Appendix L

Version: 10/01/2021

Internal Safety Audit Process

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Internal Safety Program Audits Process

Oversight of Internal Safety Program Audits

Internal Safety Audits are required per 49 CFR Part 674.27(a)(4) and 673.27(d). As part of the NJDOT SSO program, each New Jersey RTA/RFGPTS is required to develop a three-year cycle of internal compliance audits of all aspects of the ASP, covering approximately one-third of these components and subcomponents each year. The purpose of the internal safety audits is to compare the content of the safety program documentation (baseline) to the activities that the RTA/RFGPTS actually executes in order to assure that these activities are being sufficiently completed and safety performance is meeting or exceeding the established targets. Findings and changes might require the program documentation or minimum standards for safety be updated to reflect current activities or activities might need to be changed or added so that the documents and activities match.

ASP Internal Safety Compliance Audits. The following breakdown is provided to explain the expectations of the NJDOT SSO program in order to complete the entire scope for the SMS and safety program implementation:

- **ASP/SMS Implementation** review and audit of progress – Complete annually with review of the ASP and safety program related control documents/minimum standards for safety. This audit includes an accounting of progress towards safety performance targets for improvement, continuous improvement, and assurance of program recordkeeping.
- **Safety Management Policy** review and audit – Complete annually with review of the ASP.
- **Safety Risk Management** review and audit – Schedule once during the three-year cycle based on other planned audits and resources.
- **Safety Assurance** review and audit – Start this audit as soon as possible within the three-year cycle in order to complete the audit of the topics and processes as listed next. Report progress towards completing this audit each year until complete.
- **Safety Promotion** review and audit – Schedule once during the three-year cycle based on other planned audits and resources.

Grouping of Safety Program Topics

In development of the Internal Safety Audit planning, the elements/topics of the Safety program related documents can be grouped for efficiency in completion of the audit activities. These groupings also match the safety management system (SMS) required for the ASP development. The general list of the safety program related control documents/minimum standards for safety documents have also been added to the groupings. Note that the RTA/RFGPTS can split up the groupings, components, subcomponents, and safety program related control document topics as desired; however, these topics are expected to be included in the three-year cycle of internal safety audits in some way. Note that there is no expectation that these internal safety audits will include the entire safety program and implementation of the SMS, only some aspects of each topic, with respect to risk priority. Note that the 24 elements/topics from the previous safety program document, System Safety Program Plan (SSPP) are included and organized into these 12 groupings.

Grouping 1. ASP/SMS Implementation

- Review records and recordkeeping for the SMS and its implementation
- Also use the results of the remaining audit groups to assess the SMS implementation
- Annual ASP Review and Update
  - Certification of Compliance
  - Element 4. Plan Review and Modification
- Documentation and Tracking of Minimum Standards for Safety
- Integration with Public Safety and Emergency Management
  - Element 11. Emergency Management Program
  - SEPP All Elements/Topics
  - Emergency Operations/Management Plan(s) and Related Training for RTA staff and Emergency Responders
  - Drills and Exercises Program
  - Most Recent TSA BASE Review
- Assuring Integration of the Safety Department in Policy and Procedure Development and Changes

Grouping 2. Safety Management Policy

- Safety Management Policy documentation, signed/endorsed by the Accountable Executive
- Agency's safety objectives
- Organizational Accountabilities and Responsibilities
- Employee Safety Reporting System
- Policy Communication Throughout Transit Agency
- Safety Program Definition and Administration
  - Element 1. Policy Statement
  - Element 2. Purpose, Goals, and Objectives
  - Element 3. Management Structure
  - Element 4. Plan Review and Modification
  - Element 5. Plan Implementation

Grouping 3. Safety Risk Management

- Hazard Identification
- Risk Assessment and then Prioritization
- Selection and Implementation of Mitigations
- Element 6. Hazard Management Process
- Element 7. Safety Certification Process – for the formal hazard analyses
- Element 8. System Modifications – for the formal hazard analyses
- Other sources of formal risk assessment, safety and public safety related

Grouping 4. Safety Assurance – Safety Performance Measures and Targets for Improvement

- Element 9. Safety Data Acquisition
- Safety Performance Criteria, Targets, and Measures
  - National Safety Plan
  - FTA Guidance on Safety Performance Measures and Targets
  - Coordination with the State and MPO for Safety Performance Measures and Targets
- SSO Program Standard Requirements/Procedures for Hazard/Risk Identification, Data Collection, and Analyses/Assessments
- Hazard Log, Risk Register, and Corrective Actions/Mitigations Tracking and Status
- CAPs definition, tracking, closure process
- Element 24. Minimum Document Submission to the NJDOT SSO Program

Grouping 5. Safety Assurance – Notifications and Investigations of Safety Events

- Element 10. Reportable Event Notification, Investigation, and Reporting
- Element 11. Emergency Management Program
- Element 23. Roadway Worker Protection
- RTA/RFGPTS Investigation Procedure(s)
- SSO Program Standard Requirements/Procedures for Safety Event notifications and investigations
- Emergency Response/Operations Procedures
- Rail Operating Rule Book and Required Training
- Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
- Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
- Field Supervision SOPs and Required Training

