Incorporates the requirements of the PTASP final rule published in April 2024.

AGENCY SAFETY PLAN (ASP) CHECKLIST

Bus Transit Agency
Small Urbanized Area

The Federal Transit Administration (FTA) is providing this Agency Safety Plan (ASP) checklist to assist bus transit agencies that provide service in a small urbanized area (an urbanized area with a population of less than 200,000) and that do **not** provide service in a large urbanized area. This checklist is designed to help agencies develop or update their ASPs in accordance with 49 CFR part 673, as amended by the Public Transportation Agency Safety Plans (PTASP) final rule published on April 11, 2024. These agencies may be small public transportation providers[1] or large bus transit providers.

Use of this checklist is voluntary.

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[1] Small public transportation providers are recipients or subrecipients of federal financial assistance under 49 U.S.C. 5307 that have one hundred or fewer vehicles in peak revenue service across all non-rail fixed route modes or in any one non-fixed route mode and do not operate a rail fixed guideway public transportation system.

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Checklist Key

This checklist distinguishes between PTASP requirements and ASP best practices.

- Checklist items that include PTASP sections (for example, *§ 673.11(a)(3)*) are **requirements**.
  - New PTASP requirements are marked with an orange "**NEW REQUIREMENT**."
- Checklist items that do not include PTASP sections are ASP best practices.
  - New checklist items that are best practices are marked with a teal "**NEW BEST PRACTICE**."

Examples:

☐	**NEW REQUIREMENT** 9-h-1. The process includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions. *(§ 673.23(b))*
☐	**NEW BEST PRACTICE** 2-f-3. The website address of the ASP on the transit agency website, if the agency publishes it online.

FTA

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Table of Contents

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. Recipients and subrecipients should refer to FTA's statutes and regulations for applicable requirements.

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1. Transit Agency Information

The ASP specifies or references documentation that specifies:

☒ Checklist Item	ASP Page Number	Comments
1-a. Name and address of the transit agency that the ASP applies to.		
1-b. Accountable Executive name and/or title (*individual meets §§ 673.5 and 673.23(d)(1) requirements*).		
1-c. Chief Safety Officer/Safety Management System (SMS) Executive name and/or title (*individual meets §§ 673.5 and 673.23(d)(2) requirements*).		
1-d. Mode(s) of transit service covered by the ASP. (*§ 673.11(b)*)		
1-e. Mode(s) of service provided by the transit agency (directly operated or contracted).		
1-f. FTA funding types (e.g., §§ 5307, 5337, 5339).		
1-g. Whether the transit agency provides transit service on behalf of another transit agency or entity, including a description of the arrangement(s).		

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☒	Checklist Item	ASP Page Number	Comments
☐	**NEW BEST PRACTICE** 1-h. The transit agency only serves a small urbanized area (and does not also provide service in a large urbanized area).		
☐	**NEW BEST PRACTICE** 1-h-1. Which small urbanized area(s) the transit agency serves.		

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2. Plan Development, Approval, and Updates

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	2-a. The name of the State entity that drafted the ASP on behalf of the transit agency if the transit agency is a small public transportation provider. *(§ 673.11(d))*		
☐	2-b. Accountable Executive signature on the ASP and date of signature. *(§ 673.11(a)(1))*		
☐	2-c. Transit agency Board of Directors or equivalent entity approval of the ASP *(§ 673.11(a)(1)(ii))*, date of approval, and relevant approval documentation *(§ 673.31)*.		
☐	2-d. The ASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.[2] *(§ 673.11(a)(4))*		
☐	2-e. The process and timeline for conducting an annual review and update of the ASP. *(§ 673.11(a)(5))*		

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[2] Compliance with the minimum safety performance standards authorized under 49 U.S.C. 5329(b)(2)(C) is not required until standards have been established through the public notice and comment process.

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☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 2-e-1. The ASP or ASP update was developed in cooperation with frontline transit worker representatives. *(§ 673.17(b)(1)*		
☐	**NEW REQUIREMENT** 2-e-2. The process and timeline include a description of how frontline transit worker representatives cooperate in the development and update of the ASP. *(§ 673.17(b)(2)*		
☐	2-e-3. The ASP version number and other relevant information.		
☐	**NEW BEST PRACTICE** 2-e-4. The website address of the ASP on the transit agency website, if the agency publishes it online.		

