



**OFFICE *of* INSPECTOR GENERAL**  
NATIONAL RAILROAD PASSENGER CORPORATION

## **Train Operations:**

The Company Can Improve the Quality of Customer Service to  
Passengers with Disabilities

**OIG-A-2025-009 | July 11, 2025**

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## Memorandum

**To:** Roger Harris  
President

**From:** J.J. Marzullo   
Assistant Inspector General, Audits

**Date:** July 11, 2025

**Subject:** *Train Operations: The Company Can Improve the Quality of Customer Service to Passengers with Disabilities (OIG-A-2025-009)*

According to Census Bureau data, approximately 45 million people in the United States—one in seven—have a disability.<sup>1</sup> Amtrak (the company) is often a preferred mode of travel for them. As a public transportation provider, the company has a statutory requirement to provide equitable service to passengers with disabilities<sup>2</sup> and, to its credit, has committed to continually improving the quality of its customer service.<sup>3</sup> In the years ahead, the importance of this service could grow as the number of Americans over the age of 65—who more commonly need assistance while traveling—is projected to increase.<sup>4</sup>

We have previously reported on the company's efforts to bring its stations into compliance with the Americans with Disabilities Act (ADA).<sup>5</sup> This report focuses on the quality of customer service to passengers with disabilities. Given the company's core public transportation mission, our objective was to assess the company's efforts to provide high-quality customer service to passengers with disabilities.

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<sup>1</sup> U.S. Census Bureau, *2023 American Community Survey 1-Year Estimates*.

<sup>2</sup> The Americans with Disabilities Act of 1990, as amended (42 U.S.C. § 12101 et. seq.).

<sup>3</sup> Amtrak Customer Service Commitments, 10-point pledge, number 5, September 2023.

<sup>4</sup> U.S. Census Bureau, Population Division, *Projected Population by Age Group and Sex for the United States, Main Series: 2022-2100*, November 2023.

<sup>5</sup> *Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals* (OIG-A-2023-012), September 14, 2023; *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* (109-2010), September 29, 2011.

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To assess the company's efforts, we identified five key segments of a train trip—booking, at the station, boarding, on board, and deboarding—and the core aspects of customer service related to each segment. Using this as a guide, we analyzed customer feedback from survey results and individual complaints. We also interviewed representatives from nine disability advocacy groups,<sup>6</sup> as well as officials from the Federal Railroad Administration (FRA) and Department of Justice (DOJ). In addition, we interviewed company officials from the departments involved in providing customer service, including the Accessibility Office, which the company established to drive accessibility-related initiatives. We conducted direct observations at eight stations—both staffed and unstaffed—on four routes,<sup>7</sup> and we tested the booking process on the company's website and mobile application. Additionally, we reviewed applicable laws and company policies. For more information on our scope and methodology, see Appendix A.

## SUMMARY OF RESULTS

The company has ongoing efforts to improve the customer service it provides to passengers with disabilities, but it faces challenges in two key areas:

- **No overarching strategy.** The company does not have an overarching strategy—one that establishes its goals, metrics, roles, and priorities—to universally guide its customer service to passengers with disabilities. Although well intentioned, the company's current improvement initiatives in this area are fragmented between departments and not well-coordinated.
- **Not fully leveraging relevant data.** The company does not have full visibility over the quality of service it provides to passengers with disabilities because it does not regularly analyze key data that could provide insights, such as customer surveys, ridership figures, and internal customer service audits. For the one data source it routinely tracks—accessibility-related complaints—it does so inconsistently. Consistent tracking is essential to comply with federal regulation,

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<sup>6</sup> We interviewed representatives from Access Living, American Council for the Blind, Autistic Self Advocacy Network, Disability Rights Education and Defense Fund, National Association of the Deaf, National Council on Disability, National Council on Independent Living, National Disability Rights Network, and Paralyzed Veterans of America. For our interview questions, see Appendix C.

<sup>7</sup> From a total of 46 routes, we selected 4 routes: *Amtrak Cascades*, *Lake Shore Limited*, *Carolinian*, and *Northeast Regional*. For our site visit selection methodology, see Appendix A. For our site visit tool, see Appendix D.

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which requires the prompt and equitable resolution of covered complaints by these passengers.<sup>8</sup>

Without a strategy informed by relevant data, the company may not be focusing its resources on improvement initiatives with the highest potential impact. Further, it could be exposed to unnecessary financial, reputational, and legal risks from service that does not consistently meet its standards. Given the company's limited visibility over the service it provides to passengers with disabilities, we assessed the customer experience and identified three areas where it has opportunities to improve: (1) interactions with customer-facing employees, (2) communication of essential travel information, and (3) access to onboard amenities.

To enhance the quality of customer service to passengers with disabilities, we recommend that the company develop an overarching strategy and analyze the data necessary to measure its service quality. It should also implement plans and processes to address challenges in the three improvement areas we identified. In commenting on a draft of our report, the company's President agreed with our recommendations and identified actions the company plans to take to address them. For management's complete response, see Appendix E.

## **BACKGROUND**

The stated purpose for the passage of the ADA was to protect people with disabilities from discrimination.<sup>9</sup> It defines a person with a disability as someone who has a physical or mental impairment that substantially limits one or more major life activity.<sup>10</sup> Some disabilities are visible, and some are not.

In December 2020, the company and DOJ entered into a settlement agreement to resolve a potential lawsuit brought under the ADA. In addition to requiring the company to ensure that its stations are readily accessible to and usable by individuals with disabilities, the settlement agreement included key elements related to customer service, including the following examples:

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<sup>8</sup> 49 Code of Federal Regulations (C.F.R.) § 37.17 requires Amtrak to adopt complaint procedures that "incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part and 49 C.F.R. parts 27, 38 and 39."

<sup>9</sup> 42 U.S.C. § 12101(b).

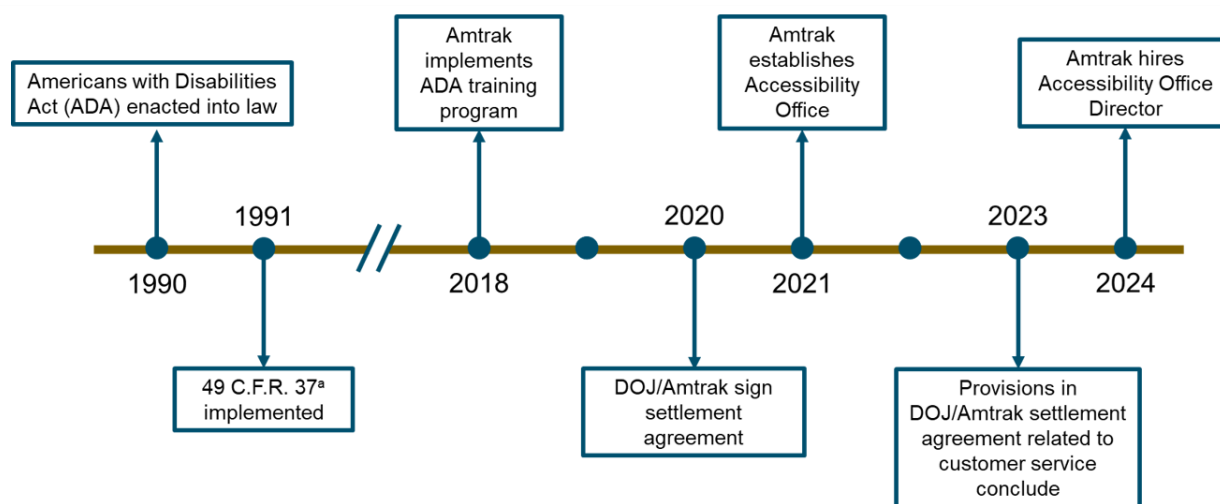
<sup>10</sup> 42 U.S.C. § 12102.

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- assigned responsibility to the Vice President of Accessibility, Stations, and Facilities for coordinating efforts to comply with the agreement, including passenger-related ADA efforts across departments
- required identification and tracking of all ADA-related complaints and established specific time frames for acknowledging receipt of these complaints and responding to them
- authorized the Vice President of Accessibility, Stations, and Facilities to evaluate trends in ADA-related complaints and to recommend systemic changes to remedy them
- established specific time frames to train customer-facing employees to interact with and assist passengers with disabilities<sup>11</sup>

Figure 1 highlights the major milestones in addressing ADA requirements related to the company's customer service.

**Figure 1: Timeline of Major ADA Milestones Related to Customer Service**



Source: Amtrak Office of Inspector General (OIG) analysis of company documents and applicable laws

Note: <sup>a</sup> 49 C.F.R. § 37.17 includes requirements for the prompt and equitable resolution of complaints for passengers with disabilities.

<sup>11</sup> In January 2018, the company implemented an ADA training program for customer-facing employees. The settlement agreement formalized specific time frames for providing that training, but this aspect of the agreement's requirements concluded in December 2023.

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The following groups and departments have responsibilities for providing customer service to passengers with disabilities:

- **The Accessibility Office** reports to the Vice President of Accessibility, Stations, and Facilities, which is responsible for coordinating efforts to comply with the ADA. In collaboration with other departments and company leadership, this office is responsible for driving initiatives, such as applying best practices for accessibility and ensuring equitable access and accommodations.
- **The Law department** reports to the Executive Vice President (EVP) Chief Legal and Human Resources Officer, General Counsel and Corporate Secretary, and is responsible for ensuring ADA compliance.
- **The Sales and Customer Service group** reports to the EVP, Marketing and Chief Commercial Officer, and supports customers with needs such as booking travel, providing general information, and addressing praise and complaints.
- **The Digital and Brand Marketing group** reports to the EVP, Marketing and Chief Commercial Officer, and manages the digital touch-points that customers use to help meet their travel needs, such as the website and mobile application.
- **The Digital Technology and Innovation department** reports to the EVP, Digital Technology and Innovation, and coordinates digital accessibility, including for customer-facing information and communications.
- **The Transportation and Customer Service Stations and Onboard groups** report to the EVP, Service Delivery and Operations, and include the conductors and station personnel who directly engage with customers.
- **The Learning and Development group** reports to the EVP, Chief Legal and Human Resources Officer, General Counsel and Corporate Secretary, and coordinates the ADA training for customer-facing employees.

