



OFFICE *of* INSPECTOR GENERAL
NATIONAL RAILROAD PASSENGER CORPORATION

Asset Management:

Better Governance and Data Would Improve Company Efforts to Achieve a State of Good Repair

OIG-A-2026-004 | April 10, 2026


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Memorandum

To: Gerhard Williams
Executive Vice President, Chief Operations Officer

Laura Mason
Executive Vice President, Capital Delivery

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

Date: April 10, 2026

Subject: *Asset Management: Better Governance and Data Would Improve Company Efforts to Achieve a State of Good Repair (OIG-A-2026-004)*

Amtrak (the company) is responsible for tens of billions of dollars in infrastructure assets. This includes more than 2,500 miles of tracks, structures, and electrical systems, most of which are on the heavily trafficked Northeast Corridor (NEC). Some of the company's bridges and tunnels are more than a century old, and parts of its electrical and signal systems date to the 1930s. The company largely inherited these aging assets from private railroads when Congress created Amtrak in 1970. By their nature and use, infrastructure assets are prone to break down, which can disrupt service, such as the recent failure of a 60-year-old insulator that caused extensive delays on the NEC.¹

The company established a target to bring its infrastructure on the NEC, its branches, and other rail lines into a "state of good repair" by 2040. Infrastructure assets are said to be in a state of good repair when they can perform as designed, they do not pose unacceptable safety risk, and their maintenance is up to date.² The company estimated that the value of its infrastructure assets that do not meet this threshold is roughly \$47 billion—known as the company's state-of-good-repair (SOGR) backlog.³ Given the

¹ On February 11, 2026, an electric traction asset failure on the Pelham Bay Bridge shut down service above New York City on the NEC for half a day.

² 49 C.F.R. § 625.41.

³ This is the estimate the company provided in the *Amtrak FY24-29 Five Year Service and Asset Line Plans*. It represents the value of existing assets and does not include the actual project costs the company would incur to replace them. It is a snapshot in time that the company updates in each five-year plan.

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importance of this infrastructure to the company's operations, our objective was to assess the company's governance and data for managing its SOGR work.

To address our objective, we reviewed company documents and interviewed officials across the two departments that share responsibility for SOGR efforts: Capital Delivery and Operations.⁴ We compared the company's efforts to federal requirements, as well as leading practices for transit asset management developed by the Federal Transit Administration (FTA). This guidance suggests transit organizations have three core governance elements for an effective asset management program—(1) a strategy that establishes specific objectives, (2) a policy that relays leadership's commitment across departments, and (3) a plan that defines roles and requisite resources and activities. We also assessed the completeness of the company's infrastructure asset inventory. In addition, we analyzed the last eight years of the company's infrastructure asset line plans to understand the history of its SOGR efforts, including how it arrived at its backlog, a challenge that began with the company's origins in 1970. For more details on our scope and methodology, see Appendix A.

SUMMARY OF RESULTS

Since 2016, the company has made targeted improvements to the processes and data it uses to manage its SOGR work, and other improvement initiatives are underway. Despite these well-intentioned efforts, the company's infrastructure asset management capabilities have not advanced significantly because it has not yet taken some foundational steps, including:

- **Fully establishing a governance framework.** The company developed the three governing elements that FTA leading practices suggest for effective asset management: a strategy, policy, and plan. Each, however, has significant shortcomings—such as a lack of specific objectives for the company's SOGR work and ineffectively communicated roles and responsibilities—resulting in staff confusion and inefficient decision-making.
- **Strengthening its SOGR infrastructure asset data.** The company has made progress in building an infrastructure asset inventory, but the data in its systems remain incomplete or in some cases inaccurate. The company has long-term improvements underway, including collecting data on the condition of its

⁴ In January 2026, the company announced that it had renamed the prior Service Delivery & Operations department to the Operations department.

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infrastructure. Until those efforts are complete, however, existing data weaknesses hinder the company's ability to develop meaningful performance metrics and make fully informed decisions about which assets to address first.

Factors outside the company's control, especially its funding level, materially impact the amount of SOGR work it can accomplish every year. Nonetheless, without taking steps that are within its control—notably, improving its governance and data—the company cannot reasonably demonstrate how the billions of dollars in federal funds it receives will reduce its backlog or improve its ability to direct such funding to investments with the highest impact.

Accordingly, we recommend that the company fully establish a governance framework for infrastructure asset management that includes specific objectives and performance metrics, as well as defined activities and resources needed to achieve a state of good repair. Further, we recommend the company better communicate roles and responsibilities of staff and departments involved in SOGR work. We also recommend advancing ongoing data improvement efforts and developing additional controls to help maintain a complete, accurate inventory. In commenting on a draft of this report, the Executive Vice President, Chief Operations Officer, and the Executive Vice President, Capital Delivery, agreed with our recommendations and described actions the company plans to take to address them. For management's complete response, see Appendix D.

BACKGROUND

Congress created Amtrak in 1970⁵ after the Penn Central Transportation Company, which owned most of the rail lines that today comprise the NEC, declared bankruptcy. By the 1960s, Penn Central and most other privately owned railroads had determined that providing passenger service was unprofitable and were deferring maintenance of capital assets. When Amtrak assumed responsibility for providing intercity passenger rail service, it became responsible for maintaining and improving an extensive rail infrastructure already in disrepair.⁶

The company has regularly received annual federal appropriations, which have averaged about \$2.4 billion per year over the last decade, and has used portions of those

⁵ Rail Passenger Service Act of 1970, Pub. L. No. 91-518, § 301, 84 Stat. 1327, 1330.

⁶ The *Northeast Corridor Commuter and Intercity Rail Cost Allocation Policy*, which the Northeast Corridor Commission publishes, informed our research on the company's SOGR history.

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appropriations—along with contributions from commuter rail authorities⁷—to fund its SOGR efforts. Separately, the federal government has funded various targeted infrastructure programs and projects to help the company address the NEC’s backlog. For example, in the late 1970s and early 1980s, the federal government funded the Northeast Corridor Improvement Project, which electrified the NEC’s south end. In the 1990s, it funded the electrification of the NEC’s north end in preparation for the company’s Acela service. In 2015,⁸ Congress created the Federal-State Partnership for State of Good Repair program (now the Federal-State Partnership for Intercity Passenger Rail program), providing additional funding to repair, replace, or rehabilitate railroad infrastructure and improve intercity passenger rail performance.

In 2021, the Infrastructure Investment and Jobs Act⁹ provided a historic amount of funding for passenger and freight rail improvements: \$22 billion solely for the company and \$44 billion for potential competitive grants to Amtrak, as well as state and local governments. With this unprecedented support, the company and its commuter rail partners have undertaken major capital projects to address the NEC’s significant backlog of work including the Portal North Bridge,¹⁰ Susquehanna River Bridge, Connecticut River Bridge, and Baltimore & Potomac Tunnels.

Company stakeholders. The company’s Engineering department was previously responsible for SOGR efforts. In 2022, the company split the Engineering department’s SOGR-related functions into two departments that now share responsibility as follows:

- The **Capital Delivery department**, led by the Executive Vice President, Capital Delivery, develops an annual SOGR work plan for the company’s infrastructure assets. In addition to prioritizing and selecting projects, the department coordinates the track outages needed to conduct the maintenance and repair work.

⁷ Eight commuter rail authorities use the NEC and have a cost-sharing policy with the company.

⁸ In 2015, Congress also passed the *Fixing America’s Surface Transportation (FAST) Act*, Pub. L. No 114-94 (129 Stat. 1312), which, in part, requires the company to regularly submit a five-year asset line plan to the Department of Transportation that includes a prioritized list of proposed capital investments. See 49 U.S.C. § 24320.

⁹ Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 (2021).

