

Date: June 30, 2025; minor formatting correction on August 26, 2025
To: Peter Jager, State Safety Oversight Program Manager
Cc: Travis King, Director Safety & Security; Audit Committee for the Utah Transit Authority
From: Mike Hurst, Director Internal Audit
Subject: 2025 Light Rail Safety Audit Results

Background

Utah Transit Authority (“UTA”) Internal Audit (“IA”) annually completes a Light Rail Safety audit required by State Safety Oversight (“SSO”). The audit is listed on the 2025 Audit Plan approved by the UTA Audit Committee on March 10, 2025.

The audit procedures are based on checklists published by the Federal Transit Administration (“FTA”) and topics are covered on a three-year rotating basis. The audit results are owned by SSO, who coordinates with UTA Safety management to determine if corrective action plans are needed to address any Findings of Non-compliance or Compliance with Recommendations.

Scope

The 2025 Light Rail Audit was completed by Mike Hurst, Director Internal Audit for UTA, who holds the certification Public Transportation Safety Certification Program – Rail certification that is required to be assigned the audit, and the Transit Safety and Security Program – Rail certification.

The audit period of review was January 1, 2024 – December 31, 2024, with information from other periods considered as necessary.

The following TASP topics were covered:

1. TASP Element #2 Goals and Objectives
2. TASP Element #4 Transit Agency Safety Plan (“TASP”) Annual Updates, Revisions, and Changes
3. TASP Element #5 Risk Management Program
4. TASP Element #12 System Safety and Security Certification
5. TASP Element #13 Rules Compliance
6. TASP Element #15 Maintenance Audits and Inspection Program

The following System Security (“SSP”) topics were covered:

1. SSP Element #1 Policy Statements
2. SSP Element #2 System Description
3. SSP Element #3 Management of the System Security Program
4. SSP Element #4 System Security Program Components

Results

The following summarize each element of the, divided into Findings of Non-compliance and Compliance with Recommendations. IA was conservative in judging something Non-compliance. SSO and Management will want to carefully review the language of this report to determine what action plans are appropriate.

1. TASP Element #2 Goals and Objectives

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

- Accountability for reporting safety goals and objectives in the dashboard is not clear.
- Procedures around the dashboard to report safety goals need improvement, including:
 - Defining distribution.
 - Responsibility for maintaining the dashboard.
 - Procedures if goals are not being met.
- Reviewed safety dashboards had data issues, including:
 - Incorrect calculations
 - No information on Safety Reliability goals
 - Per capita employee injury statistics was not anchored in total number of employees.
 - The meaning of color-coded ratings is not stated.

2. TASP Element #4 Transit Agency Safety Plan (“TASP”) Annual Updates, Revisions, and Changes

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

No issues that the auditor considers opportunities for improvement.

3. TASP Element #5 Risk Management Program

Findings of Non-compliance:

- A corrective action plan was not created for a documented hazard related to passenger drug use.

Compliance with Recommendations:

- UTA Safety could not provide evidence that high rated hazards were reported to SSO.
- Several data issues were identified within the Hazard Log. Specific details were provided to management. As an overview, these issues included:

- The Hazard Log consists of a Summary tab and the log itself. There were a total of 14 hazards that appeared on one those sources but not the other.
- The Average Days Open field, as they appear in the Summary and 180 Day Log, had the calculation formula hardcoded, meaning it was no longer automatically updating to show the correct days open.
- The meaning of code letters used to rate hazard probability are not defined.
- The meaning of code numbers to rate hazard severity are not defined.
- Authentication data (who, what, when, where) for documentary photograph evidence is not retained.
- The format for data entry the IHR field (acronym not defined in the log) is not consistent.

4. TASP Element #12 System Safety and Security Certification

This section dealt primarily with auditing the safety and security certifications that occur during construction projects or in modifications of systems. IA could not completely evaluate performance. System Safety and Security Certification requirements are not clear enough and seem to depend on project type. The types and naming of documentation were not consistent across the sample of projects reviewed. However, it is clear that safety and security activities occur extensively in construction projects and SSO played a significant role in some of the projects reviewed.

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

- System Safety and Security Certification procedures should be clarified in TASP and Agency SOP and documentation standardized, including:
 - When SSO involvement is required.
 - What documents (such as plans, certifications, etc.) are needed based on project type.
 - The timing of safety and security activities within a project.

5. TASP Element #13 Rules Compliance

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

- It is unclear what “Policy Operational Directive for Safety (2.1 Safety No. 1.2.1), mentioned in the TASP, refers to.
- The following policies and standard operating procedures (“SOP”) are listed in the TASP but are not listed as being in effect on the UTA SharePoint.
 - 4.3.2 Fire Protection and Evacuation Plans
 - 4.3.12 Personal Protective Equipment
 - 4.3.10 Bloodborne Pathogens Policy

