

2022 Safety Management System (SMS) Internal Audit

Report #: 2022-13

Audit Report



Sound Transit Audit Division
November 15, 2022

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Abbreviations

CFR	Code of Federal Regulations
FTA	Federal Transit Administration
ICAO	International Civil Aviation Organization
ISO	International Organization of Standards
SMS	Safety Management Systems

Executive Summary

Why did we audit?

As part of our 3-year Agency Audit Plan, Sound Transit's Audit Division performed an internal audit of Sound Transit's Safety Management System.

Our audit aimed specifically to evaluate progress made towards obtaining ISO 45001 certification since the 2021 baseline gap analysis audit by AMCL Inc.

The Audit Division is Sound Transit's independent assurance function that improves how the agency is operated and managed, ensuring public funds are managed transparently, and ultimately keeping employees, contractors and our riding public safe.

The purpose of this audit was to independently examine the agency's progress in meeting the requirements of each ISO clause and sub-clause, and to identify and document areas where we observed limited progress has been made in the year since the gap assessment.

The scope of the audit covered the requirements of the ISO 45001:2018 standards to provide a preliminary baseline assessment, and the status of the adoption of FTA safety management systems (SMS) methods and principles. We reviewed agency policy, leadership engagement, roles and responsibilities, internal and external communications and document controls; as well as performance monitoring and evaluation and continuous improvement.

The techniques we used to complete this audit included document reviews, staff interviews, and verification of process and procedures. However, we want to specify that our verification steps for this audit were limited and primarily focused on the framework of SMS under development by Sound Transit's Safety Department. Future audits will dive deeper into review SMS processes across the agency.

Results Summary

Based on our review of evidence and processes, we conclude that the agency's safety management system (SMS) is still in the **initiating phase** of development and implementation. We note that while some processes are in various stages of development, many have not developed as of this audit.

With that said, processes we found that were in progress (shown as part of the clauses below) were captured by the team as observations as the agency is in the early stages of working to meet the ISO standard. The team felt that in our initial work, assignment of

findings would be heavy handed. Findings are a non-compliance with a rule, standard, procedure, or process. Auditors did consider that if areas were observed that were non-compliant with the Agency Safety Plan, or other required safety rules or requirements we would have identified those as findings. However, this was not the case.

Therefore, we conclude that there are no (0) findings of non-compliance and ten (10) observations.

Each of the observations is expanded upon in greater detail in Appendix A of this report, including response requirements and timelines.

Audit Work and Scope

Overview of ISO 45001:2018 standard

We audited sections 4 through 10 of the 45001 Standard. In brief, the standard separates each section into “clauses”, giving the organization trying to achieve certification a roadmap to work towards, telling “what” each area means; however, leaving the “how” to accomplish this roadmap to the organization to develop and define as it works for them.

- Section 4.0 – Context of the Organization
- Section 5.0 – Leadership & Worker Participation
- Section 6.0 – Planning
- Section 7.0 – Support
- Section 8.0 – Operations
- Section 9.0 – Performance Evaluation
- Section 10.0 - Improvement

Our audit scope evaluated processes, procedures, and requirements which may be subject to an eventual ISO conformance audit; such as the 2017 board resolution, the ASP, and other associated processes to the safety management system.

We excluded sub-clause 9.2: Internal Audit because we cannot conduct an evaluation on our own work.

Items to note:

With the agency still in the “Initiating” phase of its SMS Implementation, key elements of the SMS are not yet in place, or are not yet fully developed. In these cases, there was a lack of plans, policies, and procedures establishing agency requirements related to the SMS.

ISO 45001 certification itself is not yet a requirement set by the agency. Given this context, this audit was conducted as a follow-up gap analysis of agency progress since the 2021 AMCL report; there are no associated findings; however, we did categorize more critical areas we identified as observations for tracking and continuous improvement purposes.