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3. Annual Safety Performance Targets

For all modes[3] covered in the ASP, the ASP includes annual safety performance targets based on the safety performance measures established under the [National Public Transportation Safety Plan](#).

☒	Checklist Item	ASP Page Number	Comments
☐	3-a. *Major Events (total)*: Based on safety and security major events as defined by the National Transit Database (NTD).[4] *(§ 673.11(a)(3))*		
☐	3-a-1. *Major Event Rate*: Based on safety and security major events as defined by the NTD, **divided by vehicle revenue miles (VRM)**. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 3-a-2. *Collision Rate*: Based on collisions reported to the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 3-a-3. *Pedestrian Collision Rate*: Based on collisions "with a person" as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		

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[3] When setting SPTs based on the safety performance measures in the National Safety Plan, FTA encourages agencies to use the following high-level modal groups: rail, fixed-route bus, and non-fixed-route bus.

[4] The NTD reporting manuals are available on the [NTD website](#).

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☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 3-a-4. *Vehicular Collision Rate*: Based on collisions "with a motor vehicle" as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	3-b. *Fatalities (total):* Based on fatalities as defined by to the NTD. *(§ 673.11(a)(3))*		
☐	3-b-1. *Fatality Rate*: Based on fatalities as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 3-b-2. *Transit Worker Fatality Rate*: Based on transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," **divided by VRM**. *(§ 673.11(a)(3))*		
☐	3-c. *Injuries (total)*: Based on injuries as defined by the NTD. *(§ 673.11(a)(3))*		
☐	3-c-1. *Injury Rate*: Based on injuries as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		

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☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 3-c-2. *Transit Worker Injury Rate*: Based on transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," **divided by VRM.** *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 3-d. *Assaults on Transit Workers (total)*: Based on assaults on transit workers as defined by the NTD. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 3-d-1. *Rate of Assaults on Transit Workers*: Based on assaults on transit workers as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	3-e. *System Reliability:* The mean distance between major mechanical system failures as defined by the NTD. *(§ 673.11(a)(3))*		

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4. Coordination with Metropolitan, Statewide, and Non-metropolitan Planning Processes

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	4-a. The transit agency makes its safety performance targets available to the State to aid in the planning process. *(§ 673.15(a))*		
☐	4-b. The transit agency makes its safety performance targets available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process. *(§ 673.15(a))*		
☐	4-c. The transit agency coordinates with the State and MPO(s) in the selection of State and MPO safety performance targets to the maximum extent practicable. *(§ 673.15(b))*		

5. Safety Management System

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	5-a. The transit agency's establishment and implementation of an SMS. *(§ 673.21)*		
☐	5-b. The SMS is appropriately scaled to the size, scope, and complexity of the transit agency and includes the following SMS components: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion. *(§ 673.21)*		

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6. Safety Management Policy

Safety Management Policy Statement

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	6-a. A written statement of the Safety Management Policy (SMP), including the transit agency's safety objectives. *(§ 673.23(a))*		
☐	**NEW REQUIREMENT** 6-a-1. The SMP statement includes a description of the transit agency's approach to cooperation with frontline transit worker representatives. *(§ 673.23(a))*		
☐	6-b. How the agency communicates the SMP throughout the organization. *(§ 673.23(c))*		

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Authorities, Accountabilities, and Responsibilities for Management of Safety

The ASP specifies or references documentation that specifies the necessary authorities, accountabilities, and responsibilities for the management of safety related to the development and management of the transit agency's SMS for the following individuals or groups: (§ 673.23(d))

☒	Checklist Item	ASP Page Number	Comments
☐	6-c. Accountable Executive 6-c-1. Accountable for ensuring the SMS is effectively implemented throughout the system and action is taken, as necessary, to address substandard performance in the SMS. *(§ 673.23(d)(1))*		
☐	6-c-2. Has ultimate responsibility for carrying out the ASP and the Transit Asset Management (TAM) Plan. *(§ 673.5)*		
☐	6-c-3. Has control or direction over the human and capital resources needed to develop and maintain the ASP and the TAM Plan. *(§ 673.5)*		
☐	6-c-4. May delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. *(§ 673.23(d)(1))*		

