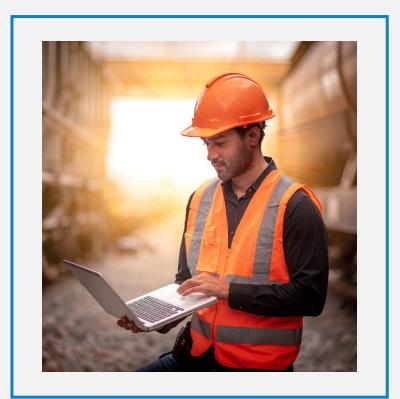
Risk-Based Inspection Program Implementation Requirements

February 25, 2025





Agenda

- 1. Assessing Implementation What to Expect
- 2. Implementation Required Actions from RBI Special Directive
- 3. Input on RBI Topics for FTA Joint SSO and RTA Workshop

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 statutes and regulations for applicable requirements.



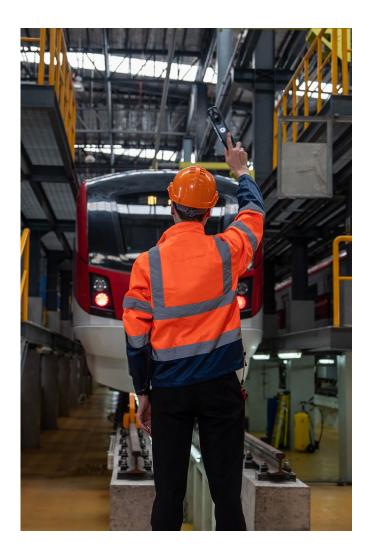


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FTA Must Assess RBI Implementation

IIJA requires FTA to assess each SSOA's capability to conduct RBIs to ensure that:

- Inspection practices are commensurate with the number, size, and complexity of the systems the SSOA oversees
- Program is risk-based
- SSOA has sufficient resources to conduct inspections





SSOA REQUIRED ACTION

Within 1 year of RBI development plan approval, SSOA must submit documentation demonstrating it has implemented its approved RBI program for at least 6 months



How will FTA fairly assess different RBI programs?

Does the documentation demonstrate the SSOA implemented its approved RBI program as described in its Program Standard?

 SSOA REQUIRED ACTIONS
 6 broad required actions listed in the special directive that provide further detail about what your documentation must demonstrate or confirm

 EVALUATION CONSIDERATIONS
 Questions related to each required action that evaluators use to uniformly review documentation to determine if the required action was met



Submit documentation that confirms the SSOA has **conducted risk-based inspections** according to Program Standard requirements, including the areas of:

- Scheduling inspections
- Inspection reports
- Immediate safety concerns
- Inspections of equipment, infrastructure, and practices specific to each RTA
- Event verification
- Ongoing monitoring
- Defects and corrective or remedial action
- CAPs and safety risk mitigation verification

Bottom Line: Did you follow your procedures for conducting RBIs?



Submit documentation that demonstrates the SSOA has received safety data from each RTA it oversees, and that the data has been received in accordance with the policies and procedures for sharing the data.

This includes:

- receiving the safety data sets specified in the Program Standard,
- the processes for sharing the data, and
- **submission time frames** defined in the Program Standard.

Bottom Line: Did you collect data from each of your RTAs?



Submit documentation that confirms the **administrative policies and procedures** of the risk-based inspection data management system are followed.

The documentation:

- must demonstrate the data management system stores records according to the SSOA's policies and procedures for the risk-based inspection data management system, and
- should demonstrate maintenance of the data management system.

Bottom Line: Is your data management system operating as described?



Submit documentation that confirms the SSOA has implemented the **risk-based inspection prioritization process**,

including data analysis and inspection prioritization according to the timelines outlined in the Program Standard.

Bottom Line: Are you following your data analysis and prioritization procedures?



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Submit documentation that the SSOA has

conducted risk-based inspections for each RTA it oversees,

and that those inspections are consistent and ongoing as defined by the SSOA's Program Standard.

Bottom Line: Are you consistently conducting RBIs across all your RTAs?



Submit documentation that the SSOA has

inspected the full spectrum of activities each RTA conducts and

that those inspections are prioritized based on relevant data,

including safety program, maintenance, and inspection data.

Bottom Line: Are you conducting RBIs across all relevant equipment, infrastructure, and practices; and are these inspections prioritized based on safety program, maintenance, and inspection data?



What You Can Do Now

Incorporate approved policies and procedures into Program Standard and ASP (5329(k)(3))



Keep a record of any changes to your approved RBI program



Collect documents to demonstrate implementation, such as prioritized inspection lists, RBI reports, inspection scheduling emails, notes from monitoring meetings



- FTA-SSOA calls resume 2 months after plan approval
 - SSOAs should ask questions and share example documentation
 - SSOAs should prepare to report on the number of RBIs completed and scheduled



RBI Session at SSO-RTA Joint Workshop (May 6-8)



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