



RBI Webinar

June 26, 2024



U.S. Department of Transportation
Federal Transit Administration



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Director

Office of Safety Oversight and Compliance

Federal Transit Administration



What is the purpose of today's RBI webinar?

Emphasize key items to include in RBI development plans based on FTA's observations during plan reviews conducted to date.



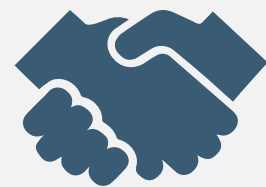
FTA will:

- Reinforce guidance
- Highlight resources



We want you to:

- Use resources
- Ask questions

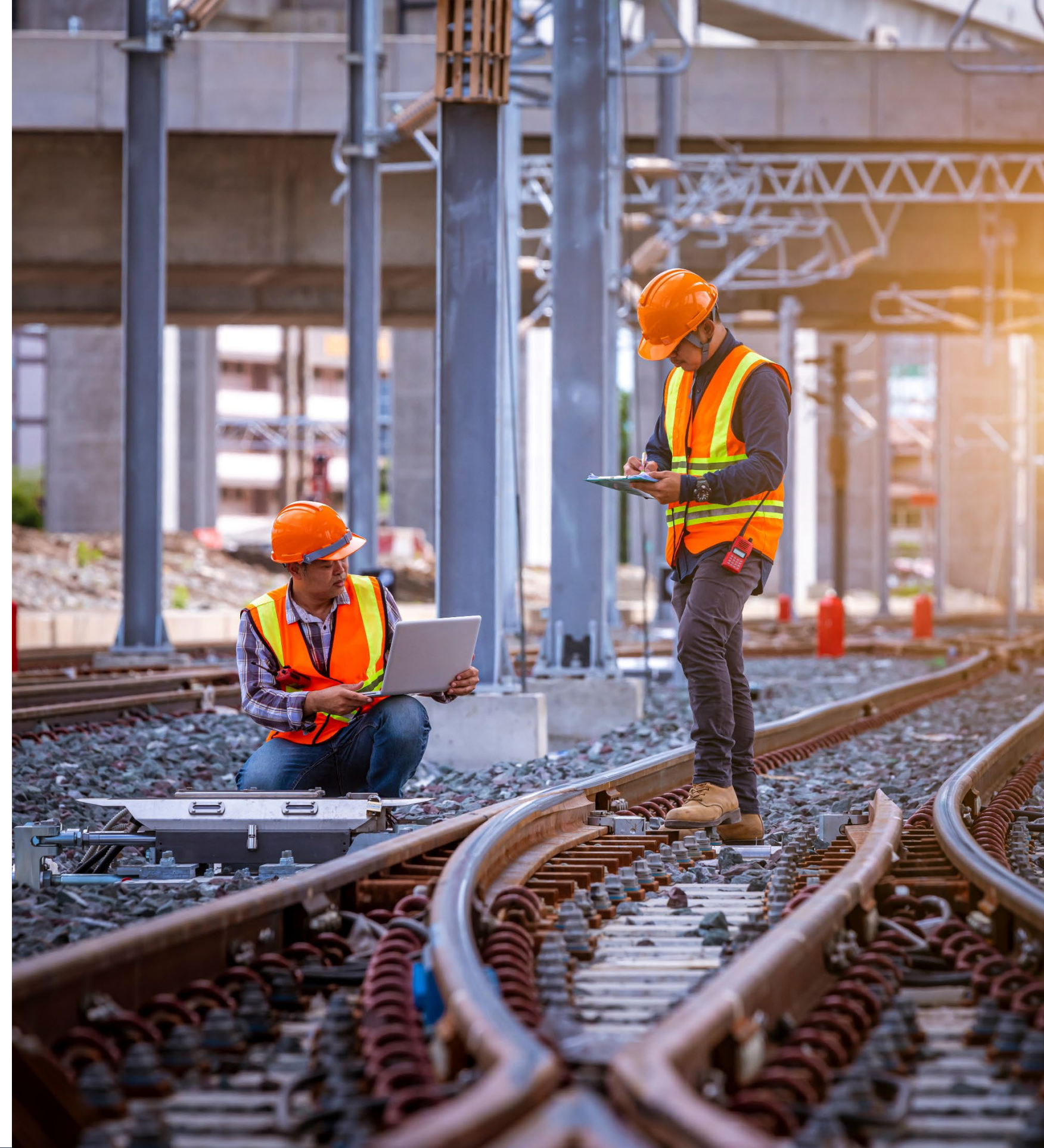


Collaboration is crucial for success!



