FTA

FEDERAL TRANSIT ADMINISTRATION

PTASP & SMS-The Role of the Transit Agency's CSO/SMS Executive and Key Staff

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Federal Transit Administration

1. Welcome

Administrative

- Safety Briefing
  - Building layout
  - Restrooms
  - Emergencies
- Speaker Introduction
- Presentation Handout
- Presentation Schedule

PTASP & SMS-Role of the CSO/SMS Executive & Key Staff

In this presentation, we will discuss:

- What is Safety Management System (SMS)?
  - Four Components of SMS
  - Safety Plan Documentation
- The Role of the CSO/SMS Executive and Key Staff
  - The Organizational Accident
  - Practical Drift
- Public Transportation Agency Safety Plan (PTASP)
- Comparing the PTASP and the SSPP
- Next Steps and Wrap-Up

FTA Regulatory Updates

Regulation	Rule Overview	Status
State Safety Oversight 49 C.F.R. Part 674	Strengthens State oversight of rail transit systems	Final Rule Published: 3/16/16 Effective: 4/15/16
Public Transportation Safety Program 49 C.F.R. Part 670	Establishes the procedural rules for enforcement of FTA's safety programs	Final Rule Published: 8/11/2016 Effective: 9/12/2016
National Public Transportation Safety Plan	Sets safety performance measures for PTASP performance targets	Final Guidance Published: 1/17/17
Public Transportation Agency Safety Plan 49 C.F.R. Part 673	Requires transit agencies to develop and implement safety plans based on SMS principles	Final Rule Published: 7/19/2018 Effective: 7/19/2019 Compliance: 7/20/2020
Public Transportation Safety Certification Training Program 49 C.F.R. Part 672	Establishes training curriculum to ensure basic level of safety-related competency for rail transit system auditing and oversight	Final Rule Published: 7/19/2018 Effective: 8/20/2018

What is Safety Management System (SMS)?

What is SMS?

SMS is a comprehensive, collaborative approach that brings management and employees together to build on the transit industry's existing safety foundation to:

- Control safety risk better
- Detect and correct safety problems earlier
- Share and analyze safety data more effectively
- Measure safety performance more carefully.

What is SMS?

Safety Management System (SMS) means the formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety risk mitigations. It includes systematic policies, procedures, and practices for the management of safety risk.

Why SMS?

- Adopting SMS principles will further deepen the industry's commitment to the safety of passengers and employees.
- It will strengthen transit agencies' core competencies in accident investigation, hazard management, safety data acquisition and analysis, and internal auditing.
- SMS offers a stronger culture for employees and managers to work together to solve safety problems.

Why SMS?

- SMS will help public transportation agencies, the States, and industry associations better prepare for and manage conditions that lead to negative events.
- SMS has worked well in other transportation industries facing challenges similar to our own including aviation, maritime and railroads, around the world, and at large and small agencies alike.
- SMS is scalable and effective across a broad range of organizations and applications.

Benefits of SMS

- Leadership commitment and accountability
- Employee engagement and empowerment
- Safety decision-making and resource allocation
- Collaboration between management and front-line staff
- Confidence in safety mitigations
- Partnership and knowledge sharing (agencies, states, and FTA)
- Continuous learning

Case Study: “Veronica’s Story”

Case Study: "Veronica's Story"

Case Study Question #1:

Based on your agency's current safety investigation processes, would your staff arrive at the same conclusion and take the same actions? If not, what other action(s) would be required to meet your agency's requirements?

Case Study: “Veronica’s Story”

Case Study Question #2:

What training and awareness activities would be needed at your agency, in order to improve management’s knowledge and understanding of “effective” hazard identification and safety risk mitigation?

Case Study: “Veronica’s Story”

Case Study Question #3:

In the event that wheels did not separate from the vehicle, what policies and procedures are in place at your agency which would have led to a near-miss/close call investigation of the circumstances?

Case Study: "Veronica's Story"

Case Study "Challenge" Question #1:

Regarding your agency's written policies and procedures for the work place, how do you know if they are valid and being followed by your employees?

Case Study: "Veronica's Story"

Case Study "Challenge" Question #2:

What are some ways that your agency staff can build trust and communication to enable your employees to share their safety concerns before negative events occur?

Case Study: "Veronica's Story"

Case Study "Challenge" Question #3:

At your agency, how much time (per week) should be scheduled to allow front-line supervisors and managers to "walk-and-talk" with their front-line employees to identify work place safety concerns?

Four Components of SMS

§ 673.21 SMS General requirements

- Each transit agency must establish and implement a Safety Management System (SMS) under this part. A transit agency SMS must be appropriately scaled to the size, scope and complexity of the transit agency and include the following elements:
  a) Safety Management Policy (§ 673.23)
  b) Safety Risk Management (§ 673.25)
  c) Safety Assurance (§ 673.27)
  d) Safety Promotion (§ 673.29)

Four Components of SMS

Safety Management Policy

- Safety Management Policy Statement
- Safety Accountabilities and Responsibilities
- SMS Documentation and Records

Safety Risk Management

- Safety Hazard Identification
- Safety Risk Assessment and Mitigation

Four Components of SMS

Safety Assurance

- Safety Performance Monitoring and Measurement
- Management of Change
- Continuous Safety Improvement