External stakeholders include DOJ, which monitors the company's compliance with the settlement agreement, and FRA, which has regulatory oversight over relevant operations.

## **NO OVERARCHING STRATEGY TO IMPROVE CUSTOMER SERVICE TO PASSENGERS WITH DISABILITIES**

The company has efforts underway to improve the service it provides to passengers with disabilities, but the company does not have a strategy with clear goals, metrics,

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roles, and priorities to drive them. This is in contrast to the company's ADA stations program, which has an overarching strategy to guide its efforts to bring stations into compliance with the law.

In recent years, the company increased its engagement with disability advocacy groups in response to one of our prior recommendations,<sup>12</sup> giving them additional opportunities to provide feedback to the company on its service. Representatives from about half of the groups we interviewed told us they have good working relationships with the company, and a third stated that its engagement with them has strengthened over time.<sup>13</sup> In addition, six of nine of the groups told us Amtrak is often the preferred mode of travel for passengers with disabilities over airlines. Moreover, the company has targeted initiatives underway to better serve passengers with disabilities, such as installing technology at staffed ticket counters to aid communications with passengers who use assistive listening devices and procuring a wayfinding system to provide navigation assistance.

Nonetheless, we identified the following challenges with coordinating and prioritizing company efforts, and measuring the quality of its service, as management control standards suggest:

- **Inconsistent coordination between departments and the Accessibility Office.** Departments do not consistently involve the Accessibility Office in initiatives that may have an accessibility impact. For example, according to company officials, the Digital Technology and Innovation department modified its mobile application but did not coordinate with the Accessibility Office to consider the needs of passengers who are blind and use screen readers, resulting in some features being inaccessible for these passengers. Multiple members of the Executive Leadership Team told us interdepartmental coordination on accessibility issues needs to improve. They also said the company could better incorporate accessibility elements at the outset of projects.
- **Ad hoc prioritization of accessibility-related initiatives.** The company does not select and prioritize its accessibility initiatives companywide. Instead, according

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<sup>12</sup> OIG-A-2014-010.

<sup>13</sup> We asked nine disability advocacy groups the following question: *"In your opinion, what is working well with how Amtrak engages your organization on matters that impact it?"* Four of the groups stated that they have good working relationships with the company, three said its engagement is much better than it used to be, and five told us the company does well meeting with the disability community.



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to company officials, individual departments decide which to pursue, and they sometimes deprioritize accessibility initiatives to pursue other efforts.

Accessibility Office officials agreed that the company could improve how it prioritizes work and that the company has been more reactive when handling accessibility-related issues, resulting in a backlog of projects for the Accessibility Office.

- **Insufficient measurement of the quality of its customer service.** Although the company has committed to improving its customer service to passengers with disabilities, it does not actively measure the quality of this service or the impact of its improvement efforts.

These challenges exist partly because the company has not implemented a strategy with clear goals, metrics, and priorities to guide its efforts for improving customer service to passengers with disabilities. In addition, although the settlement agreement with DOJ identified the Accessibility Office as responsible for coordinating accessibility-related efforts, the company has not clarified the role of other departments with responsibilities in this area, including how they should coordinate with the Accessibility Office. The company recently filled a new position in the Accessibility Office to improve interdepartmental coordination but has not yet completed the strategic planning steps that common private- and public-sector management standards call for.<sup>14</sup>

Without a clear strategy, the company risks dedicating resources to efforts that do not provide the highest return on its investment. Further, without clear roles and responsibilities, efforts that cross multiple departments often break down, resulting in initiatives that do not fully consider the needs of passengers with disabilities. These breakdowns can cause the company to retroactively incorporate accessibility features, which can increase costs and delay service improvements.

## **THE COMPANY DOES NOT FULLY CAPTURE OR LEVERAGE RELEVANT DATA**

The company does not have full visibility over the quality of service it provides to passengers with disabilities because the Accessibility Office does not (1) track all

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<sup>14</sup> Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control-Integrated Framework*, May 2013; Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014.

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accessibility-related complaints and (2) leverage other key data that could inform its efforts.

## **Company Not Capturing All Accessibility Complaints**

The Accessibility Office tracks some—but not all—accessibility-related customer complaints and their resolutions, limiting its ability to derive insights from these data, which is contrary to management control standards.<sup>15</sup> Moreover, doing so is essential to complying with federal regulation, which requires resolution of all covered complaints by passengers with disabilities.<sup>16</sup>

Customer service agents categorize complaints they receive as ADA-related in the company's case management system. The Accessibility Office manually collects complaints from this system as well as complaints that company departments or external sources forward to it. It compiles these in a spreadsheet used for reporting to DOJ every six months. This reporting, however, does not include all relevant complaints and resolutions, and does not consistently capture the timing of these resolutions, for the following reasons:

- **The case management system does not capture all complaints.** Customers use at least 14 different methods for providing feedback to the company on the service they experience. One common method is by emailing or calling the Sales and Customer Service group. Another method is by responding to the Customer Satisfaction Index (CSI) survey, which in some years has included accessibility-related questions. Complaints may also come through external sources, such as

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<sup>15</sup> Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control-Integrated Framework*, May 2013; Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014.

<sup>16</sup> 49 C.F.R. § 37.17. This federal regulation requires Amtrak to adopt complaint procedures that “incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part and 49 C.F.R. parts 27, 38 and 39.” The procedures shall meet additional requirements, including that the company “must promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant and must ensure that it has documented its response.”

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FRA and U.S. Access Board. The company's case management system, however, does not contain all complaints from all 14 sources.<sup>17</sup>

- **The Accessibility Office does not capture all complaints from the case management system.** We reviewed approximately 30 percent of interactions that made it into the company's case management system from May through October 2023. From this we identified 708 accessibility-related complaints.<sup>18</sup> However, the Accessibility Office's spreadsheet—and, therefore, its reporting to DOJ—did not include 490 (69 percent) of these, as Figure 2 shows.

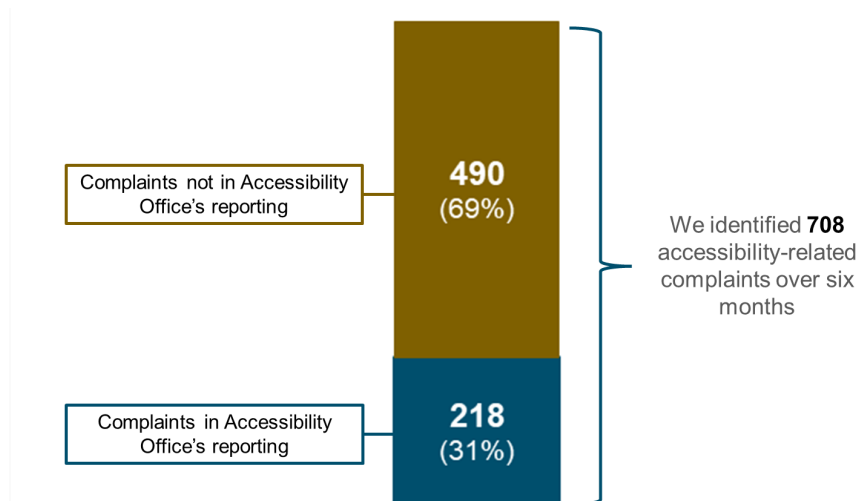
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<sup>17</sup> Customers may provide the company feedback through the Amtrak Police Department's customer safety and security surveys, the Board of Directors, employee helpline, the contact center, CSI surveys, social media, or direct communication with company employees. Our office also receives complaints, which we respond to as appropriate. Feedback may also come through external sources such as FRA, DOJ, U.S. Access Board, Freedom of Information Act requests, or members of Congress.

<sup>18</sup> To identify and analyze accessibility-related praise and complaints, we reviewed the company's Salesforce case management system for reported interactions with customers that took place from May 1, 2023, through October 31, 2023. From a total of 144,190 reported interactions, the system included 396 classified as ADA-related. From these, we excluded 16 that were not in our scope, resulting in 380 accessibility-related interactions. We then did a keyword search on a nongeneralizable sample of 43,257 of the remaining 143,794 interactions (30 percent) resulting in an additional 378 accessibility-related interactions. In total, we identified 758 accessibility-related interactions—708 of which had complaints. Because our sample was nongeneralizable, we did not project its results to the entire population of interactions from which we selected our sample.

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**Figure 2: Gaps in Accessibility-related Complaint Reporting**



Source: OIG analysis of company data from May 1, 2023 through October 31, 2023

- The Accessibility Office does not consistently track complaint resolutions.** Federal regulation requires the company to promptly and equitably resolve covered complaints by passengers with disabilities and document its resolutions.<sup>19</sup> To review the company's handling of complaints, Accessibility Office staff manually review each one to determine how the customer service team responded to each passenger. We found, however, that the office is not tracking resolutions for complaints that are not captured in its spreadsheet, and for those included, the resolution fields were blank for some complaints, leaving their ultimate disposition unclear. Moreover, even when the office closes complaints, it does not track the dates and therefore does not know how long they take to resolve.

These challenges exist because of weaknesses in the company's process for capturing and tracking accessibility-related complaints and resolutions. Complicating its tracking, the company has not defined how promptly it should resolve complaints and therefore has no basis to assess its efforts. As a result, it is missing an opportunity to use its complaint data to identify customer needs and the appropriate improvement efforts. Additionally, not being able to determine whether complaints were resolved promptly

<sup>19</sup> Each public or private entity that is subject to the regulation must "promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant and must ensure that it has documented its response." 49 C.F.R. § 37.17.

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and equitably puts the company's compliance with federal regulation at risk. More broadly, prompt resolution of complaints of any kind—whether accessibility-related or not—is a key component of providing high-quality customer service.

