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2018 Joint SSO and RTA Workshop

Breakout Session 2:
Roadmap to Drafting a
Public Transportation Agency Safety Plan

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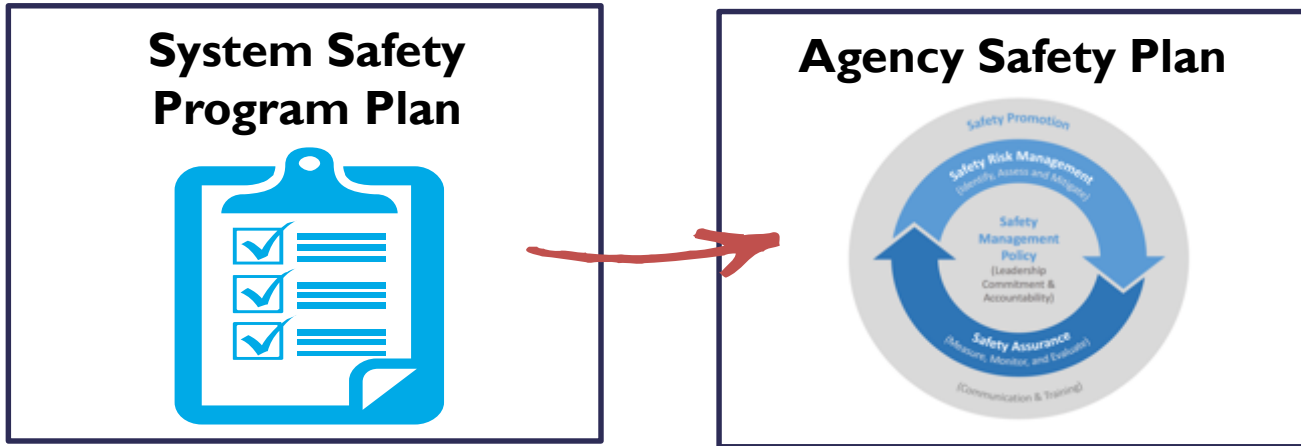**Federal Transit Administration**

U.S. Department of Transportation
Federal Transit Administration

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Today's Presentation

- Major differences between SSPP and Agency Safety Plan

- Using the FTA's Roadmap

- Signs of effectiveness

- Resources

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What are the Major Differences?

System Safety Program Plan

Agency Safety Plan

Major Difference	SSPP	Agency Safety Plan
Regulatory Structure	Compliance-based	Performance-based
Responsibility for Safety	Safety department	Accountable executive
Approach	21 fixed safety program elements	Integrated, systemwide processes that are scalable and flexible
Safety Decision Making	Hazard analysis available, if requested	Safety risk analysis integral to decision making and investments

Safety Management Policy

Organizational commitment is key

Safety Management Policy

§673 Public Transportation Agency Safety Plan (PTASP)	§659 System Safety Program Plan (SSPP)	Differences between Agency Safety Plan and SSPP Requirements and Transition Considerations
Rule Section	Elements	Requirements and Transition Considerations

Safety Management Systems – Safety Management Policy

673.23(a) A transit agency must establish its organizational accountabilities and responsibilities and have a written statement of safety management policy that includes the agency's safety objectives.	**659.19(a)** A policy statement signed by the agency's chief executive that endorses the safety program and describes the authority that establishes the system safety program plan. **659.19(b)** A clear definition of the goals and objectives for the safety program and stated management responsibilities to ensure they are achieved.	This section specifies that the Agency Safety Plan Safety Management Policy must establish the transit organization's accountabilities and responsibilities for the SMS and must contain the transit agency's safety objectives. Organizational accountabilities and responsibilities in an SMS, as discussed in the FTA's National Safety Plan, typically focus on leadership commitment to allocate necessary human and financial resources to fulfill the transit organization's safety objectives, as well as leadership commitment to establish and carry out an employee safety reporting program. Safety objectives typically include a broad description of the agency's overarching safety goals, which would be based upon that agency's unique needs. In addressing these requirements, the RTA may consider revising its existing policy statement and/or SSPP language to describe any new organizational accountabilities and responsibilities that reflect requirements in Part 673, including all activities related to the implementation of SMS. The RTA also may choose to revise the safety objectives listed within its SSPP to reflect prioritized safety objectives and the goal of continuous improvement in safety performance.