Safety Promotion

- Safety Communication
- Competencies and Training

SMS is a Management System

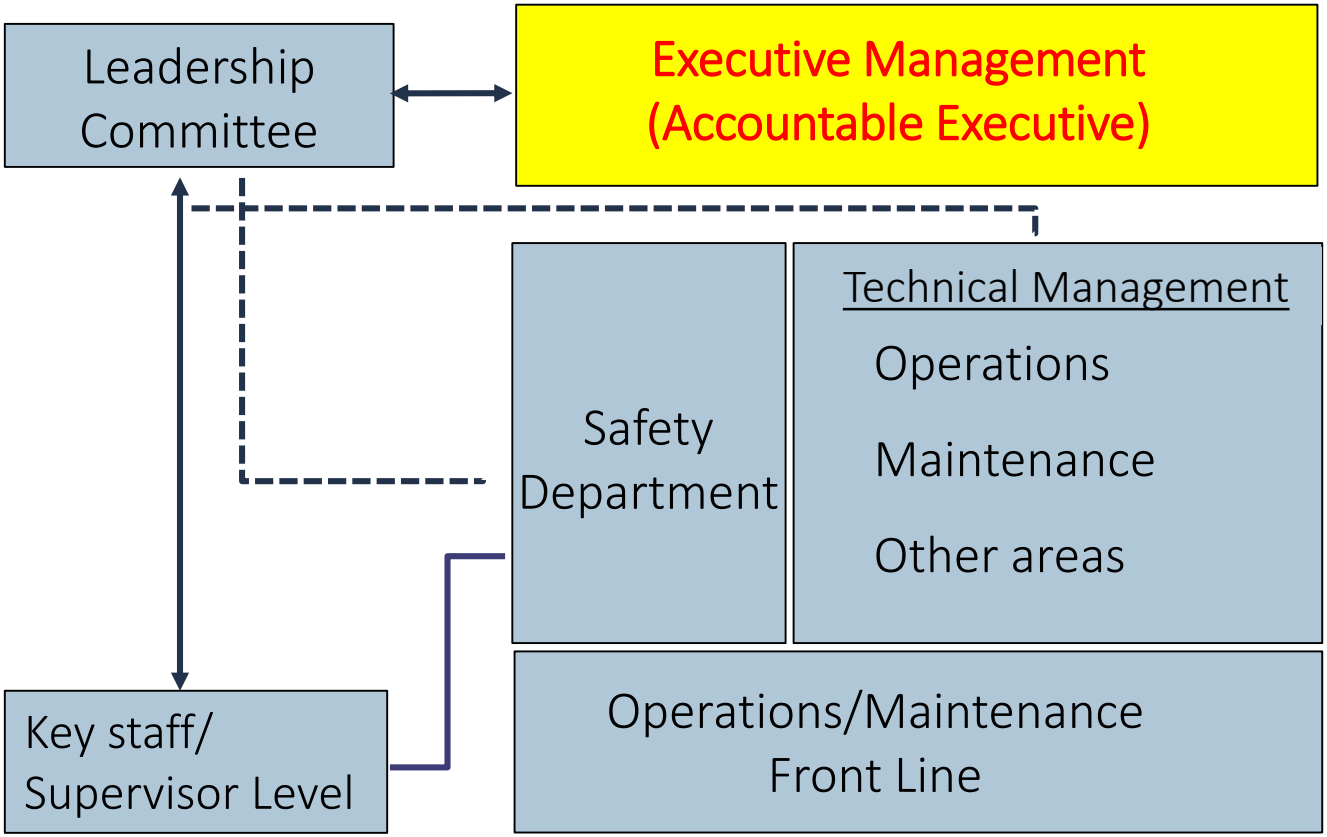
SMS-Component 1
Safety Management Policy

Safety Management Policy

- The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals within its organization, as they relate to the development and management of the transit agency's Safety Management System (SMS):
  1) Accountable Executive
  2) Chief Safety Officer or SMS Executive
  3) Agency leadership and executive management
  4) Key staff.

§ 673.23(d)

