

A photograph of a light rail train at a station platform during sunset. The train is white with blue accents and has 'Link' and 'Sound Transit' written on it. The platform is modern with a curved design and a colorful sculpture. The sky is a mix of orange and purple.

20 Comprehensive 25 Agency Audit Plan

Agency Oversight Department
Audit Division



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Purpose of the comprehensive audit plan

The purpose for the comprehensive plan is to provide an agency wide landscape of audits being performed within the Audit Division, and those facilitated outside the Audit Division.

As part of work by Project MOST, this comprehensive plan ensures that all agency functions with an “audit” component, from Environmental to Quality, roll up into a single, organized audit plan for the year.

Each function will manage its own audit work, but key milestones—such as regular reporting and tracking of audit issues, planned changes to scheduling, and presenting results to the CEO’s Cabinet and the Finance & Audit Committee (FAC) will be performed by the Audit Division.

This reinforces the agency’s commitment to a single hub for all agency audit work, focused on compliance and transparency.

Audit Division workplan criteria

Audit work from the Audit Division is based on several sets of audit risk criteria which include, but are not limited to the following:

Audit plan development criteria	
<ul style="list-style-type: none"> • Previous audit work (internal & external) 	<ul style="list-style-type: none"> • Equity commitment
<ul style="list-style-type: none"> • Business activity risks 	<ul style="list-style-type: none"> • Structure or organizational change
<ul style="list-style-type: none"> • Complexity of audit 	<ul style="list-style-type: none"> • Safety data trends and analysis
<ul style="list-style-type: none"> • Public or employee impacts 	<ul style="list-style-type: none"> • Industry trends & best practices
<ul style="list-style-type: none"> • Strategic plan alignment 	<ul style="list-style-type: none"> • Executive and management considerations
<ul style="list-style-type: none"> • Agency oversight committees’ consideration 	<ul style="list-style-type: none"> • Federal & State regulatory updates

Application of criteria towards the audit plan

Audit plan development criteria listed above helped decide topics we audit.

Not all the above criteria apply to Compliance Audit work, as that is federally and state-mandated to be done annually or at specific stages of the agency’s capital project lifecycle.

Performance Audit

Performance audits will occur within the scheduled quarter dates, with the conclusion presented at each quarterly Finance & Audit Committee (FAC) meeting.

2025 PERFORMANCE AUDITS		
AUDIT TITLE	OBJECTIVE	ESTIMATED SCHEDULE
Fare Compliance Program	Evaluate the effectiveness and consistency of fare compliance practices to support equitable access and program integrity.	Q1
Follow-up: November 26, 2021 Link Incident Audit Implementation	Review the implementation of corrective actions from the 2022 Link Incident audit for effectiveness in addressing root causes and preventing recurrence.	Q2
Disaster Preparedness (pending Finance & Audit Committee Approval)	Evaluate the agency’s readiness for major emergencies, focusing on risk management, compliance, and continuity of safety and service.	
Project Closeouts	Evaluate project closeout processes and procedures to ensure all requirements are met.	Q3
Customer Complaint Process	Assess the effectiveness and responsiveness of handling complaints to enhance service quality and customer satisfaction.	
Annual Audit Findings Follow-up Report	Follow-up on previously identified audit findings, ensuring accountability and progress toward resolution.	Q4

****Note: planned performance audit projects are subject to change, and if revisions are proposed; the Chief Audit Executive must submit the change for Finance & Audit Committee (FAC) approval.**

Compliance Audit

Federal and state rules require internal safety audits occur annually to ensure effective implementation of safety processes across all modes of transit owned by Sound Transit with the conclusion presented at each quarterly Finance & Audit Committee (FAC) meeting.

Additionally, internal audits of management systems (such as ESMS) are required to demonstrate implementation and compliance to support recognized management system accreditations.

2025 COMPLIANCE AUDITS	Q1	Q2	Q3	Q4
Internal Safety Audit – Tacoma Link	*			
Internal Safety Audit – Sounder Commuter Rail / FRA 225 Accidents & Incidents		*		
Environmental & Sustainability Management System (ESMS) Internal Audit		*		
Internal Safety Audit – Sound Transit Express Bus Service			*	
Internal Audit – Public Safety & Emergency Management			*	
Internal Safety Audit – Link Light Rail				*

Capital Project – Certification Compliance Audits

Capital Project Safety & Security Certification compliance audits are timed in conjunction with specific points of the lifecycle of the capital projects and is based on information that comes from our partners in safety and the capital project teams.