Safety Management Policy

§ 673.23 SMS Management Policy

Establish a written statement of safety policy, communicated throughout the agency, that includes:

- Safety objectives for the agency.
- Employee safety reporting program.
- Accountability and safety responsibilities for:
  - Accountable Executive,
  - Chief Safety Officer,
  - Agency Leadership, and
  - Key Staff Responsible for Safety

Relevant SSPP Sections:

- §659.19(a) – Policy Statement
- §659.19(b) – Goals and Objectives
- §659.19(c) – Management Structure
- §659.19(e) – SSPP Activities and Tasks

*See *Roadmap*, pages 18-23 and National Safety Plan, pages 15-22

Signs of Effectiveness:

- **Visible evidence** of leadership commitment, demonstrated by example
- **Clear lines** of safety accountabilities **throughout** the organization
- SMS activities are **fully resourced**
- Employees **express confidence and trust** in the organization's reporting program

Safety Management Policy

Question:
How would your agency document leadership commitment to safety?

Safety Risk Management

SMS is about managing safety risk

Safety Risk Management

§673 Public Transportation Agency Safety Plan (PTASP)
Rule Section

§659 System Safety Program Plan (SSPP)
Elements

Differences between Agency Safety Plan and SSPP Requirements and Transition Considerations
Requirements and Transition Considerations

Safety Management Systems – Safety Risk Management

673.25(a)	659.19(f)	
Safety Risk Management process. A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process must be comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.	A description of the process used by the rail transit agency to implement its hazard management program, including activities for: (1) Hazard identification; (2) Hazard investigation, evaluation and analysis; (3) Hazard control and elimination; (4) Hazard tracking; and (5) Requirements for on-going reporting to the oversight agency relating to hazard management activities and status.	Part 673 proposes a more comprehensive process for identifying and managing safety risks. It encourages the use of new safety analysis tools by adequately staffed and trained safety personnel and RTA departments, groups and committees, and subject matter experts. Also, safety risk management feeds into the SMS safety assurance process to ensure that safety risk mitigations are evaluated for effectiveness over time. In addressing these new requirements, the transit agency can update its SSPP language describing its hazard management process to reflect the new approach to safety risk management, including definitions and criteria related to safety risk management terms and activities (to be consistent with SMS concepts and terms under Section 673.5). The SSPP section can be revised to include the new organizational and reporting structure developed for safety risk management, the new tools used to support safety risk analysis and evaluation, the new roles of the adequately trained and staffed safety or SMS department in supporting and conducting safety risk analysis, and any new requirements for coordinating with and reporting to the SSOA regarding the implementation and results of the safety risk management process.

At a minimum, FTA expects each transit agency to apply its safety risk management process to its existing operations |

Safety Risk Management

§ 673.25 Safety Risk Management

Establish a process to:
- Identify safety hazards and consequences.
- Assess the safety consequences associated with the identified safety hazards.
- Prioritize safety hazards based on the level of risk.
- Implement safety risk mitigations.

Relevant SSPP Section:

- §659.19(f) – Hazard Management

  *See *Roadmap*, pages 23-28 and National Safety Plan, pages 22-24**

Signs of Effectiveness:

- Uses **all relevant and available data**
- Assesses hazards **systematically and in a timely manner**
- Identifies **trends and actionable** information
- Relies on **subject matter expertise**
- Provides **accountability** for risk acceptance
- Ensures **trained and qualified** safety analysts
- Develops **meaningful mitigations** and **effectiveness targets**

Safety Risk Management

Question:

How would you assess your current hazard management process to determine what changes you may need to incorporate into your agency safety plan?

