

# Evaluation of WMATA's Controls Over Bus Operator Licensing Requirements

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September 11, 2025

OIG 26-02





# Results in Brief

## *Evaluation of WMATA's Controls Over Bus Operator Licensing Requirements*

### Evaluation Objective

The evaluation objective was to determine the efficiency and effectiveness of the Washington Metropolitan Area Transit Authority's (WMATA's) internal controls over bus operator licensing requirements under Title 49 of the Code of Federal Regulations, Part 383: Commercial Driver's License Standards; Requirements and Penalties (49 CFR 383).

### Why We Did the Evaluation

- Compliance with 49 CFR 383 helps ensure bus operators are safe and qualified to drive, which can reduce or prevent accidents, fatalities, and injuries.
- This evaluation was included in the FY 2024 Annual Audit and Evaluation Plan.

### Recommendations

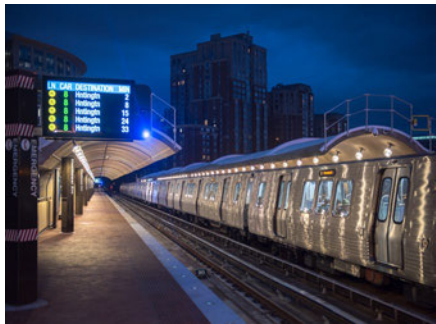
OIG made three recommendations. By addressing the recommendations outlined in this report, WMATA can strengthen the internal controls for and enhance oversight of compliance with Commercial Driver's Licensing (CDL) requirements.

### What OIG Found

The Office of Inspector General (OIG) identified three subparts of 49 CFR 383 that lay out the obligations for employers of personnel with CDLs: subparts 35, 37, and 51.

Generally, WMATA's Office of Bus Transportation has established controls to ensure compliance with subparts 37 and 51. However, OIG found that WMATA did not request a 10-year CDL-related employment history from applicants as required under subpart 35.

While this evaluation focused on the Office of Bus Transportation, WMATA's obligation to comply with 49 CFR 383 applies to any position requiring a CDL. Therefore, WMATA should consider all departments that maintain positions requiring a CDL when implementing corrective action.



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WMATA has a fleet of over 1,500 buses and 2,900 bus operators throughout the District of Columbia (DC), Maryland (MD), and Virginia (VA). At WMATA, bus operators must possess a valid Commercial Driver's Licensing (CDL) that reflects the appropriate class and endorsements as issued by the jurisdiction of the employee's residence. Federal standards for CDLs, including requirements and penalties for non-compliance, are established under 49 CFR 383.<sup>1</sup> While most of the requirements within 49 CFR 383 are the responsibility of the CDL holder, OIG identified three subparts that impose obligations on employers of personnel with CDLs.

Subpart 35 of 49 CFR 383 requires that employers request employment history for the 10 years preceding the date of application for any person applying for employment as an operator of a commercial motor vehicle.

Subpart 37 of 49 CFR 383 prohibits employers from allowing a driver to operate a Commercial Motor Vehicle (CMV) if they are aware of any of the following circumstances: (1) a driver does not have a current CDL or proper class or endorsements, or has violated any restrictions on their CDL; (2) a driver has been disqualified from operating a CDL; (3) a driver has more than one CDL; (4) a driver or motor carrier operation is subject to an out-of-service order; or (5) a driver is operating a CMV in violation of railroad-highway grade crossing law or regulation.

Subpart 51 of 49 CFR 383 prohibits employers from allowing a disqualified driver to operate a CMV. While this prohibition is also noted in subpart 37, subpart 53 provides greater detail on driver disqualification.

Additionally, 49 CFR 383 includes several requirements related to training, CDL learner's permits, and obligations of State licensing agencies. However, these additional requirements were not considered as part of this evaluation.

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<sup>1</sup> 49 CFR 383, (2025) <https://www.ecfr.gov/current/title-49/part-383>

**Finding 1:** While WMATA has generally established effective controls for CDL requirements under 49 CFR 383, with noted observations, it has not complied with the requirement to request a 10-year CDL history from applicants.

