



# Effective Practices for Corrective Action Plan

## Management – Part 1

### **Ruth Lyons**

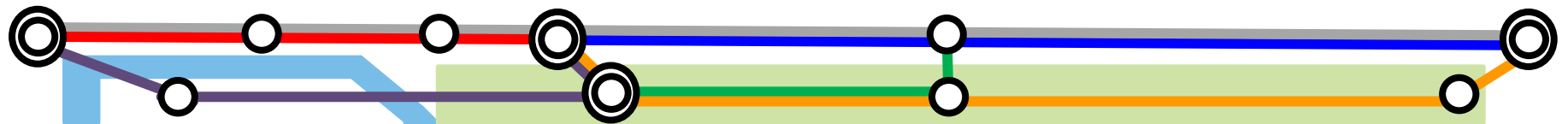
Senior Program Manager, Office of Safety Review  
Office of Transit Safety and Oversight  
Federal Transit Administration

### **Joseph Powell**

Program Manager, Office of Safety Review  
Office of Transit Safety and Oversight  
Federal Transit Administration

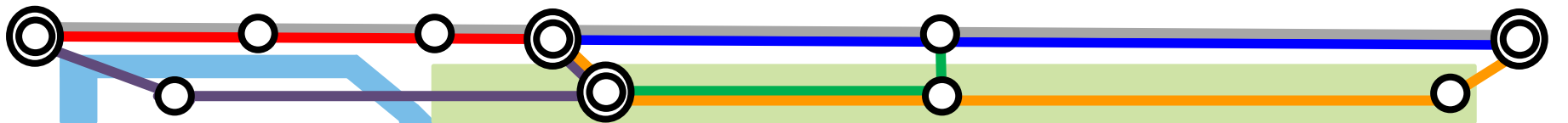
### **John P. Chism**

Program Manager, Office of Safety Review  
Office of Transit Safety and Oversight  
Federal Transit Administration



