Memorandum

To: AARON OCHOCO, Chief
Division of Safety and Management Services

From: WILLIAM E. LEWIS
Assistant Director
Independent Office of Audits and Investigations

Subject: SAFETY PROGRAM AUDIT

Attached is the Independent Office of Audits and Investigations (A&I) final audit report on the safety program. Your response has been included as part of our final report. This report is intended for your information and for Department Management.

Please provide our office with status reports on the implementation of your audit finding dispositions 60, 180, and 360 days subsequent to the date of this transmittal memorandum. If all findings have not been corrected within 360 days, please continue to provide status reports every 180 days until the audit findings are fully resolved. As a matter of public record, this report and the status reports will be posted on A&I’s website.

We thank you and your staff for their assistance provided during this audit. If you have any questions or need additional information, please contact Zilan Chen, Chief, Internal Audits, at (916) 323-7877, or myself at (916) 323-7122.

Attachment

c: Michael R. Tritz, Deputy Secretary, California State Transportation Agency
Susan Bransen, Executive Director, California Transportation Commission
Rodney Whitfield, Director of Financial Services, Federal Highway Administration
Malcolm Dougherty, Director
Kome Ajise, Chief Deputy Director
Chris Rojas, Deputy Director Administration
Zilan Chen, Chief, Internal, Independent Office of Audits and Investigations

"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"
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I. Response and Action Plan from Division of Safety and Management Services

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

AUDIT TEAM

Zilan Chen, Chief, Internal Audits
Douglas Gibson, Audit Manager
Amy Norwood, Auditor-in-Charge

P4000-0407

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"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"
SUMMARY, OBJECTIVES, SCOPE, METHODOLOGY, BACKGROUND, AND CONCLUSION

SUMMARY

The California Department of Transportation (Caltrans), Audits and Investigations completed an audit of the Safety Program. This audit was requested by the Deputy Director of Administration to evaluate whether policies, procedures and practices exist to effectively administer the Safety Program and ensure compliance with laws, rules, and standards. The audit focused mainly on the activities of the Office of Health and Safety (OHS) in the Division of Safety and Management Services (DSMS).

We determined policies and procedures exist to enable compliance with laws and safety requirements. DSMS is taking steps to improve the Safety Program by developing a written Injury and Illness Prevention Program, establishing monthly safety officer meetings, and revising the Safety Manual, policies and directives, and the Workplace Violence Prevention Program investigation process.

However, our audit found the need for further improvement as follows:

- Clarifying Roles and Responsibilities for Safety Management
- Improving Operational and Administrative Controls
- Improving Compliance with Safety Laws, Regulations and Standards
- Furthering Hazard Assessment and Control Processes
- Enhancing Workplace Violence Prevention Program
- Improving Communication between OHS and Programs/Districts
- Developing an Efficient and Reliable Safety Information System

OBJECTIVES, SCOPE AND METHODOLOGY

The audit was performed in accordance with the International Standards for the Professional Practice of Internal Auditing. The objectives of the audit were to determine if:

- Policies and procedures exist and are adequate to ensure compliance with laws, rules, and standards.
- Safety goals, expectations, and requirements are clearly and consistently communicated statewide.
- Workplace safety practices and strategies are implemented and followed to comply with laws, rules, standards, policies and procedures.
- Sufficient and reliable safety statistics are maintained to track and report on safety incidents.
Our audit focused on evaluating the roles and responsibilities of DSMS and OHS in administering the Safety Program for the period of July 1, 2015 to September 29, 2016. We conducted our audit from May 6, 2016, through September 29, 2016. Changes after these dates were not tested, and accordingly, our conclusions do not pertain to changes arising after September 29, 2016.

To achieve our objectives we gathered information through interviews with DSMS management, OHS management and staff, headquarters division/program chiefs, managers, and safety officers. We interviewed district safety officers and conducted a survey of all 12 district safety offices. We also reviewed industry practices from various sources including California Occupational Safety and Health Administration (CalOSHA), Workplace Injury and Illness Prevention Model Program, Department of Water Resources Safety Program Review, University of California at Davis and Berkeley Injury and Illness Prevention Program.