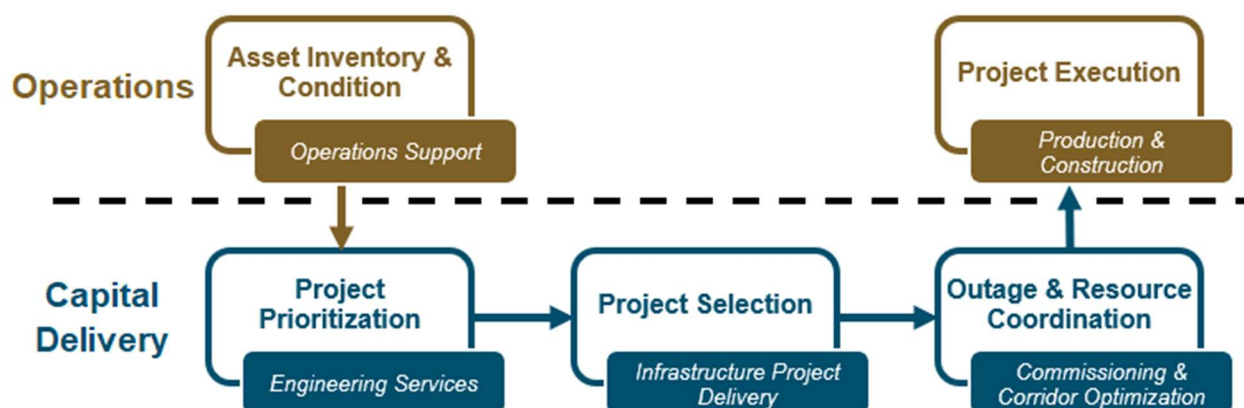
¹⁰ The Portal North Bridge is a part of the larger Gateway Program, which includes projects that have both new expansionary assets as well as SOGR work as part of their scope. In this way, SOGR work can be embedded in other major programs and projects as well as standalone efforts for the company.

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- The **Operations department**—through its sub-group, Infrastructure Maintenance & Construction Services (IMCS)—executes the SOGR work plan. The department is led by the Executive Vice President, Chief Operations Officer.

Figure 1 outlines each department’s responsibilities.

Figure 1. Department Responsibilities for SOGR Efforts



Source: OIG analysis of company documentation and interviews with company officials

External stakeholders. External stakeholders have the following roles:

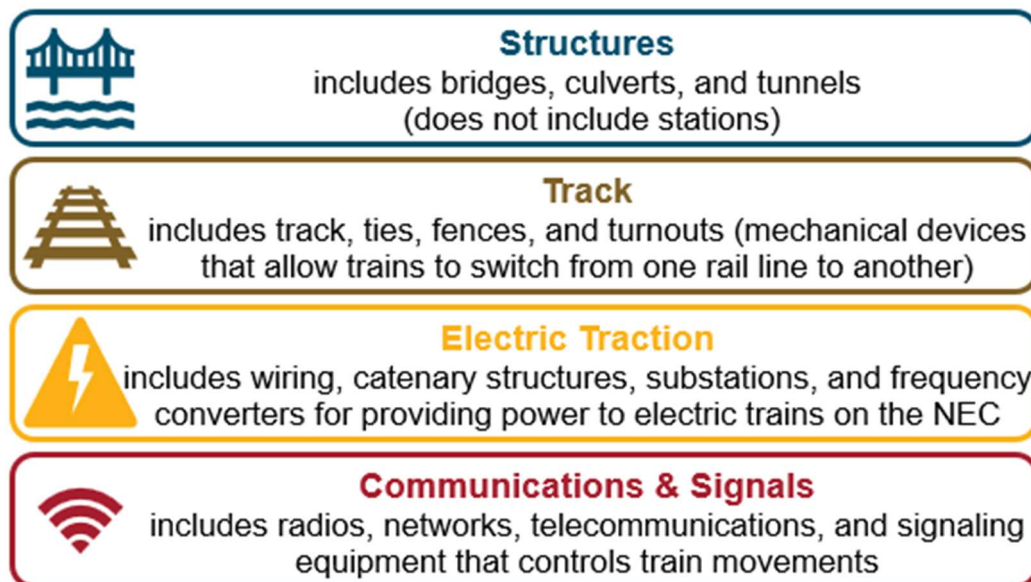
- The Federal Railroad Administration (FRA) is a Department of Transportation agency that provides the company with annual and discretionary grants, which it can use to make its rail network more safe, reliable, and resilient.
- The Federal Transit Administration (FTA) is a Department of Transportation agency that provides financial and technical assistance to agencies that operate local public transit systems. In 2016, FTA compiled leading industry practices for asset management in its *Transit Asset Management Guide*.¹¹
- Other state and local transit agencies coordinate with the company to plan and manage the track outages necessary to complete the company’s SOGR efforts.

¹¹ Federal Transit Administration, *Transit Asset Management Guide*, November 2016. Because FTA is not the company’s regulator, we discussed with company officials the appropriateness of using FTA’s leading practices to assess company operations. Company officials agreed that assessing company efforts against these leading practices was appropriate.

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Infrastructure asset types. Figure 2 shows the company's four infrastructure asset types.

Figure 2. The Company's Four Types of Infrastructure Assets



Source: OIG analysis of company documentation

Describing the backlog. The company counts its infrastructure assets either by individual units (e.g., a substation or a catenary structure) or by distance (e.g., linear feet of retaining walls or miles of electric traction wiring). It also counts the number of railroad ties it has on its network. The company reported the extent to which its infrastructure assets were not in a state of good repair, as follows:¹²

- *Assets measured by unit:* about 54 percent of 49,407 countable assets were not in a state of good repair
- *Assets measured by distance:* about 26 percent of the assets that are measured by distance (9,913 miles) were not in a state of good repair¹³
- *Railroad ties:* about 15 percent of 7,259,600 ties were not in a state of good repair¹⁴

¹² Numbers are as of FY 2024. For additional information on the SOGR status of the company's infrastructure assets, see Appendix B.

¹³ These assets measured in miles involve assets from all four asset types, including track as well as structures, electric traction, and communications & signals.

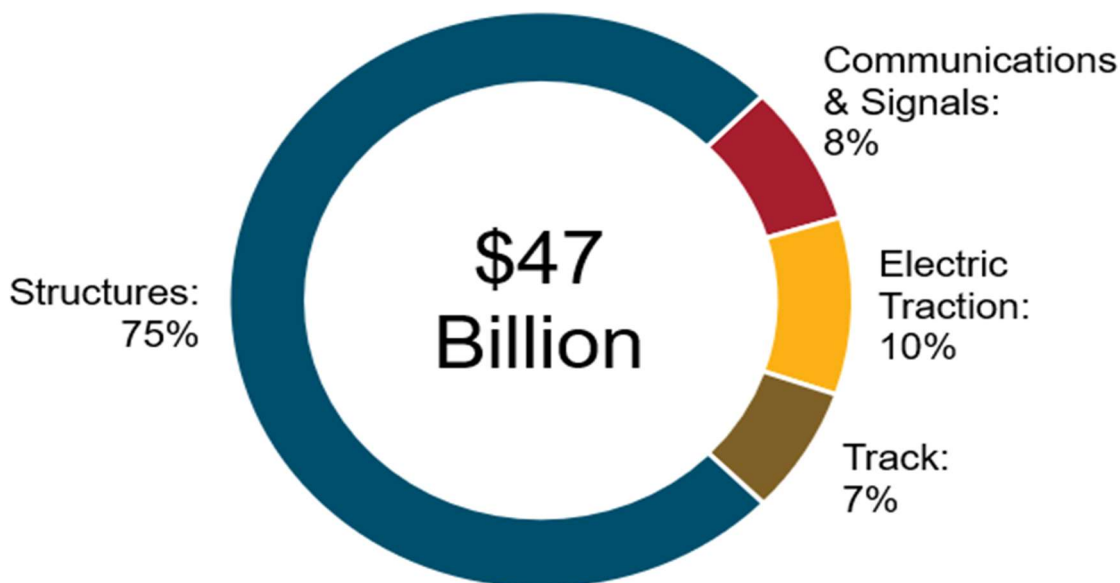
¹⁴ The company's railroad ties comprise the vast majority of its countable track assets. For clarity, we are reporting these separately.

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The company estimates its SOGR backlog—the infrastructure assets it determined to not be in a state of good repair—at about \$47 billion. This estimate, which the company last provided in the *Amtrak FY24-29 Five-Year Service and Asset Line Plans*, is a snapshot in time that the company updates in each five-year plan.¹⁵ The company began developing this number in response to external stakeholder interest about its SOGR backlog. It anticipates publishing its next plan and backlog estimate in 2026.