Agenda

- General Guidance
- RBI Policies and Procedures
- Data Collection, Storage, and Analysis
- Technical Training Plan (TTP)
- Workload Assessment (WLA)
- Q&A



Presenters



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RBI Development Plan Guidance



General Guidance

- RBI Checklist is a great resource to reference when developing your RBI plan
 - ✓ Rephrases RBI Program special directive required actions into simple questions
 - ✓ Includes information to consider from the RBI Toolkit
 - ✓ Can be used to self-assess if your plan addresses all requirements
- Include clear processes and timelines



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Risk-Based Inspection Program
Development Checklist
OCTOBER 2023

State Safety Oversight Agencies (SSOAs) can use this document to self-assess if they have addressed SSOA required actions included in the risk-based inspection (RBI) program special directives issued by the Federal Transit Administration (FTA) on October 21, 2022, as required by 49 U.S.C § 5329(k)(5).

This document is organized by the six categories of requirements and the 17 RBI program development required actions included in the special directive.

Under each of the 17 SSOA required actions included in this checklist, you will find two columns of information. The purpose of each column is described below.

- **Checklist Item** – Reformats the SSOA required actions into simple questions that SSOAs can use to self-assess if their response documents address the requirements.
- **Considerations** – Provides additional information that SSOAs should consider as they prepare their RBI program development documentation.

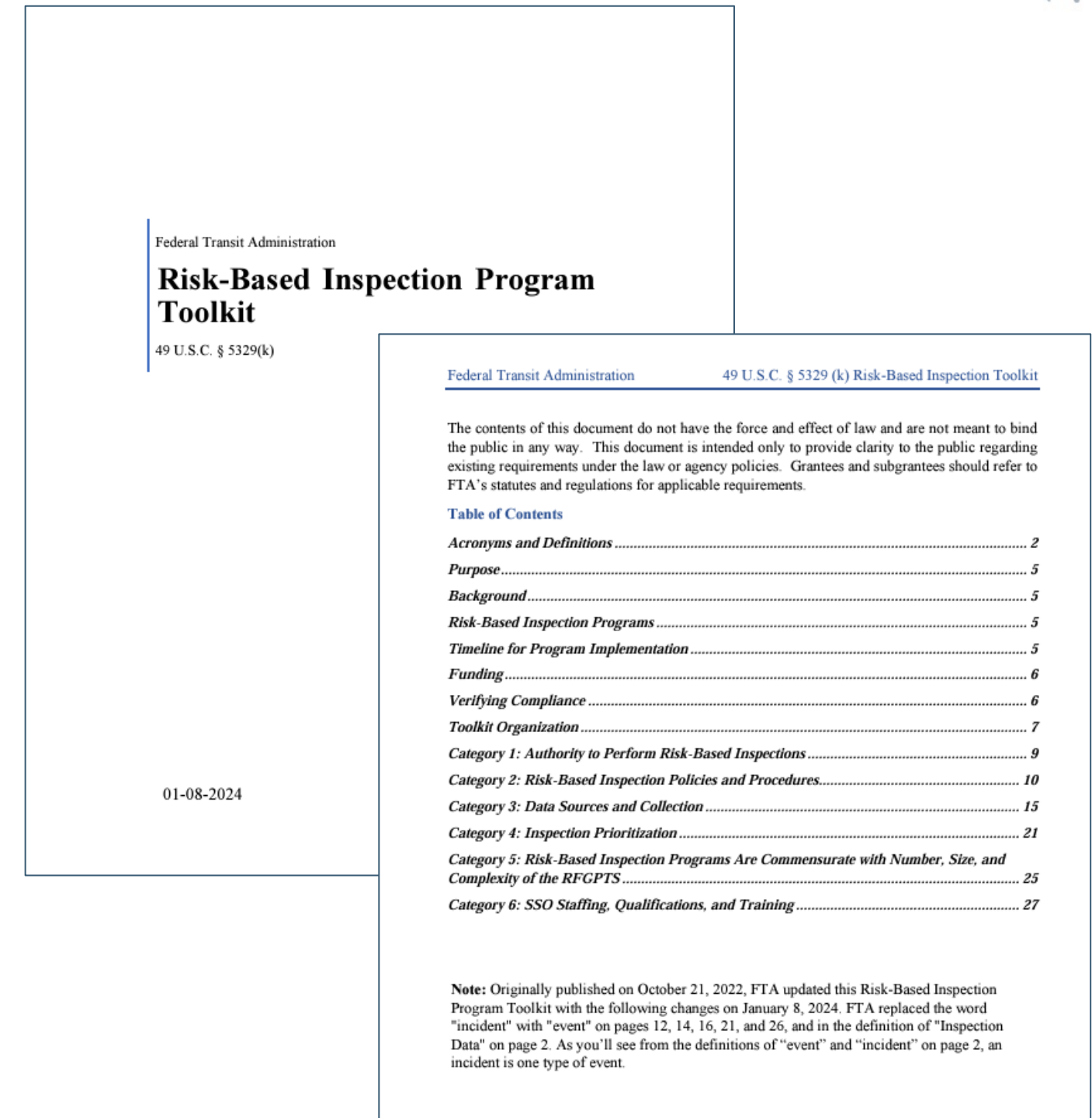
Use of this document is voluntary. The contents do not have the force and effect of law. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

