Management of Change Program Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
29 CFR 1910.119(l) — Management of Change (OSHA PSM)
29 CFR 1910.119(i) — Pre-Startup Safety Review
40 CFR 68.75 — Management of Change (EPA RMP)
29 CFR 1910.119 — Process Safety Management of Highly Hazardous Chemicals (Full Standard)
OSHA PSM Overview and Guidance
CCPS Guidelines for Management of Change
CSB Investigation Reports — MOC-Related Incidents

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

MOC Procedures and Program Structure

Audit Item	Expected Finding	Status	Notes / Evidence
Written MOC procedures	Written MOC procedures are established and maintained per 1910.119(l). Procedures address: the technical basis for the proposed change, impact of change on safety and health, modifications to operating procedures, necessary time period for the change, and authorization requirements for the proposed change. Procedures clearly define what constitutes a change versus a replacement in kind. *» Ref: 29 CFR 1910.119(l)*		
Change definition and scope	The MOC program clearly defines what types of changes require MOC review. At minimum, changes to process chemicals, technology, equipment, and procedures are covered per 1910.119(l). Best practice extends MOC to organizational changes, staffing changes, temporary changes, facility changes, software/control system changes, and changes to safety-critical equipment. The definition of replacement in kind is clear and consistently applied. *» Ref: 29 CFR 1910.119(l), CCPS guidelines*		

Audit Item	Expected Finding	Status	Notes / Evidence
Temporary change management	The MOC program addresses temporary changes with the same rigor as permanent changes. Temporary changes have defined time limits and expiration dates. Procedures exist for extending temporary changes beyond their approved duration. If a temporary change becomes permanent, a new or updated MOC is initiated. Expired temporary changes are restored to the original condition. » *Ref: 29 CFR 1910.119(l) [best practice]*		
MOC roles and responsibilities	Roles and responsibilities are clearly defined for MOC initiators, reviewers, technical evaluators, approvers, and those responsible for implementation and close-out. Approval authority levels are appropriate for the risk level of the change. The MOC program designates who can authorize changes and establishes escalation procedures for high-risk changes. » *Ref: 29 CFR 1910.119(l)(5)*		

Change Identification and Hazard Evaluation

Audit Item	Expected Finding	Status	Notes / Evidence
Change identification	Processes exist to identify changes before they are implemented. Work order systems, project management processes, and maintenance procedures include MOC screening questions. Employees are trained to recognize when a change requires MOC review. Near-miss and incident investigations evaluate whether an unmanaged change was a contributing factor. » *Ref: 29 CFR 1910.119(l) [best practice]*		
Hazard evaluation	Each proposed change undergoes a hazard evaluation addressing the technical basis for the change and its impact on safety and health per 1910.119(l)(1). The depth of hazard evaluation is proportional to the complexity and risk of the change. Evaluation methods may include What-If analysis, HAZOP, checklist review, or other appropriate methods. The evaluation considers potential process safety, personnel safety, environmental, and operational impacts. » *Ref: 29 CFR 1910.119(l)(1)*		
Risk assessment and mitigation	Risks identified through the hazard evaluation are assessed and appropriate mitigation measures are developed. Risk controls follow the hierarchy of controls. Residual risks are documented and accepted at the appropriate authority level. Action items from the hazard evaluation are tracked to completion before the change is implemented. » *Ref: 29 CFR 1910.119(l)(2), (e)*		

Authorization and Documentation

Audit Item	Expected Finding	Status	Notes / Evidence
Change authorization	Changes are authorized by appropriate personnel per 1910.119(l)(5) before		

