

Monitoring Compliance and Sufficiency of Operations and Maintenance Procedures

FTA's [Public Transportation Agency Safety Plan \(PTASP\) regulation](#) (49 CFR Part 673) establishes requirements for Agency Safety Plans (ASPs). These requirements include specifications for monitoring safety performance, including monitoring compliance with and sufficiency of operations and maintenance procedures.¹

Monitoring Compliance with Operations and Maintenance Procedures

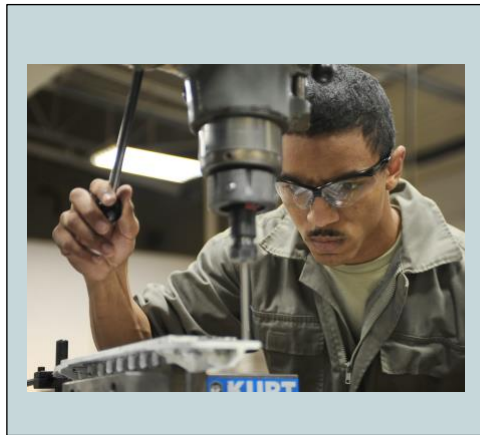
Transit agencies must establish activities to monitor their system for compliance with their operations and maintenance procedures (§673.27(b)(1)). Many transit agencies are already familiar with compliance testing—it often forms the basis of operator or mechanic certifications and recertifications, job observations, and other standard forms of employee evaluation. What can compliance monitoring tell us about our agency?

Compliance vs. Sufficiency

You may choose to use the following definitions:

Compliance means following procedures as they are written.

Sufficiency means the procedures are adequate to achieve the outcome intended.



To monitor compliance, transit agencies are encouraged to look beyond certification or job performance evaluations and to assess if employees demonstrate compliance with agency procedures. Of course, the desired answer to this question is “yes, our employees comply with our procedures all the time.” However, in a working environment, 100 percent compliance may not be occurring 100 percent of the time. To manage safety, it’s important to understand how compliance assumptions and realities could impact an agency’s safety performance.

¹ The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Grantees and subgrantees should refer to FTA’s statutes and regulations for applicable requirements.

This document was originally published in the [Transit Safety & Oversight Spotlight Newsletter in September 2020](#).

What can compliance monitoring tell us about our agency?

The compliance monitoring process allows an agency to examine its activities from all angles. For example, comparing compliance rates between day and night shifts may reveal a discrepancy and, potentially, identify a hazard that your agency may want or need to address through your Safety Risk Management process. By monitoring your agency's processes, you could discover that the compliance rates for a set of procedures are dropping to an unacceptable level.

Investigating these discrepancies and changes can reveal the "why" of the situation. Maybe compliance on the day shift is different than the night shift because the on-the-job trainers are different for those shifts. Maybe compliance rates are dropping because mechanics have identified a different way to perform a process.

Compliance monitoring helps agencies determine if employees are carrying out work as intended. Monitoring the sufficiency of procedures helps agencies determine whether their procedures have the desired outcome(s).

Monitoring the Sufficiency of Operations and Maintenance Procedures

Transit agencies must establish activities to monitor their system which help make sure their operations and maintenance procedures (§673.27(b)(1)) are sufficient. Although many transit agencies already evaluate procedures for sufficiency, they may not have a consistent and specific process to do so.

To monitor the sufficiency of operations and maintenance procedures, transit agencies can consider two questions:

1. What does this procedure ensure or prevent?
2. What indicators tell us whether our agency has successfully ensured or prevented that outcome?

Voluntary ASP Reviews

Did you know that FTA's PTASP Technical Assistance Center (TAC) offers voluntary reviews of draft ASPs?

[Submit](#) your ASP by **November 13, 2020** to guarantee review by PTASP TAC specialists.

What can our agency learn from monitoring the sufficiency of operations and maintenance procedures?

From the example in the table, we can see that the rail transit agency is not completing all safety critical work orders within the prescribed timeframe. To address the results of this monitoring activity, the transit agency may choose to review how it implements its maintenance procedure, including available resources, training, and worker efficiency, to identify opportunities for improvement.

Compliance, Sufficiency, and the ASP

ASPs must outline the agency’s process for monitoring compliance and sufficiency of operations and maintenance procedures throughout the agency. Remember that this requirement applies to all operations and maintenance procedures, not just the procedures that directly relate to safety. Agencies may design their process to prioritize or monitor various procedures differently.

For more information and resources, visit the [PTASP Technical Assistance Center \(TAC\) Resource Library](#) or submit questions to a PTASP TAC specialist by phone at 877-827-7243 or by email at PTASP-TAC@dot.gov

Safety Critical Work Order: Time to Complete	Percentage
24 Hours	45%
1 Week	30%
1 Month or More	25%

Let’s use the time to complete safety critical work orders as an example. A transit agency has a policy that requires safety critical work orders for track fastener replacement to be completed within 24 hours. A recent review of 6 months of maintenance records shows that only 45 percent of these work orders are completed within 24 hours. This monitoring activity shows that the agency is not following its procedures and that its existing efforts may not be sufficient to ensure required repairs.



PTASP Technical Assistance Available Now

- Access one-on-one Agency Safety Plan support
- Learn and share through the PTASP Community of Practice
- Explore the PTASP Resource Library

<https://www.transit.dot.gov/PTASP-TAC>