

FTA

FEDERAL TRANSIT ADMINISTRATION

2018 Joint SSO and RTA Workshop

Breakout Session I: Post 674 Certification SSO Program

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Overview

- FTA's Part 674 SSO audit program
- 49 C.F.R. Part 674 in practice
- Questions

FTA's Audit Program for 49 C.F.R. Part 674

FTA Audit Process

- FTA's SSO audits under Part 674 will follow a similar approach to the audits conducted under Part 659

3-Year
Schedule



Roughly 10
SSO audits per
year

FTA Audit Process

- Audits will assess whether the SSO program complies with:
 - 49 C.F.R. Part 674
 - SSOA Program Standard
 - Certification application documents, including workload staffing assessments and technical training plans
- Part 659.19 will be used as the requirement for the interim Agency Safety Plan until the RTA certifies its Part 673 Agency Safety Plan

FTA Audit Process

- FTA will issue findings of noncompliance, which must be addressed by corrective action within a timeframe specified by FTA
- FTA will track SSOA corrective actions to closure
- Failure to address findings of noncompliance may be subject to FTA authorized enforcement actions

FTA Audit Process

- FTA's new audit program will rollout late winter/early spring in 2019



Monitoring

- FTA also will conduct routine monitoring:
 - Monthly and quarterly calls with SSOAs
 - SSOA staffing and vacancies
 - SSO training and Technical Training Plan
 - Major SSOA activities
 - RTA safety performance
 - Additional reporting and wellness reviews to address concerns
 - Annual reporting program, including Program Standard review

Guidance

- FTA is developing guidance, including:
 - Part 674 Implementation guidelines
 - Agency Safety Plan/SMS technical assistance
 - SSO audit program manual
- Will be available late Spring/early Summer