To determine which assets are in its backlog, the company assigns each asset a SOGR score based on age or other criteria for condition, such as how often an asset fails. Assets with a lower score are added to the backlog. To efficiently estimate the value of its thousands of assets, the company uses a standard unit cost for each asset class. It then multiplies these unit costs by the number of units not in SOGR. This calculation does not consider the actual cost to repair or replace an asset, such as design, construction, and other related project expenses. According to company officials, the actual cost to repair all assets that are not in a state of good repair could be higher or lower than \$47 billion. Figure 3 shows the breakdown of the company’s backlog cost estimate by asset type.

Figure 3. Estimated Cost of SOGR Backlog by Asset Type



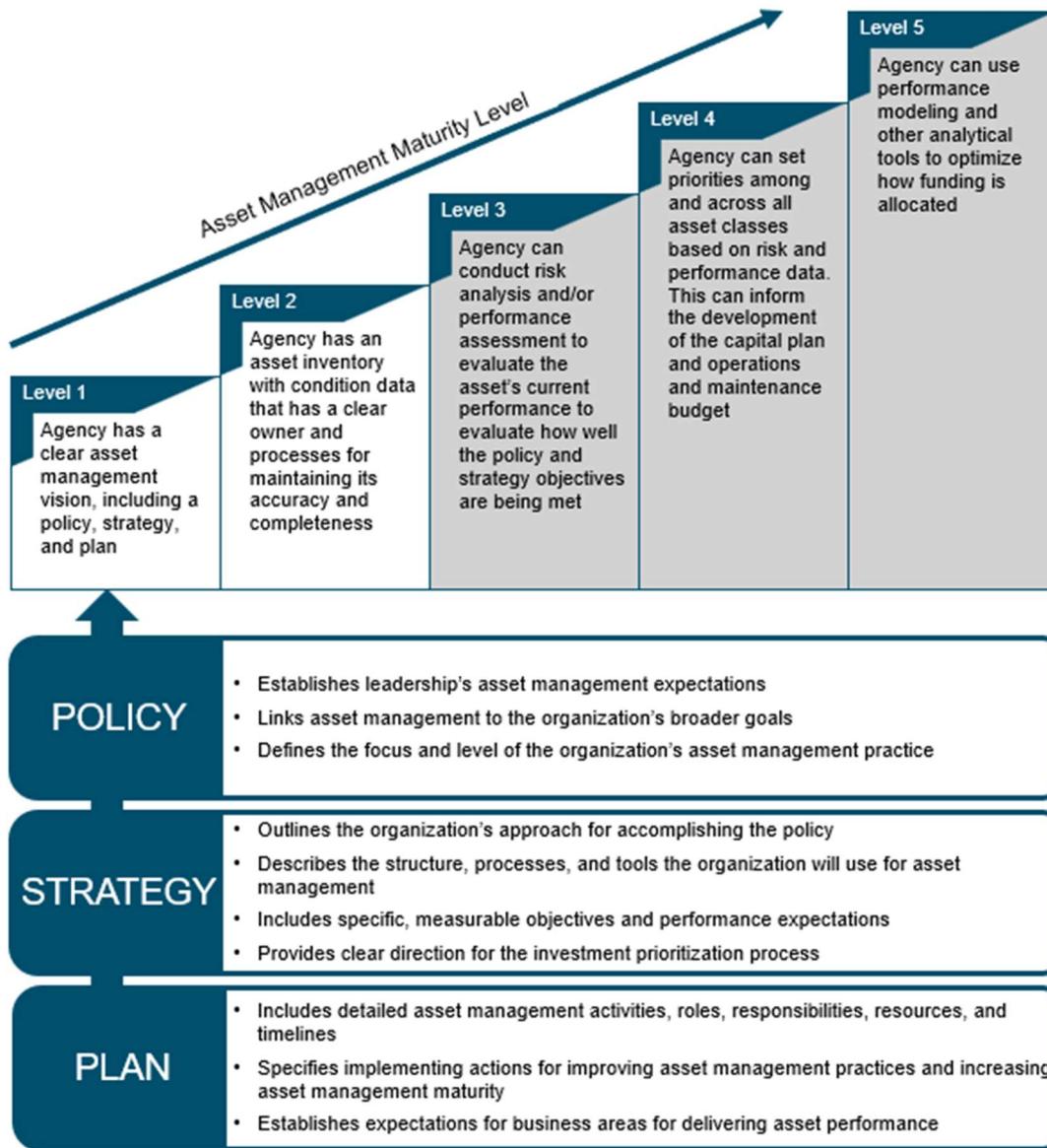
Source: OIG analysis of the company’s FY 2024 five-year asset line plan

¹⁵ Although the FAST Act requires the company to regularly submit a five-year asset line plan, it does not require the development of a SOGR cost estimate.

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Asset management leading practices. Asset management refers to the processes by which an organization maintains its assets to ensure that they provide the best value over their lifespan. FTA leading practices highlight the importance of establishing an organization’s asset management maturity and define five levels of maturity. Figure 4 outlines these maturity levels and shows where we focused our work.

Figure 4. Asset Management Maturity Model



Source: OIG analysis of FTA asset management guide
 Note: The scope of the OIG audit included the company’s practices related to levels 1 and 2, shown in the white boxes above. It did not include practices related to levels 3 through 5, shown in the grey boxes.

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THE COMPANY HAS NOT YET ADDRESSED CORE ELEMENTS OF ITS INFRASTRUCTURE ASSET MANAGEMENT

Since 2016, the company has made several improvements to its infrastructure asset management practices to help reduce the SOGR backlog. For example, the company created an electronic database to advance what it knows about its assets. In addition, it has taken initial steps to improve the information it collects on the condition of its assets and the relative importance of each to company operations. Further, it has consistently submitted its five-year asset line plans—which include the company’s infrastructure asset management strategy, policy, and plan—to the Department of Transportation, in line with regulatory requirements.

Despite these efforts, the company’s asset management capabilities have not significantly advanced because it has not yet addressed core, known weaknesses, which is contrary to management control standards. In 2025, an external consultant similarly reported that the company’s asset management capabilities had not significantly progressed since a 2016 assessment, concluding that the maturity of the company’s infrastructure asset management was low.¹⁶

Although funding levels that the company receives for repairing and replacing its assets are outside of its control, it has not yet addressed longstanding weaknesses that are within its control in areas that FTA practices state are foundational to a transit asset management program. These practices, which we discuss below, include the following:

- establishing a governance framework that communicates a unified strategy, policy, and plan with specific objectives, clear roles, and supporting processes
- improving data so the company can ensure their accuracy, use them to better drive investment decisions, and implement meaningful performance metrics

Without these core programmatic elements, company efforts to coordinate across departments are not always effective, and its investment decisions rely heavily on institutional knowledge instead of complete, high-quality data. As a result, the company cannot reasonably assess its progress toward reducing its SOGR backlog.

¹⁶ According to the consultant, this means the company was aware of the importance of asset management and was starting to apply knowledge. Among other weaknesses, the consultant identified that staff do not rely on the company’s asset management policy, the company does not have effective risk processes for its asset management, and communication between departments was poor.

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The Company Has Not Fully Established a Governance Framework

The company has developed a strategy, policy, and plan, as FTA practices suggest. Each of these governing documents, however, has significant shortcomings, as follows.

The strategy does not include key components. Although the company has a target of eliminating its SOGR backlog by 2040, the strategy it developed does not include more specific objectives for achieving this target.