BACKGROUND

Caltrans Safety Program includes the Injury and Illness Prevention Program, Workplace Violence Prevention Program and health and wellness programs. California Labor Code, Division 5, Section 6401.7, requires every employer to establish, implement and maintain an effective injury prevention program. The Safety Program is based on safety requirements including general, construction, and electrical safety orders that are a part of the regulations of CalOSHA. These safety orders include Hearing Loss, Heat Illness, and Respiratory Illness Prevention Programs, and the Hazardous Materials Communication Program. Other safety requirements are found in the California Uniform Building Code and the State Administrative Manual.

DSMS is organizationally structured under the Administration Program, and is responsible for overseeing the safety of all Caltrans employees through the Safety Program. DSMS assigned responsibility for administering the Safety Program to the OHS. OHS administers the Safety Program in headquarters and district offices. Each district safety office is responsible for administering the Safety Program in the districts and is organizationally structured under a district Administration program.

OHS oversight responsibilities include:

- Implementing and monitoring Caltrans Injury and Illness Prevention Program and related safety policies, procedures, and work practices.
- Advising managers, supervisors, and employees on safety matters.
- Providing guidance to district safety personnel, maintenance managers and supervisors, and functional program safety liaison personnel regarding Caltrans Injury and Illness Prevention Program.
- Developing and/or recommending adoption of new or revised health and safety policies, procedures, and work practices; reviewing, monitoring, and recommending health and safety training programs.
• Conducting health and safety reviews of field and office supervisors operations, records, and files to ensure compliance with the Injury and Illness Prevention Program.

• Conducting independent investigations of personal injury accidents and motorized equipment/vehicle accidents, as appropriate.

In addition to OHS and the district safety officers, the Divisions of Maintenance, Construction, Equipment, and Engineering Services have established safety positions. Further, the Division of Traffic Operations establishes statewide policies and procedures related to the Traffic Operations Program, and identifies and prioritizes the programming of safety and operational improvement projects.

CONCLUSION

Our audit disclosed DSMS has processes in place for administering portions of the Safety Program. However, the audit identified the need for further improvement as follows:

• Clarifying Roles and Responsibilities for Safety Management
• Improving Operational and Administrative Controls
• Improving Compliance With Safety Laws, Regulations and Standards
• Furthering Hazard Assessment and Control Processes
• Enhancing Workplace Violence Prevention Program
• Improving Communication between OHS and Programs/Districts
• Developing an Efficient and Reliable Safety Information System

This report is intended as information for Caltrans management. The report is a matter for public record and will be placed on Caltrans website, which can be viewed at <www.dot.ca.gov/hq/audits/reports_issued.html>.

VIEWS OF RESPONSIBLE OFFICIALS

DSMS concurred with the findings. Please see Attachment I for their response and action plan to address our recommendations.

WILLIAM E. LEWIS, CPA
Assistant Director
Audits and Investigations

June 28, 2017


FINDINGS AND RECOMMENDATIONS

FINDING 1 – Clarifying Roles and Responsibilities for Safety Management

The California Department of Transportation (Caltrans) can improve the overall management of the Safety Program by clarifying roles and responsibilities for the oversight of its entire Safety Program. The Office of Health and Safety (OHS) within the Division of Safety and Management Services (DSMS) is responsible for administering the Safety Program and reports to the Deputy Director of the Administration Program. However, there are divisions within other Caltrans programs that have safety responsibilities. Additionally, we observed at other agencies such as the State Departments of Transportation of Florida, Texas, Oregon, and the California Department of Water Resources, that their safety offices report directly to a director, chief deputy director, or chief engineer.