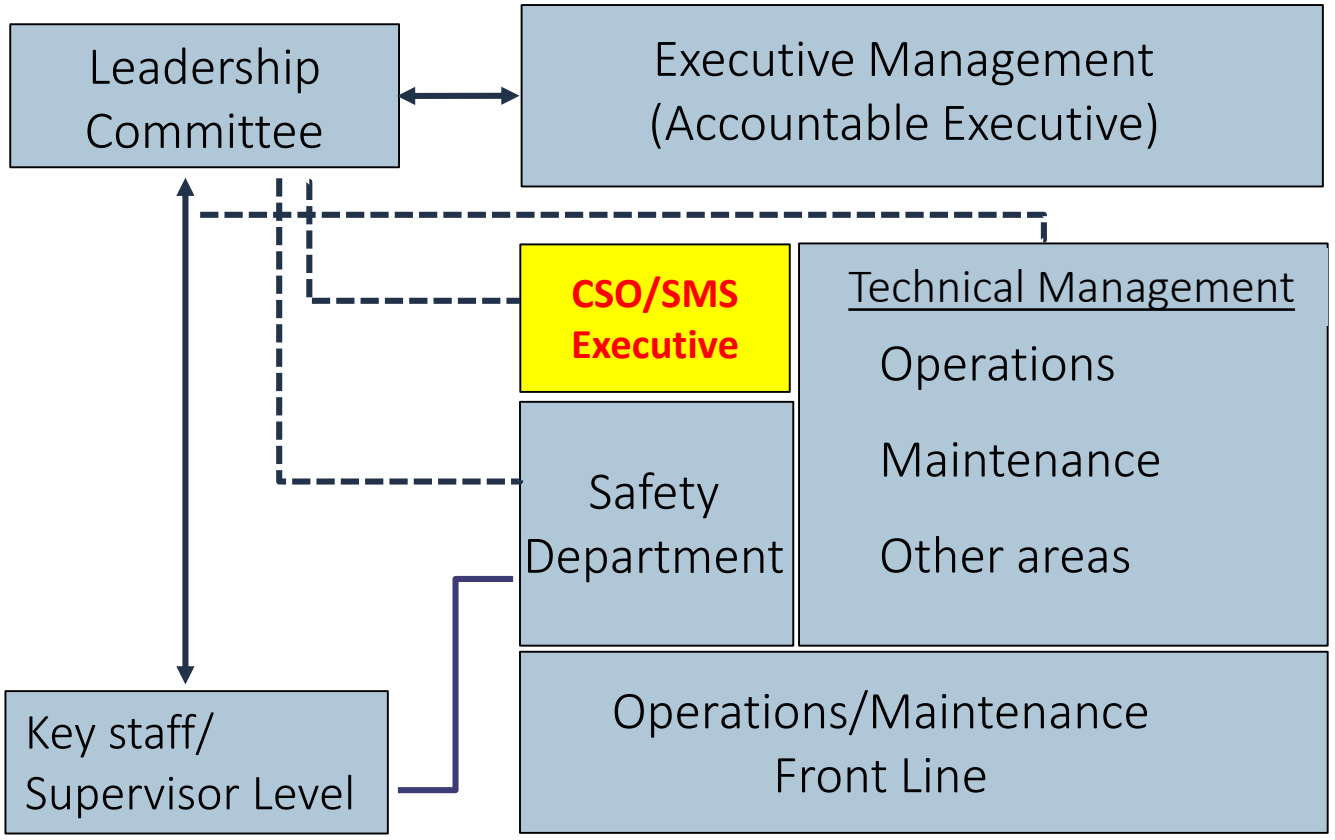
1) Accountable Executive



1) Accountable Executive

- Accountable Executive means a single, identifiable person who has ultimate responsibility for:
  - Carrying out the agency safety plan of a public transportation agency (PTASP)
  - Carrying out the agency's Transit Asset Management (TAM) Plan
  - Control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP and TAM Plan. § 673.5

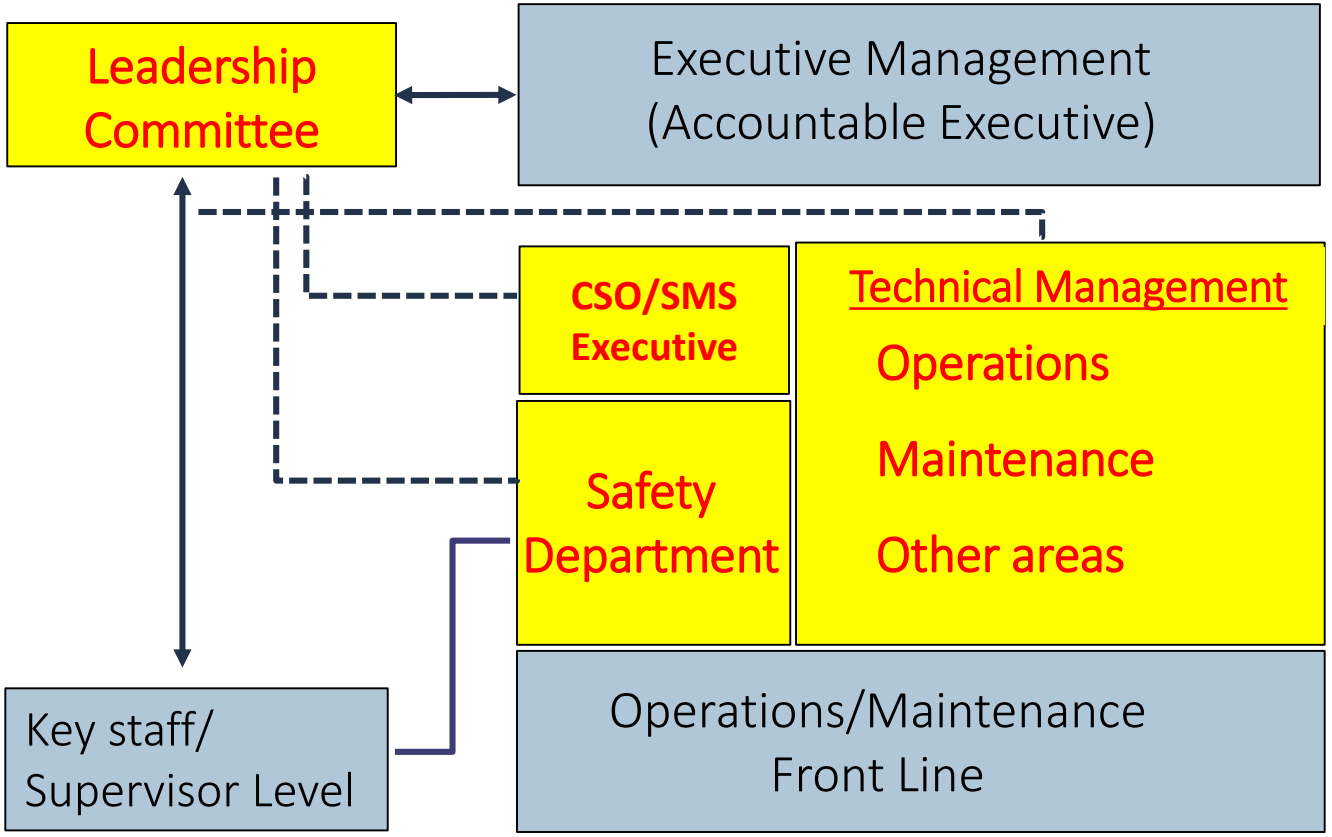
2) Chief Safety Officer-SMS Executive



2) Chief Safety Officer-SMS Executive

- Chief Safety Officer (CSO) means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. § 673.5