Part 674 in Practice

Part 674 in practice looks like the SSOA Program Standard



Part 674 in practice looks like the SSOA Program Standard



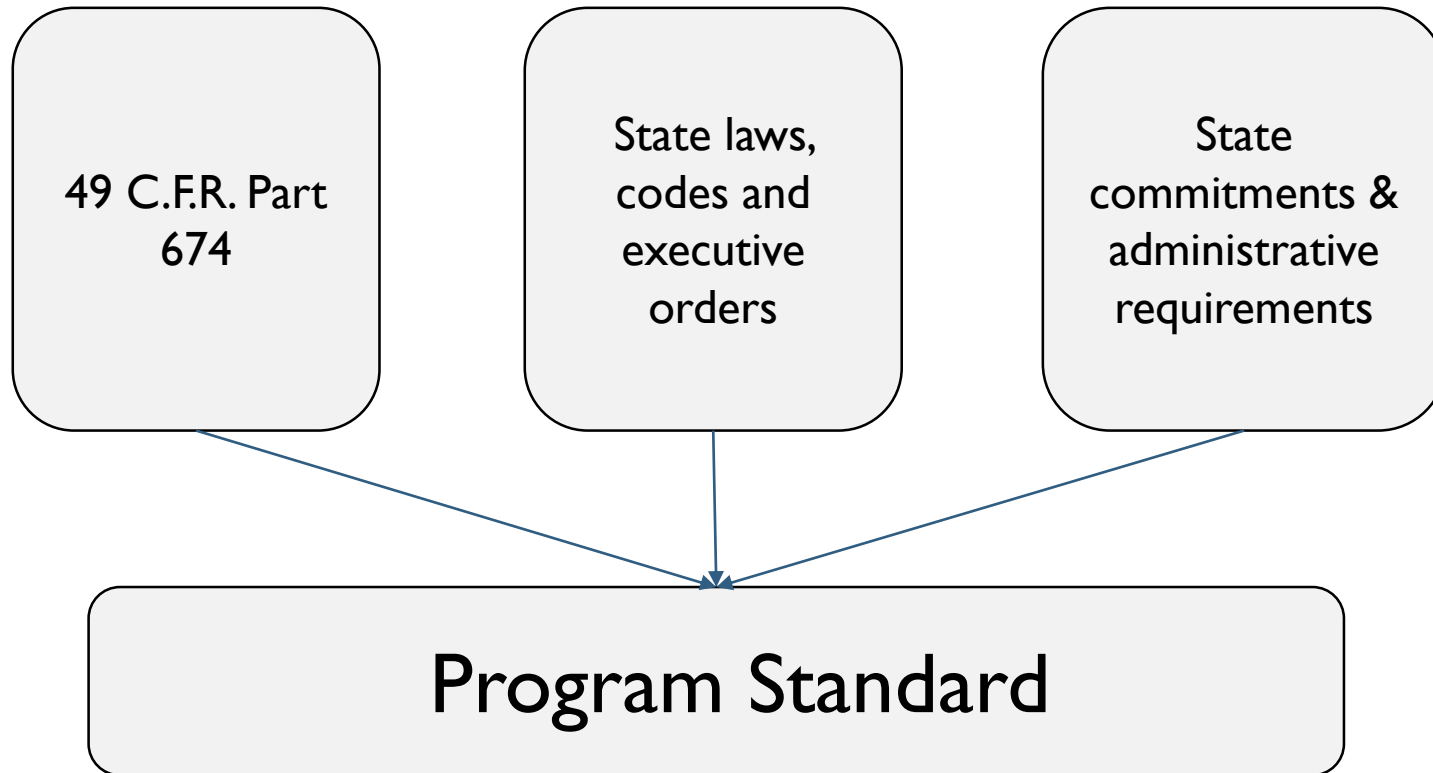
Part 674 in Practice

- Each SSOA Program Standard is

unique & different

... but they all meet FTA's requirements in 49 C.F.R. Part 674.

Part 674 in Practice



**How do SSOAs currently
address 49 C.F.R. Part 674
requirements?**

SSO Grant Program

100%

of SSOAs participate in
FTA's SSO grant program

Enforcement Authority

80%

of SSOAs have the authority to restrict or suspend service on all or part of the RTA system, or to restrict or remove equipment, infrastructure or employees from service to address a significant safety concern

Enforcement Authority

20%

of SSOAs have the authority to fine (impose civil penalties on) RTAs based on non-compliance with the Agency Safety Plan or State standards

Enforcement Authority

20%

of SSOAs have the authority to withhold, restrict or re-direct funds at the RTAs for failure to address safety concerns

Inspections

100%

of SSOAs will conduct inspections as part of Triennial Audits and CAP Verifications at the RTAs in their programs

Inspections

20%

of SSOAs are conducting risk-based, scheduled inspection programs as part of their ongoing oversight

Investigative Authority

100%

of SSOAs have the authority to conduct an investigation of any event affecting public safety at the RTA

70%

of SSOAs require notification of safety events beyond minimum FTA definition of accident

Allegations of Non-Compliance

100%

of SSOAs have the authority to investigate reports of non-compliance with Agency Safety Plan

Increasing number of SSOAs have contact information on their websites

Security

70%

of SSOAs require RTAs to submit security plans and include security in Triennial Audits

***Security is not a required element under 49 C.F.R. Part 674**

Triennial Audits

23%

of SSOAs conduct triennial audits in an ongoing manner

77%

of SSOAs conduct a triennial audit once every three years

Corrective Action Plans

75%

of SSOAs specify that CAPs include information beyond the minimum requirements specified in Part 674

Emergency Corrective Action

50%

of SSOAs require the RTA to notify the SSOA of immediate / emergency CAPs (which may have already been developed and implemented prior to SSOA approval) within 5 days

Emergency Corrective Action

35%

of SSOAs have established that the SSOA will respond with CAP approval (or feedback/suggested modification) to RTAs within 15 days of receipt of the immediate / emergency CAP

SSPP versus PTASP

87%

of SSOA Program
Standards use the term
“Agency Safety Plan” and
refer to the SSPP/PTASP

Questions

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