The lack of clarity of roles and responsibilities limits the effectiveness of Caltrans overall Safety Program in the following areas:

Safety Organization Structure
Roles and responsibilities for overall safety are decentralized and can be better structured. Director’s Policy for Health and Safety (DP-03-R1) charges the OHS with responsibility for ensuring the safety of all employees. District directors and deputy directors are also responsible under DP-03-R1 for ensuring the safety of employees, customers, the traveling public, and users of the transportation system. Much of the responsibility is being carried out by different programs or offices, including the Divisions of Maintenance, Construction, Equipment and Engineering who have established headquarters safety officer positions. The Divisions of Maintenance and Construction also established safety positions in some district offices, while the Divisions of Equipment and Construction maintain their own safety program, including tracking injuries and illnesses in their program. We found the headquarters safety officers of these programs perform similar functions as OHS. In addition, the Division of Traffic Operations coordinates and provides support for the implementation of the California Strategic Highway Safety Plan with the purpose of reducing traffic accident fatalities and serious injuries on all public roads.

Our survey and discussions with districts and division chiefs and staff disclosed that they believe DSMS and OHS should take the lead role in developing a high-level Strategic Management Plan that ensures the mission, vision, and goals related to safety are achieved. The survey and discussions also indicated that DSMS could be more proactive by utilizing their expertise and resources to develop performance measures for the programs/divisions. The current structure is inefficient and confusing due to safety direction being provided from multiple programs/divisions within Caltrans.

Caltrans has an oversight body, the Health and Safety Advisory Committee, to coordinate Safety Program activities of the different divisions, programs and OHS to ensure overall safety goals and
objectives are met. However, based on our review, the Committee is not being fully utilized. Committee meetings are not held on a regular basis, and when held, committee member attendance is inconsistent. Therefore, Committee members may not be providing the desired level of outcome as intended by the Committee Charter.

The responsibilities assigned to OHS and the safety objective of the Administration Program are not in alignment. As stated on its intranet website, one of the Administration Program’s main objectives is to ensure the safety of Caltrans employees and customers, other highway workers and the traveling public. This is a much broader set of responsibilities than those of OHS, which are limited to employee safety. In addition, the Administration Program regards itself as responsible for internal safety issues only.

Policies and Procedures
Caltrans can better monitor and update policies, directives and the Safety Manual to reflect Caltrans mission and goals for safety to comply with safety requirements. Some of the policies and procedures we reviewed took a while to be updated; while others may need further clarification. We noted the following:

- Caltrans did not have an Injury and Illness Prevention Program until August 2016 when OHS incorporated it in the Safety Manual.
- DP-03-R1 also states that OHS oversees the safe and healthy work environment of all Caltrans employees through the Safety Program. However, we noted that the 2016 revised Safety Manual removed OHS responsibility for workplace violence hazard assessments.
- DP-18-R2, Workplace Violence Prevention, does not assign the workplace violence hazard assessment responsibility to any area in Caltrans.

SAM 20050 states that instances where policy and procedural or operational manuals are not currently maintained, or lines of organizational authority and responsibility are not clearly indicated or are nonexistent, are symptoms of control deficiencies. In addition, SAM 20050 urges entity heads and managers to identify and make the necessary corrections when warned of these symptoms.

RECOMMENDATION

We recommend DSMS:

- Re-evaluate the responsibilities, and objectives of OHS with respect to the Safety Program and ensure alignment with Caltrans goals.
- Work with executive management to:
  - Re-assess the role, organizational and reporting structure of OHS in Caltrans. This includes determining the desired extent of its authority with the districts.
  - Maintain an effective oversight body to coordinate the Safety Program, monitor safety activities, and ensure that overall safety goals are met.

We recommend Caltrans management update policies and procedures to ensure they comply with rules and regulations and are consistent with each other and Caltrans’ mission, vision and goals.
DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.

FINDING 2 – Improving Operational and Administrative Controls

Our audit found that DSMS can improve its internal controls over the operational and administrative functions in OHS and DSMS. Specifically, we found:

Management and Staff Do Not Fully Perform Their Duties
Management and staff did not fully perform roles and responsibilities for administering the Safety Program as specified in the DP-03-R1 and employees' duty statements.

We noted that OHS staff did not perform required duties as documented in the duty statements to effectively administer the Safety Program. We interviewed staff, reviewed duty statements and compared them to the roles and responsibilities listed in the Safety Manual; we found that senior safety specialists mainly conducted ergonomic evaluations in headquarters instead of providing training, including mandatory “Training for Trainers”, new product evaluations, safety inspections, and consultation services to headquarters and district safety officers.