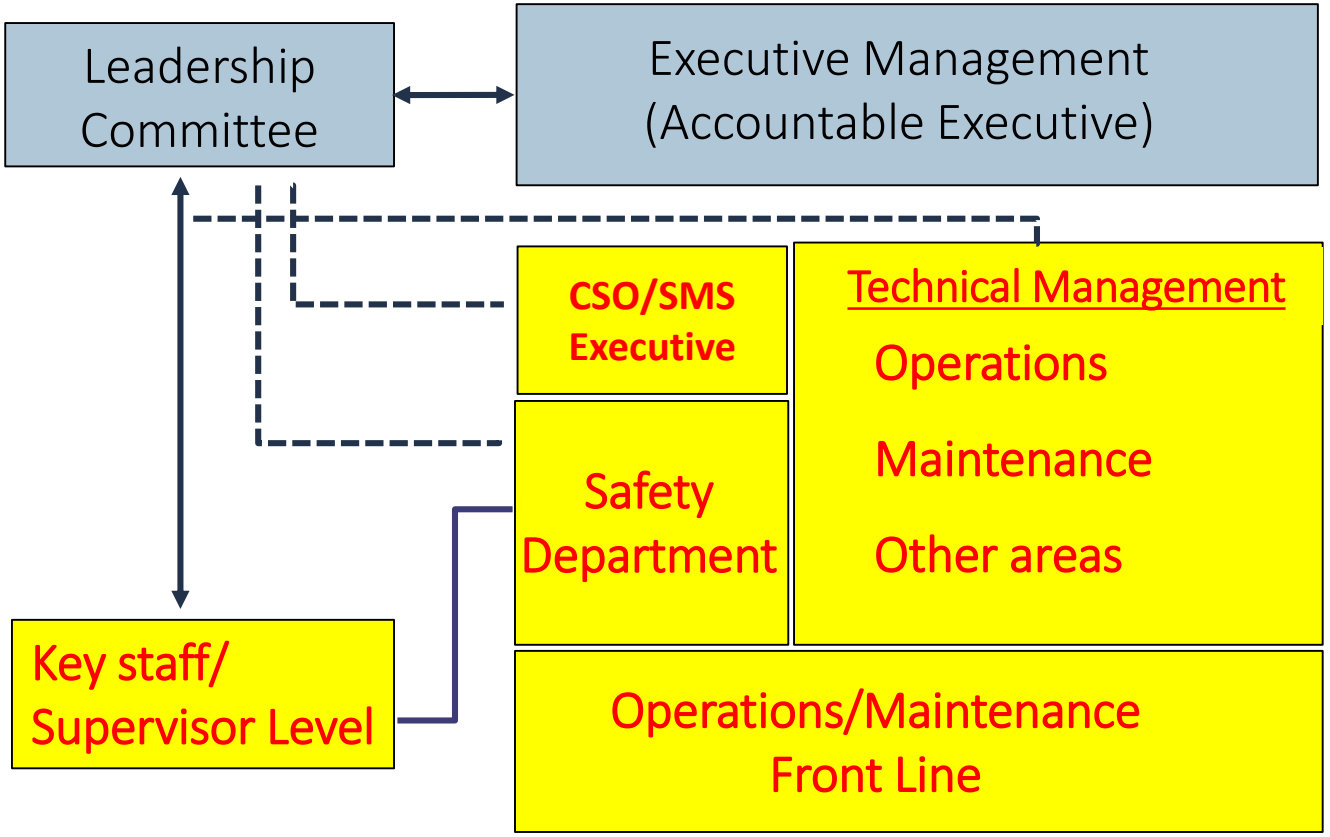
3) Agency leadership team



3) Agency leadership team

- A transit agency must identify those members of its leadership or executive management, other than an Accountable Executive, Chief Safety Officer, or SMS Executive, who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS. § 673.23 (d)(3)

4) Key Staff


Leadership Committee
Executive Management (Accountable Executive)
CSO/SMS Executive
Technical Management
Operations
Maintenance
Other areas
Safety Department
Key staff/ Supervisor Level
Operations/Maintenance Front Line

4) Key Staff

- A transit agency may designate key staff, groups of staff, or committees to support the Accountable Executive, Chief Safety Officer, or SMS Executive in developing, implementing, and operating the agency's SMS. § 673.23 (d)(4)

SMS-Component 2
Safety Risk Management (SRM)

Safety Risk Management

a) 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:

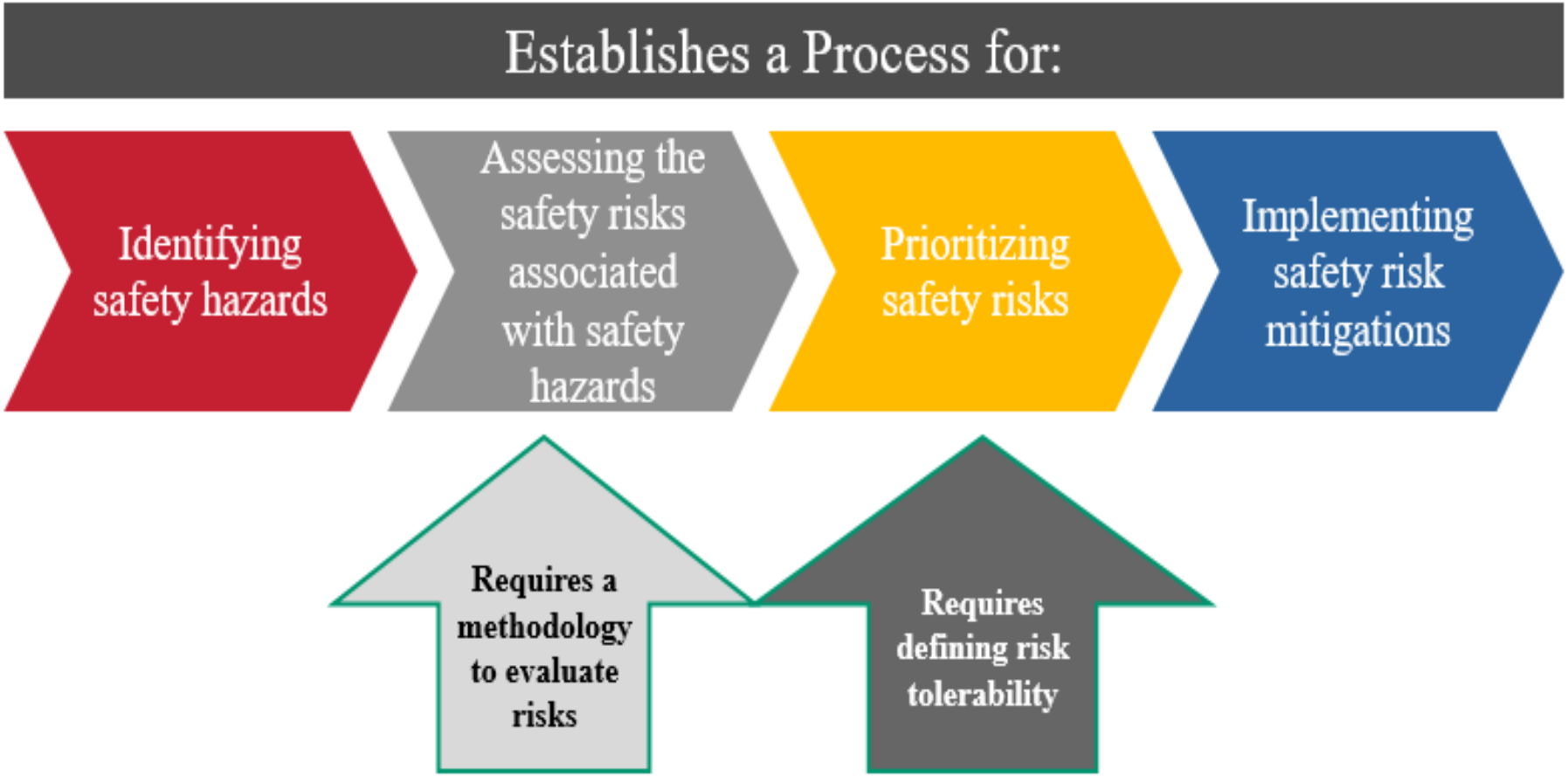
   b) safety hazard identification,

   c) safety risk assessment, and

   d) safety risk mitigation.

§ 673.25(a) - § 673.25(d)

Safety Risk Management (SRM)



Safety Risk Management

b) Safety hazard identification.

1) A transit agency must establish methods or processes to identify hazards and consequences of the hazards.

2) A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA. § 673.25(b)

Safety Risk Management

c) Safety risk assessment.

1) A transit agency must establish methods or processes to assess the safety risks associated with identified safety hazards.

2) A safety risk assessment includes an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations, and prioritization of the hazards based on the safety risk.

§ 673.25(c)

Safety Risk Assessment

The key for any agency is to establish exactly what is meant by acceptable or tolerable risk.

The expression "acceptable risk" usually, but not always, refers to the level at which further risk reduction measures or additional expenditure of resources will not result in significant reduction of risk" – ANSI B1.0 - 2010

Risk acceptance is a policy decision that must be owned & embraced the Accountable Executive, staff, and employees, as an agency, not individuals

Risk acceptance is defined by the agency's Safety Risk Management Process

KEY POINT

"Accepting" a level of risk does not mean the risk is eliminated

- "Residual risk" still remains
- Remaining risk is sufficiently low to be outweighed by the benefits of the existing operation

Safety Risk Management

d) Safety risk mitigation.

A transit agency must establish methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences. § 673.25(d)

SMS-Component 3
Safety Assurance

Safety Assurance

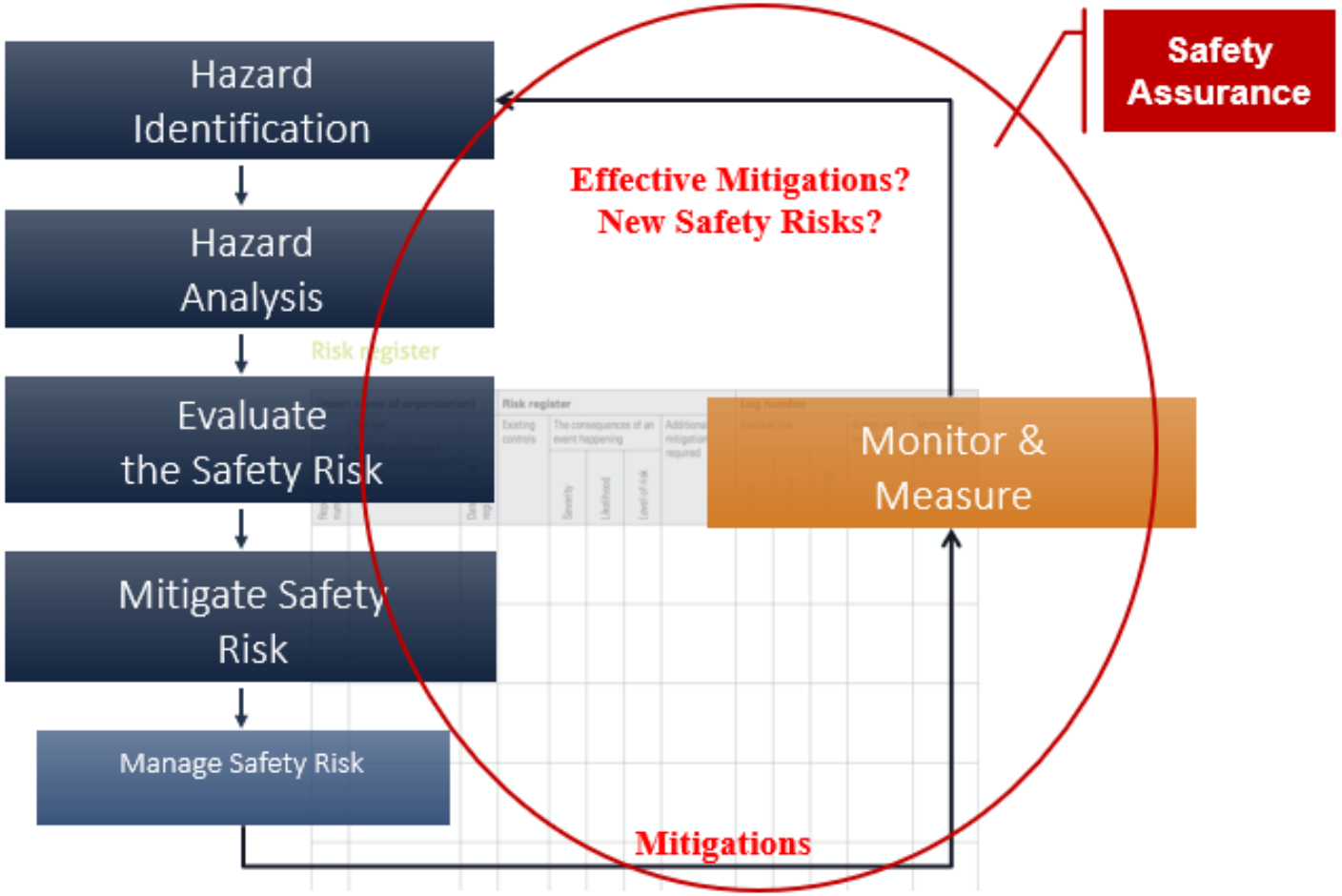
Safety Assurance means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information. § 673.5