## **Not Leveraging Other Data Sources that Could Provide Greater Visibility Over Service**

In addition to not having complete complaint data to inform improvement efforts, the company does not regularly collect and analyze accessibility-related information from other sources of customer data, as management control standards suggest.<sup>20</sup> Additional data sources that the company could leverage include the following:

- **CSI survey data** could help it understand various aspects of the customer experience for passengers with disabilities.<sup>21</sup> During fiscal year (FY) 2023, the CSI survey included questions about accessibility-related assistance, but the company removed these questions after one year, and the Accessibility Office had not reviewed the results until after we started our audit.<sup>22</sup> In August 2024, the company added a different set of optional accessibility-related questions to the survey but had not analyzed these results as of October 2024, according to a company official. Appendix B summarizes both sets of these questions.
- **Ridership data** could help it understand travel trends for passengers with disabilities.
- **Internal customer service audits** could help it identify station- or route-specific challenges, such as train crews or station agents who fail to provide required audio announcements.
- **Passenger injury claims data** could help it understand how accessibility challenges can result in injuries.

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<sup>20</sup> Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control-Integrated Framework*, May 2013; Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014.

<sup>21</sup> We reviewed limited CSI survey data, including text analytics on open-ended response data from calendar years 2020 through 2023, and responses to accessibility-specific questions that were in place only during fiscal year 2023.

<sup>22</sup> An official from the Digital and Brand Marketing group told us passengers do not identify themselves as having a disability in the CSI survey; therefore, the results will not readily show whether the individual who completed the survey was a passenger with a disability.

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- **Voucher and refund data** could help it identify accessibility complaints that resulted in refunds.

The company is not leveraging these data and information partly because the Accessibility Office has not worked with relevant departments to track and analyze these sources. Without doing so, the company may not have an accurate view of conditions that could inform a strategy and priorities. Further, it may miss opportunities to (1) understand travel trends and safety risks that passengers with disabilities face, and (2) undertake efforts to better serve and protect them. Conversely, using these data and information could help provide such insights and help identify opportunities to reduce costs and reputational risk by avoiding the circumstances that led to service issues, injury claims, vouchers, and refunds.

## THE COMPANY HAS OPPORTUNITIES TO IMPROVE SERVICE TO PASSENGERS WITH DISABILITIES IN THREE KEY AREAS

Given that the company does not have full visibility over the quality of service it provides to passengers with disabilities, we assessed various aspects of the customer experience to identify potential areas for improvement. To do so, we organized the trip lifecycle into five segments, as Figure 3 shows.

**Figure 3: Trip Lifecycle**



*Source:* OIG analysis of company documents and U.S. Department of Transportation reports

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Based on our analysis of customer complaint and CSI survey data,<sup>23</sup> interviews with representatives from nine disability advocacy groups and company officials, and observations at select stations and routes,<sup>24</sup> we identified three key areas where the company can improve its service to passengers with disabilities: (1) interactions with customer-facing employees, (2) communication of essential travel information, and (3) access to onboard amenities.

## Interactions with Customer-facing Employees

The company has committed to improving its service to passengers with disabilities<sup>25</sup> and has policies in place for employee interactions with them.<sup>26</sup> These passengers, however, have mixed experiences interacting with customer-facing employees throughout the trip lifecycle.

The FY 2023 CSI survey results showed that customers' average satisfaction with the assistance and accommodations they received for an accessible travel experience ranged from 6.8 out of 10 on the Acela business line to 5.8 out of 10 on the long distance business line.<sup>27</sup> Our review of a sample of customer complaints highlights a particular challenge in this area: 273 of 708 accessibility-related complaints (39 percent) were related to poor assistance at stations

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**39 percent of** reviewed accessibility-related complaints were about poor assistance at stations and with boarding and deboarding

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<sup>23</sup> We reviewed limited CSI survey data, including text analytics on open-ended responses from January 1, 2020, through December 31, 2023, and responses to accessibility-specific questions from FY 2023.

<sup>24</sup> From a total of 46 routes, we initially selected 3 routes. We later included a route from the company's highest revenue business line, the Northeast Corridor. For our site visit selection methodology, see Appendix A. For our site visit tool, see Appendix D.

<sup>25</sup> Amtrak Customer Service Commitments, 10-point pledge, number 5, September 2023.

<sup>26</sup> Amtrak, *Service Standards Train Service & Onboard Service Employees*, April 2024; Amtrak, *The Code of Ethics and Standards for Behavior*, October 2020; Amtrak, *Assisting Passengers with Disabilities*, February 2019.

<sup>27</sup> For the scale provided for each question, 0 is "not at all satisfied," and 10 is "extremely satisfied." Although these results do not state whether the individual who completed the survey was a passenger with a disability, we consider these responses to be relevant because of the nature of the questions and the survey section title—"accessible travel experience for customers with disabilities"—indicating that the intent was to solicit feedback from passengers with disabilities. As we noted above, the company asked these questions related to accessibility only in FY 2023. For the list of questions asked to each respondent, see Appendix B.

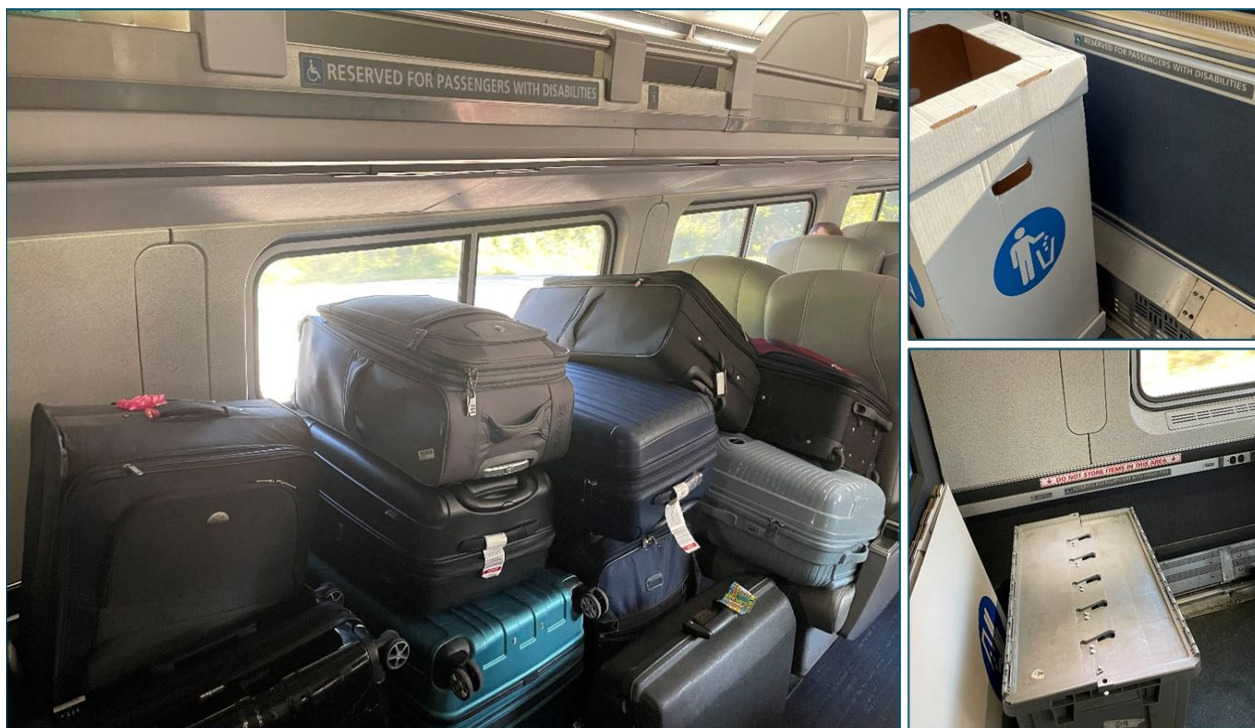


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and with boarding and deboarding, and 155 of these complaints (22 percent) were related to insensitive staff interactions. Representatives from all nine of the advocacy groups we spoke with also told us that customer-facing employees could improve their service.

Additionally, we observed—and internal customer service audits in FYs 2023 and 2024 confirmed—that onboard employees were not consistently enforcing policies<sup>28</sup> that can directly impact passengers with disabilities, such as keeping accessible seating areas clear of luggage and other items. For example, on each of the four routes we rode, we observed seating areas designated as accessible that were used for storage, as Figure 4 shows.

**Figure 4. Examples of Blocked Accessible Seating Areas**



Source: OIG, August, September, and November 2024

Customer feedback shows that passengers with disabilities have both positive and negative experiences with customer-facing employees; however, when negative interactions or service occur, they not only impact individual passengers, but risk

<sup>28</sup> Amtrak, *Service Standards Train Service & Onboard Service Employees*, April 2024.



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widespread reputational harm. For example, a representative from one advocacy group told us about an incident when a conductor left a passenger who was blind on a train at the last stop after the train was empty.

The service that employees provide could be negative for reasons outside the scope of our review; nonetheless, we found that service challenges occur partly because the company has not formalized a process to ensure that customer-facing employees and their supervisors are properly trained to assist passengers with disabilities.<sup>29</sup> In the most recent 2-year training cycle, the company reported that 512 of its 5,732 customer-facing employees (9 percent) did not complete the required training.<sup>30</sup> Federal regulation requires *all* customer-facing employees to be trained to properly assist and treat passengers with disabilities in a respectful and courteous way,<sup>31</sup> and multiple members of the Executive Leadership Team told us accessibility training is essential for ensuring consistent high-quality service.

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**9 percent of** customer-facing employees did not complete required accessibility training for calendar years 2022 through 2023

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Gaps in training persist, however, because the company has not clarified responsibility for enforcing this requirement. Officials told us that multiple groups and departments share responsibility, including the Accessibility Office, the Learning and Development group in Human Resources, and the Transportation and Customer Service Stations and Onboard groups. In addition, in December 2023, training requirements from the company's settlement agreement with DOJ concluded, but the company has not since formalized which employees and supervisors should be trained.