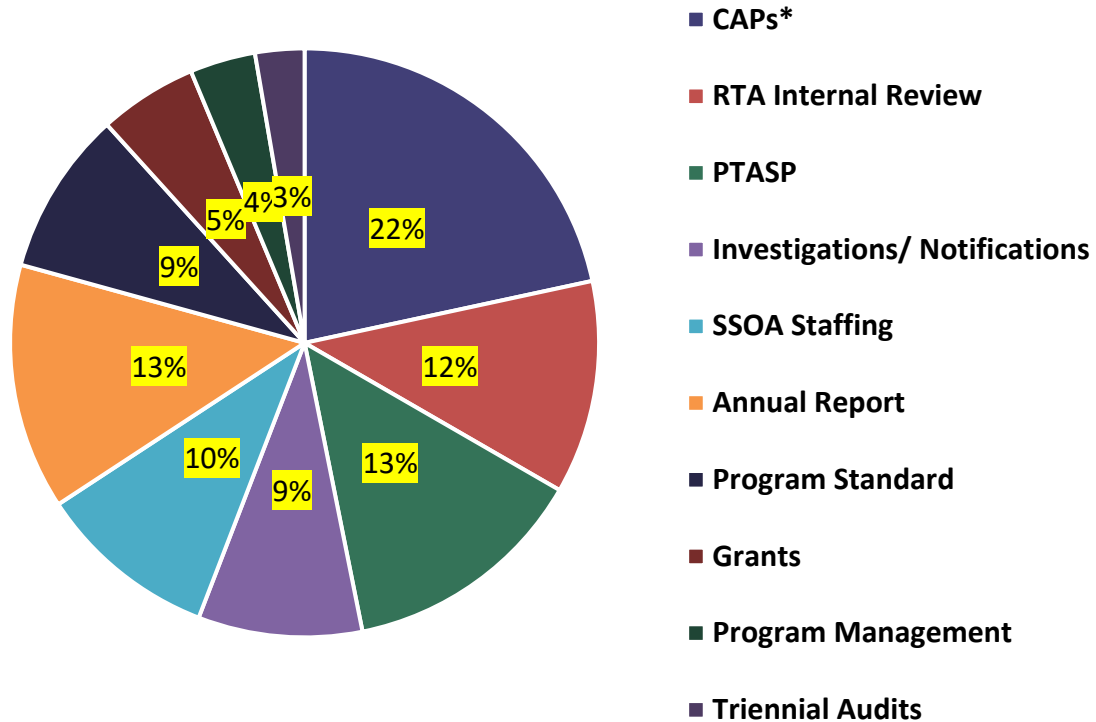
# CAP Management Agenda

- Summary of FTA Audit Findings
- Overview of CAP Management
- Summary of FTA Audits – CAP Related Findings
- CAP Management – 3 Common FTA Audit Findings
- Discussion
- Questions



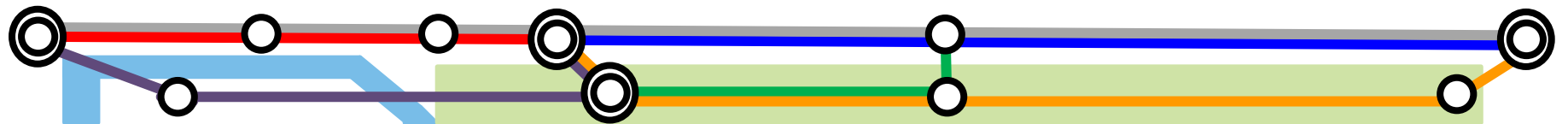
# SSOA Summary of 7 Cycles of Audits – Findings

## Total Audit Findings



- Top 5 FTA Audit Findings – For SSOAs

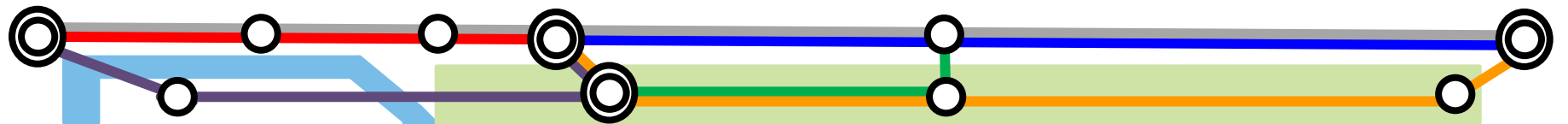
- CAPs
- PTASP Oversight
- Annual Report Submission
- RTA Internal Reviews
- SSOA Staffing



# CAP Management Overview

## Requirement: 49 CFR Part 674.37(a)

- The SSOA must review and approve CAPs before the RTA executes. Exceptions for immediate or emergency CAPs (though the SSOA must still subsequently review and approve)
- CAPs specifically describe:
  - The actions to minimize, control, correct, or eliminate the risks and hazards identified by the CAP
  - The schedule for taking those actions
  - The individuals responsible for taking those actions.
- The RTA must periodically report on CAP progress to the SSOA.