Instead, company groups that manage infrastructure have general goals for maintaining safety standards and resolving known concerns. FTA leading practices provide examples of more detailed objectives, such as the following:

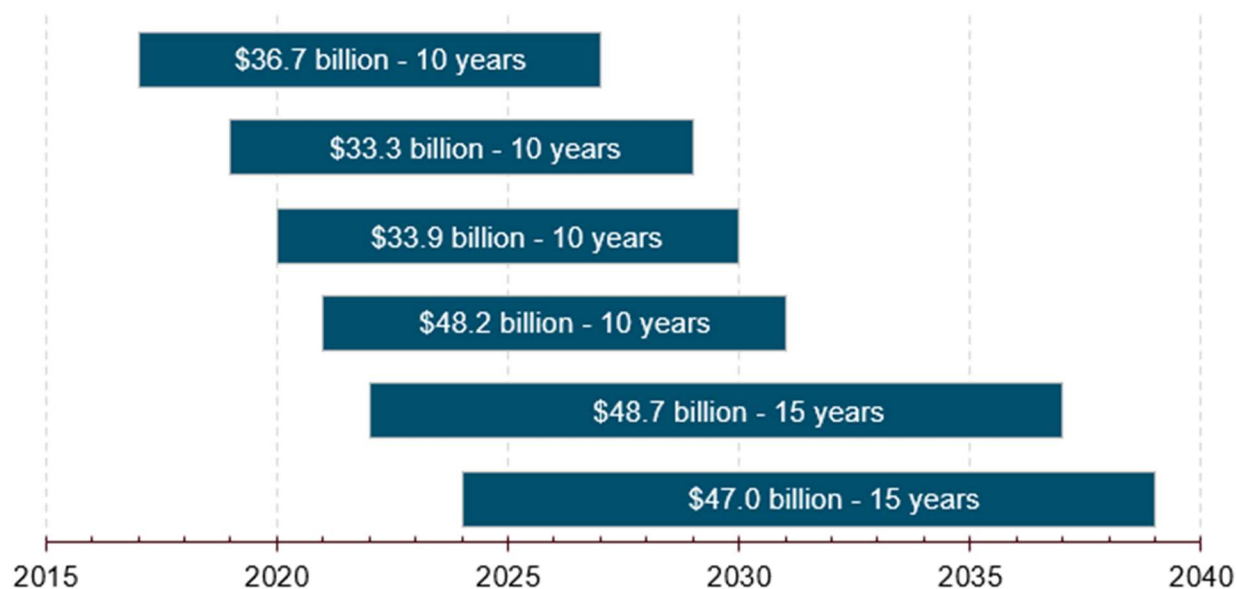
FTA leading practices call for a strategy that includes measurable objectives for an organization's asset management.

- Increase the assets in a state of good repair to a defined percentage by a given date.
- Reduce the system downtime caused by the condition of infrastructure to a defined amount of time per month or year.

In addition, the company's strategy does not establish a performance metric to measure its overall progress in reducing its backlog or to benchmark the outcome of its efforts. Without a way to meaningfully measure its progress, the company cannot assess whether its 2040 target is realistic and risks extending its timeline, as it has in prior five-year plans. For example, an analysis of the company's five-year plans shows that from fiscal year (FY) 2017 through FY 2021, the company estimated that, with sufficient funding, it would take 10 years to clear the backlog. From FY 2022 through FY 2024, however, it increased the estimate to 15 years. Figure 5 shows the company's various extensions of its target date to achieve a state of good repair.

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Figure 5. The Company's Estimated SOGR Backlog and Target Date to Clear It



Source: OIG analysis of the company's five-year asset line plans submitted from FY 2017 through FY 2024

Note: In FY 2018 and FY 2023, the company was not required to submit a five-year asset line plan.

Funding availability, inflation, and continually aging assets likely contributed to the extension of the timeline, but without defined performance metrics, the company cannot articulate the extent to which that is the case. This is exacerbated by the fact that the company did not retain the underlying details of the \$47 billion estimate. In short, the company did not save information on which specific assets it counted in the estimate, making it impossible to know whether any particular repair or replacement effort after that point reduced the dollar amount it reported. Therefore, the company does not use that figure to track its progress.

Accordingly, the company cannot demonstrate how the funding it receives will reduce its multi-billion-dollar backlog or the timeline to eliminate it. Including specific objectives and performance metrics in its strategy would help the company more accurately establish timelines and then articulate its progress against them, including whether it is on schedule to reach a state of good repair by 2040.

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Policy not effectively communicated. Although the company developed an infrastructure asset management policy to accompany its strategy and plan for addressing its SOGR backlog, it has not effectively communicated this policy to internal stakeholders as FTA practices suggest. Company officials involved in SOGR work told us that either they were unaware of the policy—which is in an appendix to the company’s FY 2024 five-year asset line plan—or it did not inform their work. FTA practices suggest that an organization’s asset management policy should be highly visible and frequently referenced to guide responsible staff’s efforts. Without a highly visible companywide policy, company leadership is missing an opportunity to affirm its commitment to sound asset management practices and communicate its expectations. It is also missing an opportunity to communicate the connection between staff’s day-to-day work and the company’s broader efforts to reduce its SOGR backlog.

FTA leading practices call for a highly visible and frequently referenced enterprise-wide policy to affirm leadership commitment to asset management across all departments.

Plan does not clarify roles and define supporting processes. The company’s asset management plan, which is intended to implement the strategy and policy, partially aligns with FTA leading practices in that it includes summarized roles and responsibilities. The plan, however, is missing other important elements. For example, the plan does not describe how each department’s business processes should support the company’s broader SOGR target or outline the activities and resources needed to achieve it, as FTA practices suggest. One official involved in developing the plan told us it serves more to document current work than to identify actions to reduce the backlog.

FTA leading practices call for a plan to detail the activities and resources needed for addressing the policy and strategy.

Further, the company does not use the plan to manage its SOGR efforts and communicate roles and responsibilities to relevant internal stakeholders. As a result, company officials in charge of SOGR efforts told us that it was not clear which departments had authority over which assets. Some officials told us they were responsible for assets but they did not have the authority to make changes to them. In addition, these officials were uncertain about how staff should support each other.

These unclear roles and responsibilities have led to poor coordination, and confusing and longer decision-making processes between departments. For example, an IMCS official in charge of construction projects told us that Capital Delivery did not

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communicate its anticipated SOGR projects for the fiscal year until after the year started, making it difficult to prepare for projects and deploy workers.¹⁷ Amending the company's plan to identify the activities and resources needed to achieve its SOGR objectives, as well as using the plan to communicate roles and responsibilities to relevant internal stakeholders, would help the company better execute its SOGR work.

The Company is Improving its Data, but Better Controls Could Help It Maintain Accuracy and Usefulness

Another foundational step to asset management is developing a complete inventory of assets, accurate data on their underlying condition, and processes to maintain the data's accuracy and completeness. The company has made progress in building an inventory and consolidating data from multiple systems, but other data weaknesses inhibit its ability to develop meaningful performance metrics and effectively prioritize which assets to fix or replace.

Early in its history, the company relied on decentralized records and spreadsheets to serve as its infrastructure inventory. In 2006, the company implemented Maximo—to improve the tracking of assets and facilitate compliance with FRA requirements.¹⁸ To support these efforts, in 2022 the company began migrating to a Geospatial Information System (GIS), which provides an interactive map of Amtrak's network so users can locate assets along company routes. The company relies on both systems to store its infrastructure asset data; GIS serves as its official inventory, and Maximo is used to track its planned and executed maintenance work. Despite this progress, we identified the following three opportunities for the company to strengthen its data management to support its SOGR efforts.

Control deficiencies exist for maintaining databases. When we compared data from the two tracking systems—GIS and Maximo—for 18 of the company's 35 asset classes,¹⁹

¹⁷ According to Capital Delivery and Operations officials, the split of the Engineering department in 2022 may have exacerbated the issue, leading to overlapping work and responsibilities, as well as siloing between the two departments involved in SOGR efforts.

¹⁸ 49 C.F.R. requires the company to conduct safety inspections for three of the four asset types: communications & signals (49 C.F.R. Parts 234 and 236), structures (49 C.F.R. Part 237), and track (49 C.F.R. Part 213).

¹⁹ In its FY 2024 five-year asset line plan, the company identified 35 infrastructure asset classes. For our process for selecting the 18 classes we assessed, see Appendix A.

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we found that they aligned for some classes but not for others. For example, 100 percent of signal machines²⁰ in the Maximo database appeared in GIS, but only 69 percent of defect detectors did.²¹ Tables 1 and 2 show the extent to which the company's infrastructure data aligned between the two systems for the classes we reviewed.