## Communication of Essential Travel Information

The challenges that passengers with disabilities experience while traveling can be exacerbated by insufficient information throughout the trip lifecycle. The company has

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<sup>29</sup> In 2018, the company contracted with a vendor to provide accessibility training for its customer-facing employees and implemented specific timeline requirements as part of its settlement agreement with DOJ in 2020. These requirements concluded in December 2023, however, and officials told us the company does not have any other documented policy or operating procedures for its accessibility training.

<sup>30</sup> This training cycle spanned calendar years 2022 through 2023.

<sup>31</sup> 49 C.F.R. § 37.173 requires the company to ensure that personnel are trained to proficiency, as appropriate to their duties, so they properly assist and treat passengers with disabilities in a respectful and courteous way, with appropriate attention to the difference among passengers with disabilities.

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ongoing efforts to improve its customer communications but has opportunities to more consistently communicate (1) accessibility information during the booking process and (2) essential travel information at stations and on trains.

**Communication during the booking process.** During the booking process, passengers with disabilities often take proactive steps to ensure that the company can accommodate their needs, making communications at this stage vital for their overall experience. In the FY 2023 CSI survey results, however, customers' ease of contacting Customer Service to request assistance for their trip ranged from 6.7 out of 10 on the state-supported and *Northeast Regional* lines to 6.0 out of 10 on the long distance line. Multiple members of the Executive Leadership Team told us the company could better communicate during the booking process about the assistance and services available, and the company has committed to improving in this area,<sup>32</sup> as management control standards suggest.<sup>33</sup>

We assessed the company's online booking process and identified the following potential areas for improvement:<sup>34</sup>

- *Passengers cannot always request in-station assistance.* When we booked trips online between a station that offered assistance and one that did not, we could not request assistance at either station.<sup>35</sup> Officials in the Accessibility Office were not aware of this issue until we told them and agreed that this could impact the many passengers who seek to request in-station assistance. A Digital and Brand Marketing official told us the company designed its online booking process to prohibit this option, and passengers must call Customer Service to request in-station assistance. The website and mobile application, however, do not

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<sup>32</sup> Amtrak Customer Service Commitments, 10-point pledge, number 5, September 2023.

<sup>33</sup> Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control-Integrated Framework*, May 2013; Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014.

<sup>34</sup> We documented and analyzed the process of booking eight separate trips for passengers with disabilities using the routes and stations where we conducted direct observations. For each category of disability assistance (blind or vision loss, deaf or hearing loss, reduced mobility, and other accessibility needs), we tested booking on the website and on its mobile application from the start of booking through the payment confirmation. We did not test the booking process through phone reservations or ticket agents or accessible kiosks at stations.

<sup>35</sup> As of October 21, 2024, a total of 340 stations were unstaffed and were therefore unable to provide in-station assistance, compared to 181 stations that were staffed.

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inform passengers while they are booking that they must call to request assistance.<sup>36</sup>

- *Station-specific information is limited.* For the online booking process, the company's website provides links to station-specific information about accessibility, such as whether the platform would be accessible. Links to this information, however, are not easily located during the website booking process and are not provided at all during the mobile application booking process. There was also no information about temporary facility changes that could impact passengers. For example, when we visited the Quantico, Virginia station, the regular pedestrian pathways were closed; instead, passengers needed to navigate through a construction area and cross live tracks to enter or exit the platform, potentially posing safety risks. The company, however, did not provide information about the closure during the booking process or at any point prior to boarding.
- *Majority of accessibility information is hard to find.* Although some information about accessible seating and requesting assistance was easy to find, most information—including everything related to in-station assistance, food service assistance, and restroom accessibility—could be found only by clicking small buttons or links that could be hard to locate.<sup>37</sup> For example, on the mobile application, the primary link to more information about accessible travel appeared similar to other headers and could be difficult to interpret as a link.<sup>38</sup>

**Audio and visual messaging throughout the trip.** The communication of essential travel information—such as train status while in stations and onboard trains—is another key component of customer service for passengers with disabilities, as it is for all passengers. We observed, however, that the quality and clarity of audio and visual messaging, including Passenger Information Display Systems (PIDS), varied widely across stations. Some stations had no visual display accompanying audio announcements or vice versa, as Figure 5 shows. Other stations had no audio or visual

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<sup>36</sup> In June 2025, company management told us it plans to update its digital channels to improve messaging and enhance its process for requesting assistance.

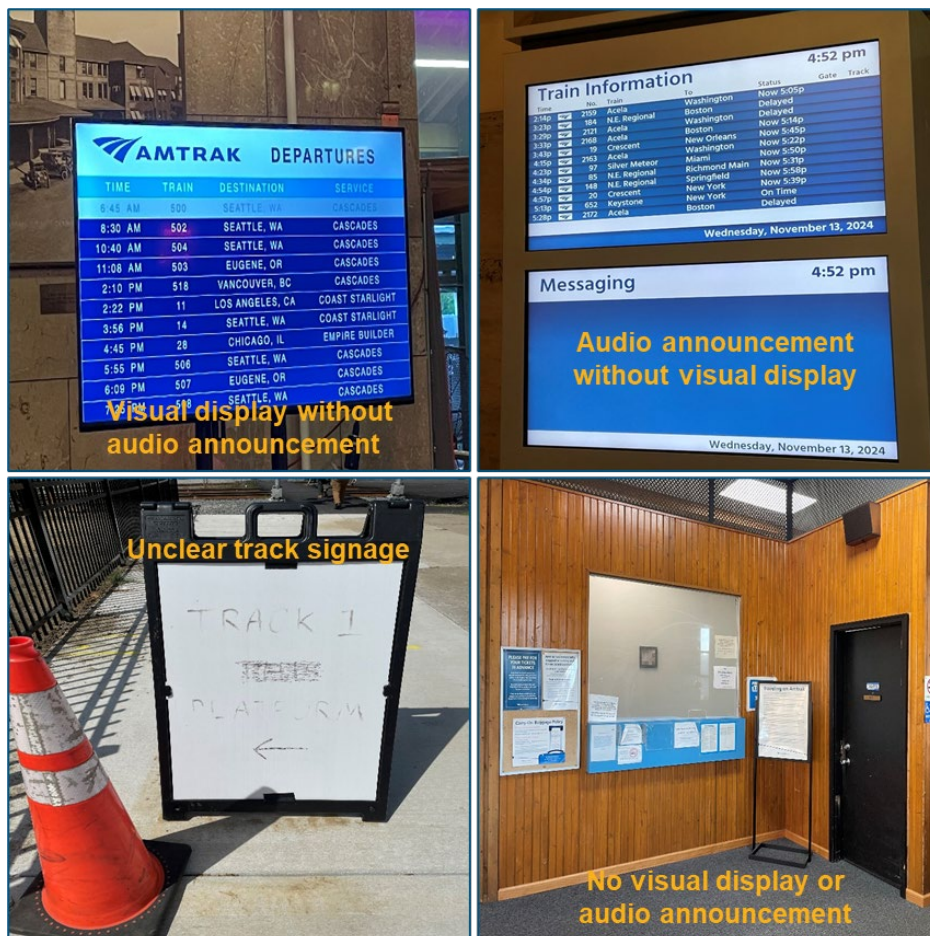
<sup>37</sup> In June 2025, company management told us it plans to update its digital booking channels to be more accessible and intuitive.

<sup>38</sup> Web content accessibility guidelines state that websites should provide ways to help users navigate and find content. See World Wide Web Consortium (W3C), *Web Content Accessibility Guidelines*, December 2024.

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communications at all. Multiple members of the Executive Leadership Team told us the company could improve the quality of information communicated in-station through PIDS announcements.

**Figure 5: Examples of Varied Messaging at Stations**



Source: OIG, August, September, and November 2024

On board, we observed—and internal customer service audits in FY 2023 confirmed—that audio announcements were sometimes difficult to hear and varied in frequency and content. Additionally, on three of the four routes we rode, we observed poor digital communication about our train status. For example, our north-bound train from Manassas, Virginia, was changed on the day of travel to originate in Washington, D.C.—about 30 miles away. The messages we received through texts and the mobile application did not match each other. We only received confirmation that we could not board in Manassas by directly contacting Customer Service and had to arrange our own

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transportation to Washington, D.C. Although these challenges impact all passengers, they can be particularly challenging for passengers with disabilities.

Providing clear communications can be difficult for reasons outside the scope of our review, and we are planning additional audit work in this area. Nevertheless, challenges persist partly because the company has not established a process to ensure that it consistently considers passengers with disabilities in its broader efforts to improve customer communications of essential information. As a result, the company does not always consider accessibility in its digital projects during the planning stages; therefore, some projects require updates after launch, according to officials. Without better communications, passengers with disabilities may continue to have inconsistent access to information necessary for a successful trip.

## **Access to Onboard Amenities**

Passengers with disabilities do not always have access to all onboard amenities, particularly food service, which is inconsistent with the company's goals,<sup>39</sup> policies,<sup>40</sup> and customer service commitments.<sup>41</sup>

Representatives from seven of the nine advocacy groups we spoke with told us that access to food services could be improved. Many of these representatives stated, for example, that passengers using mobility devices may not be able to access café or diner cars, and we observed that passengers often must travel through one or more cars to reach the food service, which can be a barrier. Company officials agreed that passengers with disabilities cannot always reach onboard amenities and therefore may not have the same customer experience as others. Given this limited access, employees are required to offer at-seat food service to these customers.<sup>42</sup> In practice, however, this does not always happen, according to Accessibility Office officials.

The company has plans to improve access to amenities on three new fleets of trains it is procuring.<sup>43</sup> Its NextGen Acela fleet is scheduled to enter service in 2025, and its Airo

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<sup>39</sup> The Strategic Blueprint outlines these goals and other initiatives, some of which relate to customer service. See Amtrak, *Strategic Blueprint FY 2024 – FY 2028*, September 2023.

<sup>40</sup> Amtrak, *Service Standards Train Service & Onboard Service Employees*, April 2024.

<sup>41</sup> Amtrak Customer Service Commitments, 10-point pledge, number 5, September 2023.

<sup>42</sup> Amtrak, *Service Standards Train Service & Onboard Service Employees*, April 2024.