OHS cannot achieve its objectives to ensure the safety of Caltrans employees if staff does not perform required duties. The conditions were partly due to the high turnover of management and staff.

Lack of Adequate Communication, Feedback and Response
We interviewed all employees working in OHS during our audit. Based on the interviews, we found that communication, direction, and feedback between management and staff within OHS is not always adequate. For example:

- Staff stated they shared information they received during California Occupational Safety and Health Administration (CalOSHA) advisory committee meetings regarding new and proposed regulations, but they did not receive direction or a response on how to proceed from management.
- Staff were not always notified by OHS management of some of the responsibilities that they had been assigned such as Machine and Tool Safety.

SAM 20050 asserts the elements of internal control includes information and communication, which requires that information must be identified, captured and communicated in a form and time frame that enables people to carry out their responsibilities.

Lack of Knowledge and Expertise
Based on our survey and interviews, we found that some staff in the Safety Program lacked safety knowledge, expertise and training. For example:
- Staff responsible for conducting construction, electrical, and industrial safety inspections had no knowledge, or experience in construction and electrical safety.
- Staff members were not provided training for new and additional safety responsibilities such as new products evaluations and workplace violence investigations.
- Not all staff received training necessary to provide “Training for Trainers” or consultative services in various technical areas related to construction, electrical and occupational safety.

Staff that lack the necessary knowledge, expertise, or training cannot effectively administer the Safety Program. Government Code, Section 13403 states a satisfactory system of internal accounting and administrative control requires “personnel of a quality commensurate with their duties”. SAM 20050 also asserts the ultimate responsibility for good internal controls rests with management.

Management believes staff are adequately trained because they are sent to training courses to become familiar with various safety subjects. Additionally, staff learn through study of the regulations to become familiar with what information needs to be provided to the employees or “trainers”. However, records from the Learning Management System indicated staff did not always complete required training.

RECOMMENDATION

We recommend DSMS:

- Ensure staff perform required duties to ensure oversight responsibilities are met.
- Develop written internal procedures for managing safety programs, including addressing district and headquarters requests for consultation, training and industrial hygiene testing.
- Provide adequate and timely feedback to staff regarding safety issues raised.

DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.

FINDING 3 – Improving Compliance with Safety Laws, Regulations, and Standards

OHS does not have an adequate process to ensure compliance with safety laws, regulations and standards for the following three areas:

1. New and Ongoing Changes to Safety Laws, Regulations and Standards

OHS can improve the monitoring, implementation, and communication of new and ongoing changes to safety laws, regulations, and standards. OHS is responsible for monitoring and
implementing Caltrans Injury and Illness Prevention Program and related policies, procedures, and work practices, which are based on the California Labor Code, CalOSHA regulations, Uniform Building Code Standards and the State Administrative Manual. Based on our interviews and survey, in some cases, program management and safety staff are the ones who notify OHS of regulatory changes. Further, OHS did not always take action after being notified of the changes, nor did it always work with program and district staff to determine the impact of the changes. Without adequate procedures to monitor and ensure new and proposed changes are implemented, Caltrans could be at risk of violating safety laws, rules and standards. Additionally, programs and districts will not be aware of needed changes in order to revise and implement safe practices and train employees in a timely manner. California Code of Regulations (CCR) requires every employer to have an effective Injury and Illness Prevention Program. The DP-03-R1 states that the OHS Chief is responsible for administering the health and safety programs.

2. Health and Safety Reviews

OHS does not conduct periodic reviews of district and program operations to ensure the Safety Program has been implemented and maintained in compliance with the Injury and Illness Prevention Program and related safety laws, regulations and standards. These reviews include verifying management has made the Safety Manual available to all employees; investigating and documenting injury accidents and illnesses; conducting training; ensuring safety meetings, facilities inspections and operations reviews are conducted and documented; and making sure corrective action is taken to mitigate hazardous conditions. If periodic reviews are not conducted, OHS cannot ensure that program and district management have complied with health and safety requirements.