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Safety Assurance

Continuous improvement depends on continual monitoring of risk

Safety Assurance

§673 Public Transportation Agency Safety Plan (PTASP) Rule Section	§659 System Safety Program Plan (SSPP) Elements	Differences between Agency Safety Plan and SSPP Requirements and Transition Considerations Requirements and Transition Considerations
Safety Management Systems – Safety Assurance		
673.27(a) Safety assurance process. A transit agency must develop and implement a safety assurance process, consistent with this subpart. A rail fixed guideway public transportation system, and a recipient or subrecipient of Federal financial assistance under 49 U.S.C. Chapter 53 that operates more than one hundred vehicles in peak revenue service, must include in its safety assurance process each of the requirements in (b), (c), and (d) of this section. A small public transportation provider only must include in its safety assurance process the requirements in (b) of this section.	**NA**	The SSPP does not discuss the nexus between safety performance and the condition of transit assets or compliance with operating rules. Instead, inspection and monitoring activities are documented as separate programs managed by different departments (e.g., track inspections by the track department, rules compliance reviews by the operations department). Results of these programs are only considered from a safety perspective when they are "entered into the hazard management process." In the opening of this section of its Agency Safety Plan, the transit agency may consider developing text to address the role of safety assurance in ensuring ongoing, integrated assessment of the agency's safety performance across departments and functions. Each transit agency's safety assurance activities should be scaled to the size and complexity of its operations. Through these activities, each transit agency should accurately determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing its SMS. Each transit agency must conduct an annual review of the effectiveness of its safety risk mitigations.
673.27(b)	**659.19(i)** A description of the process used to collect, maintain, analyze, and	The SSPP does not require the collection of data and safety information to assess compliance with and sufficiency of maintenance and operations procedures, whereas the

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Safety Assurance

§ 673.27 Safety Assurance

Establish and implement a process for:
- Safety Performance Monitoring and Measurement
- Management of Change
- Continuous Improvement

> ***See *Roadmap*, pages 28-38 and National Safety Plan, pages 25-26**

Relevant SSPP Sections:

- § 659.19(i) – Safety Data Collection & Analysis
- § 659.19(m) – Rules Compliance
- § 659.19(n) – Facility and Equipment Inspections
- § 659.19(o) – Maintenance Audits/Inspections
- § 659.19(u) – Procurement
- § 659.19(j) – Investigations
- § 659.19(l) – Internal Safety Reviews
- § 659.19(g) – System Modifications
- § 659.19(h) – Safety Certification
- § 659.19(q) – Configuration Management

Signs of Effectiveness:

- Safety Performance Indicators are **defined and monitored**
- **Effectiveness** of mitigations is **verified**
- Investigation **causal factors** include **organizational performance**
- Ops/maintenance processes **audited & analyzed for safety concerns**
- Changes are **proactively** assessed
- Areas for **improvement** are **acted upon**

Safety Assurance

Question:

What should your agency consider when establishing a process for monitoring the effectiveness of safety risk mitigations?

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Safety Promotion

Positive and responsive safety communications builds trust and a strong safety culture

Safety Promotion

§673 Public Transportation Agency Safety Plan (PTASP) Rule Section	§659 System Safety Program Plan (SSPP) Elements	Differences between Agency Safety Plan and SSPP Requirements and Transition Considerations Requirements and Transition Considerations
Safety Management Systems – Safety Promotion		
673.29(a) Competencies and training. A transit agency must establish and implement a comprehensive safety training program for all agency employees and contractors directly responsible for safety in the agency's public transportation system. The training program must include refresher training, as necessary.	**659.19(p)** A description of the training and certification program for employees and contractors, including: (1) Categories of safety-related work requiring training and certification; (2) A description of the training and certification program for employees and contractors in safety- related positions; (3) Process used to maintain and access employee and contractor training records; and (4) Process used to assess compliance with training and certification requirements.	The training requirement is enhanced in Part 673 such that each transit agency must establish a comprehensive safety training program. Through the safety training program, each transit agency must require each employee that has responsibilities for safety to complete training, including refresher training. To address these requirements, the RTA could consider reviewing and updating its existing SSPP training section to ensure that safety training for all employees and contractors is adequately covered, including refresher training. In addition to technical training on safety competencies by job description, this section also could include SMS training required by job position and any refresher training. Any new training records or processes for assessing compliance with training and certification requirements should be documented.
673.29(b) Safety communication. A transit agency must communicate safety and safety performance information throughout the agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to	**659.19(f)(5)** Requirements for on-going reporting to the oversight agency relating to hazard management activities and status. **659.19(r)**	FTA expects that each transit agency would define the means and mechanisms for effective safety communication based on its organization, structure, and size of operations. Based on existing requirements identified in the SSPP and the new Part 673 requirements, the RTA could review and revise (or develop as appropriate) its plans, policies, and procedures related to the communication of safety. The RTA could provide a brief overview regarding the organizational