Table 1. Infrastructure Assets in the Company's Inventory Database (GIS)

Asset Class	Asset Count	Assets Aligned with Maximo	Assets Not Aligned with Maximo	Percentage Aligned
Movable Bridges	17	17	0	100.00%
Tunnels	18	18	0	100.00%
Catenary Structures	18,556	18,541	15	99.92%
Substations	94	93	1	98.94%
Switches	4,647	4,589	58	98.75%
Transformers	1,249	1,231	18	98.56%
Undergrade Bridges	1,407 ^a	1,366	41 ^a	97.09%
Signal Machines	33	32	1	96.97%
Signal Bridges	575	553	22	96.17%
Switch Machines	3,814	3,583	231	93.94%
Grade Crossings	373	339	34	90.88%
Circuit Breakers	1,258	1,134	124	90.14%
Turnouts	3,791	3,407	384	89.87%
Defect Detectors	356 ^a	315	41 ^a	88.48%
Central Instrument Houses	3,447	3,030	417	87.90%
Frequency Converter Units	68	57	11	83.82%
Culverts	1,363	1,105	258	81.07%
Signals	4,474	2,989	1,485	66.81%
Total	45,540	42,399	3,141	93.10%

Source: OIG analysis of Maximo and GIS data, as of June 2025

Note:

^a We updated these numbers in August 2025 to reflect adjustments we made to arrive at accurate counts after the initial analysis.

²⁰ Signal machines transmit power to operate the signal system.

²¹ Defect detectors are pieces of equipment stationed along the right-of-way that identify defects or anomalies on a passing train, such as equipment dragging or hot bearings on a wheelset, as well as potential obstructions to rail traffic such as fallen rocks or boulders.

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**Table 2. Infrastructure Assets in the Company's Maintenance Tracking Database
 (Maximo)**

Asset Class	Asset Count	Assets Aligned with GIS	Assets Not Aligned with GIS	Percentage Aligned
Movable Bridges	17	17	0	100.00%
Signal Machines	32	32	0	100.00%
Tunnels	18 ^a	18	0 ^a	100.00%
Transformers	1,234	1,231	3	99.76%
Signal Bridges	555	553	2	99.64%
Undergrade Bridges	1,374	1,366	8	99.42%
Culverts	1,114	1,105	9	99.19%
Switches	4,629	4,589	40	99.14%
Frequency Converter Units	58 ^a	57	1 ^a	98.28%
Turnouts	3,499	3,407	92	97.37%
Catenary Structures	19,336	18,541	795	95.89%
Circuit Breakers	1,189	1,134	55	95.37%
Central Instrument Houses	3,247	3,030	217	93.32%
Signals	3,262	2,989	273	91.63%
Switch Machines	4,091	3,583	508	87.58%
Defect Detectors	458	315	143	68.78%
Substations	197	93	104	47.21%
Grade Crossings	983	339	644	34.49%
Total	45,293	42,399	2,894	93.61%

Source: OIG analysis of Maximo and GIS data, as of June 2025

Note:

^a We updated these numbers in August 2025 to reflect adjustments we made to arrive at accurate counts after the initial analysis.

To understand the causes of any discrepancies, we further analyzed 1,726 assets that were in Maximo but not in GIS, and 227 that were in GIS but not Maximo.²² We shared these discrepancies with company officials so they could assess the reason for each

²² This analysis included 11 asset types in Maximo and 9 in GIS. A listing of these classes is shown in Appendix D. Our findings for the classes we reviewed with the company cannot be used to make inferences about the remainder of the classes that we did not review with the company.

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misalignment.²³ In response to our observations, the company took additional steps to improve its data. For example, our initial analysis found that only 47 percent of the substations identified in Maximo also appeared in GIS; this improved to 96 percent after we discussed our findings with the company.

After our review and the resulting company improvement actions, all asset classes identified in Tables 1 and 2 had at least a 67 percent alignment between the two systems as of August 2025. Nonetheless, we identified the following additional control deficiencies that contributed to the initial data misalignment and could continue to negatively impact data quality if not addressed:

- *No process to monitor completeness of inventory.* Some of the discrepancies we identified were assets that the company was no longer operating and therefore should have been removed,²⁴ or were new assets that the company had not yet added to both databases.²⁵ Such circumstances occurred because, when we conducted our review, the company had not yet established controls to ensure that assets were appropriately added or removed from its systems, as leading practices suggest. Instead, IMCS officials relied on informal activities such as weekly meetings where managers could learn of new assets. In July 2025, the Capital Delivery department established a process for adding, modifying, and removing assets to its inventory. This new process appears to address the gap we identified, but it is too soon to tell how the company is implementing it. Monitoring the new process to assess its effectiveness and regularly confirming data completeness would help the company maintain accurate, up-to-date information.
- *Efforts to clean up data are not complete.* Some discrepancies were caused by inaccurate data, such as incorrect identification numbers or duplicate entries. These discrepancies occurred, in part, because the company lost an automatic data update feature when it implemented GIS in 2022. Since 2023, the company

²³ For example, the company sometimes tracks assets in GIS that it is not responsible for maintaining if they are part of its right-of-way; these would not be tracked in Maximo. Conversely, in some cases, the company will track large assets such as bridges as multiple entries in Maximo to distribute the maintenance requests over different timeframes; therefore, the totals in Maximo would differ from the totals in GIS.

²⁴ In Maximo, 648 of the assets listed were no longer operating. In GIS, 59 of the assets listed were no longer operating.

²⁵ In Maximo, six new assets were not accounted for. In GIS, 43 new assets were not accounted for.

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has been cleaning the data and progressively restoring this feature, asset by asset.²⁶ The departments intend to complete these efforts by the end of 2026.²⁷ Doing so will help ensure that the data in the systems are accurate and reliable for all users.

Having accurate and complete data in both systems will help inform the company's decisions about where to invest its SOGR resources, as well as day-to-day activities that contribute to running a safe and efficient railroad. For example, if assets are missing from the inventory database, it could increase the risk that the company will not perform safety-related maintenance on them. Conversely, if outdated assets remain in the system, the company might unnecessarily maintain them, which would add cost and consume staff resources that could be dedicated to other efforts.

Efforts to collect data on asset condition are not yet complete. The company has multi-year efforts underway to collect better data on the condition and criticality of its infrastructure assets.²⁸ This is in line with leading practices, which suggest that collecting data on asset condition helps organizations make more timely and effective decisions about when to fix or replace their infrastructure. The company, however, does not have an estimated date for when it will complete the improvement of its condition data.

Without complete condition data, the company has relied on age or other condition criteria, as well as the institutional knowledge of division leads in the field, to identify assets in need of repair or replacement. Relying on age as a measure of condition, however, increases the risk that the company prioritizes older assets at the expense of newer ones that may be in worse condition.²⁹ Further, although company officials provide valuable information on the company's infrastructure, such knowledge can be

²⁶ The company has an ongoing two-step process to re-establish this feature. First, for each asset class, Operations officials manually review and update the data to align it between the two systems. After updating all the assets in a class, the Digital Technology department restores the automatic update feature for that class.

²⁷ As of January 2026, it has instituted automatic data updates for 25 asset classes, and 32 assets remain.

²⁸ The company developed a condition assessment framework in 2018 but, at that time, did not implement or conduct the related condition assessments.

²⁹ Compounding this problem, the company's current investment decision process does not always incorporate the SOGR scoring assigned to its infrastructure assets, according to company officials. Assessing the company's prioritization process to arrive at its capital plan was outside the scope of our review.

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less reliable than data-driven inputs. For example, division leads may prioritize assets in their own areas instead of balancing their needs with the company's entire infrastructure portfolio. Further, if key staff are absent or leave the company, this institutional knowledge may be lost.

Completing its asset condition assessments and establishing a process to use them as part of its SOGR planning activities will help the company make better informed decisions about which assets to fix or replace first. In addition, more accurate condition assessments would help the company identify the resources necessary to fix infrastructure most in need, as well as any trade-offs associated with deferred maintenance. To that end, the company has already seen initial gains—company officials told us that, during a recent effort to identify capital projects for deferral, they used condition data to make more effective decisions.

Upgrading the asset management system. Although the company is improving the asset data it collects, company officials told us their current system cannot fully support all planned activities, such as collecting and reporting on condition data, as described above.