In addition, OHS does not have processes in place to enable adherence to the Hearing Protection, Respiratory Protection, Heat Illness Prevention and Hazardous Materials Communication Programs. Further, it does not have a way to ensure all employees who are exposed to specific hazards have proper equipment and training to reduce exposure. This could increase the risk of employees' exposure to hearing loss, hazardous materials, respiratory and heat related illness and injuries. OHS staff stated that management restricted them from conducting tests, inspections, and training in headquarters and district offices due to funding constraints.

The Safety Manual states that headquarters OHS is responsible for conducting health and safety reviews and it also provides minimum requirements for OHS to include in the review. The CCR requires employers to administer a Hearing Protection Program and implement a Respiratory Protection Plan to ensure the safety of employees. Further, the CCR provides steps for employers to follow to prevent heat related illnesses, and requires employers to have a written hazardous materials communication program if hazardous materials are present in the workplace.

3. Accident Investigations

OHS does not conduct accident investigations and other related activities as required by the Safety Manual. Specifically, OHS does not:

- Establish Departmental Accident Review Teams (DARTs) to identify if policies, procedures and safety practices were in place at the time of the accident.
- Monitor the implementation of the recommendations or provide status reports to the Health and Safety Advisory Committee as required.
- Ensure Caltrans complies with all CalOSHA citations issued when accidents or illnesses occur. OHS does not have a system for tracking and monitoring citations and ensuring corrective actions are taken to address citations. Moreover, districts and programs do not always forward accidents or illnesses information to OHS. OHS staff stated that they tracked citations in the past but were not able to locate the spreadsheets. OHS is working on developing a database to track citations.

OHS cannot enforce compliance with safety requirements and ensure measures are established to prevent reoccurrence if it does not follow procedures to establish DARTs, monitor the implementation of recommendations, provide status reports to the Health and Safety Advisory Committee, and track and address CalOSHA citations.

DSMS management acknowledged the responsibility for health and safety reviews is written in the Safety Manual, but stated that OHS has not performed operational reviews. DSMS management also stated that it does not have jurisdiction over district offices, nor does it have the resources, including travel dollars, to meet their objectives.

RECOMMENDATION

We recommend DSMS establish processes for:

- Monitoring and communicating new and changing safety laws, regulations and standards.
- Conducting health and safety reviews in districts and headquarters to ensure supervisors comply with safety requirements.
- Clarifying their role and responsibility for following up on changes in laws and regulations that affect occupational safety in all programs and divisions in Caltrans.
- Developing a policy department-wide that establishes roles and responsibilities for OHS involvement in investigations, including requirements for programs and districts to inform OHS when citations are issued.
- Tracking, monitoring and following up to ensure corrective action is taken to address CalOSHA citations to Caltrans.

DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.

FINDING 4 – Furthering Hazard Assessment and Control Processes

Our audit found that DSMS could improve oversight by developing a system for identifying potential or existing hazards in the workplace, including working conditions, equipment, and
Division of Safety and Management Services

Safety Program Audit

procedures and ensuring corrective measures are in place for reducing risk. We found that OHS is not always effective in conducting worksite inspections.

For example, while touring the Sacramento Warehouse, we noted, there were no fire extinguishers or flammable warning signs in the structure that contains heat-treated lumber, which present an increased safety risk of fire or chemical wash-off. There were no records of inspections of hazardous material or storm water at the warehouse. CalOSHA’s *Guide to Developing an Injury and Illness Prevention Program* stipulates that a hazard assessment survey be conducted to identify hazards in the workplace, equipment and procedures that could be potentially hazardous. The assessment should be conducted when first developing an Injury and Illness Prevention Program.

**RECOMMENDATION**

We recommend DSMS ensure proper annual facilities inspections are conducted and establish a process for following up to ensure corrective action is taken to mitigate safety hazards.

**DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE**

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.

**FINDING 5 – Enhancing Workplace Violence Prevention Program**

Caltrans is committed to conducting business, providing services, and protecting its employees and the public by providing a safe and secure work environment through an effective Workplace Violence Prevention Program. DSMS is responsible for administering the Workplace Violence Prevention Program to ensure compliance with laws, regulations, policies and safety work practices. DSMS has established preventative measures such as providing mandatory training through a third party vendor; setting policy; and providing guidance.