OIG evaluated the Office of Bus Transportation's compliance with CDL requirements contained within 49 CFR 383. OIG performed compliance tests by observing the validation of CDLs and DOT medical cards, including maintaining endorsements<sup>2</sup>, examining policies and procedures and associated data, and reviewing assessments on adherence to local motor vehicle laws, regulations, and rules. Overall, the Office of Bus Transportation has established effective controls through processes and procedures that ensure compliance with 49 CFR 383. However, OIG found that WMATA did not request a 10-year CDL-related employment history from applicants as required under 49 CFR 383.35. Table 1 below summarizes WMATA's control environment for each associated subpart of 49 CFR Part 383.

**Table 1: WMATA's Bus Operator CDL Controls Under 49 CFR 383**

CDL Standards/Requirements	49 CFR 383 Subpart	Implemented	WMATA's Control(s)
1. Notification of Previous Employment	383.35	NO	<ul style="list-style-type: none"> <li>• Management is engaging in a coordinated effort to update the application process, to include a request for 10 years of CDL employment from applicants</li> </ul>
2. Employer Responsibilities	383.37	YES	<ul style="list-style-type: none"> <li>• Daily inspection of the CDL</li> <li>• Automated DMV reporting</li> <li>• Undercover on-board assessments</li> <li>• Employee self-reporting</li> </ul>
3. Disqualification of Drivers	383.51	YES	<ul style="list-style-type: none"> <li>• Daily inspection of the CDL</li> <li>• Automated DMV reporting</li> <li>• Employee self-reporting</li> <li>• Undercover on-board assessments</li> </ul>

<sup>2</sup> Endorsements are certifications added to a license that allow commercial motor vehicle drivers to operate specific vehicles. For example, a "P" endorsement indicates a CDL holder is allowed to operate a passenger vehicle.

### Controls Not Implemented to Meet Subpart 35 of 49 CFR 383

Under Subpart 35 of 49 CFR 383, requested employment history information must include the following:

1. A list of the names and addresses of previous employers for which the applicant was a commercial vehicle operator;
2. Dates the applicant was employed by these employers; and
3. The reason for leaving such employment.

Interviews with personnel from Workforce Planning & Strategy and Transportation revealed that WMATA does not request this information as part of the application process for bus operators. Once made aware of this requirement during OIG's evaluation, Transportation management immediately coordinated with other WMATA departments to initiate corrective action. The planned corrective action includes modifying WMATA's application process to include a request for the required previous employment history.

### Controls Implemented to Meet Subparts 37 and 51 of 49 CFR 383 with Noted Observations

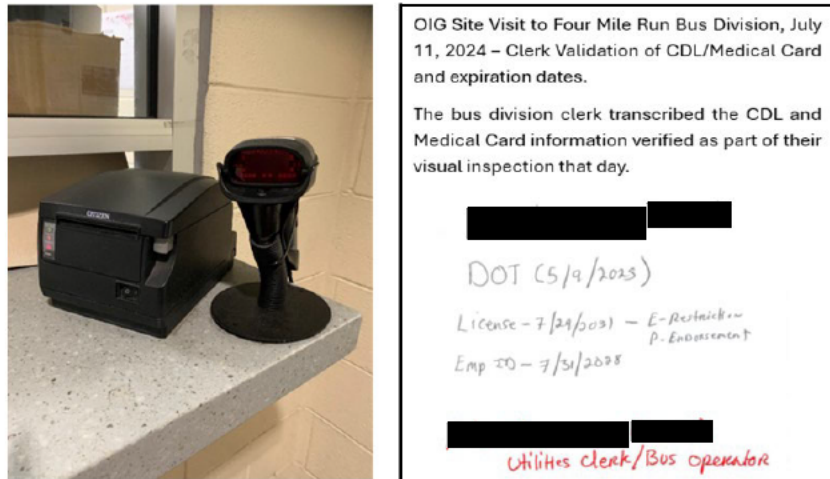
OIG reviewed four controls that WMATA implemented to meet the requirements of Subparts 37 and 51 of 49 CFR 383: daily inspection of CDLs, automated DMV reporting, employee self-reporting, and undercover onboard assessments.