All deficiencies related to any ISO 45001 clause or sub-clause found to be in the Compliance Unlikely (Red) rating were classified as observations. Additionally, any issues critical to the organizational implementation or leadership, under clauses 4 & 5, and shown as "Compliance at Risk" have also been identified in this report as an observation because they effect the organizational approach and implementation of SMS.

Additionally, our audit work had a limited focus on ISO Clause 9: Performance Evaluation and Clause 10: Improvement due to the SMS still being in the implementation stage and systems and processes not yet operating within the management system.

Grading criteria:

As part of our criteria to evaluate the agency's SMS maturity, the audit team utilized best-practices of SMS evaluation from the International Civil Aviation Authority's (ICAO) Annex 19 – Safety Management for their SMS Evaluation Tool and Guidance as an "Industry Best Practice" to determine the maturity level of the agency's SMS.

The Audit Division will create future guidance in the future to align to Annex 19, but with agency stakeholder inputs as it relates to transit.

Gap Analysis Grading Scale Definitions

Auditors utilized that same grading scale AMCL's used to ascertain where the agency stands with each ISO sub-clause (grading scale of Red, Amber, and Green).

GREEN	Compliance likely
<p>Based on the information provided during the previous assessment and our current audit, the processes and/or documents necessary to potentially fulfil the requirements in this clause can be broadly characterized as being compliant and applied in a controlled, systematic fashion.</p> <p>It is likely that ST would achieve compliance to this clause, assuming this could be successfully demonstrated in a fully evidenced Certification Audit.</p>	
AMBER	Compliance at risk
<p>Based on the information provided during the previous assessment and our current audit, the processes and/or documents necessary to potentially fulfil the requirements in this clause can be broadly characterized as: i.) existing but not yet fully complete or compliant, or ii.) complete or compliant but not yet consistently applied to the management system.</p> <p>The risk is that ST would not achieve compliance to this clause without further work, such as completing improvement projects or ensuring existing processes are adequately aligned, controlled, integrated and/or applied.</p>	
RED	Compliance unlikely
<p>Based on the information provided during the previous assessment and our current audit, the processes and/or documents necessary to potentially fulfil the requirements in this clause can be broadly characterized as not currently in place.</p> <p>It is unlikely that ST would achieve compliance to this clause, without introducing further processes/documents and ensuring their integration into the organization.</p>	

Audit Results

AMCL/ST Internal Audit Comparison

No.	ISO 45001 Clause	Reviews completed	
		AMCL 2021	ST 2022
4.1	Understanding the Organization and its Context	AMBER	AMBER
4.2	Understanding the Needs and Expectations of Workers and other Interested Parties	AMBER	AMBER
4.3	Determining the Scope of the OH&S Management System	RED	RED
4.4	OH&S (SMS) Management System	AMBER	AMBER
5.1	Leadership and Commitment	AMBER	RED
5.2	OH&S Policy (SMS Policy)	GREEN	AMBER
5.3	Organizational Roles, Responsibilities, and Authorities	AMBER	AMBER
5.4	Consultation and participation of Workers	AMBER	AMBER
6.1.1	Actions to Address Risks and Opportunities (General)	RED	AMBER
6.1.2.1	Hazard Identification	GREEN	GREEN
6.1.2.2	Assessment of OH&S Risks and other Risks	AMBER	AMBER
6.1.2.3	Assessment of OH&S Opportunities and other Opportunities	RED	RED
6.1.3	Determination of Legal Requirements and other Requirements	AMBER	GREEN
6.1.4	Planning Action	AMBER	AMBER
6.2.1	OH&S Objectives	AMBER	AMBER
6.2.2	Planning to achieve OH&S objectives	AMBER	AMBER
7.1	Resources	AMBER	AMBER
7.2	Competence	AMBER	AMBER
7.3	Awareness	GREEN	GREEN
7.4	Communication	AMBER	AMBER
7.5	Documented Information	AMBER	AMBER
8.1.1/8.1.2	Operational Planning and Control (General/Eliminating Hazards and Reducing OH&S Risks)	AMBER	AMBER
8.1.3	Management of Change	AMBER	AMBER
8.1.4	Procurement	GREEN	AMBER
8.2	Emergency Preparedness and Response	GREEN	GREEN
9.1	Monitoring, measurement, analysis and evaluation	AMBER	AMBER
9.2	Internal Audit	AMBER	AMBER
9.3	Management review	RED	RED
10.1	General	AMBER	AMBER
10.2	Incident, Nonconformity, and Corrective Action	AMBER	AMBER
10.3	Continual Improvement	AMBER	AMBER

- Clause 9.2 was not fully reviewed as part of the internal audit because the auditors could not review their own process.