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☒ Checklist Item	ASP Page Number	Comments
6-d. Chief Safety Officer or SMS Executive		
☐ 6-d-1. Designated by the Accountable Executive and has the authority and responsibility for day-to-day implementation and operation of the SMS. *(§ 673.23(d)(2))*		
☐ 6-d-2. Holds a direct line of reporting to the Accountable Executive.[5] *(§ 673.23(d)(2))*		
☐ 6-d-3. Is an adequately trained individual who has responsibility for safety. *(§ 673.5)*		
6-e. Transit agency leadership and executive management *(§ 673.23(d)(4))* ☐ Those leadership or executive management members, other than the Accountable Executive and Chief Safety Officer/SMS Executive, who have authorities or responsibilities for the day-to-day implementation and operation of the SMS.		

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[5] A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer or SMS Executive. (§ 673.23(d)(2))

The CSO must be able to communicate directly with the Accountable Executive about safety issues without interruption or intermediaries. Agencies may use a "dotted line" report on an organizational chart to indicate that the CSO has the authority to speak with the Accountable Executive at any time regarding a safety issue, even if another employee supervises the CSO.

☒ Checklist Item	ASP Page Number	Comments
☐ 6-f. Key staff *(§ 673.23(d)(5))* Key staff, groups of staff, or committees that support the Accountable Executive and Chief Safety Officer/SMS Executive in developing, implementing, and operating the SMS.		

Transit Worker Safety Reporting Program

The ASP specifies or references documentation that specifies:

☒ Checklist Item	ASP Page Number	Comments
☐ 6-g. A process that allows transit workers to report safety concerns to senior management. *(§ 673.23(b))*		
☐ **NEW REQUIREMENT** 6-g-1. The process includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions. *(§ 673.23(b))*		
☐ 6-g-2. The process includes protections for transit workers who report. *(§ 673.23(b))*		

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☒	Checklist Item	ASP Page Number	Comments
☐	6-g-3. The process includes a description of transit worker behaviors that may result in disciplinary action and, therefore, are excluded from protection. *(§ 673.23(b))*		

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7. Safety Risk Management

A transit agency must develop and implement a Safety Risk Management process for all elements of its system. (*§ 673.25(a)*)

Hazard Identification

The ASP specifies or references documentation that specifies:

⊠ Checklist Item	ASP Page Number	Comments
7-a. Methods or processes to identify hazards and potential consequences of the hazards. (*§ 673.25(b)(1)*)		
7-a-1. As a source for hazard identification, the transit agency considers data and information provided by an oversight authority, including but not limited to FTA and the State. (*§ 673.25(b)(2)(i)*)		
NEW REQUIREMENT 7-a-2. As a source for hazard identification, the transit agency considers data and information regarding exposure to infectious diseases provided by the Centers for Disease Control and Prevention (CDC) or a State health authority. (*§ 673.25(b)(2)(ii)*)		

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☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 7-a-3. As a source for hazard identification, the transit agency considers safety concerns identified through its Safety Assurance activities. *(§ 673.25(b)(2)(iii))*		

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Safety Risk Assessment

The ASP specifies or references documentation that specifies:

☒ Checklist Item	ASP Page Number	Comments
☐ 7-b. Methods or processes to assess the safety risk associated with identified hazards. *(§ 673.25(c)(1))*		
☐ 7-b-1. An assessment includes assessing the likelihood and severity of the potential consequences of identified hazards. *(§ 673.25(c)(2))*		
☐ 7-b-2. Assessment determines if safety risk mitigation is necessary and informs prioritization of safety risk mitigations. *(§ 673.25(c)(2))*		
☐ 7-b-3. Assessment takes into account existing safety risk mitigations. *(§ 673.25(c)(2))*		

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Safety Risk Mitigation

The ASP specifies or references documentation that specifies:

⊠	Checklist Item	ASP Page Number	Comments
☐	7-c. Methods or processes to identify safety risk mitigations or strategies necessary as a result of the transit agency's safety risk assessment to reduce the likelihood and severity of potential consequences. *(§ 673.25(d)(1))*		
☐	**NEW REQUIREMENT** 7-c-1. As a source for safety risk mitigation, the agency considers guidance provided by an oversight authority, if applicable, and FTA. *(§ 673.25(d)(2)(i))*		
☐	**NEW REQUIREMENT** 7-c-2. As a source for safety risk mitigation, the agency considers guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority. *(§ 673.25(d)(2)(ii))*		

