FTA

2017 SSO Training Workshop

SSO Audit Process

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Federal Transit Administration

SSO Audit Program Overview

- Audit Program Background

- Audit Team

- Audit Cycle 6

- Audit Activities
  - Timeline, Activities, Pre- and Post-Audit

- Audit Report Process
  - Report and Tracking Matrix

- Audit Findings, OFEs

- Discussion

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SSO Audit Program Background

- 49 CFR Part 659.7 requires FTA to monitor and evaluate compliance of the SSO agencies with FTA's SSO rule

- FTA has designated an SSO Program Manager for each State who leads the audit effort

  - Joe Powell

  - Eric Madison

  - Juan Morrison

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SSO Audit Team

Subject Experts

Program Manager

Regional SSO Contact

FTA HQ

Team Lead

FTA Region

Contractors

Other Regional Personnel

Audit Team

Technical Experts

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SSO Audit Team

FTA Region

Connect States and FTA HQ

- Identifies concerns during pre-audit
- Provides continuity with grantee executive management
- Provides additional information to team regarding ongoing projects
- Supports resolution of findings

FTA HQ

Oversee and Manage Audit

- Approves all Findings
- Brings authoritative response during audits
- Provides SSO Program expertise
- Clarifies requirements for SSO Agency and RFGPTS
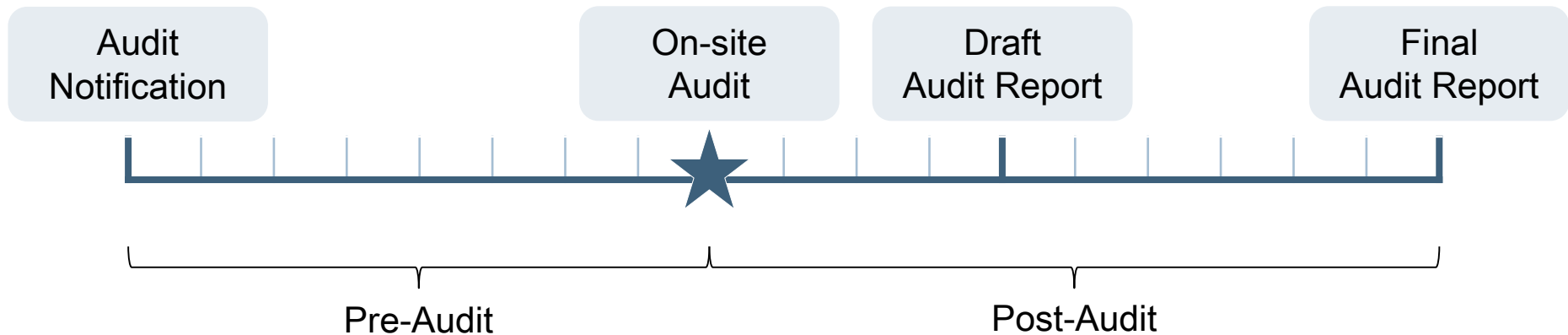- Leads audit

Contractor

Technical Expertise and Support

- Coordinates with audit participants through audit process
- Provides subject matter expertise
- Tracks Findings to resolution

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SSO Audit Cycle 6

- FTA has completed 5 audit cycles

- Cycle 6 runs from January 1, 2017 – April 15, 2019
  - Each State will be subject to Audit Cycle 6

- States continue implementing Part 659 while transitioning to Part 674

- Information collected through the SSO audit program will support the SSOA's Part 674 certification

SSO Audit Timeline Overview

Audit Notification — On-site Audit — Draft Audit Report — Final Audit Report

Pre-Audit | Post-Audit

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SSO Audit Activities

Four major audit phases:

Pre-Audit Activities

Pre-Audit

- FTA issues Pre-audit notification
  - Draft audit schedule & Document request

- SSOA submits documentation
  - Sensitive security information to be reviewed on-site

- FTA and SSOA coordination call
  - Includes FTA TSO and Region

- SSOA coordinates with RTAs to develop the final on-site schedule with locations and personnel


Issue Pre-Audit Notification
Pre-Audit Documentation Submitted
Conduct Coordination Call with SSO & Region
Finalize Audit Schedule
Complete Pre-Audit Review
On-Site Audit