DSMS could enhance its Workplace Violence Prevention Program functions as follows:

- Identify and communicate valid workplace violence risks to employees and management. DSMS logs all completed Allegation of Workplace Violence Intake forms and incidents Reports into the Safety Information Management System. However, OHS management stated the information is not used to communicate to all employees and management to identify potential risks or implementing preventative measures.

- Establish and implement formal procedures for workplace violence investigations. We reviewed six investigations and found instances of inconsistency in substantiating reported incidents and the reversal of a conclusion without documented justification.

- Clarify the responsibility of OHS for providing guidance in conducting Workplace Violence Prevention Program investigations. District safety offices review the initial intake forms and assign the cases to managers and supervisors to conduct investigations. OHS conducts the
investigations for headquarters programs if the parties involved are in the chain of command or upon request. Having different functions perform the investigations may create inconsistencies in processes and procedures in conducting the investigations.

The lack of Workplace Violence Prevention Program preventative measures, including investigations, to address potential issues increases the risk of threat, violence or harm to employees and the public. The Workplace Violence Prevention Program policy requires headquarters and district safety offices to ensure compliance with the Safety Manual by providing employee assistance program services and taking appropriate corrective action when policy violation occurs.

RECOMMENDATION

We recommend DSMS:

- Review the Workplace Violence Prevention Program policies and processes and make revisions where necessary to ensure they are adequate.
- Develop methods of effectively communicating awareness of workplace violence prevention and changes to the Workplace Violence Prevention Program to all employees.
- Ensure consistent approaches in the investigation and substantiation of complaints.

DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.

FINDING 6 – Improving Communication between the Office of Health and Safety and Programs/Districts

OHS communicates safety issues and guidance through Health and Safety Advisory Committee meetings, the Safety Manual, monthly teleconferences, annual safety conferences, email, and safety bulletins. OHS does a good job communicating information on various health topics and training opportunities department-wide through regular emails. We noted improvement could be made in the communication of safety requirements and providing guidance. Specifically, we found the following:

- OHS has not communicated the Safety Manual revisions to all staff. During the course of our audit, OHS revised many of the chapters in the Safety Manual. Although OHS involves some subject matter experts in revising the manual, programs/divisions and district safety office staff surveyed stated that they are not aware of the revisions.
- Not all districts and division safety officers are able to attend the annual safety conferences due to budgetary travel restrictions. DSMS hosts these conferences at various district offices each year where they coordinate and conduct training, discuss safety topics and exchange information.
- Two surveyed districts stated they do not have any OHS staff assigned to their district and have no interaction with OHS.
- One program was not aware of the heat illness prevention and hearing loss prevention programs even though staff are exposed to these hazards. Other programs were not aware of the Injury and Illness Prevention Program.
- Two district safety officers stated that they did not receive any training as new employees and rely on equipment/supply vendors or other districts for updates on regulatory changes.

CalOSHA requires that a system for communicating matters relating to occupational safety and health be available to and understandable by all affected employees. Substantial compliance with this provision includes meetings, training programs, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees. If programs/divisions and districts are not aware of safety requirements, work practices may not be in place to address safety hazards. Further, without including the programs/districts in the safety manual revision, programs/districts may overlook key safety information. Finally, staff cannot be held accountable for actions resulting from unsafe practices if they are not aware of what is required.

By improving the communication of safety requirements, DSMS will be able to fulfill its responsibilities in providing advice regarding laws, rules, and regulations; developing and recommending adoption of new or revised health and safety policies, procedures, and work practices; and enforcing health and safety laws and policies.

**RECOMMENDATION**

We recommend the DSMS and OHS to:

- Ensure the revised Safety Manual clearly establishes the responsibilities and procedures for communicating and promoting safety issues and guidance.
- Communicate information on safety topics, including new and proposed requirements, revisions to directives, policies, and the Safety Manual department-wide.
- Use appropriate means of communication including recently established monthly teleconferences, safety bulletins, etc. to disseminate information on safety topics.
- Identify and reach out to programs in headquarters and districts that may not have a safety officer to attend safety meetings and conferences and provide alternative means of communication.

**DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE**

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.
FINDING 7 – Developing a Reliable Safety Information Management System

The Safety Information Management System (SIMS) is used to track injuries and illness incidents and motor vehicle accidents, and comprises 13 databases and a statewide reporting tool. Information from SIMS is used to provide mandatory reports to CalOSHA, quarterly and annual reports of safety goal metrics, and meet other ad hoc reporting requests.

We found information generated by SIMS is not always accurate, and as such, the reports provided to CalOSHA and used for safety goal metrics may be incorrect. Specifically, we found the numbers in the 2015 annual “District on the Job Illness and Injury Incident Rates” report used by Caltrans, and the CalOSHA reports did not include 25 personal injury accidents for that year which were included in another SIMS-generated report, “Personal Injury Accidents by Calendar Year”. Inclusion of these injuries would have changed the 2015 incident injury rate to 6.84 instead of the 6.71 reported, pushing the rate above Caltrans’ benchmark of 6.81. The incident rate is the ratio of injuries and accidents to the number of employees.

Inaccurate reports prevent Caltrans from determining whether it is meeting its safety goals. Using multiple databases also requires additional time and resources to track, maintain, reconcile, and report injuries, illnesses and motor vehicle accidents. CCR Title 8, Section 14300, requires employers to prepare, maintain records and report work-related injuries and illnesses.

One factor contributing to the unreliability of SIMS is that each district is responsible for inputting their information and the user may change the type of information. Further, publishing reports from an Access database is challenging because the reports are generated using real time numbers, and there are no controls to track changes made by districts and headquarters subsequent to the reports being generated. Generating reports from 13 databases increases the possibility of errors.

RECOMMENDATION

We recommend DSMS to:

- Continue to explore options for developing a more efficient tracking system.
- Establish administrative controls on data fields.
- Establish a process to ensure data integrity by conduct periodic reviews based on risk.
- Create guidelines to ensure consistency by all database users and a process for modifying information after mandatory reports have been issued.

DIVISION OF SAFETY AND MANAGEMENT SERVICES RESPONSE

The Division of Safety and Management Services concurred with the finding and recommendations, and will take steps to address them. Please see Attachment I for details of the response and action plan.
ATTACHMENT I

Response and Action Plan from the Division of Safety and Management Services
### Audit Name: Safety Program Audit

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<tr>
<th>A&amp;I Audit Recommendation</th>
<th>Auditee Response to Draft Report</th>
<th>Estimated Completion Date</th>
<th>Staff Responsible</th>
<th>A&amp;I Analysis</th>
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<td><strong>Audit Report Finding Number 1</strong>&lt;br&gt;Clarifying Roles and Responsibilities for Safety Management</td>
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<td>We recommend DSMS:</td>
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<td>OHS is partnering with the Division of Research, Innovation and System Information to initiate a preliminary investigation that will examine the organizational structure and roles and responsibilities of the statewide Safety Program in Caltrans to ensure alignment with Caltrans goals.</td>
<td>September, 2018</td>
<td>SSM III, SSM II</td>
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<td>- Re-evaluate the responsibilities, and objectives of OHS, with respect to the Safety Program and ensure alignment with Caltrans goals.</td>
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<td>We recommend Caltrans' management update policies and procedures as needed to ensure they comply with regulations and are consistent with Caltrans mission, vision, and goals.</td>
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<td>DSMS will conduct quarterly meetings with the Health and Safety Advisory Committee to review policies, risks, and safety activities.</td>
<td>September, 2016 and ongoing</td>
<td>SSM III, SSM II</td>
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<td>DSMS will ensure staff perform their responsibilities. Staff duty statements will be updated to align with roles and responsibilities.</td>
<td>Ongoing</td>
<td>SSM III, SSM II, SSM I</td>
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<td>- Ensure staff perform required duties to ensure oversight responsibilities are met.</td>
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<td>- Develop written internal procedures for managing safety programs, including addressing district and headquarters requests for consultation, training and industrial hygiene testing.</td>
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<td>- Provide adequate and timely feedback to staff regarding safety issues raised.</td>
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<td>DSMS will develop written internal procedures and desk manuals for managing the statewide safety program.</td>
<td>September, 2018</td>
<td>SSM II, SSM I, Safety staff</td>
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<td>DSMS will create a tracking system to identify and track safety suggestions, and will publish on DSMS intranet site for transparency.</td>
<td>June, 2018</td>
<td>SSM II</td>
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### Audit Report Finding Number 3
**Improving Compliance with Safety Laws, Regulations, and Standards**

