

EXECUTIVE SUMMARY REVIEW OF SYSTEM SAFETY PROGRAM PLAN

INTRODUCTION

We conducted a review of Port Authority of Allegheny County's (Port Authority's) System Safety Program Plan (SSPP). This review is required on a triennial basis by the Federal Transit Administration (FTA) in 49 CFR §659.27 which specifies that the Pennsylvania Department of Transportation (PennDOT) must require Port Authority to develop and document a process for the performance of on-going safety and security reviews to assess implementation of Port Authority's SSPP. The purpose of this audit was to determine whether the SSPP in effect as of September 2009 included all elements required by the FTA Regulations 49 CFR 659 and the Pennsylvania Rail Transit Safety Review Program (RTSRP), assess whether the elements of the plan are implemented, and to suggest recommendations for improvement if needed. The scope of our review was September 1, 2009 through September 30, 2010.

STATEMENT OF OPINION

In our opinion, the SSPP in effect as of September 2009 included all elements required by the FTA Regulations 49 CFR 659 and the RTSRP and, in general, the elements of the plan are implemented. Several observations and recommendations were made as a result of our testing and they are summarized below.

SUMMARY OF AUDIT RESULTS, OBSERVATIONS AND RECOMMENDATIONS

OBSERVATION 1 – Strengths Noted During the Review

We noted the following areas of excellent performance during the review.

- The SSPP included all elements required by the FTA Regulations 49 CFR 649 and the RTSRP, was submitted to the RTSRP on a timely basis and approval of the SSPP was received from the RTSRP.
- A total of 2,156 Port Authority employees maintained CDLs. All employees who require a CDL to perform their jobs had a current CDL. In addition, all 24 instructors possessed valid CDL licenses and all instructors who are permitted to conduct CDL testing as CDL examiners had current examiners' licenses as required by Port Authority and state regulations.
- All Pending Change Notices affecting aspects of safety and/or security functions for the North Shore Connector Light Rail Project were reviewed and approved by the director of system safety.

OBSERVATION 2 – Track Entry Right-of-Way Training and Safe Busway Driving Training for Employees and Contractors

We noted that an on-going process does not exist to ensure that training is provided to employees who are hired/transferred into positions that require Track Entry Training and/or Safe Busway Driving Training.

Employees:

As of October 28, 2010, 49 of the 259 employees with job duties that **may** require them to work in or adjacent to an active rail right-of-way still need to complete the Track Entry Training Program. A total of 210 employees working in these positions have received this training. Of the 49 employees who need to receive training, approximately 10 have job duties that require them to enter the right-of-way on a regular basis. Training is required for the majority of these 49 employees as a safety precaution because their job duties **may** require them to enter the right-of-way. In response to this observation, the Rail Maintenance Training function has begun

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an initiative to train these employees. As of December 17, 2010, 40 of the 49 employees have been trained and it has been determined that three of these employees do not require training at this time.

In November 2009, the Bus Operations Division started an initiative to ensure that all employees who operate a non-revenue vehicle on any of the busways are properly qualified. We reviewed the training records for a sample of the employees who required training to verify that they completed the Safe Busway Driving Training.

Contractors:

We reviewed the training logs for the Track Entry Training Program sessions and the Safe Busway Driving Training sessions and noted that this training is being provided to contractors on a consistent, on-going basis. Nine Track Entry Training sessions were held from September 2009 through September 2010 and a total of 94 contractors were trained during these sessions. Also, five Safe Busway Driving Training sessions were held during this time and 30 contractors were trained.

RECOMMENDATION 2

Track Entry Training should be provided to all employees who still need to complete it.

Port Authority should establish written procedures to ensure that, on an on-going basis, each employee hired/transferred into a position requiring Track Entry Training and/or Safe Busway Driving Training is identified and the training is provided.

The Right of Way Allocation Requests should be attached to all applicable training logs to document that requested training was provided and identify the names of the employees/contractors trained in association with each request.

MANAGEMENT RESPONSE 2

The rail maintenance training function is in the process of providing Track Entry Training to all employees who require it.

Target Date for Implementation: We will provide Track Entry Training to all required hourly personnel by December 24, 2010.

Employees from the Rail Operations/Engineering Division, Bus Operations Division, System Safety Department and Human Resources Division will work together to develop a process to identify the employees who require training at the time they are hired/transferred into a position requiring it and ensure that the training is provided. The manager of rail maintenance training will lead the effort to review job position descriptions annually to identify the ones that require Track Entry Training and the frequency with which this training is required and notify employees in the Employment and Development Department who will update the job position descriptions with the training requirements. When a person is hired/transferred into a position requiring Track Entry Training, employees in the Employment and Development Department will notify the manager of rail maintenance training so that he is aware that Track Entry Training needs to be provided and the required frequency of the training. In the future, the manager of rail maintenance training will ensure that the Track Entry Training is provided within two weeks of the effective date of the system pick. Written procedures for this process will be created.

Target Date for Implementation: June 30, 2011

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Right of Way Allocation Request Forms for contractors will be retained for a three-year period. Employees in the System Safety Department who provide the Track Entry Training to contractors will attach a copy of the Right of Way Allocation Request Forms to the training logs to provide an audit trail between contractor training required and the training that was provided.

Target Date for Implementation: January 31, 2011

OBSERVATION 3 – Storage of Training Records

Electronic records of employees and contractors who have received right-of-way track entry training are stored on a local computer and filed manually by the safety specialist. Because this data is not stored on a network server, it is not backed-up resulting in a risk that this information can be lost in the event that the hard drive on the computer fails. While some training records for employees are entered into PeopleSoft where they are backed up, training records for contractors are not stored in PeopleSoft.

RECOMMENDATION 3

This electronic file should be stored on the network so that it is included in Port Authority's automatic backup process.

MANAGEMENT RESPONSE 3

This file will be stored on the network so that it is backed up.

Target Date for Implementation: March 31, 2011

FOLLOW UP ON PREVIOUS AUDIT RECOMMENDATIONS

We made two observations/recommendations during the previous review which was completed in December 2007. The first observation/recommendation was that Port Authority had completed an organization restructuring, therefore, the names of some of the departments and job titles had changed. These organizational changes were not incorporated in the 2006 Safety and Security Certification Plan for the North Shore Connector Project or the SSPP. The director of system safety has revised the organization chart and we consider this recommendation to be closed.

The second observation/recommendation was that configuration management documentation was stored in vault files in either printed form or on electronic media. No disaster recovery plan was in place for the configuration management documents. We recommended that management should consider including the configuration management documents and the versions of the software that were used to create them in Port Authority's information technology data backup and disaster recovery plans. Management initiated a project to include configuration management information in Port Authority's electronic document management system. A contract is in place with a vendor to digitize this data and the project is approximately one third complete. The status of this project will be reviewed during the next audit of the SSPP.