- Daily Inspection of CDL – WMATA has a daily inspection process requiring bus operators to present their CDL and a DOT medical card to clerks during check in prior to dispatch (see Figure 1).<sup>3</sup> Clerks scan the CDL, which electronically logs the bus operator into the Trapeze system.<sup>4</sup> The system will notify the clerk if a CDL or DOT medical card is approaching expiration or has already expired. Clerks also visually observe whether the CDLs and DOT medical cards are valid and up to date. If the CDL or DOT medical card is found to be invalid, the clerk will not issue a bus operator's manifest,<sup>5</sup> and the bus operator will not be able to drive until the issue is resolved.

<sup>3</sup> This process is governed by WMATA's Work Instruction BTRA-BDIV-WRK32-01, Section six, Daily CDL and DOT Card Checks.

<sup>4</sup> Software application used to manage work scheduling (including absences) and operator payroll information for bus and rail operators, including bus operator candidates.

<sup>5</sup> A manifest, provided daily by a depot clerk, is a complete record of a bus operator's daily work and is entered into the Operator Records Management System at the end of the bus operator's workday. WMATA issues over 977,000 paper manifests a year.

**Figure 1: License Scanning Device and Division Clerk's Notes from Visual Inspection**

**Note:** Clerks do not document the information observed in the visual inspections. The written notes in Figure 1 were prepared at the request of OIG to understand the division clerk's visual inspection process.

OIG conducted site visits at three bus divisions – Four Mile Run, Shepherd Parkway, and Andrews Federal Campus – to observe the validation processes.<sup>6</sup> All three bus divisions conducted scans and visual inspections of CDL and DOT medical cards. However, we also found that a clerk assigned to Shepherd Parkway was not checking for the necessary endorsements or restrictions<sup>7</sup> on the CDL during the inspection. For example, a CDL with a restriction “B” requires the bus operator to wear corrective lenses when operating a commercial vehicle. The clerk did not confirm that bus operators had corrective lenses before issuing manifests, although a Shepherd Parkway employee told OIG that restrictions are validated on a periodic basis.

- Automated DMV Reporting – During employee onboarding, WMATA enrolls bus operators in a driver's license monitoring program that authorizes WMATA to access their driving records throughout the entirety of their employment.<sup>8</sup> Designated WMATA personnel actively monitor driving records daily through secured electronic portals established with the DMV/MVAs of VA, MD, and DC.<sup>9</sup> Each DMV/MVA automatically notifies WMATA when there is any change in the CDL and DOT medical status of enrolled bus operators. Status changes include, but are not limited to, changes in a bus operator's residence/jurisdiction, an upcoming expiration date, or a suspension or disqualification of a license. WMATA

<sup>6</sup> OIG observed validation processes for a single shift during site visits.

<sup>7</sup> A restriction, listed on a CDL, is placed on a bus driver from operating certain equipment or vehicles.

<sup>8</sup> This process is governed by WMATA's Work Instruction BTRA-BDIV-WRK32-01, Section seven, Jurisdictional Driver's License Monitoring Program – Information Intake Process.

<sup>9</sup> This process is governed by WMATA's Work Instruction BTRA-BDIV-WRK32-01, Section eight, Ongoing Commercial Driver's License Monitoring Process.

personnel monitoring the portals immediately notify division superintendents of any status changes that would prohibit personnel from operating a bus (see Figure 2). The Division superintendents will then place the affected bus operator out of service until the matter is resolved.

**Figure 2: Example of DMV Reporting Communication Chain**

From:

Sent:

To:

Cc:

Subject:

Thursday, March 6, 2025 6:28 PM

BTRA CinderBed CBTR

Fwd: Driver's License Monitoring - CBTR

Please take the appropriate administrative action and provide the operator 72 hours to correct the issue. The operator must provide a certified copy of their MVR.  
Thank you

[Get Outlook for iOS](#)

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From:

Sent:

To:

Cc:

Subject:

Thursday, March 6, 2025 5:18 PM

George

Subject: Driver's License Monitoring - CBTR

Please be advised that the listed employee (s) has been flagged by their respective jurisdiction's DMV for EXPIRED MEDICAL DOT CARD (Medical Cert Letter Undeliverable), **SUSPENDED**, DOWNGRADED, CANCELLED, ELIGIBLE, OR DISQUALIFIED Driver's License and or a CITATION.  
If applicable please remove this employee from service and have them to address the issue IMMEDIATELY.