We recommend DSMS establish processes for:
- Monitoring and communicating new and changing safety laws, regulations, and standards.
- Conducting health and safety reviews in districts and headquarters to ensure supervisors comply with safety requirements.
- Clarifying their role and responsibility for following up on changes in laws and regulations that affect occupational safety in all programs and divisions in Caltrans.
- Developing a policy department-wide that establishes roles and responsibilities for OHS involvement in investigations, including requirements for programs and districts to inform OHS when citations are issued.
- Tracking, monitoring and following up to ensure corrective action is taken to address CalOsha citations to Caltrans.

| DSMS will establish a process for monitoring and communicating new and changing safety laws, regulations, and standards. OHS will publish quarterly newsletters. | June, 2018 | SSM II |
| DSMS will collaborate with district and division safety officers to ensure supervisors comply with safety requirements. | September, 2018 | SSM III, SSM II |
| DSMS will establish a process for following-up on changes in laws and regulations that affect occupational safety in Caltrans. | June, 2018 | SSM II |
| OHS is partnering with the Division of Research, Innovation and System Information to initiate a preliminary investigation that will examine the organizational structure and roles and responsibilities of the statewide Safety Program in Caltrans to ensure alignment with Caltrans goals. | September, 2018 | SSM III, SSM II |
| DSMS will develop statewide tracking tool for CalOsha citations to ensure corrective action is taken and statewide communication occurs. | June, 2018 | SSM II, AGPA |

### Audit Report Finding Number 4
**Furthering Hazard Assessment and Control Process**

We recommend DSMS ensure proper annual facilities inspections are conducted and establish a process for following up to ensure corrective action is taken to mitigate safety hazards.

| DSMS will partner with the Divisions of Business, Facilities and Security, Maintenance, Equipment, and Traffic Operations to develop a system that will document facility inspections and establish a process to ensure corrective action is taken to mitigate safety hazards. | September, 2018 | SSM III, SSM II, Safety Officers |

### Audit Report Finding Number 5
**Enhancing Workplace Violence Prevention Program**

We recommend DSMS:
- Review the Workplace Violence Prevention Program policies and procedures consistent with the results from the Lean 6 Sigma effort underway.
- Develop methods of effectively communicating awareness of workplace violence prevention and changes to the Workplace Violence Prevention Program to all employees.

| DSMS will revise the Workplace Violence Prevention Program policies and procedures consistent with the results from the Lean 6 Sigma effort underway. | March, 2018 | SSM II, SSM I |
| DSMS will improve the intranet site for OHS on Workplace Violence Prevention. | June, 2018 | SSM II, SSM I |
Audit Report Finding Number 6
Improving Communication between the Office of Health and Safety and Programs/Districts

We recommend the DSMS and OHS to:

- Ensure the revised Safety Manual clearly establishes the responsibilities and procedures for communicating and promoting safety issues and guidance.
- Communicate information on safety topics, including new and proposed requirements, revisions to directives, policies, and the Safety Manual department-wide.
- Use appropriate means of communication, including recently established monthly teleconferences, safety bulletins, etc., to disseminate information on safety topics.
- Identify and reach out to programs in headquarters and districts that may not have a safety officer to attend safety meetings and conferences and provide alternative means of communication.

Audit Report Finding Number 7
Developing a Reliable Safety Information Management System

We recommend DSMS to:

- Continue to explore options for developing a more efficient tracking system.
- Establish administrative controls on data fields.
- Establish a process to ensure data integrity by conducting periodic reviews based on risk.
- Create guidelines to ensure consistency by all database users and a process for modifying information after mandatory reports have been issued.