



**September 7, 2023**

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U.S. Department of Transportation  
Federal Transit Administration



# Dr. Melonie Barrington

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**Director**

Office of Safety Review

Federal Transit Administration



# Agenda

- Program Update
- Category 4
- Category 5
- Category 6
- Questions
- Wrap Up



# Presenters



**Cyrell R. McLemore**

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**Senior Inspection Specialist**

Office of Safety Review

Program Operations Division



**Emily Jessup**

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**Attorney Advisor**

Office of Chief Counsel

Legislation and Regulations Division

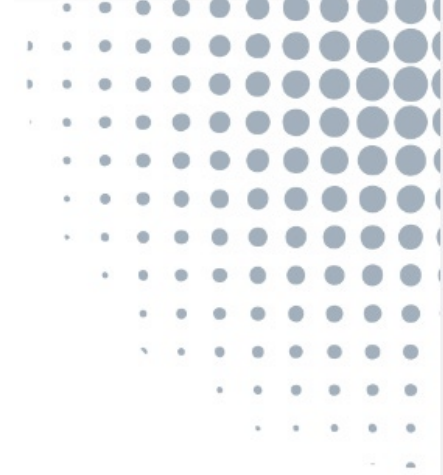


# Risk-Based Inspection Program Update

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# RBI Sessions at SSO/RTA Workshop



NOV. 14 – SSOAs Only	NOV. 15 – SSOAs & RTAs	NOV. 16 – SSOAs & RTAs
RBI Presentation 30 mins		
RBI Panel SSOA Insights 1 hr, 45 mins	RBI FTA Panel 1 hr, 15 mins	RBI Panel SSOA Lessons Learned 1 hr, 15 mins
RBI Office Hours 60 mins	RBI Office Hours 60 mins	



Email [FTA-RBI@dot.gov](mailto:FTA-RBI@dot.gov) to request an Office Hours session

# RBI Program Development Resources



1. RBI Program Development Submission Checklist
2. Workload Assessment Template

## Rail Transit Inspector Training\* (third-party)

### The University of Wisconsin at Madison

Interdisciplinary Professional Programs

<https://interpro.wisc.edu/courses/?topics=Electric%20Power%7CTransportation%20Infrastructure%7CVehicles%20and%20Powertrains&coursesearch=rail&sort=relevance#038;coursesearch=rail&sort=relevance>

### The University of Tennessee at Knoxville

Center for Transportation Research

Track Inspection and Safety Standards for Rail Transit Systems

<https://ctr.utk.edu/rail-courses/>

\*FTA does not recommend or endorse any specific training programs.





# Incident Verification → Event Verification

Replace RBI Toolkit references to “**incident verification**” with “**event verification**” (pages 12, 15, 22, 27).

## *Page 12 Updates*

**Event Verification** - Describe how inspections verify the RTA confirms the successful repair of an event scene.

- Policies and procedures should address the inspection of areas with similar characteristics to those where an event occurred.
- Post-event repair inspections verify that the RFGPTS successfully repaired the event scene.
- Beyond confirming the repairs, the policies and procedures should include how the SSOA will assess whether the RTA is leveraging data and information collected through investigation activity to determine probable cause and to support the identification of hazards.

**The RBI Toolkit will be updated by January 2024.**





# RBI Development Plan: ASP Submission

- RTAs must update their Agency Safety Plan (ASP) to include policies and procedures for:
  - Providing SSOAs with **access** to the RTA to conduct RBIs (Category 2)
  - Sharing with the SSOA, **the data the RTA collects when identifying hazards and assessing and mitigating safety risk** (Category 3)
- To streamline the ASP update process, some SSOAs have asked:
  - If the RTA can submit proposed language for the ASP, and
  - Wait until after FTA approves the RBI development plan to incorporate the language into the ASP
- Why?
  - To avoid potentially updating their ASP twice
  - Timing for required annual ASP updates may not align with RBI plan submission deadline



# RBI Development Plan: ASP Submission (continued)

SSOA submits proposed ASP language related to RBI requirements. Submission includes:

a. **Full ASP**, citing pages/sections that address RBI requirements

OR

b. **Section of the ASP** that addresses RBI requirements

AND

c. **Program Standard** that cites where language related to each requirement appears in the submitted ASP

1

SSOA submits RBI plan

2

FTA iterates plan with SSOA

3

FTA approves RBI plan

4

SSOA implements RBI

5

FTA verifies RBI implementation

6

FTA closes special directive

ASP

Includes **proposed ASP language**

ASP language may change if plan changes based on FTA feedback

SSOA provides **final ASP language to RTA** to update ASP

SSOA submits a **document certifying that FTA-approved ASP language has been incorporated into the ASP**



