

Questions and Answers:

“The FTA Bus Safety Program and SMS,” Webinar sponsored by the National RTAP
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Q: It seems like the SMS Documentation and Records section under Safety Management Policy is just repeating the other sections. Can you give a specific example of what should go in this section?

A: This subcomponent requires that a transit agency document its SMS activities. The other components don't require specifically that a transit agency document the results of the activities required under the components. So, the documentation will be the product of activities described within other SMS components, i.e., Safety Risk Management, Safety Assurance, and Safety Promotion, as well as the Safety Management Policy component. Below are some examples of documentation or records that an agency may develop and keep on file based on the implementation of its SMS.

- The organizational system description
- The SMS gap analysis
- The SMS implementation plan
- The Safety Management Policy Statement
- The description of accountabilities, responsibilities and authorities for the operation of the SMS
- The description of the activities for Safety Risk Management and their procedures
- The description of the activities for Safety Assurance and their procedures
- The description of the employee safety reporting program, including the safety reporting policy
- The safety management training curriculum
- The means for safety communication
- All Safety Risk Management and Safety Assurance activities and their outputs

Q: What is the difference between safety and security, or does the SMS include security?

A: There is no bright line between a safety event and a security (public safety) event as many security events can have safety implications for a transit agency. A transit agency should evaluate security events under its SMS and consider the potential consequences to people, assets, systems and the environment. A transit agency's actions to mitigate a security risk may be very different from the actions it would take to mitigate a safety risk because an agency's security response may be defined by its relationship with law enforcement. A good example of when the line is blurred and an SMS would incorporate security, could be where a passenger on a bus assaults the bus driver. The assault could lead to other consequences such as the loss of control of the vehicle, which would put

the safety of other passengers at risk. A transit agency may need to evaluate this kind of security risk under its SMS and identify appropriate mitigations.

Q: Where does the 'reactive' portion, i.e., the actual accident investigation and root cause analysis, reside in the SMS framework?

A: Essentially, reactive activities are under Safety Risk Management. Accident investigation is a source of hazard identification. Root cause analysis, on the other hand, is simply a specific technique for the analysis of information, typically used in accident investigations. The phrase "root cause analysis" is not represented in the SMS Framework because it is a technique, whereas an SMS is made up of processes, activities, and tools.

Q: Will FTA provide links to documents for the SMS structure and planning?

A: FTA is in the process of developing guidance materials to help guide the industry in its implementation of SMS. As these materials become available, FTA will post the guidance on its safety training and resource website at <http://safety.fta.dot.gov>.

Q: How long does my agency have to fully implement SMS?

A: The length of time required to fully implement SMS will vary from agency to agency. For example, an SMS for the MTA in New York City is going to have some very different characteristics than an SMS at a rural South Dakota demand response agency. Based upon models that we have seen in other industries, the implementation of a mature and effective SMS could take anywhere from two to five years, depending on agency size and operating characteristics. It likely will take longer to implement SMS at a larger agency due to the number of functions that support service delivery. Ultimately, an SMS need only be as complex as the organization.

Q: What is the timeline for completion and submission of the SMS Plan/Document and who monitors compliance?

A: FTA will propose requirements for SMS implementation in a notice of proposed rulemaking (NPRM) for Public Transportation Agency Safety Plans. The public will have an opportunity to comment and provide feedback on the NPRM. FTA will provide information about the SMS implementation timeline with the final rule. FTA is currently developing guidance to assist transit agencies with implementing SMS. There are some SMS resources currently available on the SMS page of FTA's website at http://www.fta.dot.gov/tso_15176.html.

Q: Can SMS help a small transit agency achieve its safety goals?

A: Yes. Implementing SMS does not need to involve acquisition of new or additional technology, creating new structures within the agency, or (necessarily) hiring additional personnel. Implementing SMS provides a transit agency's leadership with the information it needs to refocus and streamline existing processes, activities, and resources to achieve safety objectives. The necessary information can be derived from answering the following four questions:

1. What are your greatest safety risks?
2. How do you know that?
3. What are you doing about them?
4. Is what you are doing working?

An agency's response to each of the four questions will provide it with the information needed to determine whether its risk mitigation strategies are working according to agency expectations and to institute alternative mitigations where necessary.

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