Grouping 6. Safety Assurance – Compliance with Operations Rules/Procedures

- Element 13. Rules Compliance
- Element 22. Hours of Service
- Rail Operating Rule Book and Required Training
- Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
- Field Supervision SOPs and Required Training
- Inclement Weather Procedures and Refresher Training
- Operator Certification/Refresher Training and Record-Keeping
- Inspection and Maintenance Manuals, SOPs, and Standards, Supervision, Training, and Competency

Grouping 7. Safety Assurance – Compliance with Inspection and Maintenance (I&M) Requirements

- Element 14. Facilities and Equipment Inspections
- Element 15. Maintenance Audit and Inspection Program
- Element 23. Roadway Worker Protection
- Transit Asset Management (TAM) Plan
- Inspection and Maintenance (I&M) Manuals, SOPs, Standards, Supervision, Training, and Competency
- Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
- Maintenance (equipment and rail infrastructure/systems) Job-based Certification/Refresher Training

Grouping 8. Safety Assurance – Compliance with Local, State, and Federal Safety Requirements

- Element 18. Compliance with Local, State, and Federal Safety Requirements, includes OSHA-Related Requirements at the state, local, and/or transit agency level
- Element 19. Hazardous Materials Program
- Element 20. Drug and Alcohol Program

Grouping 9. Safety Assurance – Management of Change

- Element 7. Safety Certification Process
- Element 8. System Modifications
- Element 17. Configuration Management
- Element 21. Procurement
- Configuration Management Plan (CMP)
- Safety Certification Plan (SCP)
- Tracking of Significant Capital Projects
- Safety-Related Procurement Specifications/Requirements

Grouping 10. Safety Assurance – Continuous Improvement

- Element 12. Internal Safety Audit Program
- Tracking the Three-Year Cycle of ISAs
- Element 9. Safety Data Acquisition – includes results from investigations, internal audits, emergency management
- Assuring Integration of the Safety Department in Policy and Procedure Development and Changes
- Element 4. Plan Review and Modification

Grouping 11. Safety Promotion – Training

- Element 16. Training and Certification Program
- Rail Operating Rule Book and Required Training
- Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
- Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
- Field Supervision SOPs and Required Training
- Inclement Weather Procedures and Refresher Training
- Operator Certification/Refresher Training and Record-Keeping
- Maintenance (equipment and rail infrastructure/systems) Job-based Certification/Refresher Training
- Inspection and Maintenance Manuals, SOPs, and Standards, Supervision, Training, and Competency

Grouping 12. Safety Promotion – Communication
- Policy Communication Throughout Transit Agency
- Element 9. Safety Data Acquisition – data analysis results for investigations, internal audits, hazard management, emergency response, rules/procedures compliance
- Safety Performance Criteria, Targets, and Measures
- Employee Safety Reporting System

Internal Audit Schedule and Plan. The NJDOT SSO program requires that each RTA/RFGPTS provide a three-year schedule of internal safety audits at the beginning of that three-year cycle (required by February 12th as part of the Annual Report) of the year starting the three-year cycle) with a schedule of each of the three years of audits for the safety program. This schedule of internal safety audits can change as needed so long as the overall three-year requirement of completing audits of all aspects of the ASP and safety program is met. The schedule and progress of internal safety audits each year is tracked as part of the monthly status tracking that includes corrective actions taken/plans, investigations, and internal safety audits.

The RTA/RFGPTS develops any needed procedures and checklists for each planned audit and documents the results of completed internal safety audits. Each year, the RTAs/RFGPTS are expected to schedule and prepare any needed documentation for their internal safety audits. Once the RTA/RFGPTS is ready to schedule each of their internal safety audits, the NJDOT SSO program is required to be notified at least thirty (30) calendar days before the internal safety audit. Notifications and plans/checklists are required to be sent to the NJDOT SSO program (NJOFGSSO@dot.nj.gov). Staff from the NJDOT SSO program may participate in the RFGPTS internal safety audits, as time and resources allow.

The CSO must ensure that the internal audit process allows for an objective review and assessment for all audit topics. This may require some audit topics to be audited by a different individual or audit team than for other audit topics. Auditors must not audit any topics that fall within the scope of their ongoing job responsibilities. The following general internal audit guidelines should be followed:

- The internal auditor should be free from any conflict of interest arising either from professional or personal relationships or other interests in an activity, which is subject to audit.
- The internal auditor should be free from undue influences which either restrict or modify the scope or conduct of their work or over-rule or significantly affect judgment as to the content of the internal audit report.
- The internal auditor should not allow their objectivity to be impaired when auditing an activity for which they have had authority or responsibility.
- An internal auditor should be consulted about significant proposed changes in the internal control system and the implementation of new systems and make recommendations on the standards of control to be applied.