- 3.xx.xx New Chemical Approval Policy
 - None of the Agency SOPs listed in section 4.3.1.1 and 4.3.1.2 of the TASP are in the Agency SOP section of SharePoint.
- The following policies and SOPs are on SharePoint but have not been updated in at least three years:
 - UTA.03.01 Employee and Public Safety (June 2021)
 - 4.3.3 Hazard Communication...(July 2017)
 - 4.3.6 Visitor Access (February 2015)
- It is unclear who is responsible for safety and compliance related policy/SOP – management or Safety? The TASP would be strengthened with this clarification.
- Section 3.10.2 Medical Monitoring requires “biannual physical examinations”, but this requirement is not mirrored in Corporate Policy No. 6.4.1.
 - Based on context, the TASP intends these physicals to be every two years. That’s “biennial” not “biannual”.
- Section 3.10.2 lists emotional health evaluations but it is not clear if it is required or optional.
 - Fit for Duty SOP (No. LRSU OPS 0400.0423 REV 3 says employees are expected to be “mentally fit” but does not include the additional information the TASP has.
- The TASP references old SOP for Hours of Service, 101.09.
- OPS-SOP-0106 REV 2.0 hasn’t been reviewed in over three years – last updated November 2020.
- TASP does not mention Fatigue Management. Covered by LRSU OPS 0400.0423 REV 3.
- The TASP mentions the old UTA Drug and Alcohol policy. Current policies are UTA.01.15 (FRA) and UTA.01.18 (FTA)
- The TASP does not mention over-the-counter medications, but UTA.01.18 does.
- The following were observed at an onsite inspection at the Jordan River maintenance shop (specific details were provided to management):
 - Four fire extinguishers did not have a recent monthly inspection.
 - Expired Narcan
 - Outdated evacuation plan was posted
 - A “red bag”, an old evacuation carry kit that was done away, was still in use.
- The following was observed at an onsite inspection at the Midvale maintenance shop (specific details were provided to management):
 - Expired Narcan.

6. TASP Element #15 Maintenance Audits and Inspection Program

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

- Maintenance of Way (“MOW”) Management did not know what, if any, FTA regulations applied to overhead catenary inspections.
- MOW stores the information of major maintenance in a system called IPCS, but the forms themselves do not list maintenance issues, so there is no link between inspection and IPCS.

- The inspection forms used by MOW for inspecting overhead catenary poles are just a list of pole block sections. They are filled out with basic tick marks, sometimes initials, and sometimes the date. This form lacks the following elements:
 - Procedure checklist – it is not clear what is being done
 - Formal date recordkeeping
 - Formal recordkeeping of who performed the inspection
 - Indications of issues noted (in fact, IA could not actually perform a step due to that data limitation.)

1. SSP Element #1 Policy Statements

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

No issues that the auditor considers non-compliance.

2. SSP Element #2 System Description

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

- Section 2.3 – Vanpool and MicroTransit are two transit modes not mentioned in the background of the system
- The background, or an appendix, should include a list of UTA properties that fall under Security.

3. SSP Element #3 Management of the System Security Program

Findings of Non-compliance:

- Odd numbered pages are missing from the SSP. It is not an editorial mistake, actual pages of information are missing. A few examples that demonstrate this:
 - Page 4 (Index) ends with section 3.4.2, the next page picks up with section 5.2
 - Page 10 starts mid-section with the preceding information missing.
 - Page 10 ends with section 1.3 and page 12 begins with a heading section and then 1.5.3.
 - Page 24 ends with section 3.5, next page begins with 3.6.2. There should be at least a 3.6.1.

Compliance with Recommendations:

- The document could be strengthened by more clearly mentioning the position of the Security group within UTA.
- The background, or an appendix, should include a list of UTA properties that fall under Security.
- Section 3.4.1 of the SSP states that the Police department is part of the Safety and Security department – they report to Operations.
- The role of the Police department *internally* should be better defined and described.

4. SSP Element #4 System Security Program Components

Findings of Non-compliance:

No issues that the auditor considers non-compliance.

Compliance with Recommendations:

- Responsibility for the Continuity of Operations Plan is not defined in the SSP.
- Section 3.7.1 of the SSP states that the Safety and Security Review Committee meets on a “regular basis”. “Regular basis” is not sufficiently descriptive to establish a control. Some clarification on meeting frequency, who calls meetings, who sets agendas, etc. would strengthen the governance around this committee.
- Section 3.7.2 of the SSP describes Rail Services and Bus Operations safety committees but there is not detail on the roster of the committee, when they meet, who calls meetings and sets agendas, etc.
- Section 6.5.2 of the SSP needs to define responsibility for Security Investigations. Also discuss what other parties may need to get involved – potential overlap with a security issue could include: Human Resources, Ethics Officer, Police, Finance, etc.
- UTA job descriptions do not match descriptions of duties in SSP. Having the documents match has an extra emphasis of importance because the SSP isn’t a widely distributed or available document.
 - Examples:
 - Trax Operator job description has some things that suggest the responsibilities outlined in the SSP (section 4.4.4.7) but not clearly. The job description is more safety focused but it could be interpreted to include security
 - Rail Service Employee job description – no descriptions of SSP duties described in 4.4.4.8. There is some suggestion of inspections, the language is more mechanical focused, but it could be interpreted to include security.
 - Electromechanic job description – some of the descriptions fit well into duties described in 4.4.4.5 of the SSP but security is not explicitly discussed.