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Safety Promotion

§ 673.29 Safety Promotion

Establish and implement:
- Comprehensive safety training program for all agency employees/contractors directly responsible for safety.
- Approach for communicating an agency's safety performance throughout the organization

Relevant SSPP Sections:

- §659.19(p) – Training and Qualification
- §659.19(r) – Safety Program for Employees and Contractors
- §659.19(s) – Hazard Materials
- §659.19(t) – Drug and Alcohol

   *See *Roadmap*, pages 38-40 and National Safety Plan, pages 27-28

Signs of Effectiveness:

- Personnel are **trained and competent** to perform their **duties**
- Training program is **monitored for effectiveness and updated**, as needed
- Safety communication tools and processes are **well-defined and used**
- All employees understand **their role with respect to safety**

Safety Promotion

Question:
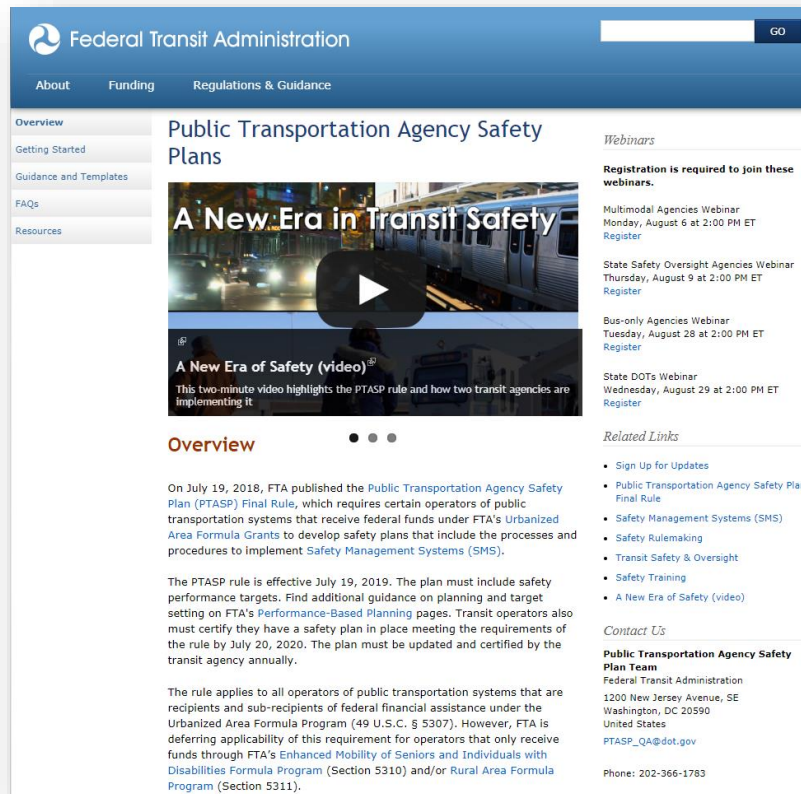
Who does your agency need to engage in the development of your Agency Safety Plan?

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Summary

- SSPP processes and activities support SMS / Agency Safety Plan – FTA's Roadmap can help!

- Key considerations for SMS/Agency Safety Plan:
  o *Organizational commitment* to SMS is key
  o SMS is about *managing* safety risk
  o *Continuous improvement* depends on continual monitoring of risk
  o *Positive and responsive safety communication* builds trust and a strong safety culture

More Information and Follow-up Questions

- Questions: PTASP_QA@dot.gov

- Other questions? Call the TSO Main Number at 202-366-1783

https://www.transit.dot.gov/PTASP