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On-site Audit Activities

Entrance Briefing

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Conduct Interviews

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Conduct Field Observations & Verification Activities

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Conduct Records Review

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Exit Briefing

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Post-Audit

- On-site audit activities led by the FTA SSO Program Manager assisted by a lead auditor and audit team

- Entrance briefing
  - Introduces the audit team, participants and activities

- Sessions
  - Interviews and records reviews
  - Observations and field verification activities

- Exit briefing
  - Present observations and preliminary concerns
  - Explain post-audit process

- *Portions of the audit maybe conducted via teleconference*

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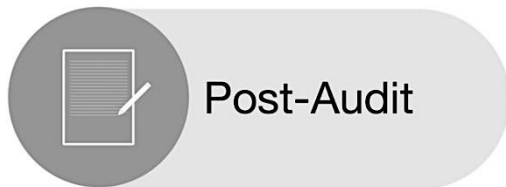
Post-Audit Activities
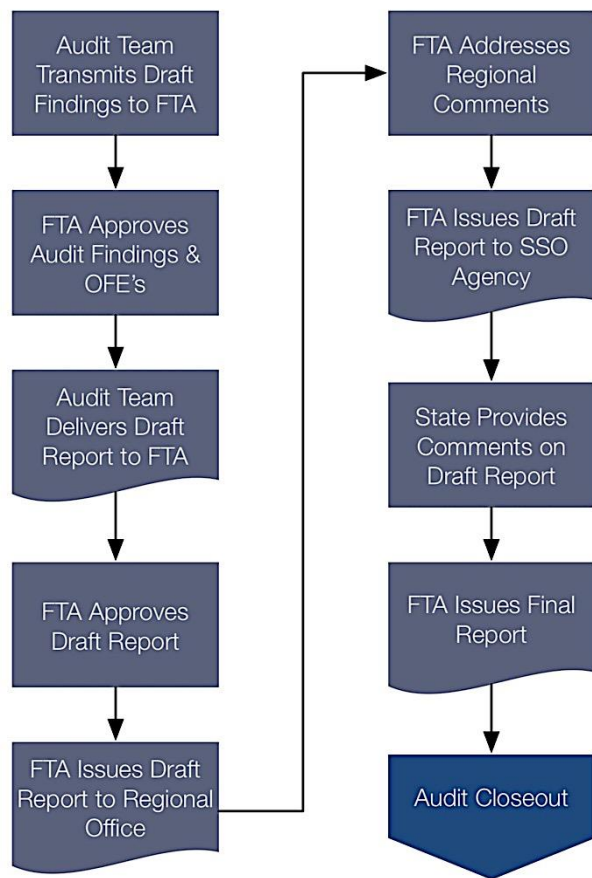
- Draft audit report developed and reviewed by FTA internally

- Draft audit report provided to the SSOA for review and comment period (2 weeks)

- FTA reviews the SSOA's submitted comments to the draft report

- Final audit report developed and distributed to the SSOA

- FTA to post final audit reports on its website
  - Personal or SSI information is redacted prior to posting

SSO Audit Report Process

- Draft Report
- Final Report
- Tracking Matrix

SSO Audit Findings

The Audit Finding	
FTA Rule Requirement	Citation of requirement(s) at issue in the finding
Finding	Finding text
Source	Reference to the specific document(s), procedure(s), or other item(s) serving as the basis of the finding
Required Action(s)	Actions the SSO agency must take to resolve the finding

SSO Audit OFEs

- Opportunities for Enhancement (OFEs) do not indicate noncompliance with Part 659

  - The SSOA is not obligated to implement a CAP for OFEs

- FTA will issue OFEs when:

  - Enhancements can be made to the SSO program for Part 674 compliance

  - Elements are outside of either Part 659 or Part 674, but represent enhancements that would strengthen the SSO program

- OFEs are intended to serve as Technical Assistance to aid the SSO in achieving program certification prior to April 15, 2019

DISCUSSION

Certification Application Process Discussion

- Questions?

  – Audit process, on-site activities, findings, OFEs?

Questions?

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