Detailed Results (By ISO 45001 Sub-Clause)

Clause 4: Context of the Organization

<p>4.1 Understanding the organization and its context</p>	<ul style="list-style-type: none"> • Rating remains at <i>Compliance at Risk</i>. • Internal and External stakeholders are not identified to the extent required to conform to OH&S standards. • Limited documentation exists to determine external and internal issues relevant the purpose and strategic direction. The Agency Safety Plan (ASP) is the only document currently published which is not formatted to comply with ISO standards.
<p>4.2 Understanding the Needs and Expectations of Workers and other Interested Parties</p>	<ul style="list-style-type: none"> • Rating remains at <i>Compliance at Risk</i>. • Not all interested parties (i.e., stakeholders) are identified or documented. • Stakeholder needs and expectations are not clearly identified or reviewed. • Needs and expectations relevant to the SMS are not clearly defined or documented.
<p>4.3 Determining the Scope of the OH&S System</p>	<ul style="list-style-type: none"> • Rating remains at <i>Compliance Unlikely</i>. • The scope needs greater clarification and definition. There are plans to expand the scope from OH&S to better align with FTA requirements for SMS implementation. The expanded scope would include transit safety, including operations and maintenance of the system as well as public interface with the system. There are also plans to obtain certification for only Tacoma Link operations and maintenance prior to obtaining certification for other modes or for the agency as a whole.
<p>4.4 Management of the OH&S system</p>	<ul style="list-style-type: none"> • Rating improved to <i>Compliance at Risk</i>. • There are no documented plans or processes to align clauses 4.1, 4.2 and 4.3 to the agency business practices.

Clause 5: Leadership

<p>5.1 Leadership and Commitment</p>	<ul style="list-style-type: none"> • Rating has fallen to <i>Compliance Unlikely</i>. • A Top Management council has not been identified. • There is no formal management review process developed or documented including a documented commitment for directing and supporting workers to contribute to the effectiveness of the OH&S management system • There has been a lack of engagement from Top Management/ST Leadership. Additionally, it is unclear who the executive
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	<p>sponsor/advocate is for the work of gaining ISO certification for safety management.</p> <ul style="list-style-type: none"> • There is a lack of clarity of agency commitment towards ISO certification, identified in the Agency Five-Year Strategic Plan 2020, Agency Goal 1.1. There is a lack of staff clarity on the status of the five-year plan, and the timeframe the issuance of a new strategic plan and of what the requirements will be for ISO certification and for the asset management system.
<p>5.2 OH&S Policy (SMS Policy)</p>	<ul style="list-style-type: none"> • Rating has fallen to <i>Compliance at Risk</i>. • Two policies in place, Board R2017 and Agency Safety Plan, together both meet the requirements of SMS/OH&S. There is minimal mention of a commitment to safe & healthy work conditions and prevention of injury/illness. The Board Policy should refer to the ASP policy statement to eliminate confusion. • There is a lack of clarity of agency commitment towards ISO certification, as the Agency Five-Year Strategic Plan 2020, goal 1.1. There is a lack of staff clarity on the status of the five-year strategic plan, and the timeframe the issuance of a new strategic plan and of what the requirements will be for ISO certification and for the safety management system.
<p>5.3 Organizational Roles, Responsibilities, and Authorities</p>	<ul style="list-style-type: none"> • Rating remains at <i>Compliance Unlikely</i>. • Top Management/ST Leadership has not adequately assigned the roles and responsibilities for implementing the safety management system. This is especially the case, for the roles and responsibilities of agency departments outside of the Transportation Safety & Security division that are critical to the success of the safety management system and for ISO certification.
<p>5.4 Consultation and Participation of Workers</p>	<ul style="list-style-type: none"> • Rating remains at <i>Compliance Unlikely</i>.