# Be purposeful with the language in your RBI program development documentation

## Special Directive and/or RBI Toolkit

## SSOA RBI Development Documents (Program Standard/ASP/etc.)

### Requirements/“Must”

- RBI programs must contain these



Will

### “Should/Could/Can/May”

- Best practices/recommendations
- Not required by the statute or special directive



Will/May/Might

### Example:

*SSOAs are required to conduct unannounced inspections*



*“the SSOA **may** perform unannounced inspections”*



*“the SSOA **will** perform unannounced inspections”*



# Q&A

- Please enter your questions in the chat



# Category 4

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## Inspection Prioritization



# Category 4: Inspection Prioritization

SSOA Required Action (D0010)	Considerations
<p>Submit SSOA Program Standard language that <b><u>specifies the SSOA's prioritization process</u></b> for its risk-based inspection program, <b>including data analysis procedures, safety concern prioritization rating procedures, and inspection prioritization procedures.</b></p>	<ul style="list-style-type: none"><li data-bbox="1199 497 2998 647">❑ Does your Program Standard <b>specify the prioritization process for your risk-based inspection program?</b></li><li data-bbox="1199 731 2998 881">❑ Does your process in the Program Standard include <b>data analysis procedures?</b><ul style="list-style-type: none"><li data-bbox="1249 900 2998 1360">▪ Does the process <b>specify the safety metrics</b> that you will use to prioritize inspections by evaluating relevant data? RBI Toolkit examples:<ul style="list-style-type: none"><li>- Number and status of RTA-identified and SSOA-identified defects.</li><li>- Number and type of events, CAPs, and hazards in an area.</li><li>- Number and type of inspections conducted in an area.</li><li>- Repeat concerns.</li></ul></li><li data-bbox="1249 1397 2998 1519">▪ Does the process include <b>comprehensive data analysis</b> of safety program metrics data, maintenance data, and inspection data types?</li></ul></li></ul>



# Category 4: Inspection Prioritization (continued)

SSOA Required Actions (D0010)	Considerations
<p>Submit SSOA Program Standard language that <u>specifies the SSOA's prioritization process</u> for its risk-based inspection program, <b>including data analysis procedures, safety concern prioritization rating procedures, and inspection prioritization procedures.</b></p>	<ul style="list-style-type: none"><li><input type="checkbox"/> Does your process include <b>safety concern prioritization rating procedures</b>?<ul style="list-style-type: none"><li>▪ Did you explain <b>how you will analyze data</b> about safety concerns <b>and use it to prioritize inspection activities</b>?</li><li>▪ Did you determine <b>how to scale prioritization ratings</b>?</li></ul></li> <li><input type="checkbox"/> Does your process include <b>specific inspection prioritization procedures</b>?<ul style="list-style-type: none"><li>▪ If you oversee more than one RTA, did you also develop a <b>procedure for identifying and prioritizing safety concerns among the RTAs</b> you oversee?</li><li>▪ Did you develop policies and procedures that describe <b>how to prioritize inspections for each RTA</b> you oversee?</li></ul></li></ul>

# Category 4: Inspection Prioritization (continued)

SSOA Required Actions (D0011)	Considerations
<p>Submit SSOA Program Standard language that <b>describes a <u>continuous process</u> for risk-based inspection prioritization</b> that <b><u>specifies</u> the frequency of data analysis, safety concern prioritization, and inspection prioritization.</b></p>	<ul style="list-style-type: none"><li data-bbox="1199 506 3115 656">❑ Does your Program Standard <b>describe a continuous process for risk-based inspection prioritization?</b></li><li data-bbox="1199 731 3115 1200">❑ Does your Program Standard <b><u>specify the frequency of data analysis, safety concern prioritization, and inspection prioritization?</u></b><ul style="list-style-type: none"><li data-bbox="1282 900 3065 1125">• Does your Program Standard state that you will <b>perform the data analysis, safety concern prioritization, and inspection prioritization process for each RTA</b> it oversees?</li><li data-bbox="1282 1134 2532 1200">• This process should occur <b><u>at least once per year.</u></b></li></ul></li></ul>



# Category 5

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**Risk-Based Inspection Programs Are Commensurate with Number, Size, and Complexity of the RFGPTS**



# Category 5: RBI Programs are Commensurate with Number, Size and Complexity of RFGPTS the SSOA Oversees

SSOA Required Actions (D0012)	Considerations
<p>Submit SSOA Program Standard policies and procedures that <b>demonstrate the SSOA will administer risk-based inspections programs <u>commensurate with the complexity of each RTA</u></b> that an SSOA oversees.</p>	<p><input type="checkbox"/> Does your Program Standard include policies and procedures that <b>demonstrate that you will administer risk-based inspections programs <u>commensurate with the complexity of each RTA</u></b> that you oversee?</p>