Safety Assurance

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 100 vehicles in peak revenue service, must also include in its safety assurance process:

c) Management of change § 673.27(c)
d) Continuous Improvement § 673.27(d)

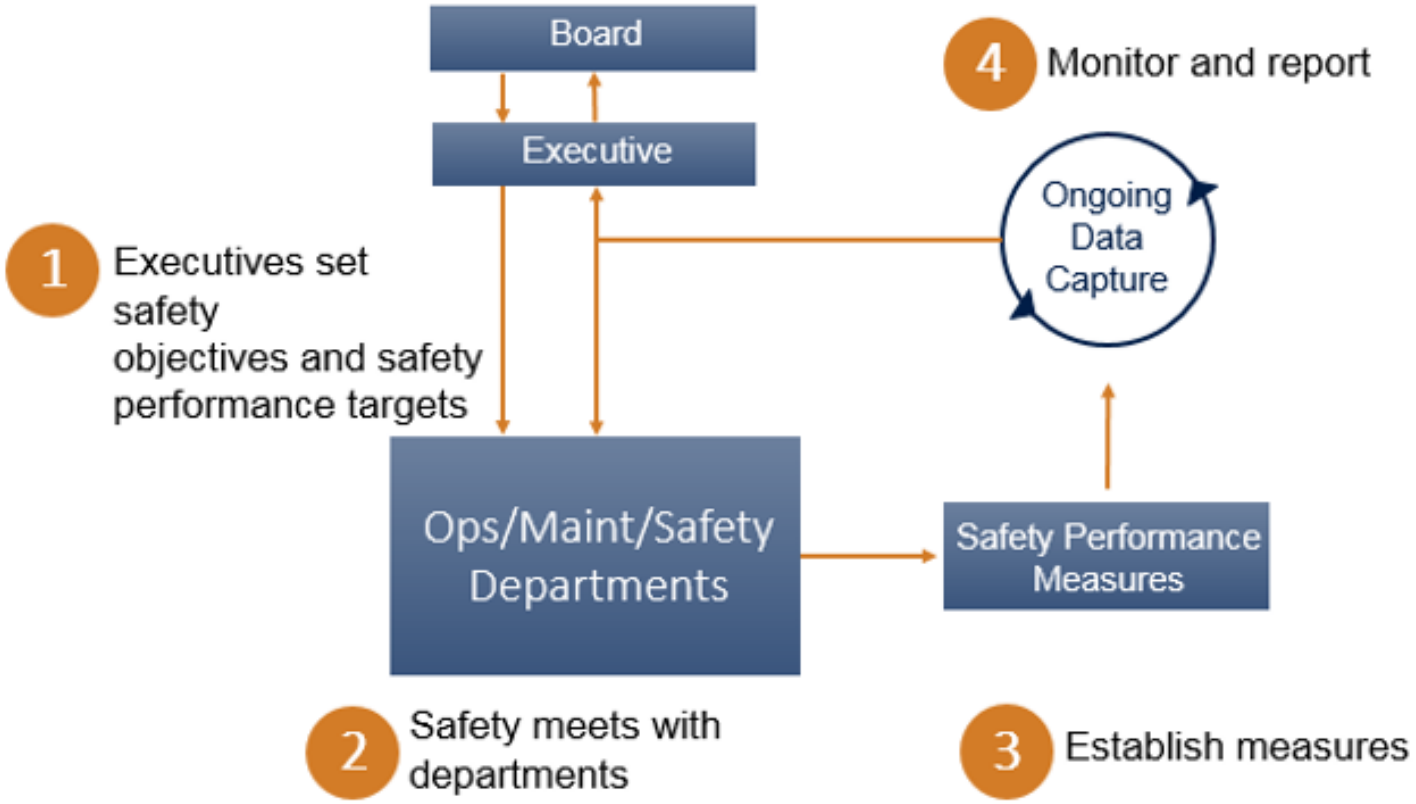
SRM/Safety Assurance Process



SRM/Safety Assurance Objectives

- What are our most serious safety concerns? (SRM)
- How do we know this? (SRM)
- What are we doing about it? (SRM)
- Is what we are doing working? (SA)
- How do we know what we are doing is working? (SA)
  - Have we verified with front-line? (SA)
  - Do the data/trends verify it's working? (SA)

SRM/Safety Assurance Objectives



Management of Change

Management of Change means a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process