Clause 6: Planning

<p>6.1.1 Actions to Address Risks and Opportunities (General)</p>	<ul style="list-style-type: none"> • Rating remains at <i>Compliance Unlikely</i>. • There is no proactive risk assessment approach established for the OH&S management system. There are no management system risk assessment plans or processes documented. • There is poor agency wide alignment for how risks are identified and managed. Without an agency-wide risk management framework, the risk management requirements of ISO for Safety Management will have critical roadblocks to implementation.
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6.1.2.1 Hazard Identification	<ul style="list-style-type: none"> Rating remains at <i>Compliance Likely</i>, as there are no significant deficiencies.
6.1.2.2 Assessment of OH&S Risks and other Risks	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>.
6.1.2.3 Assessment of OH&S Opportunities and other Opportunities	<ul style="list-style-type: none"> Rating remains at <i>Compliance Unlikely</i>. There are no processes for consistently and systematically assessing risks or opportunities to the SMS and its intended outcomes and planning of associated actions to address them.
6.1.3 Determination of Legal Requirements and other Requirements.	<ul style="list-style-type: none"> Rating improves to <i>Compliance Likely</i>, as there are no significant deficiencies identified.
6.1.4 Planning Action	<ul style="list-style-type: none"> Rating remains at <i>Compliance as Risk</i>. There is no planning process to integrate and implement actions into the OH&S management system.
6.2.1 OH&S Objectives	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>. Although, Transportation Safety & Security staff is very focused on identified objectives for the safety management system, there is concern that these objectives may no longer be aligned with the agency's goals and objectives. A new Five-Year Agency Strategic Plan, may have significant impact on these objectives, and require the asset management team to rewrite their objectives for the asset management system
6.2.2 Planning to achieve Asset Management objectives	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>. Roles and responsibilities involving plans to achieve OH&S objectives have not been established beyond low-level committees. Stakeholders have not been identified when planning how to achieve its OH&S objectives, including how the results are evaluated, including indicators for monitoring the progress of achievement of objectives.

Clause 7: Support

7.1 Resources	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>. Factors to determined resources needed for the establishment, implementation, maintenance and continual improvement of the OH&S management system have not been identified. There is no tool in place to manage data consistently for the establishment, implementation, maintenance and continual improvement of the OH&S management system. (An IT solution is slated for 2022/2023).
7.2 Competence	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>.
7.3 Awareness	<ul style="list-style-type: none"> Rating remains at <i>Compliance Likely</i> as there were no significant deficiencies identified.
7.4 Communication	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>. When establishing communication processes, there is a lack of scope and understanding when interested parties are considered.
7.5 Documented Information	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>. Documented information. As an ISO certified SMS in implemented formal documentation control will need to be an integral part of the ISO system. There is coordination across the agency in documentation that is required, but this is fragmented through several groups. Without an agency-wide document control protocol obtaining this is possible, however, this will be more difficult to achieve and maintain.

Clause 8: Operation

8.1.1/8.1.2 Operational Planning and Control (General/Eliminating Hazards and Reducing OH&S Risks)	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>. There is no scope defined to ensure that outsourced processes are controlled (see 8.4).
8.1.3 Management of Change	<ul style="list-style-type: none"> Rating has fallen to <i>Compliance Unlikely</i>. There is no systematic process to review the consequences of unintended change and take action to mitigate any adverse effects.
8.1.4 Procurement	<ul style="list-style-type: none"> Rating has fallen to <i>Compliance at Risk</i>. Procurement processes do not define and apply occupational health and safety criteria for the selection of contractors. The type and degree of control to be applied to outsourced functions and processes has not been defined within the OH&S management system. IGA's lack clarity.
8.2	<ul style="list-style-type: none"> Rating remains at <i>Compliance Likely</i> as no significant deficiencies were identified.