For more information about the risk-based inspection program special directives, visit <https://www.transit.dot.gov/RBI>.

Page 1 of 19

General Guidance (continued)

- SSOAs can use language directly from the RBI Toolkit
- Modified RBI Toolkit language is acceptable but needs to be clear and meet the required actions
- RBI Toolkit language must be expanded upon to provide sufficient detail about how you will meet required actions
- FTA will be distinguishing between process vs. practice to verify RBI Program implementation



General Guidance (continued)

- Using FTA-provided templates for the workload assessment (WLA) and Technical Training Plan (TTP) is optional but encouraged
- If using your own format, these resources can still be used as a reference

The screenshot shows an Excel spreadsheet with the following structure:

Workload Assessment Table for SSOA Name						
Year - Covering Period Date - Date						
SSO Program Major Responsibility Activity	Frequency of Activity	Estimated SSOA Staff Hours	Estimated Contractor Staff Hours	Total Estimated Hours	Notes	
Develop, revise, update and distribute SSO Program Standard.						
Attend meetings and workshops to discuss new and evolving SSO program requirements.						
Conduct workshops with Rail Transit Agencies (RTAs) to discuss new and evolving SSO program requirements.						
Review and formally approve Agency Safety Plans (ASP).						

The screenshot shows an Excel spreadsheet with the following structure:

Example Technical Training Plan Elements					
SSOA Name	Program Manager	Version Date			
<p>Use the table below to complete the technical competency areas for your SSOA. Directions are provided by way of expandable/collapsible buttons to the left of Column C. The default setting for the first technical competency is expanded so that the instructions can be viewed. You can close them at any time by clicking the "-" button on the left.</p>					
Competency 1-Rail transit agency (RTA) organizational structure					
SSOA Technical Requirement Details		Current Status	Means to meet Competency Requirement		
<p>Step 1: In the box below, enter in your State's technical requirements for meeting this competency area.</p> <p>Maintain knowledge of the transit agency organization structure through annual review of organizational charts contained within the System Safety Program Plan (SSPP); determine if the organizational structure supports safety communication and reporting and management of safety priorities and concerns; determine if a direct reporting relationship exists between the AGM involved with safety and the CEO/GM of the transit agency.</p>		<p>Step 2: In the box below, enter the status for your SSOA in meeting the technical requirement: "Completed" or "Planning."</p> <p>[Enter "Completed" or "Planning"]</p>	<p>Step 3: In the box below, identify how your SSOA met, or intends to meet the tech requirement for this competency area: "RTA Training" AND/OR "Equivalency." Once complete, you will move to the next section to enter in details regarding your selection.</p> <p>SSO Program Manager - Equivalency Only New SSOA Employees - initial training as outlined below plus gaining equivalency through annual plan reviews and system audits.</p>		
Course Title or Equivalency	Examination Requirement	Demonstration / Validation Method	Refresher Frequency	Refresher Validation Method	Competency Documentation
<p>Step 4: In the box below, enter the title of the RTA Step 5: For the RTA Step 6: In the box below, Step 7: In the box below, Step 8: In the box below, identify how refresher training is Step 9: In the box below, identify how refresher training is</p>					

RBI Policies and Procedures

Your Program Standard and each RTA's Agency Safety Plan need to contain similar language (no conflicts)

- Include explicit language about collaborating to develop policies and procedures for access
- Include explicit language about sharing data
- Policies and procedures need to cover all aspects of the system for each RTA



RBI Policies and Procedures (continued)

- If using different terminology than the special directive/RBI Toolkit, define your terms within your RBI development plan documentation
- Ensure policies and procedures are clearly described in your Program Standard and each Agency Safety Plan

Preferred

Each RTA includes the detailed RBI policies and procedures directly in their Agency Safety Plan

Acceptable

The SSOA's policies and procedures are included as an appendix to the RTA's ASP with a statement about why they are attached (e.g., the RTA will follow them)

OR

Limited details included in the ASP, but all required actions are clearly met

OR

No details in the ASP, but there is a statement that the RTA will adopt the SSOA's policies and procedures



RBI Policies and Procedures (continued)

- Program Standard and ASPs need to appropriately use “will” and “may”

Special Directive
and/or RBI Toolkit

SSOA RBI Development Plan 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

Example:

SSOAs **are required** to conduct
unannounced inspections



“ [SSOA name] **may** perform unannounced inspections”



“ [SSOA name] **will** perform unannounced inspections”



Data Collection, Storage, and Analysis



- Clearly explain **data collection** processes
 - Types of data to be collected
 - How data will be shared
 - How often data will be collected



- Include specific details related to **data storage**
 - Where data sets will be stored
 - How the data will be organized
 - How long records must be kept
 - How and when records are disposed
 - How data is protected



- Specify how **data analysis** will support risk identification and inspection prioritization
 - Describe the tool(s) being used



Technical Training Plan & Workload Assessment

Technical Training Plan (TTP)

- All competency areas need to be covered
- Ensure training and equivalencies are clearly explained
- Include training information for contractors
 - Describe how they are qualified to support relevant technical areas
 - If supporting oversight activities, describe how they are complying with FTA's Public Transportation Safety Certification Training Program (PTSCTP)

Workload Assessment (WLA)

- Clearly outline activities and hours for State staff vs. contractors
- Include the hours dedicated to RBI in the other major activity areas
 - If using FTA's template, record the total RBI hours from these other major areas in Table 2
- Specify the number of annual hours you used to calculate FTEs



Use of FTA's templates is optional but encouraged.



Questions



Q&A

- Please enter your questions in the chat



Stay Informed



Submit Questions

- Email: FTA-RBI@dot.gov



Access Resources

- <https://www.transit.dot.gov/RBI>
- Additional resources shared via email



Engage

- July 1-on-1 calls



Helpful Resources

- Development Plan Checklist
- Workload Assessment (WLA) Template
- Technical Training Plan (TTP) Template
- TTP Sample Workbook
- RBI Toolkit