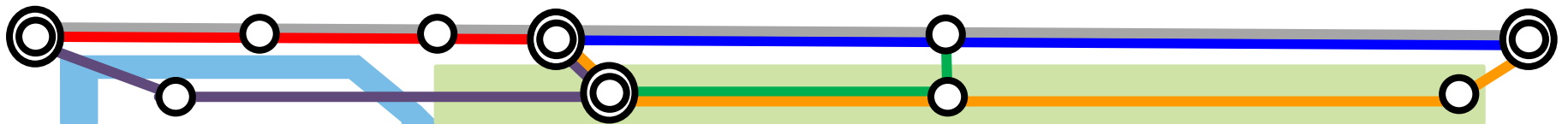
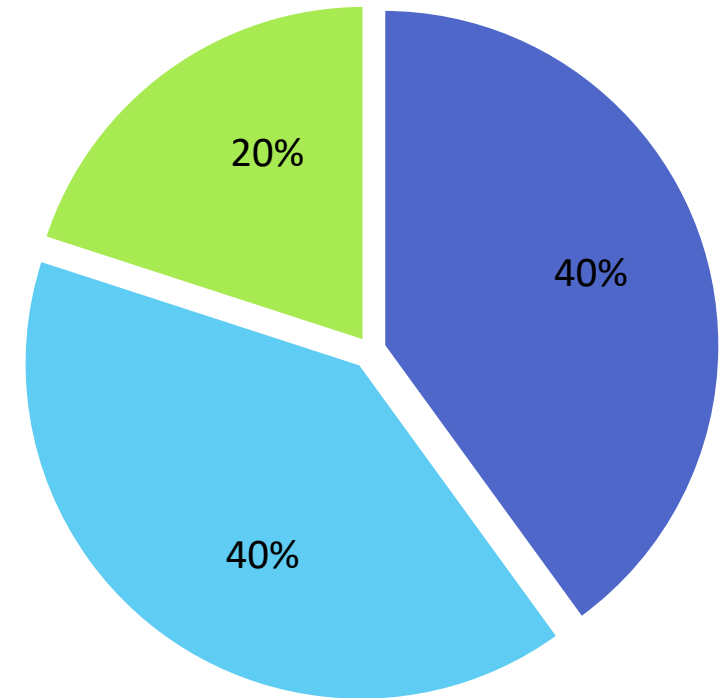


# Summary of FTA Audits - CAP Related Findings

- CAP findings account for ~25% of all FTA's Audit Program Findings
  - Over 120 FTA audit findings from 2019 with 30 CAP related findings

- SSOA did not ensure that RTA developed CAPs for risks, hazards or investigation reports.
- SSOA did not ensure that CAPs included an accurate schedule.
- SSOA did not ensure that the RTAs developed CAPS as required.

## Common CAP Findings



# CAP Management – 3 Common FTA Audit Findings

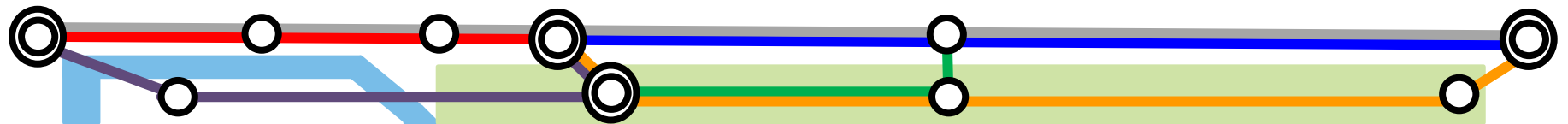
- Issue 1: CAPs are not developed for risk, hazards or investigation reports.

Actions RTA implemented to minimize risks/hazards or result of investigation report CAPs Not Reported to SSOA	
Concern	Action
Pedestrian's jaywalking / fouling the streetcar right-of-way	<ul style="list-style-type: none"> <li>• Railing on sidewalk</li> <li>• Improved train lighting</li> <li>• Reduced train speed</li> <li>• Enforcement</li> <li>• Public outreach</li> </ul>
Motorist make illegal left turns in front of light rail	<ul style="list-style-type: none"> <li>• Traffic signal phase changes</li> <li>• LED Train Approach blank-outs</li> <li>• Delineators</li> </ul>
Mainline derailment	<ul style="list-style-type: none"> <li>• Procedure changes for chocking wheels</li> <li>• Develop fatigue management program</li> <li>• Procedure and training for radio communication</li> <li>• Conduct Special assessment for other derailment locations</li> </ul>



# CAP Management – FTA Audit Findings

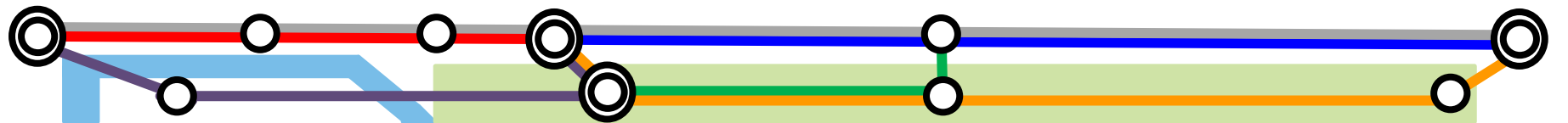
- Issue 2: CAPs not developed as required
  - CAPs not provided for internal reviews, as required by Program Standard
  - Other CAPs not developed and tracked