**CBTR**

Customer Id: R\*\*\*-\*\*\*-  
Customer Id:  
Full Name:   
C Birthdate:

Previous

Current License Status: DRVSUS

Current CDL Status: DRVSUS

- Employee Self-Reporting – WMATA requires that all bus operator's self-report any moving traffic violations received while on or off duty. Examples of moving traffic violations include failure to stop at a red light or stop sign, striking a fixed object or vehicle, making a right turn on red, using a cell phone or electronic device while driving, and failing to yield to a pedestrian in the crosswalk. Bus operators must also self-report when arrested or charged with a criminal or serious traffic offense.

OIG tested self-reporting compliance by sampling DMV/MVA data transmitted through the secured portals for a two-week period. DMV/MVA data for three bus operators indicated status changes to their CDLs that required disclosure to WMATA. Two bus operators'



CDLs were suspended, and one bus operator received a traffic citation in their personal vehicle. In all three instances, Bus management initiated administrative investigations. One employee transferred to a different department within WMATA that did not require a CDL and, therefore, was no longer subject to the reporting requirements. Another bus operator received disciplinary action for failure to properly report moving violations (see Figure 3). The third bus operator's citations flagged in the DMV/MVA data were determined to be non-moving traffic violations and were still under management investigation at the time of this report.

**Figure 3: Example of Discipline for Failure to Properly Report Moving Violations**

**LAST CHANCE AGREEMENT**

**Washington Metropolitan Area Transit Authority**  
 &  
**Amalgamated Transit Union, Local 689**

Re: [REDACTED]

The Washington Metropolitan Area Transit Authority ("WMATA" or "Authority"), Amalgamated Transit Union, Local 689 ("Union" or "Local 689"), and [REDACTED] (Employee No. [REDACTED], collectively ("Parties"), hereby enter into this Last Chance Agreement ("LCA"). The Parties, in the interest of fostering and maintaining sound labor relations have met and agreed to the following:

1. In lieu of immediate termination of Mr. [REDACTED] for his *failure to properly report moving violations and events concerning his CDL including a requirement that he successfully complete a Drivers Improvement Program*, Mr. [REDACTED] agrees to a ten (10) work-day suspension and last chance at employment under the following terms:


- Undercover Onboard Assessments – When operating WMATA vehicles, WMATA mandates that all employees comply with all jurisdictional motor vehicle laws, rules, and regulations, reporting all violations to their immediate manager. WMATA uses undercover on-board assessments to examine adherence to this control, which OIG tested.

OIG tested 221 undercover on-board assessments<sup>10</sup> conducted in calendar year 2023. Of the 221 assessments reviewed, only two instances were found where bus operators made a "safety critical (moving traffic violation) error" while driving a bus in revenue service

<sup>10</sup> Random Onboard Efficiency Ride Assessments are documented in the Operating Performance Reports and are conducted by a Transit Fleet Supervisor in plain clothes or as directed by staff.

(see Figure 4) but where WMATA did not take immediate action. Specifically, one bus operator made a right turn on red, while the other bus operator failed to stop at a stop sign or red light. These traffic violations should have resulted in the immediate removal of the operators from service, a process referred to as a “hold off.”<sup>11</sup> However, both bus operators continued to drive that day and on subsequent days.