In 2017, the company identified the need to upgrade their asset management system, Maximo, but it has not yet done so. As of February 2026, the company decided to upgrade to a newer version of Maximo that will include tools to advance its asset management capabilities, including centralized condition assessments, lifecycle management, and performance analyses for individual assets. The company is soliciting a contractor to integrate the newer version of Maximo with other company systems, as leading practices suggest, and anticipates selecting one in spring 2026.³⁰ Given the company's ongoing efforts to modernize its asset management system, we are not making a recommendation at this time but will continue to monitor the company's progress.

CONCLUSIONS

At its inception, the company inherited a railroad that was largely in a state of disrepair. Since then, it has worked to improve its asset management capabilities. Despite these efforts, the company still has significant opportunities to improve its core infrastructure asset management practices. Including specific objectives in its infrastructure asset

³⁰ Our scope did not include assessing the requirements gathered or the capabilities planned for this new version of Maximo.

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management strategy, making the accompanying policy more visible, and improving its supporting plan would enable the company to better assess its progress, articulate the return on the taxpayers' investment, and align the company's efforts to eliminate its SOGR backlog. Additional actions—such as solidifying data-related controls and advancing the collection of condition data—would help ensure that the company has a reliable foundation of data to make better investment decisions and support its future operations.

RECOMMENDATIONS

To address these issues, we recommend that the Executive Vice President, Chief Operations Officer, and the Executive Vice President, Capital Delivery:

1. Fully establish a governance framework for the company's infrastructure asset management by taking the following actions:
 - a. Amend the company's infrastructure asset management strategy to include specific objectives and performance metrics for bringing its assets into a state of good repair.
 - b. Develop and implement an approach to communicate the company's infrastructure asset management policy companywide.
 - c. Amend the company's infrastructure asset management plan to include activities and resources needed to meet its objectives, and develop and implement an approach to communicate roles and responsibilities to internal stakeholders.
2. Strengthen the company's data for SOGR decision making by taking the following actions:
 - a. Complete ongoing efforts to align the company's infrastructure asset data between Maximo and GIS. This should include re-establishing a feature to automatically update these data.
 - b. Establish a process to regularly validate that the company's infrastructure data are complete, accurate, and aligned between systems, as appropriate. As part of this process, regularly monitor the effectiveness of the company's practice to add and remove infrastructure assets in Maximo and GIS.

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- c. Complete ongoing infrastructure condition assessments and establish a process to ensure that the company uses these assessments to inform SOGR activities.

MANAGEMENT COMMENTS AND OIG ANALYSIS

In commenting on a draft of this report, the Executive Vice President, Chief Operations Officer, and the Executive Vice President, Capital Delivery, agreed with our recommendations and identified actions the company plans to take to address them, which we summarize below.

- **Recommendation 1:** Management agreed with our recommendation to fully establish a governance framework for the company's infrastructure asset management. Management stated that the company plans to publish a new asset management lifecycle strategy in its 2026 Infrastructure Asset Line Plan. It also plans to develop an Infrastructure Asset Management Policy, a Strategic Asset Management Plan, and an Infrastructure Renewal Policy, all of which management plans to communicate companywide. The target completion date is September 30, 2028.
- **Recommendation 2:** Management agreed with our recommendation to strengthen the company's data for SOGR decision making. Management stated that the company will continue ongoing efforts to automatically update data communication between GIS and Maximo. Additionally, the company is developing an engineering practice for identifying, documenting, and submitting asset data impacted by capital projects and programs to ensure data are regularly added and updated. Further, the company plans to complete its condition assessments and use them to drive infrastructure investments on SOGR activities. The target completion data is September 30, 2031.

For management's complete response, see Appendix D.

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APPENDIX A

Objective, Scope, and Methodology

This report provides the results of our audit of the company's efforts to achieve a state of good repair for its infrastructure assets. Our objective was to assess the company's governance and data for managing its SOGR work. Our scope covered the company's core asset management processes as described in FTA's asset management maturity model's first two levels; that is, the governance structure (strategy, policy, and plan) and asset inventory data. Our scope did not include levels 3-5 of the model, nor did it include the company's prioritization process to arrive at its capital plan.

Our review was focused on the company's infrastructure assets. Accordingly, our scope included company processes related to four types of infrastructure assets: structures, track, communication and signals, and electric traction. It did not include fleet, stations, or facilities. Our review covered the company's actions beginning in 2016 after the passage of the FAST Act—which required the company to begin submitting infrastructure asset line plans—through the end of our audit work. We performed our audit work from November 2024 through February 2026 in Philadelphia, Pennsylvania, and Washington, D.C.

To assess the company's SOGR efforts, we reviewed federal requirements and industry leading practices for asset management, including requirements related to the submission of the company's five-year asset line plans.³¹ We also reviewed the FTA's *Transit Asset Management Guide*, which is a compilation of several other sources of leading practices in asset management.³² We confirmed with company officials responsible for SOGR efforts that the FTA guide was appropriate for assessing the company's infrastructure asset management efforts.

Over the course of our audit, we conducted 64 interviews with officials in the Capital Delivery, Operations, and Finance departments. These included the Executive Vice

³¹ 49 U.S.C. § 24320 & 24904.

³² FTA's guidance references PAS55 (British Standards Institute), International Infrastructure Management Manual (New Zealand Asset Management Support), ISO 55001 asset management committee (International Organization for Standardization), and American Association of State Highway and Transportation Officials Transportation Asset Management Guide: Volume 2 – A Focus on Implementation. See FTA, *Transit Asset Management Guide – Focusing on the Management of Our Transit Investments*, (Report No. 0098), November 2016.

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Presidents for Capital Delivery and Operations. In addition, we interviewed officials from the Federal Railroad Administration, Northeast Corridor Commission, and the external consultant that reviewed the company's asset management efforts.

To describe the SOGR backlog and its history, we reviewed the company's five-year asset line plans from 2017 through 2024 and summarized the progress of the company's asset management over those years. We also reviewed the Northeast Corridor Commission's *Northeast Corridor Commuter and Intercity Rail Cost Allocation Policy*, which provides research on the company's SOGR history.

To assess the company's governance for managing its SOGR work, we reviewed company documents, including its infrastructure asset management strategy, policy, and plan.³³ To assess the completeness of these documents, we compared them to FTA leading practices. In addition, we interviewed officials from Capital Delivery and Operations who were responsible for managing SOGR work, including representatives from Capital Delivery infrastructure disciplines and IMCS divisions. We then analyzed these interviews for reportable themes.

To assess the completeness of the company's inventory data, we compared data on asset classes from GIS (its inventory database) and Maximo (its maintenance tracking database) that the company counts by individual unit rather than by distance. For example, bridges are counted by individual unit, but track is measured by distance. This approach allowed us to do a comparative analysis of the number of assets in each class. Of the company's 35 infrastructure asset classes, we initially identified 29 that the company counts by individual unit. Later, in discussions with company officials, we learned that 11 of these classes are tracked in ways that precluded us from consistently performing this analysis. As a result, we ultimately selected 18 classes for our analysis.

After confirming our methodology with company officials in charge of the data, we compared the two databases to identify how many assets from each system were present in the other. In May 2025, we completed our first review and provided the results to the company. We initially planned to work with the company to perform a closer review of assets in all 18 classes that appeared in one of the data systems but not the other. Due to time and resource constraints, however, we were able to complete this closer review for only 11 classes in Maximo and 9 in GIS (see Appendix D). This included 1,726 assets that were in Maximo but not in GIS, and 227 that were in GIS but

³³ The strategy, policy, and plan are included in the *Amtrak FY24-29 Five Year Service and Asset Line Plans*.

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not in Maximo. Company officials did not review the discrepancies we found in the remaining seven classes in Maximo and nine in GIS. Our findings for the classes we reviewed with the company cannot be used to make inferences about the remainder of the classes that were not reviewed with the company.

To assess the company's efforts to collect condition data and advance its asset management system, we interviewed IMCS officials responsible for managing these efforts. We also reviewed IMCS planning documents to confirm the new and planned condition assessments, as well as pre-award contract documentation detailing the requirements of the new system. Our scope did not include the procurement process for the new version of Maximo, including the requirements gathered or the capabilities planned.