<sup>43</sup> *Major Programs: Company Established a Management Framework for Long Distance Fleet Replacement Program but Can Improve Risk Management and Clarify Lines of Authority* (OIG-A-2025-001), December 13, 2024.

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fleet is scheduled to enter service in 2026, but its new long distance fleet may not enter service until the 2030s. In the meantime, access to onboard amenities such as food service remains limited because the company has not fully assessed the costs and benefits of improvement options on its current trainsets. Options could include incorporating digital technology, such as allowing passengers to order food on the mobile application or instituting other methods like food carts.

FRA officials agreed that the company has opportunities to incorporate digital technology into its food service; other passenger railroads, such as Brightline in Florida and VIA Rail in Canada, have adopted similar features. The Vice President of Accessibility, Stations, and Facilities told us company officials have discussed incorporating mobile ordering or deploying food carts on board, but these discussions were in the early stages.<sup>44</sup>

### **Inconsistent Service for Passengers with Disabilities Could Pose Legal, Financial, and Reputational Risks**

As a result of inconsistent interactions with customer-facing employees, communication of travel information, and access to onboard amenities, the company sometimes misses opportunities to provide high-quality service to passengers with disabilities. Accordingly, it could also face the following risks:

**Legal and financial risks.** Inconsistent service to passengers with disabilities can expose the company to legal and financial risks. For example, as part of the December 2020 settlement agreement with DOJ, the company was required to establish a compensation fund of \$2.25 million to be paid to eligible victims hurt by inaccessibility at select stations. In 2022, DOJ reported that the company paid more than \$2 million from this fund to more than 1,500 individuals who experienced disability discrimination from inaccessible rail stations. The company has also paid injury claims and other non-injury settlements and has issued refunds and vouchers as part of resolving complaints. Alternatively, if the company can improve the service it provides, it would not only uphold its commitments to passengers with disabilities but could also help grow passenger ridership and generate additional revenue.

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<sup>44</sup> In addition, passengers with disabilities do not always have access to restrooms onboard trains. Representatives from six of the nine advocacy groups told us it is difficult or impossible for some passengers to access parts of the train, including the restrooms. Given the ongoing efforts to improve access to restrooms for its future trainset designs, we are not making a recommendation in this area.

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**Reputational risks.** In the past, the company has received negative public attention for poor customer service to passengers with disabilities. In one instance, for example, it attempted to charge two passengers using wheelchairs \$25,000 for their seats. In another instance, a passenger with multiple sclerosis alleged that she was denied boarding for two days because employees initially would not take her bags onto the train and then tried to charge extra for her service animal, powerchair, and additional seat. We previously reported that such negative public attention can result in damage to the brand, a loss of public confidence, reduced market share, and a decrease in ridership and revenue.<sup>45</sup> Continuing to improve customer service to passengers with disabilities can reduce these risks.

## CONCLUSIONS

The company has made efforts to improve the quality of its service to passengers with disabilities. Nonetheless, a continued coordinated focus on these efforts will be essential to its plan to increase ridership. Developing a strategy with goals and priorities, strengthening its process for tracking complaints and resolutions, and leveraging other relevant data sources to provide visibility over the quality of customer service it provides to passengers with disabilities would help make the most effective use of its resources. Further, training all customer-facing employees, consistently communicating essential travel information, and providing equal access to onboard amenities will improve the experience for passengers with disabilities and ultimately benefit all passengers.

## RECOMMENDATIONS

We recommend that the company President—in consultation with the Vice President of Accessibility, Stations, and Facilities—and in coordination with other relevant departments as necessary, take the following actions:

1. Develop, document, and implement a strategy with clear goals, metrics, and priorities to guide efforts for improving customer service to passengers with disabilities. This strategy should also clarify roles and responsibilities, including how the relevant departments should coordinate on accessibility issues.

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<sup>45</sup> *Governance: Better Adherence to Leading Practices for Ethics Programs Could Reduce Company Risks* (OIG-A-2017-012), June 26, 2017.

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2. Strengthen and document a process for collecting, tracking, and resolving all accessibility-related complaints—including defining timelines for resolving them—in accordance with federal regulation.
3. Begin tracking and using other relevant data sources to improve visibility over the quality of the company's customer service to passengers with disabilities and to inform the strategy it develops.
4. Formalize a process to regularly train all customer-facing employees and supervisors on interacting with passengers with disabilities in accordance with federal regulation. This should include clarifying the responsibility for enforcing this requirement and which employees and supervisors should receive training.
5. Establish and document a process to ensure that the company fully considers passengers with disabilities in any efforts to improve the communication of essential travel information.
6. Assess the costs and benefits of options to improve access to onboard amenities, such as food service, for passengers with disabilities. Based on this analysis, develop a proposal of any potential improvement options and submit it to the Executive Leadership Team for consideration.

## **MANAGEMENT COMMENTS AND OIG ANALYSIS**

In commenting on a draft of this report, the company's President agreed with our recommendations and identified actions the company plans to take to address them, which we have summarized below:

- **Recommendation 1:** Management agreed with our recommendation to develop, document, and implement a strategy with clear goals, metrics, and priorities that also clarifies roles and responsibilities for coordinating in order to guide efforts for improving customer service to passengers with disabilities. Management stated that the company has already taken the initiative in developing a strategic framework and will work with leadership across the company towards a final strategic plan. The target completion date is March 31, 2026.
- **Recommendation 2:** Management agreed with our recommendation to strengthen and document a process for collecting, tracking, and resolving all accessibility-related complaints—including defining timelines for resolving



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them—in accordance with federal regulation. Management stated that the company will strengthen and document current processes, including resolution timelines, and will develop and implement a new workflow within its case management system to more efficiently collect, track, and resolve accessibility-related complaints. The target completion date is September 30, 2026.

Management also stated that it agrees that there is a potential for complaints to be missed, but it disagrees that a significant number of complaints were not tracked. This was based on a May 2025 test sample of 27 complaints the company reviewed. We note, however, that we analyzed 43,257 interactions in the company's case management system (30 percent) from May to October 2023. To ensure that we did not overcount, we individually reviewed every identified complaint and excluded any that were not accessibility-related. Based on this, we identified 708 accessibility-related complaints, of which 490 (69 percent) did not appear in the Accessibility Office's spreadsheet. Thus, we continue to believe that the Accessibility Office tracks some—but not all—accessibility-related customer complaints and their resolutions, limiting its ability to derive insights from these data.

- **Recommendation 3:** Management agreed with our recommendation to begin tracking and using other relevant data sources to improve visibility over the quality of the company's customer service to passengers with disabilities and to inform the strategy it develops. Management stated that the company will gather quantitative and qualitative feedback from customers, conduct training, and track assistance requests. These would be positive steps. Tracking and analyzing other sources of customer data noted in our report—including ridership data, internal customer service audits, passenger injury claims data, and voucher and refund data—would strengthen its efforts. The target completion date is May 31, 2026.
- **Recommendation 4:** Management agreed with our recommendation to formalize a process to regularly train all customer-facing employees and supervisors on interacting with passengers with disabilities in accordance with federal regulation and to clarify responsibility for enforcing this requirement. Management stated that the Training and Development team, in partnership with the Accessibility Office and operational leaders, will implement a process for ADA training that clarifies roles and responsibilities for delivering, tracking,

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and enforcing training for all customer-facing employees. The target completion date is January 30, 2026.

- **Recommendation 5:** Management agreed with our recommendation to establish and document a process to ensure that the company fully considers passengers with disabilities in any efforts to improve the communication of essential travel information. Management stated that the company will review its current processes for opportunities to establish and document improvements, which could include upgrading tools, training staff, and creating a process around best practices for passengers with disabilities. The target completion date is March 31, 2026.
- **Recommendation 6:** Management agreed with our recommendation to assess the costs and benefits of options to improve access to onboard amenities, such as food service, for passengers with disabilities. Management stated that the company will complete an assessment of options to improve access and present a proposal to the Executive Leadership Team for consideration and direction. The target completion date is May 31, 2026.

For management's complete response, see Appendix E. Management also provided technical comments that we have incorporated in this report as appropriate.

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## **APPENDIX A**

### **Objective, Scope, and Methodology**

This report provides the results of our audit of Amtrak’s customer service to passengers with disabilities. Our objective was to assess the company’s efforts to provide high-quality customer service to passengers with disabilities. Our scope included its policies, procedures, and practices for interacting with passengers with disabilities<sup>46</sup> throughout all segments of the trip lifecycle and across various departments. Our scope for relevant data—including praise and complaints, customer satisfaction, claims, and ridership data—was from calendar years 2020 through 2023. We excluded the ADA Stations Program from our scope. We conducted our work from February 2024 through July 2025 in Chicago, Illinois; Elkhart, Indiana; Manassas, Virginia; Olympia, Washington; Philadelphia, Pennsylvania; Portland, Oregon; Quantico, Virginia; and Washington, D.C.

To understand the company’s efforts to provide high-quality customer service to passengers with disabilities, we identified five key segments in the lifecycle of a train trip. We also analyzed customer praise and complaint and CSI survey data, conducted direct observations at stations and along routes, reviewed customer-facing employee accessibility training, and tested the booking process for passengers with disabilities on its website and mobile application. We also interviewed representatives from nine disability advocacy groups, other external stakeholders, and knowledgeable company officials, including the executive leadership team.

**Analysis of customer complaint data.** To assess the company’s use and reporting of accessibility-related customer praises and complaints, we used its Salesforce case management system to generate a report of all customer interactions, including praise and complaints, from May 1, 2023, through October 31, 2023. From a total of 144,190 reported interactions during that period, the system included 396 classified as ADA-related. We found that 16 were not in scope and removed them from our analysis, resulting in a total of 380 accessibility-related interactions.

To independently identify relevant customer praise and complaints, we did a keyword search on a nongeneralizable sample of the first 43,257 of the remaining 143,794 interactions (30 percent) which included interactions from all 6 months of that period.

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<sup>46</sup> Our scope focused on passengers with disabilities; we did not include employees with disabilities.

