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## MEMORANDUM

**TO:** Fiscal and Management Control Board (FMCB)

**FROM:** Michael Catsos  
*Deputy Director of Safety Assurance and SMS Implementation*

**DATE:** June 7, 2021

**SUBJECT:** Internal Safety Audit (ISA) Program

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### Internal Safety Audit Program: Overview, Purpose, and Scope

MBTA Safety carries out an Internal Safety Audit (ISA) program to ensure that safety-related tasks and activities performed by key MBTA departments adhere to written plans, programs, and procedures, are consistent with federal and state regulations, and align with industry best practices. In addition to fulfilling key federal and state regulatory requirements at 49 Code of Federal Regulations (CFR) Part 673 and 22 Code of Massachusetts Regulations (CMR) 151, the ISA program allows MBTA Safety staff to verify that the Transit Safety Plan and Safety Management System are effectively implemented, performing their intended functions, achieving their performance objectives, and ultimately safeguarding MBTA, its personnel and contractors, and the public from hazards.

All MBTA departments that conduct safety-related activities or implement safety-related programs are subject to ISAs on a triennial basis, with each safety-sensitive function audited at least once every three years. The current triennial schedule is as follows:

2020 (Complete)	2021 (In Progress)	2022
Operations Control Center	Rail Vehicle Maintenance	Heavy Rail Ops & Training
Transit Facilities Maintenance	Maintenance of Way	Capital Delivery
Procurement & Logistics	Light Rail Ops and Training	Power
Bus Maintenance	Occupational Health Services	Signals
E&M Training	Paratransit "The Ride"	Safety
		Bus Operations

Overall, each audit establishes whether departments are compliant or noncompliant with safety program requirements in a number of distinct functional areas in accordance with the following scale:

Assessment Scale Level	Description
<b>Noncompliant (NC)</b>	Not in compliance with applicable regulations or MBTA safety program requirements.
<b>Compliant with Recommendation (CWR)</b>	Technically in compliance with applicable regulations and requirements, but: <ul style="list-style-type: none"><li>•No written plan, policy, or procedure is in place;</li><li>•Practices not fully consistent with industry best practices and standards;</li><li>•Organizational and resource issues inhibit performance of safety activities.</li></ul>
<b>Compliant (COM)</b>	Resources in place to accomplish all objectives. Employees trained and knowledgeable on the policies and procedures which facilitate compliance with safety requirements.

#### Internal Safety Audit Process

MBTA Safety's annual audit includes the following general process steps, carried out in coordination with all departments subject to audit in a given year:

- **Annual Kickoff Meeting, Internal Training, and Scoping:** MBTA Safety's audit team hosts an informational meeting for all impacted departments to discuss the annual audit schedule, scope, requirements, and logistics. Audit team members complete training and familiarization as needed to prepare for upcoming activities.
- **Checklist, Document Request, and Schedule Development:** MBTA Safety prepares a notification memo and document request for each department to formally schedule the upcoming audit and to collect applicable documents for review. Documentation collected and reviewed prior to the audit includes maintenance and inspection records, training materials and transcripts, department-specific policies and procedures, meeting minutes, and other items related to implementation of the safety program. MBTA Safety also prepares an audit checklist designed to gauge compliance with different aspects of the safety program, which is populated by auditors during later phases.
- **Management Interviews:** MBTA Safety holds formal management interviews with each audited department, reviewing all checklist questions and populating the checklist with initial responses. During this phase, auditors identify any preliminary findings or areas of concern for discussion with department representatives. Management interviews may lead to requests for additional documents or adjustments to planned field activities and records reviews.
- **Records Reviews and Field Activities:** When applicable, MBTA Safety may perform targeted field activities including facility or equipment inspections and work observations, as well as on-site records reviews of maintenance documentation and other items not provided in response to the initial document request.

- **Checklist Completion:** Following each audit, MBTA Safety drafts and distributes a complete checklist capturing management interview discussions, document verification, and field activities. MBTA Safety submits the draft checklist to the audited department for their review, comment, and acceptance.
- **Draft and Final Report Completion:** MBTA Safety completes a final checklist and Internal Safety Audit Summary Report which provides an overview of the audit methodology, activities, and findings, indicates compliance or noncompliance, and identifies deficiencies requiring corrective action.
- **Corrective Action Plan Development and Review:** MBTA departments are required to develop and submit formal Corrective Action Plans (CAPs) in response to all findings. Any CAPs and recommendations resulting from the audit are reviewed and approved by the Department of Public Utilities (DPU) and tracked through MBTA's safety data management system until closure.
- **Annual Reporting:** MBTA Safety produces an Annual Internal Safety Audit Report summarizing all audit activities and findings in the previous calendar year, delivering the report to the Accountable Executive / General Manager for approval and then providing the signed report to the DPU no later than February 15.