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 internal controls related to the company's governance and data for managing SOGR efforts. We assessed the relevant internal control components and underlying principles and determined that the following internal control areas were significant to our objective:

- **Control Environment:** Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.
- **Risk Assessment:** Management should define objectives clearly to enable the identification of risks and define risk tolerances. Management should identify, analyze, and respond to significant changes that could impact the internal control system.
- **Control Activities:** Management should design the entity's information system and related control activities to achieve objectives and respond to risks. Management should implement control activities through policies.

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- **Information and Communication:** Management should use quality information to achieve the entity's objectives. Management should internally communicate the necessary quality information to achieve the entity's objectives. Management should externally communicate the necessary quality information to achieve the entity's objectives.
- **Monitoring:** Management should establish and operate activities to monitor the internal control system and evaluate the results. Management should remediate identified internal control deficiencies on a timely basis.

We developed audit work to ensure that we assessed each of these controls. This included assessing whether the company established an organizational structure, defined clear objectives, and responded to weaknesses in a timely manner. In addition, we reviewed the company's asset inventory system to determine if the company has appropriate controls for maintaining complete and accurate inventory data. We have noted in this report the control deficiencies our audit work identified. We did not review the company's overall system of controls and procedures. Because our review was limited, we may not have identified, and therefore disclosed, all relevant internal control deficiencies that existed at the time of our audit.

Computer-processed Data

To determine the accuracy of the infrastructure asset inventory, we used computer-processed data from GIS and Maximo. We assessed the reliability of the data by interviewing department officials who maintain the data. We also took the following steps:

- We ensured that both sets of data were downloaded on the same day to minimize discrepancies due to time differences.
- We compared the GIS data the company provided to its online dashboard, which pulls data from the same database. Although we found errors in the data the company provided, the company corrected the errors and provided new files. We compared the data again and found that they were valid and reliable.
- We validated that we used the correct class codes for each system. Specifically, the company provided the appropriate class codes to use for downloading data from Maximo and confirmed that we were using the correct class codes for our analysis of Maximo data.

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- We used our comparison of the data across the two systems as an additional validation step. The discrepancies we found in that comparison are reflected in the results of the comparison that we discuss in the report.

Based on our professional judgement, as well as tests and work performed, we determined that the data were sufficiently reliable for the purposes of our audit, and we reported on the discrepancies we identified in our comparison of data across the two systems.

Prior Reports

In conducting our analysis, we reviewed the following reports:

- *Information Technology: Better Identifying and Tracking Operational Technology Assets Across the Company Would Improve Cybersecurity* (OIG-A-2023-002), November 7, 2022
- *Governance: More Effective Planning and Coordination of Track Outages Would Help Achieve a State of Good Repair* (OIG-A-2020-016), September 14, 2020
- *Asset Management: More Effective Management of Vehicle Fleet Would Improve Safety and Reduce Costs* (OIG-A-2020-007), March 17, 2020
- *Asset Management: Improved Inventory Practices Could Help the Company Better Manage its Maintenance-of-Way and Rolling Stock Equipment* (OIG-A-2019-010), July 25, 2019

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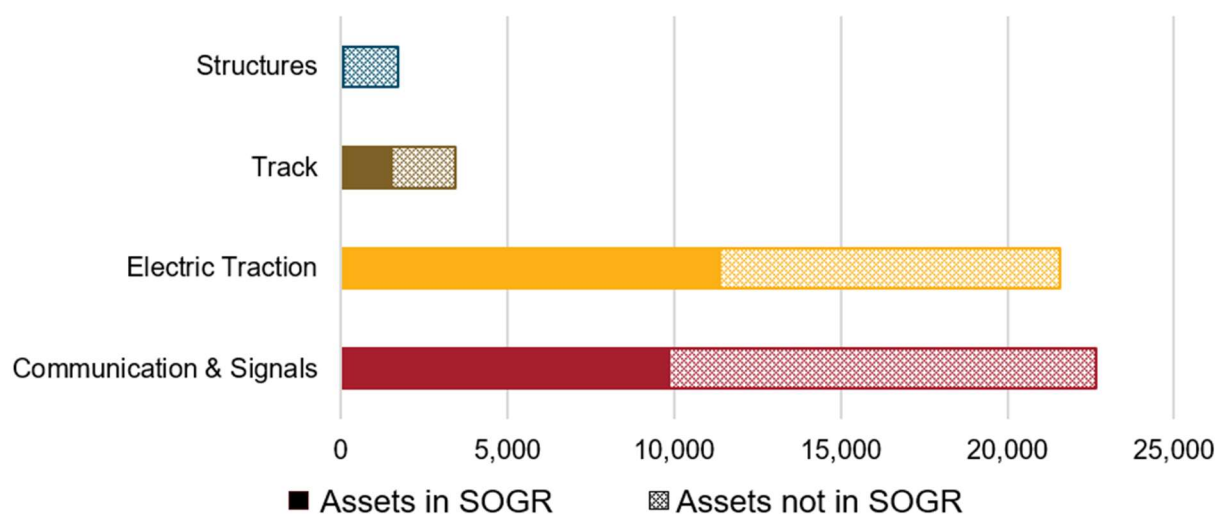
APPENDIX B

Company Reporting on the SOGR Status of its Infrastructure Assets

To obtain a picture of the overall status of the company's infrastructure assets, we analyzed the assets the company reported in its FY 2024 five-year plan and estimated the number in a state of good repair using a percentage value the company reported for each asset class. Across its 4 asset types, the company reported 35 asset classes. Of these, it counted 25 by individual unit and 8 by distance, such as linear feet or track miles. The remaining 2 asset classes are concrete and wooden ties, which it counted by individual unit. We describe the results of our analysis below.

- **Assets measured by unit.** Of the 49,407 assets measured by unit, 53.8 percent were not in a state of good repair. Figure 6 shows the breakdown by asset type.

Figure 6. Assets Measured by Units

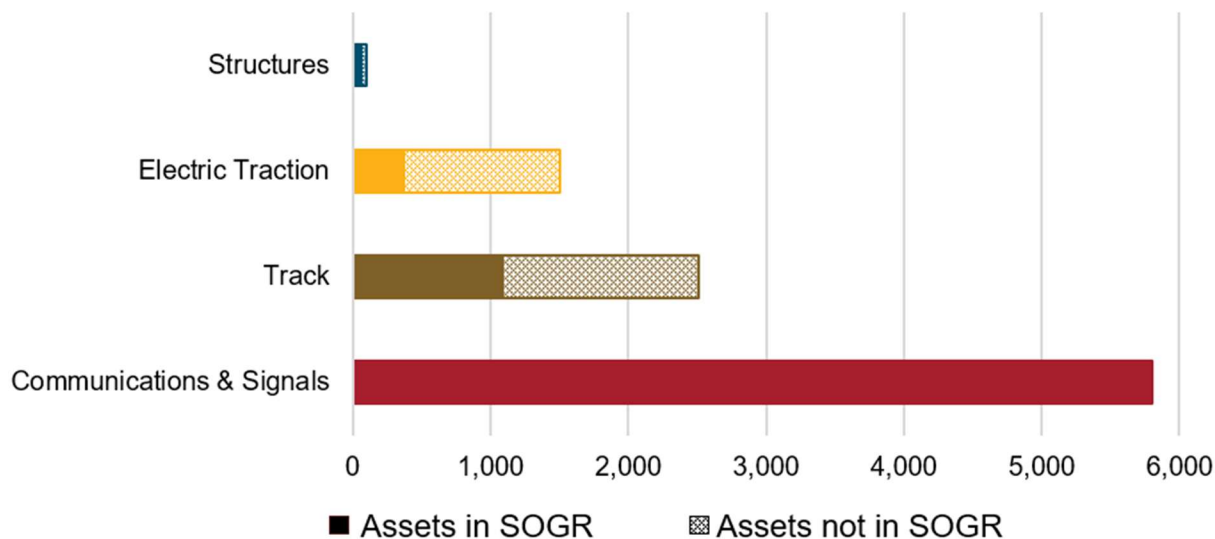


Source: OIG analysis of the company's FY 2024 five-year asset line plan

- **Assets measured by distance.** Of the 9,913 miles of assets measured by distance, 26.2 percent were not in a state of good repair. Figure 7 on the next page shows the breakdown by asset type.