Emergency Preparedness & Response	
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Clause 9: Performance Evaluation

9.1 Monitoring, measurement, analysis and evaluation	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>.
9.2 Internal Audit	<ul style="list-style-type: none"> Was not fully reviewed by ST Compliance Auditors due to the auditors could not review their own process. 2021 AMCL baseline gap assessment and 2022 SMS Internal Audit conducted.
9.3 Management Review	<ul style="list-style-type: none"> Rating remains at <i>Compliance Unlikely</i>. There is no formal management review process established.

Clause 10: Improvement

10.1 General	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>.
10.2 Incident, Nonconformity, and Corrective Action	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>.
10.3 Continual Improvement	<ul style="list-style-type: none"> Rating remains at <i>Compliance at Risk</i>.

Conclusion

It was clear to the audit team that Sound Transit's Transportation Safety and Security Division (TSS) are committed to working towards the goal of developing, implementing, and maintaining a safety management system that satisfies all requirements needed to obtain ISO certification.

The audit team is aware that a broader, impactful SMS goes beyond only employee health & safety and is required to meet FTA & WSDOT expectations for continual implementation & improvement. The agency is still determining the scope of the safety management system given this additional requirement.

Furthermore, the current Agency Strategic Plan (circa August 2020), under agency goal 1.1, expresses the goal of obtaining ISO certification by the end of December 2024. However, TSS staff acknowledge that this timeframe is not obtainable. Staff are strongly considering seeking certification first for the Tacoma Link modal system before expanding for certification on other modes and functions.

This is in large part due to the fact that Tacoma Link is both owned and operated by Sound Transit, allowing for greater safety management controls within the transit system.

An updated version of the agency strategic plan should establish achievable timeframes for SMS implementation and ISO certification that are based on updated data and analysis from ST Safety and with awareness of the gaps still remaining from the AMCL baseline gap assessment and the work from this internal audit. An updated agency strategic plan will recommit top management's support to address safety management system gaps and accelerate the agency on the path to certification.

Additionally, external and internal audits of the management system should continue, and a management review council or committee should be formed, comprised of executive level representatives with SMS roles and responsibilities.

Observations

As noted earlier in this report there were no findings. All ISO 45001 gaps or deficiencies notes have been classified as observations. **There are ten (10) observations with Recommendations; outlined further in the attached appendix.**

Next Steps

For the items raised, the Audit staff will work with **Transportation Safety & Security Division** to determine the party responsible for addressing the observation and its mitigation. The party responsible will be provided with the appropriate response form, and will be required to use this form to submit a proposed corrective action back to audit within **30 days (about 4 and a half weeks)** upon issuance of the Final Audit Report.

For Observations with Recommendations, responders are not obligated to complete the recommended actions because the identified issue is compliant but are still required to submit the Observation with Recommendations Form (see supplied template). These action plans must be submitted within **30 days (about 4 and a half weeks)** of the distribution of this report.

Recommendation responses shall be sent back using the template response format provided and will be tracked, verified, and if necessary, escalated to achieve satisfactory closure to prevent recurrence.

For recommendations, acceptable responses include:

- (1) Accepted
- (2) Accepted with Modification (include modification description) or
- (3) No Action Taken with Justification (including justification explanation and evidence) and changes are not made to prevent a future recurrence.

Appendix A: Observations Table

The following table summarizes the findings and observations listed in the audit report.

The table below provides space for the responsible party to respond to each finding and observation. Once received and approved by the appropriate authority, the Audit Division will periodically follow up to ensure that the mitigations are put in place to the identified concerns. Additionally, we will collect and document objective evidence for verification and closure purposes.

Findings:

There were no **(0)** findings associated with this audit.

Observations with Recommendations:

At the time of the audit, we identified ten **(10)** Observations with Recommendations where if not addressed have the potential to become a finding in the future.