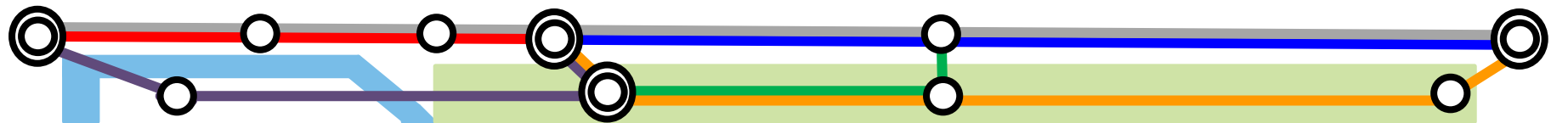
# CAP Management – 3 Common FTA Audit Findings

- Issue 3: CAPs did not include an accurate schedule
  - CAP does not have an implementation schedule/ date
  - CAP implementation dates are past due (sometimes years)
  - CAP matrices have different dates (SSOR, SSOA, RTA, etc.)
  - CAP noted closed, but still open



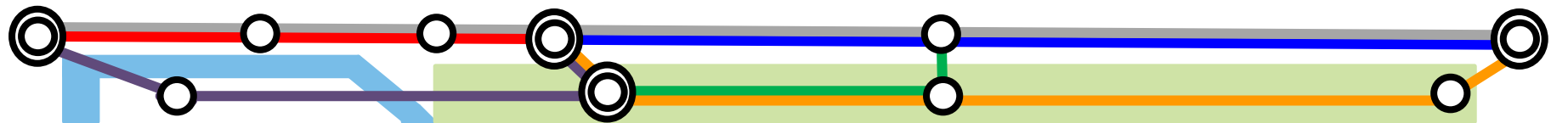
# Discussion #1 – What’s Wrong

CAP #	CAP Source	CAP Description	SSOA Approved	Responsible	Status	Proposed Date	Status/ Comment	Actual Date	SSOA Verified/ Closed
1	December Derailment	Update track inspection SOP X	3/1/2022	Joe Smith, Metro Track Manager	Open	12/3/2022	3/1/2022 Update... 6/12022 Update...		Closed 1/5/2022

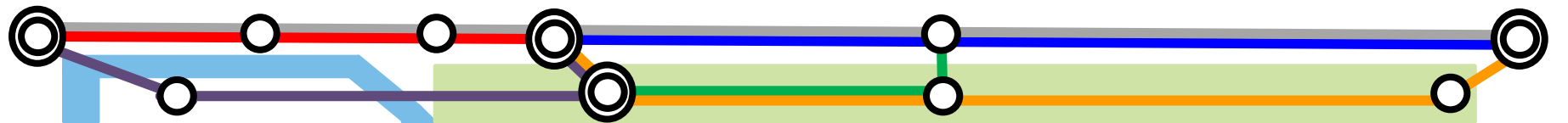


# Discussion #2 – What's Wrong?

CAP #	CAP Description	CAP Source	Person Responsible	Implementation Date
1	FLS	2020 RTA Internal Review	Metro	Nov-2021
2	RTA to include SMS training in new hire orientation and quarterly employee training	2021 SSOA Triennial Audit		Nov-2021
3	<ul style="list-style-type: none"> <li>• Procedure Updates</li> <li>• Purchase Wheel Measurement and Truing Machine</li> <li>• Conduct assessment for state of good repair</li> </ul>	12/2020 Derailment	John (Who retired in 2021)	11/2021 - 4/2024