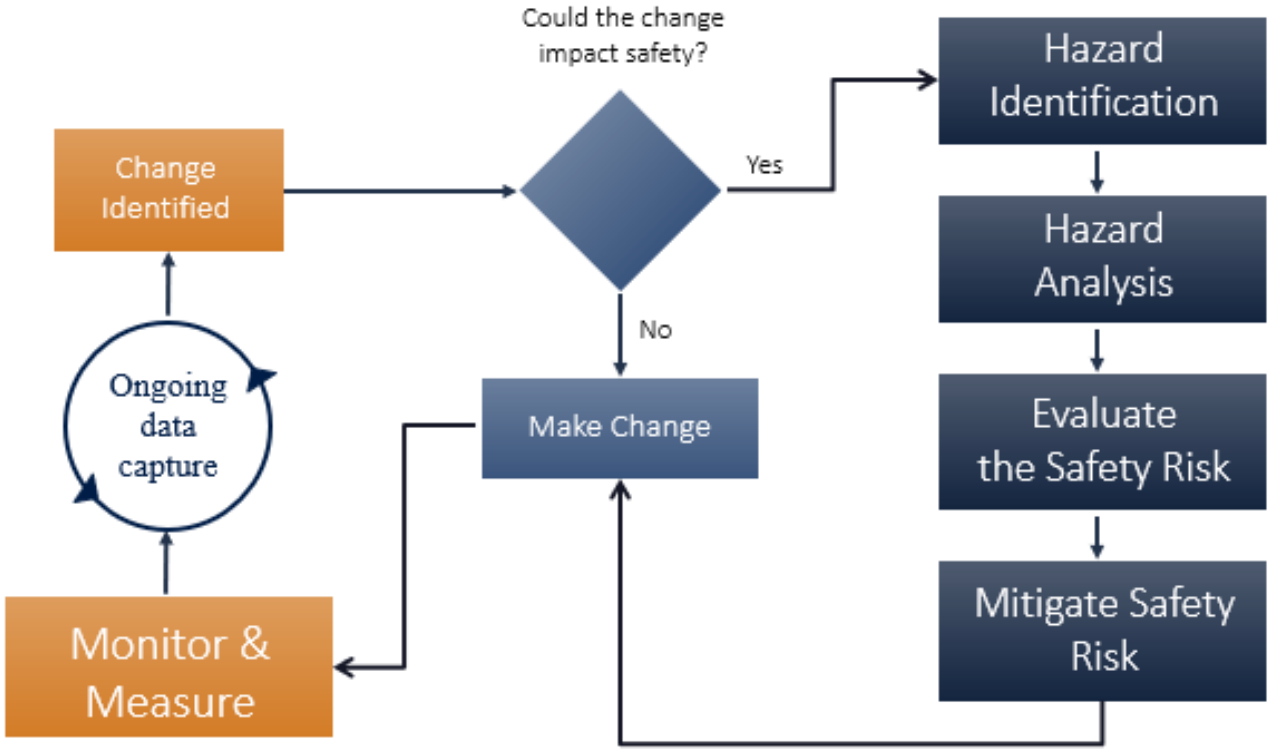
Management of Change

c) Management of change.

1) A transit agency must establish a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance, before the changes are allowed.

2) If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process. § 673.27(c)

Evaluating Change



Management of Change analyzes proposed system modifications/changes to assure additional hazards are treated.

Management of Change Criteria

- No operations should take place in the changed environment until:
  - The change is evaluated to determine *if* it will impact safety
  - If it might, then safety risk evaluation must be completed
- Criteria must be ***unquestionably supported*** by all levels of management

Continuous Improvement

- ***Continuous Improvement*** means a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies.

Continuous Improvement

d) Continuous improvement.

1) A transit agency must establish a process to assess its safety performance.

2) If a transit agency identifies any deficiencies as part of its safety performance assessment, then the transit agency must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies. § 673.27(d)

SRM/SA Gap Analysis

- All transit agencies implement safety risk mitigations, however, we do not always:
  - **Ensure** safety risk mitigations are being implemented (SA)
  - **Verify** that safety risk mitigations are appropriate and effective
  - **Assess** safety risk mitigation to identify potential new hazards, safety deficiencies, or latent conditions (SA)
  - **Establish** performance and monitoring activities to ensure safety risk mitigation objectives are reached

SMS-Component 4
Safety Promotion

Safety Promotion

- Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

§ 673.5

Competencies and Training

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. § 673.29(a)

**ALL training should include expectations, explain why policies/procedures are in place, and how to report safety concerns.

Competencies and Training

- Executive leadership's responsibilities include, but are not limited to:
  - Selection of qualified individuals for key agency positions in support of the PTASP and SMS
  - Effective planning and budgeting for the utilization of available Federal, State, and local training opportunities (for all levels of employees)
  - Compliance with FTA's training guidance rule: 49 CFR Part 672

Competencies and Training

All Employees

- Understanding of performing tasks safely
- Demonstrating competency in completing tasks correctly
- Reporting of:
  - Unsafe work conditions
  - Safety vs. service
  - Inconsistent management support

Managers and Supervisors

- Analyze safety data
- Extract information from safety data
- Encourage safety reporting
- Document concerns and follow-up with consistency
- "GO LOOK":
  - Verify risk mitigations are implemented/effective
  - Conduct field observations
  - Conduct walk-and-talks with employees
- Foster a positive "learning" safety culture

Senior Management

- Strategic SMS goals
- Commitment of necessary resources to address safety risk
- Leadership Styles
  - Understand failure is a starting point
  - Staff speaks openly on safety concerns
  - Gives consideration to ideas for change
- Foster a positive "learning" safety culture

Safety Communication

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 employees' roles and responsibilities
- informs employees of safety actions taken in response to reports submitted through an employee safety reporting program. § 673.29(b)

Safety Communication

Sets the tone for your agency's safety culture

- Provides ongoing communication – up, down and across
- Communicates lessons learned and safety information
- Demonstrates management commitment
- Develops safety management skills to support safety performance improvements

Effective Communication (Cont'd)

- SMS is dependent upon ongoing management commitment to communication
- One of management's most important responsibilities under SMS is to encourage and motivate others to want to communicate openly, authentically and without concern for reprisal

Four-step
Safety Management Process

Four-step Safety Management Process

In practice, an SMS uses a four-step Safety Management Process:

- **Step 1: Identify safety concerns**
- **Step 2: Assess safety risk**
- **Step 3: Mitigate safety risk**
- **Step 4: Monitor safety performance**

Four-step
Safety Management Process

Safety management process steps help answer questions like:

- Are current resources enough?
- Are additional resources necessary?
- Do we need to move current resources to focus on other safety concerns?