**Figure 4: Operator Performance Report Excerpt – Safety Critical Error Observed**

		OPERATING PERFORMANCE REPORT					
Supervisor:	[REDACTED]	Date:	21-Nov-2023	Time:	06:41 PM	Status:	APPROVED
Operator:	[REDACTED]	Payroll:	[REDACTED]	Assessment Type:	Efficiency Ride		
Division:	LANDOVER BUS TRANSPORTATION			Unit #:	708 AM		
Block#:	LG04	Bus#:	7029	Route:	G12	Run#:	253
				Time On:	02:11 PM	Time Off:	03:10 PM
Location On:	New Carrollton Station			Location Off:	Greenbelt Station		
<b>Safety Critical Errors</b>	<input checked="" type="checkbox"/> Failed to stop at red light or stop sign			<input type="checkbox"/> Cell Phone Electronic device usage			
	<input type="checkbox"/> Struck fixed object vehicle			<input type="checkbox"/> Failed to yield to pedestrian in the crosswalk			
	<input type="checkbox"/> Made a right turn on red			<input type="checkbox"/> Failed to secure the bus			
	<input type="checkbox"/> Did not wear seatbelt			<input type="checkbox"/> Accelerated in approach of a yellow light			
Instructions	Operator [REDACTED] was not made aware of the above Deficiencies and was not reminded to continue to operate according to WMATA Standard Operating Procedures (SOP).						

OIG recommends that the GM/CEO:

1. Update WMATA’s application process for all positions requiring a CDL to include a request for employment history information required under 49 CFR 385.35

### Management Response

In response, Human Capital Talent Acquisition will collaborate cross-departmentally to incorporate the 10-year employment history requirement contained in 49 CFR 383.35. Request assistance from Audit & Compliance to conduct an assessment to identify gaps within WMATA's current practices, planned actions under the existing efforts, and the requirements outlined in 49 CFR 383. The findings of this assessment will include clear

<sup>11</sup> Hold off – To postpone or delay a bus operator from driving a bus.

actions and timelines for implementation. The assessment will be completed by **April 1, 2026**.

### OIG Comment

OIG considers management's comments responsive to the recommendation and the corrective actions taken should resolve the issue identified in this report. OIG will follow up on the planned actions during the corrective action plan phase.

2. Require all bus divisions to validate CDL restrictions as part of the daily CDL inspections to ensure compliance with 49 CFR 385.37

### Management Response

The background for this recommendation stems from an OIG site visit during which the depot clerk did not verify that a bus operator with restriction "B" on their CDL was wearing corrective lenses as required per this restriction. In response, Bus Transportation will:

- A. Update and reissue BTRA-BDIV-NTS06, Daily CDL & DOT Card Checks to reiterate the requirement for daily inspections of CDL's to include verification of restrictions, **by November 1, 2025**.
- B. **By April 1, 2026**, assess the feasibility of incorporating business practices that produce records to verify thorough CDL and DOT checks. This may include documented spot checks, and a bus operator check process checklist.

### OIG Comment

OIG considers management's comments responsive to the recommendation and the corrective actions taken should resolve the issue identified in this report. OIG will follow up on the planned actions during the corrective action plan phase.

3. For all departments that maintain positions requiring a CDL:
  - a. Notify all departments of their obligations under 49 CFR 383.
  - b. Determine the extent of controls in place governing compliance with 49 CFR 383 and implement as necessary.

### Management Response

Operations will:

- A. Work cross-departmentally to create and distribute a staff notice delineating departmental obligations under 49 CFR, by **March 1, 2026**.
- B. Request assistance from Audit & Compliance to conduct a comprehensive gap analysis of 49 CFR 383 control requirements and current business practices across applicable departments. Based on the analysis findings, Operations will identify existing controls and document any necessary new controls to support compliance, by **April 1, 2026**.

### OIG Comment

OIG considers management's comments responsive to the recommendation and the corrective actions taken should resolve the issue identified in this report. OIG will follow up on the planned actions during the corrective action plan phase.



### Scope

The scope of the evaluation was limited to three employer requirements identified in 49 CFR 383. 49 CFR 383 includes several requirements related to training, CDL learner's permits, and obligations of state licensing agencies that were not considered as part of this evaluation. The scope included applicable policies and procedures.

### Methodology

To achieve the evaluation objective, OIG conducted the following actions:

- Researched CDL and DOT medical card processes by reviewing WMATA's policies and procedures and examining best practices using prior internal and external reviews and research publications.
- Reviewed applicable sections of the CFR, Title 49, Part 383, Commercial Driver's License Standards; Requirements and Penalties.
- Conducted interviews with WMATA officials, including directors, supervisors, and bus operators in the Department of Bus Services, Office of Bus Transportation. The OIG also met with officials from the Department of People, Culture and Inclusion, Office of Talent Acquisition, as well as Digital Modernization.
- Conducted three site visits to bus divisions to observe CDL and DOT medical card validation processes.
- Conducted tests of Operation Performance Reviews in CY 2023 focusing on bus operator safety critical errors and other infractions.
- Reviewed internal controls over CDL processes involving specific requirements and conducted tests of controls.