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Our keyword search resulted in an additional 378 accessibility-related interactions. In total, we identified 758 accessibility-related interactions, 708 of which included complaints. We developed our list of keywords based on interviews with representatives from disability advocacy groups. We also used four sources published by public- and private-sector organizations, including two from universities, as well as the U.S. Department of Transportation's Airline Passengers with Disabilities Bill of Rights. To mitigate limitations of a keyword search—such as identifying false positives—we included various spellings of words and then individually reviewed all praise and complaints that the search identified and excluded any that were not accessibility-related. Because our sample was nongeneralizable, we did not project its results to the entire population of interactions from which we selected our sample.

**Analysis of CSI survey data.** We reviewed limited CSI survey data from the company to identify feedback related to accessibility, including the following:

- text analytics data on all open-ended CSI survey responses from January 1, 2020, through December 31, 2023 (A partner to the company produced these text analytics. The analytics assigned responses to various topics, some of which related to accessibility, and designated some responses as positive or negative.)
- responses to accessibility-specific questions that the company asked only during FY 2023

**Direct observations.** To directly observe the company's customer service to passengers with disabilities and validate our other analysis, we conducted site visits at eight stations—both staffed and unstaffed—on four routes from August 27, 2024, through November 13, 2024. We determined which routes and stations to visit based on the following sample selection methodology:

- **Train routes.** To identify which train routes to visit, we considered (1) the quality of onboard assistance for customers with disabilities by route, based on FY 2023 CSI survey ratings, (2) the number of passengers with disabilities per route, based on FY 2023 ridership data, and (3) geographic and logistics considerations. From a total of 46 routes, we initially selected 3 based on this methodology. We selected one route with a below average CSI rating and an average number of passengers with disabilities. We also selected one route with an average CSI rating and an average number of passengers with disabilities. Finally, we selected one route with an above-average CSI rating and an above-average

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number of passengers with disabilities. We later included a route from the company's highest revenue business line, the Northeast Corridor.

- **Stations.** We selected two stations along each route at which to board and alight based on the following criteria:
  - *Staffed or unstaffed, as of July 2024.* We selected two stations on each route; one was staffed, and the other was unstaffed.
  - *Responsibility for ADA compliance, as of July 2024.* We ensured that for both selected stations on each route, the company had ADA responsibility for the platform, the station building, or both.
  - *Number of passengers with disabilities, based on FY 2023 ridership.* We selected stations that had a relatively high number of passengers with disabilities compared to others on the selected route.

We then developed a tool to guide our observations during site visits. This tool allowed us to collect consistent information and illustrative examples of what worked well and what could be improved throughout the trip lifecycle. During our site visits, we surveyed the departure station, boarded the train, rode the train, surveyed while onboard the train, deboarded the train, and surveyed the destination station. We observed visual and audio communications at stations and onboard trains; access to amenities such as boarding assistance, accessible seating, food service, and availability of employees; and employee interactions with customers. Because our sample was nongeneralizable, we did not project its results to the entire population of routes from which we selected our sample.

For a list of the routes and stations we visited, see Table 1. For a more detailed site visit methodology, see Appendix D.

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**Table 1. Routes and Stations Visited for Observations**

<b>Train Route</b>	<b>FY 2023 CSI Onboard Assistance Rating</b>	<b>FY 2023 Ridership by Route for Passengers with Disabilities <sup>a</sup></b>
<b><i>Amtrak Cascades</i></b>	7.15	6,860
<b><i>Carolinian/Piedmont</i></b>	7.84	13,671
<b><i>Lake Shore Limited</i></b>	6.18	7,351
<b><i>Northeast Regional</i></b>	7.24	41,380

<b>Station</b>	<b>Route</b>	<b>FY 2023 Ridership by Station for Passengers with Disabilities</b>	<b>Staffing</b>	<b>ADA Responsibility</b>
Olympia-Lacey, WA	<i>Amtrak Cascades</i>	963	Unstaffed	Platform
Portland, OR	<i>Amtrak Cascades</i>	7,013	Staffed	Station
Quantico, VA	<i>Carolinian/Piedmont</i>	246	Unstaffed	Station & Platform
Washington Union Station	<i>Carolinian/Piedmont</i>	39,641	Staffed	Station & Platform
Chicago Union Station	<i>Lake Shore Limited</i>	48,469	Staffed	Station & Platform
Elkhart, IN	<i>Lake Shore Limited</i>	322	Unstaffed	Station & Platform
Manassas, VA	<i>Northeast Regional</i>	430	Unstaffed	Station & Platform
Philadelphia 30 <sup>th</sup> Street Station	<i>Northeast Regional</i>	33,569	Staffed	Station & Platform

Source: OIG analysis of company data

Note: <sup>a</sup> Ridership figures may not capture all passengers with disabilities because they are contingent on passengers self-identifying during the booking process.

**Testing the booking process.** To assess the information the company communicates to passengers with disabilities that help inform their trip expectations, we tested the booking process through the website and mobile application. We analyzed the process of booking eight separate trips for passengers with disabilities using the routes and stations where we conducted direct observations. For each option for assistance that the company provides (blind or vision loss, deaf or hearing loss, reduced mobility, and other accessibility needs), we tested from the start of booking through payment

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confirmation. We did not test the booking process through phone reservations, ticket agents at stations, or kiosks in stations.

**Interviews of disability advocacy groups.** To obtain perspectives from the disability community, we selected a nongeneralizable sample of nine advocacy groups based on three factors: (1) national coverage, (2) coverage of specific areas of disability, and (3) recommendations of knowledgeable internal and external officials. Based on these selection criteria, we interviewed representatives from the following groups:

- Access Living
- American Council for the Blind
- Autistic Self Advocacy Network
- Disability Rights Education and Defense Fund
- National Association of the Deaf
- National Council on Disability
- National Council on Independent Living
- National Disability Rights Network
- Paralyzed Veterans of America

To conduct the interviews, we developed open-ended interview questions. We then analyzed the responses to identify common themes and illustrative examples.

**Interviews of knowledgeable officials.** To obtain perspectives from relevant internal officials with a role in providing customer service to passengers with disabilities, we interviewed officials from the following groups and departments:

- The Accessibility Office
- The Law department
- The Sales and Customer Service group
- The Digital and Brand Marketing group
- The Digital Technology and Innovation department
- The Transportation and Customer Service Stations and Onboard groups
- The Learning and Development group

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In addition, we interviewed seven members of the Executive Leadership Team involved in the Accessibility Executive Oversight Committee—the highest-level steering committee on accessibility issues. We also interviewed external stakeholders from DOJ and FRA.

To establish criteria, we reviewed company policies and procedures, relevant laws and regulations, and internal control guidance from private- and public-sector organizations.

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 provides a reasonable basis for our findings and conclusions based on our audit objective.

## **Internal Controls**

We reviewed the internal controls in place for efforts to provide high-quality customer service to passengers with disabilities. We assessed the internal control components and underlying principles and determined that the following internal control areas were significant to our audit objective:

- **Control Environment:** Management should establish an organization structure, assign responsibility, and delegate authority to achieve the entity's objectives.
- **Risk Assessment:** Management should identify, analyze, and respond to risks related to achieving the defined objectives.
- **Control Activities:** Management should design control activities and the entity's information system to achieve objectives and respond to risks. Management should implement control activities through policy.
- **Information and Communication:** Management should provide quality information to achieve the entity's objectives. Quality information is important to both internal and external stakeholders.
- **Monitoring:** Management should assess the quality of performance over time and address identified issues.



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We developed audit work to ensure that we assessed each of these control areas. Specifically, we identified and reviewed company policies, procedures, and processes for providing customer service to passengers with disabilities. We also identified roles and responsibilities and assessed the extent to which they were clearly defined, interviewed knowledgeable Amtrak officials and external stakeholders, and assessed the extent to which the company has the data and information needed to meet its objective of providing high-quality customer service for these passengers.

We also developed audit steps to evaluate controls over the company's case management system, Salesforce, that were relevant to our audit objective. Specifically, we evaluated the design and operating effectiveness of the case management system's controls. Our review was limited to the internal control components and underlying principles that were relevant to our audit objective. We did not review the overall system of controls; therefore, our review may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

## **Computer-processed Data**

To accomplish our objective of assessing the company's efforts to provide high-quality customer service to passengers with disabilities, we relied on computer-processed data from the following four sources:

- *Customer praise, complaint, voucher, and refund data* from Salesforce to understand what is and is not working well with customer service to passengers with disabilities, as well as the effects of any challenges. We also used these data to assess the extent to which the company has the data and information needed to meet its objective of providing them with high-quality customer service.
- *CSI survey data* related to accessibility or passengers with disabilities to understand what is and is not working well with customer service for them, as well as the effects of any challenges. This included using analytics generated from the CSI survey data.
- *Claims data* to understand the effects of any challenges with customer service to passengers with disabilities.
- *Ridership data* for background purposes and to assess the extent to which the company has the data and information needed to meet its objective of providing high-quality customer service to passengers with disabilities.

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We assessed the reliability of these data by reviewing prior OIG and other company reports, interviewing the officials responsible for the underlying data, and checking the underlying data for reasonableness and validity. Based on our observations and tests, we determined that the data were sufficiently reliable to meet our objective.

Because we created our own dataset of accessibility-related customer praise and complaints using a keyword search, and because of limitations using keyword searches—such as their potential to fail to capture all relevant data or to produce false positives—we took additional steps to assess the reliability of the praise and complaint data. These steps included using multiple sources to identify keywords and reviewing all complaints that the search identified as accessibility-related. Additionally, we used the work of internal specialists to further assess the reliability of injury claims data by comparing the total claims payments for FY 2020 through FY 2023 to the company's accounts payable data. The specialists did not perform any further analysis on the data or perform any work in support of the findings developed in this report. Based on our observations and tests, we determined that the data were sufficiently reliable to meet our objective.