Based on the results of each audit conducted, the CSO (or the contracted auditor) must prepare a written report documenting findings, recommendations and any corrective actions identified as a result of the audit. The NJDOT SSO program requires that the internal audit reports produced for each audit be provided for review by the CSO within sixty (60) calendar days of the closing conference, additional time requires communication and agreement with the NJDOT SSO program. This requirement is intended to help address any issues with the internal audit findings, corrective actions taken, and CAPs developed and to streamline the approval of CAPs, and the RTA/RFGPTS's Annual Report and certification letter. The Annual Report is further discussed in Sections 4 and 9 of this program standard. Each RTA/RFGPTS is required to provide the NJDOT SSO program with an annual internal safety audit report and certification letter of compliance, signed by the Accountable Executive along with the RTA/RFGPTS's current ASP by February 12th of each year.

The RTA/RFGPTS must also prepare an **Internal Safety Audit/Review Findings Log** to track through implementation all findings, recommendations, and corrective actions taken/plans developed as a result of the internal safety audit/review process. Recommendations are required to be considered for developing a CAP and the determinations be documented. The log is to be provided to the SSOA in editable spreadsheet format Monthly.

NJDOT SSO Program Participation in Internal Safety Audits. Once the RTA/RFGPTS plan/procedure for the internal safety audit has been received and reviewed, the NJDOT SSO program staff may decide to participate with the on-site portion of the audit. This intent for the NJDOT SSO program staff to participate in the internal safety audit should be communicated to the RTA/RFGPTS Safety Department as soon as possible. NJDOT SSO program staff that intend to participate in the internal safety audit will need to have current track safety training and acceptable personal protective equipment (PPE) to be on the rail system or in the rail related facilities.

When the NJDOT SSO program staff observe the planned internal safety audit activities, they will need to follow and participate in any job safety briefings and follow all rail system procedures, as appropriate. Observations and field notes should be taken by the NJDOT SSO program staff, so that notes from the field visit can be documented. Any documents or records collected during the

internal safety audit may also be collected by the NJDOT SSO program staff. Permission for taking photographs should be covered ahead of the field visit or as part of the job safety briefing.

The NJDOT SSO program will need to determine how much of this type of participation and observation in the internal safety audits can be completed within the NJDOT SSO program resources and balanced with other NJDOT SSO program requirements and duties.

Updates:

- March 5, 2018 – initial release as part of Version 1.0
- July 7, 2020 – rewrite based on the Agency Safety Plan, safety management system, and safety program description.
- October 1, 2021 – Minor edits to language; changes to the required submission date for the 3-year audit schedule to align with the Annual Report submission (February 12th), submission requirements for final report, and included the Internal Safety Audit/Review Findings Log.

Internal Safety Program Audit Summary Conformance Checklist

	SUMMARY CONFORMANCE CHECKLIST **FOR CONDUCTING INTERNAL SAFETY PROGRAM AUDITS**					

RAIL TRANSIT SYSTEM: _____

REV. NO: _____

NO. _____ ITEM _____

PLAN TITLE: _____

DATE: _____

NO. _____ ITEM _____

NO.	ITEM	ACCEPTABLE	UNACCEPTABLE	NO.	ITEM	ACCEPTABLE	UNACCEPTABLE
1	Is the purpose of the review clearly stated in the Agency Safety Plan (ASP)?			9	Verification of checklists for conducting Internal Audits of each of the ASP topics. Were checklists and supporting documents provided reasonably in advance to the SSO program?		
2	Scope of the review to address all topics of the ASP. Is/Are the audit team(s) properly staffed with the system safety manager and other suitable individuals (or an appropriate audit team members).			10	Verification of formal documentation and reporting of the audit findings, observations, and any corrective Actions Required. Was the SSO program sent a copy of the individual audit checklists/reports as they were completed?		
3	Are all topics of the ASP performing or functioning as Intended?			11	Overall schedule for audits. Did the SSO program receive the schedule for the audit at least 30 days in advance of the audit?		
4	Are the RFGPTS personnel responsible for the implementation of the ASP Identified?			12	Verification of submission of annual reports. Was the SSO program sent the annual report(s) by the RTS?		
5	Verification of employee compliance with the requirements of the Safety Programs.			13	Verification of formal letter of certification from RTA AE indicating compliance with the requirements of the ASP.		
6	Are departments to be audited notified of the audit schedule? Is this a surprise audit? Is notification to the SSO program given 30 days prior to the audit?			14	Identification of any areas in need of Improvements in order to meet the requirements of the ASP. Are corrective actions set out with a schedule and the person responsible identified?		
7	Are departments to be audited aware of their responsibilities under the Safety program established?			17			
8	Verification of Individual records, qualifications, and personnel qualifications.			18			

THE AGENCY SAFETY PLAN IS:
_____ ACCEPTABLE
_____ UNACCEPTABLE, REVISE AND RESUBMIT

REVIEWED BY: _____ **DATE:** _____

APPROVED BY: _____ **DATE:** _____

Concurrence by Manager/Supervisor, SSO program: _____ **DATE:** _____
Conformance Checklist Form (For NJDOT Use Only)

Comments