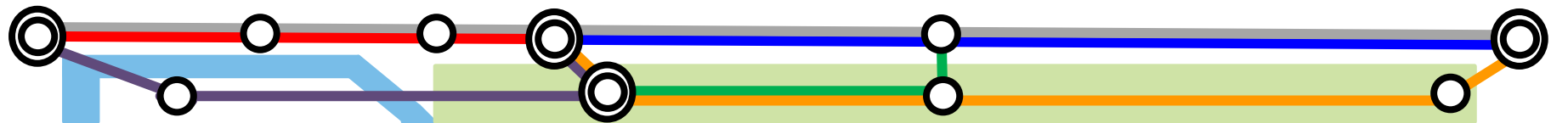
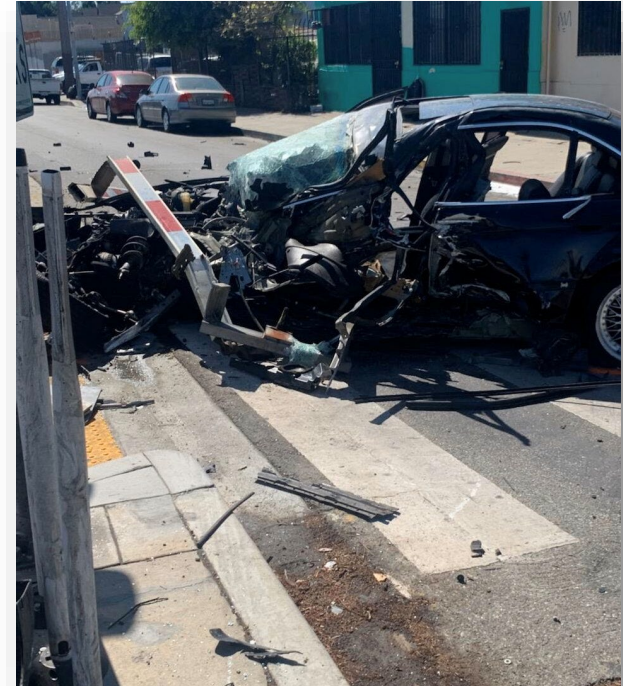


# Discussion #3 – Determining CAPs



# Discussion #3 – Determining CAPs

- Accident Scenario: Light Rail vs. Motorist
  - Motorist Made Illegal Left Turn in Front of Light Rail Train Against Red Traffic Signal



# Discussion #3 – Determining CAPs

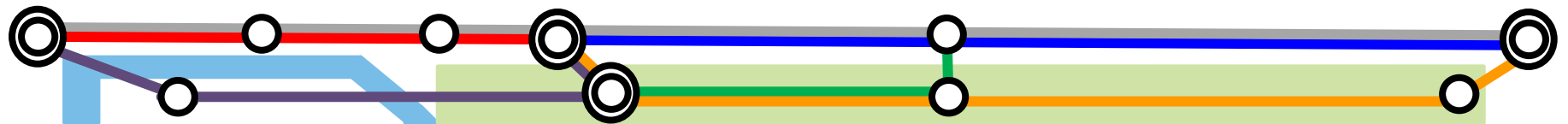
Program Standard Section X:

- “CAP(s) must be developed to address any findings resulting from an investigation”

Findings and Contributory Causes

- Pavement markings deteriorated
- Median with plastic delineator installations nor consistent with other locations
- No train-approach/blank-out signal
- Issues with effectiveness of exit gates

#	CAP Description





# Contact Information

**Ruth Lyons**

Senior Program Manager, Office of Safety Review  
Office of Transit Safety and Oversight  
Federal Transit Administration

[Ruth.Lyons@dot.gov](mailto:Ruth.Lyons@dot.gov)

202-366-2233

**Joseph Powell**

Program Manager, Office of Safety Review  
Office of Transit Safety and Oversight  
Federal Transit Administration

[joseph.powell@dot.gov](mailto:joseph.powell@dot.gov)

202-366-1631

**John P. Chism**

Program Manager, Office of Safety Review  
Office of Transit Safety and Oversight  
Federal Transit Administration

[john.chism@dot.gov](mailto:john.chism@dot.gov)

202-366-7581