## Prior Reports

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

- *Major Programs: Company Established a Management Framework for Long Distance Fleet Replacement Program but Can Improve Risk Management and Clarify Lines of Authority* (OIG-A-2025-001), December 13, 2024
- *Major Programs: Americans with Disabilities Act Program Progressing, but Faces Some Challenges to Meeting Completion Goals* (OIG-A-2023-012), September 14, 2023
- *Governance: Better Planning and Coordination Could Help the Company Achieve its Aggressive Timeline for ADA Compliance* (OIG-A-2021-012), September 2, 2021
- *Governance: Better Adherence to Leading Practices for Ethics Programs Could Reduce Company Risks* (OIG-A-2017-012), June 26, 2017
- *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* (109-2010), September 29, 2011

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## **APPENDIX B**

### **Accessibility-related CSI Questions, FY 2023 and August 2024**

CSI 3.0, the version of the survey the company used during FY 2023 included questions specifically related to accessibility. It removed these questions from subsequent surveys. In August 2024, it added a different set of optional accessibility-specific questions to the end of the CSI survey, according to a Marketing department official. These CSI questions are listed below.

**CSI 3.0, questions 123 through 134 within a section called “*Accessible Travel Experience for Customers with Disabilities*” from the CSI questionnaire, used only during FY 2023:**

123. Overall, how satisfied were you with any assistance and accommodations you received towards providing an accessible travel experience? [On a scale of 0 through 10 where 0 is not at all satisfied and 10 is extremely satisfied]

124. Did you request assistance for your trip when booking your ticket? [yes or no]

125. [If “Yes” in 124] Did you receive the assistance you requested during your trip? [yes or no]

126. How satisfied are you with the assistance that you received? [On a scale of 0 through 10 where 0 is not at all satisfied and 10 is extremely satisfied]

*How satisfied were you with the following aspects toward providing an accessible travel experience?* [On a scale of 0 through 10 where 0 is not at all satisfied and 10 is extremely satisfied]

127. Accessibility of the train design

128. Assistance provided by Amtrak staff at the boarding station (requested prior to travel in reservation)

129. Assistance provided by Amtrak staff at the boarding station (on demand, not requested in reservation)

130. Assistance provided by Amtrak staff on the train

131. Assistance provided by Amtrak staff at the arrival station (requested prior to travel in reservation)

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132. Assistance provided by Amtrak staff at arrival station (on demand, not requested in reservation)

133. Ease of locating or calling staff at the station to request assistance

134. Ease of contacting customer service to request assistance for your trip

**Optional accessibility-specific questions called “*Accessible Travel Experience for Customers with Disabilities*” added to the end of the CSI survey in August 2024:**

1. Did you request accessibility assistance or an accommodation for your trip when booking your ticket? [yes or no]
2. [If no in Q1, Q2] Were accessibility accommodations available to you throughout your trip? [yes, no, or N/A]
3. [If no in Q2] Please elaborate on how we could accommodate you better in the future? [open-ended]
4. [if yes in Q1, Q4-Q6] Was the request for accessibility assistance or an accommodation fulfilled during your trip? [yes or no]
5. Overall, how satisfied were you with any assistance and accessibility-related services you received during your trip? [On a scale of 0 through 10 where 0 is not at all satisfied and 10 is extremely satisfied]
6. *How satisfied were you with the following aspects toward providing an accessible experience?* [On a scale of 0 through 10 where 0 is not at all satisfied and 10 is extremely satisfied]
  - Boarding and detraining (e.g., understanding available boarding equipment that can be requested (lifts, ramps, bridge plates); interacting with a Red Cap; navigating boarding queue, etc.)
  - Navigating the train (e.g., accessing the café and restrooms, locating the train crew, locating available onboard seating, etc.)
  - Assistance provided by Amtrak staff at the origin and destination stations (requested prior to travel in reservation) and ease of locating staff
  - Ease of contacting customer service to request assistance throughout your trip
  - Availability of accessibility information (via website, calls with agents, notifications, etc.)

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7. Did your most recent trip include an Amtrak Thruway Bus connection? [yes or no]
8. [*If yes in Q1 or yes/no in Q2, and yes in Q7*] Did the bus meet your accessibility expectations? [yes or no]
9. [*If no in Q8*] What did not meet your expectations?
  - Driver interaction
  - Boarding, e.g., lift
  - Accessible seating
  - Location of amenities (outlets, lights, etc.)

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## **APPENDIX C**

### **Interview Questions for Disability Advocacy Groups**

We used the questions below to interview representatives from disability advocacy groups. We asked the same questions in each interview, allowing us to gather consistent information across a range of topics. We used these questions to capture perceptions of what is working well and not working well with the company's engagement with the disability community and, more broadly, with customer service to passengers with disabilities across specific segments of the trip lifecycle.

1. What is your role within your organization?
2. In this role, what is your level of interaction with Amtrak?
3. In your opinion, what is working well with how Amtrak engages your organization on matters that impact it?
4. What, if anything, is not working well with how Amtrak engages your organization on matters that impact it?
5. [If applicable] When your organization has raised accessibility related concerns with Amtrak, how responsive has the company been in addressing those concerns?
6. What could Amtrak do more of, if anything, to improve its partnership with your organization?
7. Over the past 3 years, has the level of communication and outreach changed?
  - a. If yes, in what ways?
  - b. If yes, what caused this change?
8. Is there anything else that would be helpful for us to keep in mind about your organization's relationship with Amtrak?
9. We would like to hear your broader perspective on the most common issues you are aware of with regards to the customer service Amtrak provides to passengers with disabilities, especially for individuals that your organization represents?
10. We'll start at the beginning, with *planning and booking a trip* with Amtrak, which includes trip planning, inputting trip requirements, selecting trip options, and purchasing a ticket — either online or through the customer service phone line.

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- a. What, if anything, is Amtrak doing well with this process?
    - i. [For anything mentioned] Do you have any examples of this?
  - b. What, if anything, is not working well with planning and booking a trip?
    - i. [For anything mentioned] Do you have any examples of this?
    - ii. What was the impact?
11. **At the station**, which includes navigating the station, waiting to board, understanding signage and audio/visual messaging, and interacting with station employees.
- a. What, if anything, is working well with this segment of the trip lifecycle?
  - b. What, if anything, is not working well with this segment?
    - i. Examples?
    - ii. Impacts?
12. **Boarding**, which includes boarding with or without accessible boarding technologies, stowing personal items, and interacting with Amtrak employees.
- a. What, if anything, is working well with this segment of the trip lifecycle?
  - b. What, if anything, is not working well with this segment?
    - i. Examples?
    - ii. Impacts?
13. **On board**, which includes using amenities like food service, understanding signage and audio/visual messaging, and interacting with the on board employees.
- a. What, if anything, is working well with this segment of the trip lifecycle?
  - b. What, if anything, is not working well with this segment?
    - i. Examples?
    - ii. Impacts?
14. **Deboarding**, which includes retrieving personal items, deboarding with or without accessible boarding technologies, and interacting with Amtrak employees.
- a. What, if anything, is working well with this segment of the trip lifecycle?

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- b. What, if anything, is not working well with this segment?
    - i. Examples?
    - ii. Impacts?
- 15. Are there any other challenges with customer service for passengers with disabilities that we have not discussed yet?
- 16. Other than what we have already discussed, what improvements, if any, would you recommend to ensure high-quality customer service for passengers with disabilities at Amtrak?
- 17. What transportation providers or other types of organizations, if any, have high-quality customer service for individuals with disabilities?
  - a. What, if anything, do you think Amtrak could learn from these other organizations?
- 18. In your work, have you come across any resources that provide standards or leading practice that we could learn from?
- 19. Keeping in mind everything we've discussed so far, what are the top things you think Amtrak needs to keep in mind to ensure passengers with disabilities have a high-quality customer experience?
- 20. Other than what we have already discussed, is there anything else about accessibility and Amtrak that you'd like to share?



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## **APPENDIX D**

### **Site Visit Tool**

To conduct our site visit observations in a consistent manner, we designed a tool to help us observe, photograph, and document aspects or illustrative examples of customer service to passengers with disabilities that are working well, as well as opportunities for improvement. In the tool, we listed aspects of customer service to observe at each station and on each train. We identified these from company policies and procedures, and from interviews with company officials and representatives from disability advocacy groups.

**Aspects of Customer Service for Passengers with Disabilities to Observe:** The audit team will observe and document the following aspects of the company's customer service for passengers with disabilities at each station and on each route, if applicable.

#### **Station**

- Visual messaging/signage, including delay alerts
- Audio messaging/announcements, including delay alerts
- Availability of accessible boarding and alighting options
- Accessible waiting areas/lounges
- Red Cap distribution centers
- Availability of employees
- Employees appearing visible and helpful, including assistance offered on platform and with baggage

#### **Route**

- Visual messaging/signage, including delay alerts and pre-detraining announcements
- Audio messaging/announcements, including delay alerts and pre-detraining announcements
- Accessible seating
- Baggage properly stowed out of aisleways and accessible seating areas

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- Employees appearing visible and helpful, including assistance offered for food service
- Path of travel to food service
- Food service menu options
- Path of travel to restrooms
- Condition of train interior
  - Call button operability
  - Accessible bathroom in working order
- Path of travel to other onboard amenities (viewing car, etc.)
- Differences in access to onboard amenities and services between business, coach, quiet car, rooms, lower-level seating, upper-level seating

**Other**

- Alerts on app, via text message, and via email

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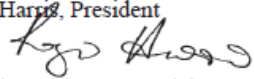
## APPENDIX E

### Management Comments

NATIONAL RAILROAD PASSENGER CORPORATION

Memo



Date: June 27, 2025	From: Roger Harris, President 
To: John Marzullo, Assistant Inspector General, Audits	Department(s): Operating and Commercial
cc	Eliot Hamlich, EVP Marketing & CCO David Handera, VP Accessibility, Stns, & Facs William Herrmann, EVP Chief Legal and Human Resources Officer (CLHRO) Carol Lopez, Director Accessibility Office Laura Mason, EVP Capital Delivery Jennifer Mitchell, EVP Strategy & Planning Steven Predmore, EVP CSO Gerhard Williams, EVP Service & Delivery Ops Tracie Winbigler, EVP Business Transformation & CFO Christian Zacariassen, EVP CIO

**Subject:** Management Response to *Train Operations: The Company Can Improve the Quality of Customer Service to Passengers with Disabilities* (Draft Audit Report for Project No. 007-2024).