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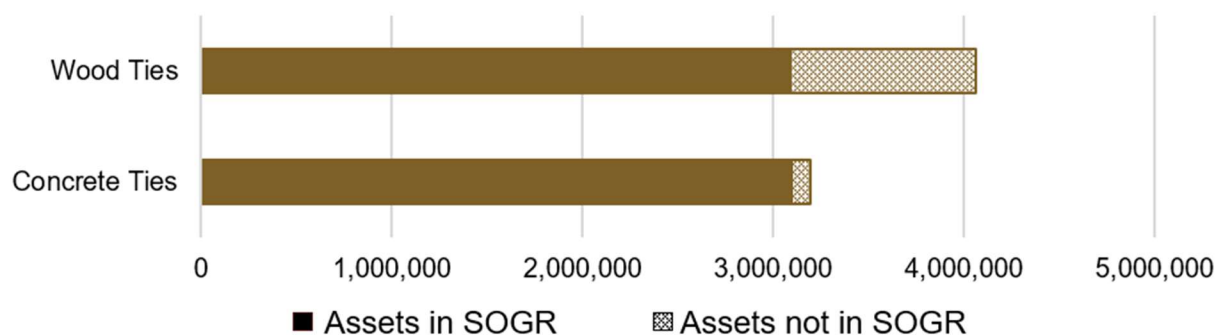
Figure 7. Assets Measured by Distance (in Miles)



Source: OIG analysis of the company's FY 2024 five-year asset line plan

- Railroad Ties.** We analyzed ties separately because the total number of ties is over 7 million, which would make a side-by-side comparison with the other asset classes difficult. Of the 7,259,600 ties the company reported, 14.8 percent were not in a state of good repair. Figure 8 shows the breakdown between wooden and concrete ties.

Figure 8. Railroad Ties



Source: OIG analysis of the company's FY 2024 five-year asset line plan

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APPENDIX C

Asset Misalignment Discussed with the Company

Asset Class	OIG Assessed in GIS & Maximo	Assets not Aligned with Maximo Discussed with the company	Assets not Aligned with GIS Discussed with the company
1. Frequency Converter Units	x	x	x
2. Transformers	x	x	x
3. Substations	x	x	x
4. Undergrade Bridges	x	x	x
5. Signal Bridges	x	x	x
6. Grade Crossings	x	x	x
7. Defect Detectors	x	x	x
8. Switches	x	x	x
9. Signal Machines	x	x	
10. Signals	x		x
11. Switch Machines	x		x
12. Tunnels	x		x

Source: OIG analysis of Maximo and GIS data

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APPENDIX D

Management Comments

NATIONAL RAILROAD PASSENGER CORPORATION

Memo



Date: April 3, 2026

From: Laura Mason, EVP Capital Delivery

Liam McQuat on behalf of Laura Mason

Gerhard Williams, EVP Chief Operations Officer

To: John Marzullo,
Assistant Inspector
General, Audits

Department(s): Capital Delivery and
Operations

cc Roger Harris, President
 Ken Altman, VP Government Affairs & Corporate
 Communications
 Kuvesh Ayer, VP Chief Procurement Officer &
 SCO
 Costin Corneanu, EVP Chief Financial Officer
 Eliot Hamlisch, EVP Marketing & Chief
 Commercial Office
 William Herrmann, EVP Chief Legal and Human
 Resources Officer & Corporate Secretary
 Liam McQuat, VP Engineering Services
 Jennifer Mitchell, EVP Strategy & Planning
 Steven Predmore, EVP Chief Safety Officer
 Christian Zacariassen, EVP Digital Technology
 and Innovation

Subject: Management Response to *Asset Management: Better Governance and Data Would Improve Company Efforts to Achieve a State of Good Repair* (Draft Audit Report for Project No. 002-2025).

This memorandum provides Amtrak's response to the draft audit report titled, "Better Governance and Data Would Improve Company Efforts to Achieve a State of Good Repair". Management agrees with all the noted OIG recommendations below and appreciates the opportunity to provide a response.

To address the issues noted in the audit report, the OIG recommends that the Executive Vice President, Chief Operations Officer, and the Executive Vice President, Capital Delivery, take the following action(s):

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NATIONAL RAILROAD PASSENGER CORPORATION

Recommendation #1:

Fully establish a governance framework for the company's infrastructure asset management by taking the following actions:

- a. Amend the company's infrastructure asset management strategy to include specific objectives and performance metrics for bringing its assets into a state of good repair.
- b. Develop and implement an approach to communicate the company's infrastructure asset management policy companywide.
- c. Amend the company's infrastructure asset management plan to include activities and resources needed to meet its objectives and develop and implement an approach to communicate roles and responsibilities to internal stakeholders.

Management Response/Action Plan: Amtrak concurs with the recommendation. Amtrak's Infrastructure Maintenance & Construction Services (IMCS) and Capital Delivery (CAPD) departments are committed to establishing a governance framework for the company's infrastructure asset management. The Infrastructure Asset Line Plan 2026 (IALP 2026), which is nearing publication, provides a strategy for managing assets across their lifecycle, including focus areas, goals, and objectives that advance standardized practices, clarify organizational alignment, and strengthen lifecycle-based asset management to bring assets into a state of good repair. An Infrastructure Asset Management Policy is under development to establish an enterprise-level approach to managing infrastructure assets that align with corporate strategies and business priorities. A Strategic Asset Management Plan (SAMP) and Infrastructure Renewal Policy that includes activities and resources needed to meet objectives and define internal stakeholder roles and responsibilities will be developed. Once finalized, the Asset Management Policy, SAMP, and Infrastructure Renewal Policy will be communicated companywide. Taken together, IALP2026 and associated future policies and plans will address this recommendation.

Responsible Amtrak Official(s): Gerhard Williams, EVP, Chief Operations Officer
 Laura Mason, EVP, Capital Delivery

Target Completion Date: September 30, 2028

Recommendation #2:

Strengthen the company's data for SOGR decision making by taking the following actions:

- a. Complete ongoing efforts to align the company's infrastructure asset data between Maximo and GIS. This should include re-establishing a feature to automatically update this data.

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NATIONAL RAILROAD PASSENGER CORPORATION

- b. Establish a process to regularly validate that the company's infrastructure data are complete, accurate, and aligned between systems, as appropriate. As part of this process, regularly monitor the effectiveness of the company's practice to add and remove infrastructure assets in Maximo and GIS.
- c. Complete ongoing infrastructure condition assessments and establish a process to ensure that the company uses these assessments to inform SOGR activities.

Management Response/Action Plan: Amtrak concurs with the recommendation. Strengthening the data used for SOGR decision making is a priority for Amtrak's Infrastructure Maintenance & Construction Services (IMCS) and Capital Delivery (CAPD) departments. Efforts to align and automatically update infrastructure data between GIS and Maximo 7.5 are ongoing with support from Amtrak's Digital Technology (DT) department. For Amtrak's upcoming implementation of Maximo Application Suite (MAS), DT has committed to full integration with GIS prior to go-live. To supplement the systems integration, IMCS and CAPD are developing an Engineering Practice (EP) that establishes a required process for identifying, documenting, and submitting infrastructure asset data impacted by capital projects and programs to ensure infrastructure asset data is regularly added and updated as appropriate. IMCS and CAPD are working to complete ongoing infrastructure condition assessments, and to develop the Renewal and Maintenance Priority (RaMP), a structured, data-driven framework designed to prioritize infrastructure investments based on both asset condition and operational criticality to inform SOGR activities. Taken together, these efforts to modernize the Enterprise Asset Management (EAM) program for infrastructure will address this recommendation. Although 2031 is the target completion date, there will be incremental gains made in strengthening the company's data for SOGR decision making between now and then.

Responsible Amtrak Official(s): Gerhard Williams, EVP, Chief Operations Officer
Laura Mason, EVP, Capital Delivery
Christian Zacariassen, EVP, Digital Technology and Innovation

Target Completion Date: September 30, 2031

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APPENDIX E

Abbreviations

FTA	Federal Transit Administration
FY	Fiscal Year
GIS	Geospatial Information System
IMCS	Infrastructure Maintenance and Construction Services
NEC	Northeast Corridor
OIG	Amtrak Office of Inspector General
SOG	state-of-good-repair
the company	Amtrak

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APPENDIX F

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OIG MISSION AND CONTACT INFORMATION

Mission

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

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