



Lessons Learned from Voluntary Agency Safety Plan Reviews (Part 2)

FTA's Public Transportation Agency Safety Plan (PTASP) Technical Assistance Center (TAC) offers voluntary reviews of draft Agency Safety Plans (ASP). This article is the second in a series that discusses some of the industry's most common ASP questions, issues, and concerns.¹

Related Resources

- [PTASP Applicability webinar](#)
- [Safety Assurance webinar](#)
- [Safety Assurance Lessons Learned webinar](#)

Monitoring as an Essential Safety Assurance Function

One of the key elements of Safety Assurance is monitoring. Particularly, through monitoring:

- Compliance with and sufficiency of operations and maintenance procedures (§673.27(b)(1)),
- Effectiveness of safety risk mitigations (§673.27(b)(2)), and
- Information reported through internal safety reporting programs (§673.27(b)(4)).

Related Resources

- [Guide to Developing the Safety Assurance Component of an ASP](#)
- [Introduction to Safety Performance Indicators and Targets](#)
- [Monitoring Compliance with and Sufficiency of Operations and Maintenance Procedures](#)

The ASP must outline these monitoring programs. Some ASPs do not describe monitoring as an ongoing activity. Although the regulation does not specify how often agencies must conduct these monitoring activities, agencies may benefit from specifying the expected frequency of each monitoring activity.

Investigations and Causal Factors

Agencies must investigate “safety events to identify causal factors” (§673.27(b)(3)). Some agencies focus their causal factor identification on a narrow range of factors.

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 December 2020](#).



When identifying causal factors, agencies may find it helpful to consider:

- **Human factors**, such as human error or rule violations;
- **Equipment and infrastructure factors**, such as vehicle or infrastructure failures;
- **Environmental factors**, such as lighting, weather, or visibility; and
- **Organizational factors**, such as resource management, organizational culture, or processes.

Management of Change and Continuous Improvement

Rail transit agencies and bus transit agencies that are not small public transportation providers must include Management of Change and Continuous Improvement processes in their ASP (§673.27(c) and (d)). Some ASPs reviewed from these agencies do not reflect the fundamental requirements of these two processes.

For example, Management of Change activities are most effective when implemented before a change is made. Knowing how a change may impact safety performance before the change is implemented helps the agency make informed decisions and prepare for unintended impacts caused by the proposed change.

Some ASPs do not address the requirement in Continuous Improvement for acting on the results of a safety performance assessment. The ASP should describe how the agency develops and carries out a plan, under the direction of the Accountable Executive, to address any identified safety deficiencies (§673.27(d)(2)).

Safety Communication

While the safety training required in the PTASP regulation only applies to workers who are directly responsible for safety (§673.29(a)), safety communication applies to every person in the transit agency (§673.29(b)). Some ASPs do not clearly describe how an agency shares safety communications throughout the entire agency. The ASP should clearly define the communication tools and processes that the agency uses to ensure that all workers receive clear safety communication and understand their safety responsibilities.

Visit the [TAC Resource Library](#) for guides, fact sheets, and webinars on the PTASP regulation. Contact the PTASP TAC (1-877-827-7243 or PTASP-TAC@dot.gov) for assistance with any PTASP-related topic.

Related Resources

- [Guide to Developing the Safety Promotion Component of an ASP](#)
- [Safety Training Resources](#)
- [Understanding PTASP Safety Training and Communication Requirements](#)