This memorandum provides Amtrak's response to the draft audit report titled, "The Company Can Improve the Quality of Customer Service to Passengers with Disabilities". Management has reviewed the recommendations and appreciates the opportunity to provide a response.

The OIG recommends that the company President—in consultation with the Vice President of Accessibility, Stations, and Facilities—and in coordination with other relevant departments as necessary, take the following actions:

**Recommendation #1:**

Develop, document, and implement a strategy with clear goals, metrics, and priorities to guide efforts for improving customer service to passengers with disabilities. This strategy should also clarify roles and responsibilities, including how the relevant departments should coordinate on accessibility issues.

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Management Response/Action Plan:

While Amtrak's oversight and advancement of accessibility across the enterprise has significantly improved over the years, Amtrak agrees with the recommendation in developing a clearly defined strategy with goals, metrics and priorities with a focus on improving the experience for passengers with a disability. Amtrak has already taken the initiative in developing the strategic framework and will work with the leadership across the enterprise toward a final strategic plan.

Responsible Amtrak Official(s): David Handera, VP Accessibility, Stns, & Facs  
Carol Lopez, Director Accessibility Office

Target Completion Date: March 31, 2026

**Recommendation #2:**

Strengthen and document a process for collecting, tracking, and resolving all accessibility related complaints—including defining timelines for resolving them—in accordance with federal regulation.

Management Response/Action Plan:

Management agrees with this recommendation. While the tracking of complaints has improved over the years, Amtrak agrees there is the potential for complaints to be missed. Although the report used a key word search, we disagree that a significant number of complaints were not tracked. The team queried a small test sample (May 2025) with the list of key words provided by OIG and found that 5 out of 27 complaints were ADA related and those five were appropriately tagged and escalated to the Accessibility Office. The remaining 22 ranged from praise to service complaints and were not ADA related. Notwithstanding our queries, Amtrak is committed to ensuring coding of ADA complaints is accurately captured in the tracking and reporting systems

The team will strengthen and document current processes, which include resolution timelines, and develop and implement a new workflow within Salesforce to more efficiently collect, track, and resolve accessibility related complaints.

Responsible Amtrak Official(s): David Handera, VP Accessibility, Stns, & Facs  
Carol Lopez, Director Accessibility Office  
Lynda Kopecki, Sr Director Customer Care  
Sunil Tewari, AVP DT Customer Service and Revenue Systems

Target Completion Date: September 30, 2026

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**Recommendation #3:**

Begin tracking and using other relevant data sources to improve visibility over the quality of the company's customer service to passengers with disabilities and to inform the strategy it develops.

**Management Response/Action Plan:**

Management agrees with this recommendation and acknowledges the importance of tracking and using relevant data to improve the experience of customers with disabilities. To enhance the visibility of the quality of customer service provided to passengers with disabilities and to inform future strategies around improving this service, Amtrak commits to 1) gathering quantitative and qualitative feedback directly from customers and distributing these insights within the organization, 2) ongoing training of Care Center agents, and 3) expanding capabilities to better track and fulfill assistance requests.

1. **Ask Now Survey.** Each quarter, Amtrak will run a survey specifically designed to learn from customers who self-report their requests for accessibility assistance or accommodation. This primary research will allow customers with disabilities to directly voice their areas of satisfaction and/or concern to Amtrak. Amtrak will analyze all feedback and distribute insights and recommended actions to internal groups such as Amtrak's Accessibility Office.
2. **Care Center Training and Agent Empowerment.** As part of our ADA compliance strategy, all Care Center new hires will be required to complete a robust training curriculum focused on delivering equitable, informed, and empathetic service to individuals with disabilities. To reinforce ongoing ADA alignment and service consistency, all agents will be required to complete annual recertification with an emphasis on quality of service for customers with disabilities. Accessible job aids and up-to-date reference tools will be readily available to ensure agents can confidently apply ADA principles in day-to-day interactions.
3. **Accessibility.** The Accessibility Office will coordinate with Digital Technology and Customer Service on enhanced capabilities to input and track assistance requests between in-station and on-board staff. This expansion will serve as an additional data source for quality assurance in customer service to document on demand requests.

This additional communication method will reduce missed assistance requests and increase customer satisfaction.

**Responsible Amtrak Official(s):**

Lisa Copeland, AVP Loyalty & Customer Engagement  
Lynda Kopecki, Sr Director Customer Care  
Federico Gazzolo, VP Customer Service  
Sunil Tewari, AVP DT Customer Service and Revenue Systems

**Target Completion Date:**

May 31, 2026

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**Recommendation #4:**

Formalize a process to regularly train all customer-facing employees and supervisors on interacting with passengers with disabilities in accordance with federal regulation. This should include clarifying the responsibility for enforcing this requirement and which employees and supervisors should receive training.

**Management Response/Action Plan:**

Management agrees with this recommendation and has taken steps to establish a formal, repeatable process to ensure ADA training is consistently delivered, tracked, and enforced for all customer-facing employees. The Training and Development team, in partnership with the Accessibility Office and operational leaders, will implement the following process to ensure compliance:

**1. Annual Compliance Review and Training Cycle**

- ADA training will be conducted every other year for all customer-facing employees and supervisors.
- The cycle includes:
  - A comprehensive audit of completion status.
  - Identification of in-scope employees (including new hires, rehires, and transfers into customer-facing roles).
  - Formal follow-up and escalation process for non-compliant employees.
- Supervisors will be held accountable for ensuring timely completion and will be notified of employee compliance through automated reporting from the Learning Management System (LMS).

**2. Ownership and Enforcement**

- The Training and Development Team will own and maintain the ADA delivery model.
- The Accessibility Office will own and maintain the ADA curriculum.
- Operational department heads will be responsible for ensuring their teams meet compliance deadlines.
- A centralized dashboard will monitor completion status by business line and be reviewed quarterly with HR and Compliance partners.

**3. Hybrid Training Strategy for Sustainability and Reach**

To support compliance while managing cost and reach, Amtrak has adopted, and will continue to develop, a hybrid ADA training model that includes:



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- E-Learning for Continuing Employees: Scenario-based, consistent modules for those who have completed in-person training previously.
- In-Person Training for New Hires: Live, instructor-led sessions focused on real-time interaction and foundational learning.
- Manager-Led Coaching for Reinforcement: In FY25, Amtrak will roll out a structured coaching toolkit with practical ADA scenarios for daily reinforcement within teams.

#### 4. Continuous Improvement and Regulatory Alignment

- The ADA curriculum will be reviewed annually in partnership with the Accessibility Office to ensure alignment with federal regulations and best practices.
- Updates and enhancements (e.g., new scenarios, LMS upgrades) will be deployed as needed to address evolving regulatory requirements and employee feedback.

#### Conclusion:

This formalized process ensures ADA training will not only be consistent and auditable but also embedded in Amtrak's culture of accessibility and customer service. By establishing an annual training cycle, clarifying roles and responsibilities, and leveraging a hybrid delivery model, Amtrak will be committed to meeting and exceeding its ADA compliance obligations.

Responsible Amtrak Official(s): Federico Gazzolo, VP Customer Service  
Jarrett Alston, VP Transportation  
Eileen Cooke, Chief Learning Officer

Target Completion Date: January 30, 2026

#### Recommendation #5:

Establish and document a process to ensure that the company fully considers passengers with disabilities in any efforts to improve the communication of essential travel information.

#### Management Response/Action Plan:

Management agrees with the recommendation. While Amtrak has current processes in place for communication of essential travel information, we will review them for opportunities to establish and document improvements. Improvements could include upgrading tools, additional training of staff, and creating a process around best practices for ADA travelers.

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Responsible Amtrak Official(s): Phillip B McClure, Sr Dir Customer Experience  
Lynda Kopecki, Sr Dir Customer Care  
Samantha Eitzmann, Sr Dir Digital & Brand Operations

Target Completion Date: March 31, 2026

**Recommendation #6:**

Assess the costs and benefits of options to improve access to onboard amenities, such as food service, for passengers with disabilities. Based on this analysis, develop a proposal of any potential improvement options and submit it to the Executive Leadership Team for consideration.

Management Response/Action Plan:

Management agrees with the recommendation. Amtrak will complete an assessment of options to improve access to onboard amenities for passengers with disabilities, evaluating both the costs and benefits, and assessing the level of effort required for potential improvements. Based on this analysis, we will develop a proposal and present it to the Executive Leadership Team for consideration and direction. In the interim, if we identify opportunities that can be implemented immediately, we will proceed with those improvements and include the actions or solutions that have already been completed in the final proposal to the Executive Leadership Team.

Responsible Amtrak Official(s): Federico Gazzolo, VP Customer Service  
Patricia Orfini, AVP Product Dev & Customer Exp  
Jarrett Alston, VP Transportation  
Gabrielle Pfeifer, Sr Dir Digital Design & Product Mgmt.

Target Completion Date: May 31, 2026



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## **APPENDIX F**

### **Abbreviations**

the company	Amtrak
ADA	Americans with Disabilities Act
C.F.R.	Code of Federal Regulations
CSI	Customer Satisfaction Index
DOJ	Department of Justice
EVP	Executive Vice President
FRA	Federal Railroad Administration
FY	fiscal year
OIG	Amtrak Office of Inspector General
PIDS	Passenger Information Display Systems

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## **APPENDIX G**

### **OIG Team Members**

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Jana Brodsky, Senior Audit Manager

Alejandra Rodriguez, Senior Manager, Data Analytics

Sarah Brandes, Senior Auditor, Lead

Samuel Diaz, Senior Auditor

Rosalind Sipple, Auditor

Alison O'Neill, Communications Analyst

Sid Schwartz, Contractor

# OIG MISSION AND CONTACT INFORMATION

## Mission

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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.

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