8. Safety Assurance

Safety Performance Monitoring and Measurement

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	8-a. Activities to monitor the system for compliance with and sufficiency of the transit agency's procedures for operations and maintenance. *(§ 673.27(b)(1))*		
☐	8-b. Activities to monitor the transit agency's operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. *(§ 673.27(b)(2))*		
☐	8-c. Activities to conduct investigations of safety events to identify causal factors. *(§ 673.27(b)(3))*		
☐	8-d. Activities to monitor information reported through any internal safety reporting programs. *(§ 673.27(b)(4))*		

Management of Change

Not Required for Small Public Transportation Providers

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	8-e. A process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. *(§ 673.27(c)(1))*		
☐	8-e-1. Proposed changes that may impact the transit agency's safety performance are evaluated through its Safety Risk Management process. *(§ 673.27(c)(2))*		

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Continuous Improvement

NOTE: FTA has extended applicability of continuous improvement to all transit agencies subject to the PTASP regulation. This includes small public transportation providers.

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	8-f. A process to assess the transit agency's safety performance **annually**. *(§ 673.27(d)(1))*		
☐	**NEW REQUIREMENT** 8-f-1. The process includes identifying deficiencies in the SMS and the agency's performance against its safety performance targets. *(§ 673.27(d)(1)(i))*		
☐	8-g. How the transit agency develops and carries out a plan(s) under the direction of the Accountable Executive to address any deficiencies identified through the safety performance assessment process. *(§ 673.27(d)(4))*		

9. Safety Promotion

Competencies and Training

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	9-a. The transit agency established and implemented a comprehensive safety training program. *(§ 673.29(a)(1))*		
☐	9-a-1. The safety training program is for all operations transit workers and transit workers directly responsible for safety. *(§ 673.29(a)(1))*		
☐	**NEW REQUIREMENT** 9-a-2. The safety training program includes de-escalation training. *(§ 673.29(a)(1))*		
☐	**NEW REQUIREMENT** 9-a-3. The safety training program includes safety concern identification and reporting training. *(§ 673.29(a)(1))*		
☐	9-a-4. The safety training program includes refresher training, as necessary. *(§ 673.29(a)(1))*		

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Safety Communication

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	9-b. How the transit agency communicates safety and safety performance information throughout its organization. *(§ 673.29(b))*.		
☐	9-b-1. How the transit agency conveys information on hazards and safety risk relevant to transit workers' roles and responsibilities. *(§ 673.29(b))*		
☐	9-b-2. How the transit agency conveys the safety actions taken in response to reports submitted through the transit worker safety reporting program. *(§ 673.29(b))*		
☐	**NEW REQUIREMENT** 9-b-3. How the transit agency conveys the results of cooperation with frontline transit worker representatives in developing and updating the ASP. *(§ 673.29(b))*		

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10. Additional Information

Part 673 does not require transit agencies to include the following information in their ASPs. However, a transit agency could specify or reference documentation that specifies:

☒ Checklist Item	ASP Page Number	Comments
☐ 10-a. Definitions of terms used in the ASP.		
☐ 10-b. List of acronyms used in the ASP.		
☐ 10-c. Certification of compliance with Part 673 in the Transit Award Management System (TrAMS), including: 10-c-1. Name of the individual or entity that certifies compliance; and		
☐ 10-c-2. Date of certification.		
NEW BEST PRACTICE ☐ 10-d. Description of recordkeeping process for documents that set forth the ASP, including those related to the implementation of SMS; results from SMS processes and activities; and those included in whole, or by reference, that describe the programs, policies, and procedures that the transit agency uses to carry out its ASP.		

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☒	Checklist Item	ASP Page Number	Comments
☐	**NEW BEST PRACTICE** 10-d-1. Includes how documents will be made available upon request by FTA or other Federal entity and a State.		
☐	**NEW BEST PRACTICE** 10-d-2. Includes that transit agency will maintain these documents for a minimum of three years after they are created.		

PTASP TECHNICAL ASSISTANCE CENTER

PTASP Technical Assistance Available
- Access one-on-one Agency Safety Plan support
- View the Agency Safety Plan Directory
- Explore the PTASP Resource Library

transit.dot.gov/PTASP