Context of the Organization: Clause 4.1

Observation #1: Limited documentation exists to determine internal and external issues relevant to the SMS, including its purpose and strategic direction.

The recommendation is for a thorough review and identification of internal and external issues that impact the SMS. (This will allow for more effective identification of stakeholders-see Observation #2)

Context of the Organization: Clause 4.2

Observation #2: Not all stakeholders are identified and documented and stakeholder needs and expectations relevant to the SMS are not clearly defined or documented.

The recommendation is for identification and tracking of stakeholders to the SMS and identification of their expectations for the SMS.

Context of the Organization: Clause 4.3

Observation #3: The scope of the SMS needs greater clarification and definition. There are plans to expand the scope from OH&S to better align with FTA requirements for SMS implementation. The expanded scope would include transit safety, including operations and maintenance of the system as well as public interface with the system. There are also plans to obtain certification for only Tacoma Link operations and maintenance prior to obtaining certification for other modes or for the agency as a whole.

The recommendation is for the final scope to be determined and documented and formally approved by management.

Context of the Organization: Clause 4.4

Observation #4: There is no documented plans to align clauses 4.1, 4.2, and 4.3 to agency business practices.

The recommendation is for the establishment of a documented alignment of agency business practices to the scope and objectives of the SMS.

Leadership: Clause 5.1

- **Observation #5:** There is no formal management review process developed or documented including a documented commitment for directing and supporting workers to contribute to the effectiveness of the SMS/OH&S management system.

The recommendation is for a management council or similar to be formed that is responsible for ensuring agency commitment to obtaining ISO 45001 certification and for directing and supporting stakeholders (including ST staff) towards implementation of the SMS.

Leadership: Clause 5.2

- **Observation #6:** Board Policy R2017 and the Agency Safety Plan policy statement in combination meet the requirements of ISO 45001, however there is no single policy meeting these requirements.

The recommendation is for the ASP policy statement to be updated to meet ISO 45001 requirements for documented policy.

Leadership: Clause 5.3

- **Observation #7:** ST Leadership has not adequately assigned the roles and responsibilities for implementing the safety management system. This is especially the case, for the roles and responsibilities of agency departments outside of the Transportation Safety & Security division that are critical to the success of the safety management system and for ISO certification.

The recommendation is for establishment of a system safety management council or similar (see Observation #5) to gain awareness of the functions outside of TSS to be performed during SMS implementation and to compel action on SMS implementation tasks throughout the agency.

Leadership: Clause 5.4

- **Observation #8:** Although awareness of the SMS is increasing throughout the agency, the consultation and participation of the staff across the agency remains limited.

The recommendation is for the workforce to be encouraged to engage with the SMS and to documentation of cross functional area consultation for the further implementation of SMS. (This may require prior action on Observation #7.)

Planning: Clause 6.1.2.3

- **Observation #9:** There are no processes for consistently and systematically assessing risks or opportunities to the SMS and its intended outcomes and planning associated actions to address them.

The recommendation is to conduct an assessment of risks and opportunities to the SMS and identify planning and other actions to address them.

Planning: Performance Review

- **Observation #10:** There is no formal management review process established.

The recommendation is establishment a system safety management council or similar (See Observation #7) that will conduct a formal management review of the SMS, including its opportunities and risks.

Appendix B: Personnel Interviewed

Sound Transit
Branden Porter, Director – Transportation Safety & Security
Erin Brumbaugh, Deputy Director – Transportation Safety & Security
Melissa Durel, Manager – Security & Safety Management System
Zahid Kahn- Deputy Director, Enterprise Asset Management
Michelle Foster, Associate Project Manager, Enterprise Asset Management

Appendix C: Documents Reviewed

The audit team reviewed the following documents and records during the audit

Resolution No. R2017-13 – Adopting a Safety Policy
Sound Transit’s Agency Strategic Plan, August 2020
SMS Implementation Plan (Current-Excel file)
Agency Safety Plan, Sound Transit, Rev 0.0, Jul 2020
Sound Transit’s Accident Prevention Plan, Version 5.0, Feb 2021