Audit Item	Expected Finding	Status	Notes / Evidence
	implementation. The authorization process verifies that hazard evaluation is complete, action items are resolved, affected documents are updated, affected employees are trained, and pre-startup safety review requirements are met. Authorization is documented with signatures and dates. » *Ref: 29 CFR 1910.119(l)(5)*		
Process safety information updates	Process safety information (P&IDs, equipment specifications, chemical data, process parameters) is updated to reflect the change per 1910.119(d). Updates are completed before or concurrent with the change implementation. Documents affected by the change are identified in the MOC package. Document revisions are tracked and controlled. » *Ref: 29 CFR 1910.119(d), (l)*		
Operating procedure updates	Operating procedures affected by the change are revised per 1910.119(f) and 1910.119(l)(3). Revised procedures are reviewed and approved before the changed process is started up. Employees are trained on revised procedures. Procedure revisions clearly identify what has changed. » *Ref: 29 CFR 1910.119(f), (l)(3)*		
MOC documentation and tracking	Complete MOC packages are maintained including the change request, hazard evaluation, risk assessment, action items, approvals, affected document list, training records, and pre-startup review. An MOC tracking system (register or database) provides visibility into all open, in-progress, and completed MOCs. MOC packages are retained for the life of the process or per records retention requirements. » *Ref: 29 CFR 1910.119(l) [best practice]*		

Training and Communication

Audit Item	Expected Finding	Status	Notes / Evidence
Employee notification	Employees whose job tasks are affected by the change are informed of and trained on the change before startup per 1910.119(l)(4). Notification covers what is changing, why, any new hazards or modified procedures, and any changes to their roles or responsibilities. Communication methods are appropriate for the workforce (shift meetings, written notices, training sessions). » *Ref: 29 CFR 1910.119(l)(4)*		
Affected employee training	Training on the change is provided to all affected employees including operators, maintenance workers, contractors, and emergency responders per 1910.119(l)(4). Training covers modified operating procedures, new equipment or controls, new hazards, and changed emergency procedures. Training is documented with attendee names, dates, and topics covered. » *Ref: 29 CFR 1910.119(l)(4), (g)*		

Audit Item	Expected Finding	Status	Notes / Evidence
Contractor notification	Contractors working in or near the affected area are notified of changes that may affect their safety per 1910.119(h). Contractor employees receive appropriate training on changes that affect their work scope or safety. Contractor notification is documented. » *Ref: 29 CFR 1910.119(h)*		

Pre-Startup Safety Review and Close-Out

Audit Item	Expected Finding	Status	Notes / Evidence
Pre-startup safety review	A pre-startup safety review (PSSR) is conducted per 1910.119(i) for new and modified facilities. The PSSR confirms that construction and equipment are in accordance with design specifications, safety/operating/maintenance/emergency procedures are in place, a process hazard analysis has been performed and recommendations resolved, and training has been completed. The PSSR is documented and authorized before the process is started. » *Ref: 29 CFR 1910.119(i)*		
MOC close-out	A formal close-out process verifies that all MOC requirements have been met before the change is considered complete. Close-out verifies: all action items are resolved, documents are updated, training is complete, PSSR is performed (if required), and the change is functioning as intended. Close-out is documented with responsible party sign-off. » *Ref: 29 CFR 1910.119(i), (l) [best practice]*		
Post-implementation review	For significant changes, a post-implementation review is conducted to verify the change is performing as intended and no unintended consequences have occurred. Review timing is appropriate for the type of change (typically 30–90 days after startup). Lessons learned are captured and fed back into the MOC program. » *Ref: CCPS guidelines [best practice]*		

Program Review and Improvement

Audit Item	Expected Finding	Status	Notes / Evidence
MOC program audit	The MOC program is audited at least every three years as part of the PSM compliance audit per 1910.119(o). Audit evaluates procedure adequacy, implementation consistency, documentation completeness, training effectiveness, and timeliness of change reviews. Audit findings drive corrective actions and program improvements. » *Ref: 29 CFR 1910.119(o)*		
MOC metrics and trending	Key metrics are tracked to evaluate MOC program performance including: number of MOCs initiated and completed, average review/approval cycle time, overdue MOCs,		

Audit Item	Expected Finding	Status	Notes / Evidence
	action item closure rates, and incidents attributed to unmanaged changes. Trends inform program improvement and resource allocation. » *Ref: CCPS guidelines [best practice]*		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review