### Principles and Standards for Offices of Inspector General (Green Book) Statement

The evaluation was conducted in accordance with the Principles and Standards for Offices of Inspector General, dated July 2024, approved by the Association of Inspectors General.

## M E M O R A N D U M



SUBJECT: Management Response: OIG  
Evaluation of WMATA's Controls  
Over Bus Operator Licensing  
Requirements

DATE: September 8, 2025

FROM: EVP & Chief People Officer – Sherri Dickerson  
EVP & Chief Operating Officer – Leroy Jones  
TO: WMATA Inspector General – Michelle Zamarin

Sherri  
Dickerson

Digitally signed by Sherri  
Dickerson  
Date: 2025.09.08  
15:30:07 -04'00'

Leroy Jones,  
Jr.

Digitally signed by Leroy  
Jones, Jr.  
Date: 2025.09.08  
17:49:30 -04'00'

This memorandum is provided in response to WMATA Office of Inspector General's (OIG) finding and recommendations per the Evaluation of WMATA's Controls Over Bus Operator Licensing Requirements report dated August 13, 2025.

**Finding 1:** While WMATA has generally established effective controls for CDL requirements under 49 CFR 383, with noted observations, it has not complied with the requirement to request a 10-year CDL history from applicants.

**Recommendation 1:** Update WMATA's application process for all positions requiring a CDL to include a request for employment history information required under 49 CFR 383.35

**Response:** In response, Human Capital Talent Acquisition will collaborate cross-departmentally to incorporate the 10-year employment history requirement contained in 49 CFR 383.35. Request assistance from Audit & Compliance to conduct an assessment to identify gaps within WMATA's current practices, planned actions under the existing efforts, and the requirements outlined in 49 CFR 383. The findings of this assessment will include clear actions and timelines for implementation. The assessment will be completed by **April 1, 2026**.

**Recommendation 2:** Require all bus divisions to validate CDL restrictions as part of the daily CDL inspections to ensure compliance with 49 CFR 385.37.

**Response:** The background for this recommendation stems from an OIG site visit during which the depot clerk did not verify that a bus operator with restriction "B" on their CDL was wearing corrective lenses as required per this restriction.

In response, Bus Transportation will:

- A. Update and reissue BTRA-BDIV-NTS06, Daily CDL & DOT Card Checks to reiterate the requirement for daily inspections of CDL's to include

Management Response: Evaluation of WMATA's Controls Over Bus Operator  
Licensing Requirements  
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verification of restrictions, **by November 1, 2025**.

- B. **By April 1, 2026**, assess the feasibility of incorporating business practices that produce records to verify thorough CDL and DOT checks. This may include documented spot checks, and a bus operator check process checklist.

### **Recommendation 3**

For all departments that maintain positions requiring a CDL:

- a) Notify all departments of their obligations under 49 CFR 383.
- b) Determine the extent of controls in place governing compliance with 49 CFR 383 and implement as necessary.

**Response:** Operations will:

- A. Work cross-departmentally to create and distribute a staff notice delineating departmental obligations under 49 CFR, **by March 1, 2026**.
- B. Request assistance from Audit & Compliance to conduct a comprehensive gap analysis of 49 CFR 383 control requirements and current business practices across applicable departments. Based on the analysis findings, Operations will identify existing controls and document any necessary new controls to support compliance, **by April 1, 2026**.

## To Report Fraud, Waste, or Abuse

### Please Contact:

**Email:** [hotline@wmataoig.gov](mailto:hotline@wmataoig.gov)

**Website:** [wmataoig.gov/hotline-form/](http://wmataoig.gov/hotline-form/)

**Telephone:** 1-888-234-2374

**Facsimile:** 1-800-867-0649

**Address:** WMATA  
Office of Inspector General  
Hotline Program  
500 L'Enfant Plaza SW, Suite 800  
Washington, D.C. 20024