# Category 5: RBI Programs are Commensurate with Number, Size and Complexity of RFGPTS the SSOA Oversees (continued)

SSOA Required Actions (D0013)	Considerations
<p>Submit SSOA Program Standard policies and procedures that <b>demonstrate <u>consistent and ongoing risk-based inspections of each RTA</u></b> that an SSOA oversees.</p>	<ul style="list-style-type: none"> <li data-bbox="1269 545 3078 765">❑ Does your Program Standard include policies and procedures that demonstrate <b><u>consistent and ongoing risk-based inspections of each RTA</u></b> that an SSOA oversees?</li> <li data-bbox="1269 851 3078 996">❑ Do the policies and procedures include (or consider) <b><u>at least four onsite risk-based inspections per RTA per year?</u></b></li> </ul>

# Category 5: RBI Programs are Commensurate with Number, Size and Complexity of RFGPTS the SSOA Oversees (continued)

SSOA Required Actions (D0014)	Considerations
<p>Submit SSOA Program Standard policies and procedures that <b>demonstrate the SSOA inspects the full spectrum of activities for each RTA</b> it oversees and that those <b>inspections are prioritized based on relevant data</b>, including safety program, maintenance, and inspection data collected by the SSOAs.</p>	<ul style="list-style-type: none"> <li data-bbox="1082 478 3215 694"> <input type="checkbox"/> Does your Program Standard include <b>policies and procedures that demonstrate the SSOA inspects the full spectrum of activities for each RTA</b> it oversees?                      Inspected activities must include at a minimum:                     <ul style="list-style-type: none"> <li>• Scheduling inspections</li> <li>• Inspection reports</li> <li>• Immediate safety concerns</li> <li>• Inspections of equipment, infrastructure, and practices specific to each RFGPTS</li> <li>• Event verification</li> <li>• Ongoing monitoring (procedures, maintenance, and operations)</li> <li>• Defects and corrective or remedial action</li> <li>• CAP and safety risk mitigation verification</li> </ul> </li> <li data-bbox="1082 1341 3215 1632"> <input type="checkbox"/> Does your Program Standard include policies and procedures that <b>demonstrate that inspections are prioritized based on relevant data, including safety program, maintenance, and inspection data</b> collected by the SSOA?                     </li> </ul>

# Category 6

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## SSO Staffing, Qualifications, and Training



# Category 6: SSOA Staffing, Qualifications, and Training

SSOA Required Actions (D0015)	Considerations
<p>Submit an <b><u>updated workload assessment to align with increased responsibilities</u></b> of the risk-based inspection program.</p>	<ul style="list-style-type: none"><li data-bbox="1192 545 2952 686">❑ Did you <b>submit an updated workload assessment</b> that includes increased responsibilities for risk-based inspection activities?</li><li data-bbox="1192 780 2845 1140">❑ Does your workload assessment <b>describe the activities and resources</b> that the SSOA will require <b>to perform risk-based inspections</b>?<ul style="list-style-type: none"><li data-bbox="1259 1014 2962 1140">▪ Examples of activities: data analysis, risk assessment, track, power, signals, vehicles, operations, and communications.</li></ul></li></ul>

# Category 6: SSO Staffing, Qualifications, and Training (continued)

SSOA Required Actions (D0016)	Considerations
<p>Submit <b>documentation that confirms the qualifications and capability of SSOA personnel</b> conducting risk-based inspections in required areas of expertise.</p>	<p><input type="checkbox"/> Did you submit an updated <b>Technical Training Plan (TTP) that confirms SSOA personnel conducting risk-based inspections are qualified and skilled in the competencies needed</b> to fulfill RBI program requirements such as data analysis, risk assessment, and inspection?</p>

# Category 6: SSO Staffing, Qualifications, and Training (continued)

SSOA Required Actions (D0017)	Considerations
<p>Submit an <b><u>updated Technical Training Plan</u></b> to align with the <b>increased responsibilities</b> of SSOA risk-based inspection programs.</p>	<ul style="list-style-type: none"><li data-bbox="1202 549 3002 765">❑ Did the SSOA <b>submit an updated Technical Training Plan (TTP)</b> to align with any changes to the SSOA's oversight responsibilities, including those related to a risk-based inspection program?<ul style="list-style-type: none"><li data-bbox="1292 859 3002 990">▪ Does the updated TTP <b>reflect personnel and necessary training for each activity</b> outlined in the SSOA's workload assessment?</li><li data-bbox="1292 1074 3002 1271">▪ Does the TTP <b>include any training required by the RTA to access specific areas of the system</b>, such as Roadway Worker Protection training?</li></ul></li></ul>



# Q&A

- Please enter your questions in the chat



# Poll



**Please provide your  
response to the  
displayed question.**



# Stay Informed



## Submit Questions

- Email: [FTA-RBI@dot.gov](mailto:FTA-RBI@dot.gov)



## Access Resources

- <https://www.transit.dot.gov/RBI>



## Register for the Workshop

- [2023 SSO/RTA Workshop](#)

St. Louis, Missouri | November 14–16, 2023