Starting in 2025, the capital project certification compliance audit program has been enhanced, with only 3 audits per project: one audit to occur before a project moves to pre-integrated testing, one audit prior to opening for revenue service, and one final transition audit no less than 90 days after opening for passengers to ensure workarounds are resolved.

The schedule listed below is subject to change based on actual timing of each project. If there are changes in project milestone dates, the audit plan will adjust accordingly.

2025 CAPITAL PROJECT – CERTIFICATION COMPLIANCE AUDITS	Q1	Q2	Q3	Q4
Downtown Redmond Link Readiness Certification Audit	*			
East Link (E130) Readiness Certification Audit		*		
Downtown Redmond Link Operational Transition Audit		*		
Federal Way Link Project Assurance Certification Audit			*	
Bus Rapid Transit (Electric Vehicles) Procurement Audit			*	
East Link (E130) Operational Transition Certification Audit				*

This list of projects is **tentative based on where each project is in the capital program and where safety feels these are ready for our audit work.

Audits facilitated outside of the Audit Division

The following audits will be conducted by other functions but will be reported through the Audit Division to track results, schedule changes, and present findings quarterly to the Finance & Audit Committee (FAC).

2025 AUDITS – OUTSIDE THE AUDIT DIVISION			
Type	Owner	Topic	ESTIMATED SCHEDULE
Internal	Quality	Internal Quality Audit - TBD	TBD
External	Finance	Financial Statement Audit	Q2
External	Finance	IT General Controls of Financial Statement Audit	
External	Finance	Single Audit	
External	Finance	Annual Comprehensive Financial Report	
External	Finance	Agreed Upon Procedures (AUPs) for National Transit Database (NTD)	
External	Finance	Agreed Upon Procedures (AUPs) for Schedule of Sources and Use of Funds (Subarea Equity)	
External	Finance	Regional Fare Coordination (ORCA) Audit	

Audits facilitated outside of the Audit Division (Continued)

2025 AUDITS – OUTSIDE THE AUDIT DIVISION			
Type	Owner	Topic	ESTIMATED SCHEDULE
External	Finance	SOC 1 Examination for ORCA – INIT & ROOT	Q2
Internal	Environmental	Annual Environmental Compliance Audit	Q3
External	Information Security	ISO 27001 (Information Security Management Systems) Maturity Assessment	
External	Information Security	Department of Licensing (DOL) Data Security Compliance Audit	
Internal	Quality	Internal Quality Audit - TBD	
External	Environmental	ESMS ISO 14001 Annual Surveillance Audit	Q4
External	Finance	2024 Accountability Audit (Performed by WA State Auditor)	
Internal	Quality	Internal Quality Audit - TBD	

Advisory Services

Global audit standards allow Audit Division staff to perform consulting activities throughout the year that are consultative in nature, offering expertise and insight, focusing on adding value without an expression of auditor opinion or development of an audit report.

Those activities are assigned as follows:

Director's Office:

- CEO & DCEO – Agency Oversight requested consultation
- Artificial Intelligence (AI)
- Enterprise Risk Management
- Enterprise Resource Planning / Enterprise Asset Management System (ERP/EAMS) Transformation Program

Performance Audit:

- Small and Attractive Asset Inventory Process

Compliance Audit:

- Documents Review – Asset Management System

Requirements & Independence

The Audit Division performs audits in accordance with our audit charter and Generally Accepted Government Auditing Standards (GAGAS or “Yellow Book”) issued by the United States Government Accountability Office (GAO) and with the Global Internal Audit Standards.

These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence we obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Also, the Audit Division is committed to following safety oversight standards set forth by the Federal Transit Administration (FTA), Federal Railroad Administration (FRA), and all other relevant auditing requirements or standards.

Furthermore, audit standards require confirmation, at least annually, of the organizational independence of the internal audit activity. Sound Transit's Audit Division is organizationally independent of audited management and, as such, remains objective when conducting audits, and staff have no conflicts of interest with subject matter contained in this Comprehensive Agency Audit Plan.