



FEDERAL TRANSIT ADMINISTRATION

2018 SSO Program Workshop

Auditing Rail Transit Agencies

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Topics For Discussion

1. Part 659 Reviews vs. Part 674 Audits
2. Parts of an Audit—What to do?
3. Staffing – Who's gonna' do it?
4. Audit Procedures – How it gets done!
5. Findings & CAPs – Now what?

Part 659 Review vs Part 674 Audit Requirements

659.29

- At least every three (3) years the SSOA must conduct an onsite review of the RTA's implementation of its SSPP and system security plan.
- The SSOA must prepare and issue a report containing findings and recommendations resulting from that review, which, at a minimum, must include an analysis of the effectiveness of the SSPP and the security plan and a determination of whether either should be updated.

5329(d)(4)(A)

- Each SSO program shall establish a SSOA that: (vi) audits, at least once triennially, the compliance of the RFGPTS in the eligible State subject to this subsection with the public transportation agency safety plan required under subsection

Language from 674.31

- At least once every three years, an SSOA must conduct a complete audit of an RTA's compliance with its Public Transportation Agency Safety Plan
- The SSOA shall issue a report with findings and recommendations arising from the audit, which must include, at minimum, an analysis of the effectiveness of the Public Transportation Agency Safety Plan, recommendations for improvements, and a corrective action plan, if necessary or appropriate. The RTA must be given an opportunity to comment on the findings and recommendations.

Part 659 Review vs Part 674 Audit Comparison

Item	Part 659	Part 674
Review/Audit Scope	Review of RTA Safety & SECURITY Plans & Program	Audit of RTA Safety Plan & Program
Report Content	<ul style="list-style-type: none">Findings/RecommendationsEffectiveness of the SSPP	<ul style="list-style-type: none">Findings/RecommendationsEffectiveness of the PTASPRecommendations for improvementsCAP if appropriate
RTA Review Period	N/A	RTA is given opportunity to comment on findings and recommendations

Part 659 Review vs Part 674 Audit

Meriam-Webster Definitions

- Review—A general Survey (as of the events of a period)
- Audit—A methodical examination and review
- Examine—To inquire into carefully; Investigate

Parts of an Audit



Parts of an Audit

Discussion - Inspections

- Inspections
 - What inspections does the audit focus on?
 - Track? Vehicles? Operations? Signal?
 - RWVP badge, RWVP work locations, facility cleanliness, lockout/tagout?
 - How is inspection coordinated with RTA?
 - Announced/Unannounced Inspections?
 - Work-zone observations? (Midnight)
 - How do you identify potential problem areas?

Parts of an Audit

Discussion – Record Review

- Record Review
 - What types records are prioritized (PMI, training, etc.)?
 - How many to look at (Sample sizes)?
 - Are records for the entire system sampled (Red Line/Green Line)?
 - What period of records are sampled? All 3-years?
 - How do you prioritize or select which records to sample (where do you expect to find problems)?

Staffing

Discussion (Without Contractor)

- Non-Contractor support
 - Finding time to schedule within 3-years and develop report?
 - Challenges with Expertise?
 - Hiring the right folks?
 - Borrowing from other offices?

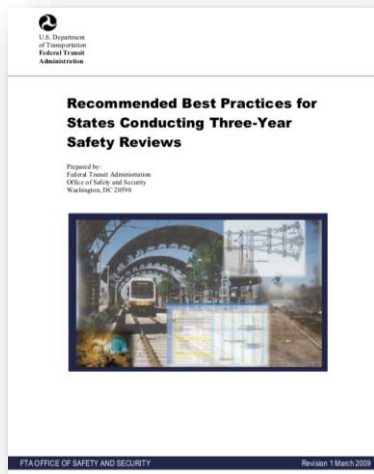
Staffing Discussion (With Contractor)

- Contractor support
 - SSO Staff Participation?
 - Determining approach/scope?
 - Are Control and Awareness more of a challenge?
 - Long-Term vs. Task-Based Contracting?

Audit Procedures

Sample Audit Checklist

Reference:



<https://www.transit.dot.gov/oversight-policy-areas/ss0-three-year-review-recommended-best-practices-march-26-2009-final>

Audit Activity	Audit Checklist – #13 Rule Compliance
Document Review	SSPP Compliance with Program Standard Internal Review Findings
Record Review	Sample Efficiency Check of Operators RWP compliance audit program
Interview	Interview RTA Management and Safety
Interview	Interview Operators and Mechanics
Field Observation	Witness Supervisor conducting Efficiency Check/ RWP badge check
Inspection	Conduct independent Efficiency Check, inspect radios, PPE, etc.
Rule Review	Review Rulebook revision process, how long bulletins in effect, maintenance SOPs

Audit Procedures

Discussion (Ongoing vs. 3-year)

- Ongoing Audits
 - Staffing/Resource Impact?
 - Frequent on-site activity?
 - # of Findings?
- Once every 3-years
 - Preparation and scheduling?
 - Typical on-site timeframe?
 - # of Findings?

Audit Procedures

Sample Audit Checklist

Best Practice Example:

Ongoing audit schedule and comprehensive for all lines

Elements	2018	2019	2020
Maintenance & Inspection (#14 & 15)	Red Line Facilities	Green Line Facilities	Vehicles
Training & Certification (#16)	Red Line Operators	Green Line Operators	Mechanics
Administration Elements	1-5	6-13	17-21

Findings and CAPS Discussion

- Common Findings
 - What are common 3-year review findings?
 - Are thresholds provided to guide findings?
 - 10% of accidents not reported within 2-hours?
 - 10% of noncompliant PM inspections?
- CAPS
 - Do all findings result in CAPs?
 - How are CAPs developed for findings of previous issues?
 - Inspections not performed last year, but now current?

Findings and CAPS

Sample SSOA 3-year Findings

- Top Findings
 - Maintenance inspection records are not sufficiently maintained or missing documentation
 - Training records are not sufficiently maintained or missing documentation
 - Hazard management program not sufficiently implemented
 - Not all required items, including hazards, are tracked as CAPs
 - Drug and Alcohol testing not completed with required thresholds (post accident)

Questions?

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