

The vendor master file is a critical component of WMATA's financial operations, serving as the centralized repository for all vendor-related information. It includes key details such as vendor names, addresses, contact information, payment terms, and banking details. This database facilitates efficient vendor management, procurement processes, and payment disbursements. The integrity and reliability of the vendor master file are crucial for ensuring financial transparency and accountability. The accuracy of vendor information and adherence to procurement policies must also be assessed. Maintaining a clean and reliable vendor master file supports informed decision-making, strengthens vendor relationships, and safeguards the company's financial interests.

The audit objective is to determine if WMATA has effective internal controls over its Vendor Master File.

Talented Teams and Asset Management

The most significant operating cost drivers are personnel costs, primarily wages and benefits, which account for a significant percentage of WMATA expenditures. Controls over assets are also critical to WMATA's programs and activities. WMATA needs to ensure human capital and assets are managed appropriately, and that programs run efficiently and effectively. We have four reviews in these areas.

1. Evaluation of Alternate Inventory Practices (In Process)

In January 2020, OIG performed a review of WMATA's Inventory Practices. The inventory was valued at \$144 million at the time of the review. The report contained five recommendations, including strengthening access controls and surveillance capabilities, fully accounting for capital inventory, and establishing barcoding. WMATA implemented some recommendations, while others are still outstanding until January 2024. The objective is to follow up on the prior inventory review recommendations to determine the status of corrective actions and to identify any emergent risks that may impact project completion.

2. Audit of Succession Planning focusing on the Effectiveness of the Knowledge Transfer Process.

Succession planning is critical to maintaining operational continuity and leadership stability within WMATA. A key component of effective succession planning is the transfer of knowledge from outgoing employees to their successors, ensuring that institutional expertise is retained and effectively utilized by the next generation of leaders. The effectiveness of this knowledge transfer process directly impacts the organization's ability to maintain service quality, mitigate risks, and sustain its strategic objectives during leadership transitions. This audit will assess the overall effectiveness of WMATA's succession planning efforts, emphasizing the processes and mechanisms in place for knowledge transfer. The audit will examine whether current practices adequately capture and transfer critical knowledge and whether documentation and training efforts support a smooth transition.

The objective of this audit is to identify any gaps or weaknesses in the succession planning and knowledge transfer processes that could hinder WMATA's ability to maintain operational continuity and achieve its long-term goals.

3. Audit of Real Estate Asset Management

The Department of Finance ensures Metro's fiscal integrity. Real Estate and Development, a division within the Department of Finance, focuses on optimizing Metro's real estate and parking portfolios. As we enter an era where business can be conducted through teleworking and office space may be underutilized, having a robust real estate asset management process that strategically aligns with changing work conditions and activities will be essential for remaining competitive in the industry. Real estate management involves maintaining an accurate inventory and managing real estate effectively for optimization. Moreover, it is crucial to have an effective real estate asset management strategy that aligns with Metro's mission, business objectives, and activities. Finally, establishing clear policies and procedures for acquiring, selling, and leasing real estate is key to harmonizing the strategy with the real estate asset management process.

The audit objectives are to (1) review Metro's real estate and parking inventory management, (2) evaluate the strategy for optimizing Metro's real estate and parking portfolios, and (3) assess the policies and procedures for acquiring, selling, and leasing real estate.

4. Audit of Transit Asset Inventory and Conditional Assessment

WMATA maintains a comprehensive transit asset inventory encompassing all vehicles, infrastructure, and equipment essential for transportation operations. This inventory serves as a vital resource for strategic planning, maintenance scheduling, and budget allocation.

Regular assessments of asset conditions are conducted to evaluate their performance, safety, and reliability. These assessments involve systematic inspections, data collection, and analysis to identify maintenance needs, prioritize investments, and ensure compliance with regulatory standards. As part of WMATA's transit asset management plan framework, the integrity of the transit asset inventory and the condition assessment process should be validated. Additionally, data accuracy and compliance with asset management policies should be verified.

The audit objective is to determine whether WMATA has effective internal controls for managing the transit asset inventory and conditions assessment.

Infrastructure Investment and Jobs Act

On November 6, 2021, Congress passed the IIJA, a once-in-a-generation investment in our nation's infrastructure and competitiveness. The historic legislation, in part, will improve transportation options for millions of Americans and reduce greenhouse emissions; build a national network of electric chargers and upgrade the power infrastructure; and make our infrastructure resilient to cyber-attacks.

IIJA Section 30019(d)(2)(E)(iii) requires WMATA OIG to issue a report two and five years after the enactment of the IIJA that includes, in part, an assessment of the effective use of funding to address major capital improvement projects. We have several ongoing and proposed reviews in this area, as shown in the sections above.

Authority, Mission, and Contact Information

WMATA OIG was created by Board of Directors Resolution 2006-18, approved April 20, 2006, and codified by the WMATA Compact, Section 9(d), in 2009. The Office of Inspector General, as an independent and objective unit of the Authority, conducts and supervises audits, program evaluations, and investigations relating to agency activities; promotes economy, efficiency, and effectiveness in agency activities; detects and prevents fraud and abuse in agency activities; and keeps the Board fully and currently informed about deficiencies in agency activities as well as the necessity for and progress of corrective action.

Hotline

The OIG Hotline provides WMATA employees, contract employees, and the public with a confidential means of reporting to OIG instances of fraud, waste, and abuse relating to agency programs and operations.

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