Four-step
Safety Management Process

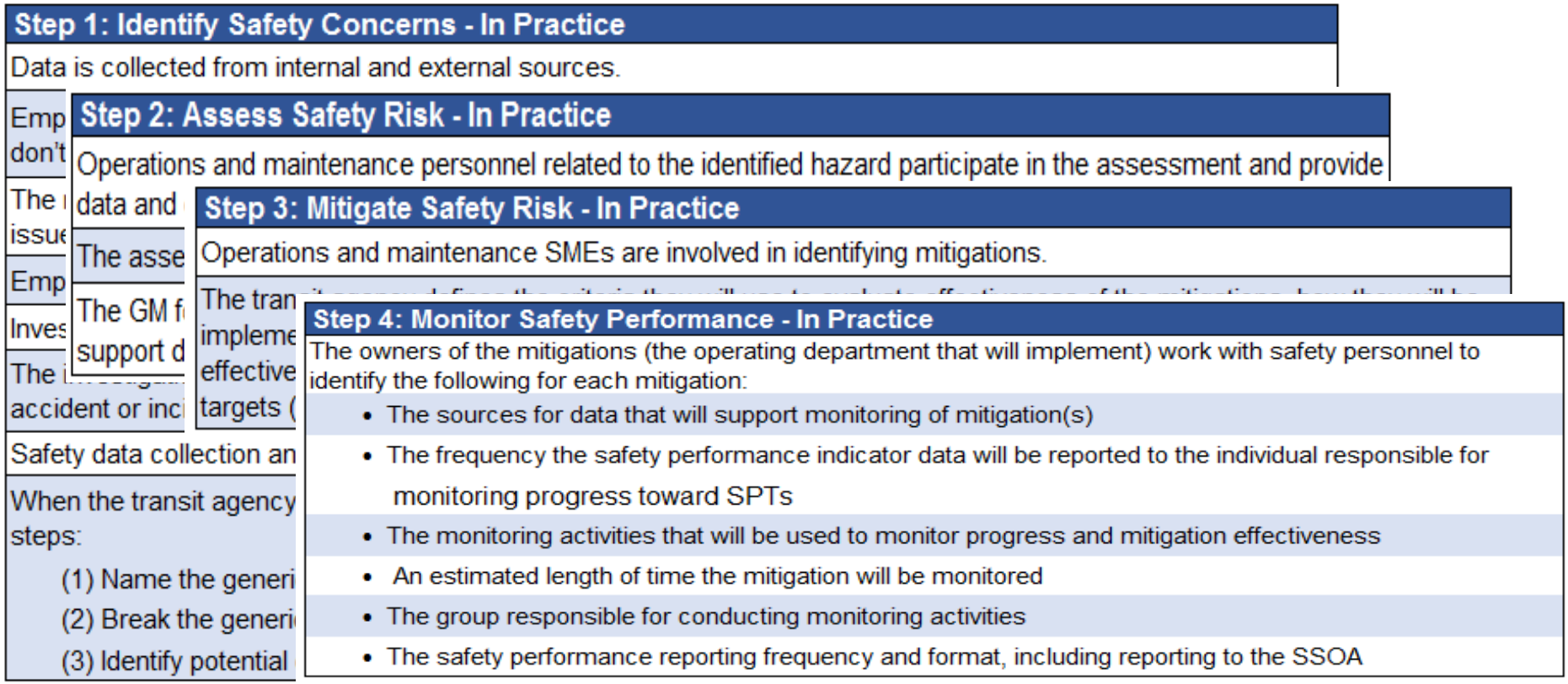
- To help you understand what these safety management process steps can look like in practice at your agency, the following sections will present ***implementation examples*** for each.
- These are the types of activities and outputs your agency will need to implement and manage in order to have an effective SMS in place.

Four-step
Safety Management Process

The tables on the following pages contain **implementation examples** of an SMS in practice, organized by the Safety Management Process Steps. Note that these examples do not represent explicit requirements defined by FTA.

No transit agency is expected to have completed SMS implementation at this point.

Four-step
Safety Management Process



Exercise:

Turning SMS Theory into Practice

Exercise Instructions:

1. Review the implementation examples for each of the following Safety Management Process Steps, as they relate to your agency.
2. Use the righthand column to mark your responses.
   a. Mark "**3**" if the example is fully documented and implemented.
   b. Mark "**2**" if the example is partially implemented.
   c. Mark "**1**" if the example is not fully documented and implemented or if you are unsure.
3. Add up the scores and complete the summary table.

The Role of the CSO/SMS Executive and Key Staff

Managing Safety – "By-the-Numbers"

- Transit agencies document their commitment to safety in the form of written safety policies (signed by CEO). These policies typically include verbiage such as "Safety is everyone's responsibility" or "Safety is Job #1".
- Additionally, transit agencies employ safety professionals in order to maintain a safe transit system. These individuals conduct the bulk of safety work on behalf of the transit agency.

Managing Safety – "By-the-Numbers"

So, lets run the numbers. These actual statistics reflect the number of safety professionals employed to "manage" safety at three large transit agencies:

Agency #1 – (**32**) Safety Professionals….

…with **10,000** employees

Agency #2 – (**34**) Safety Professionals…

…with **11,000** employees

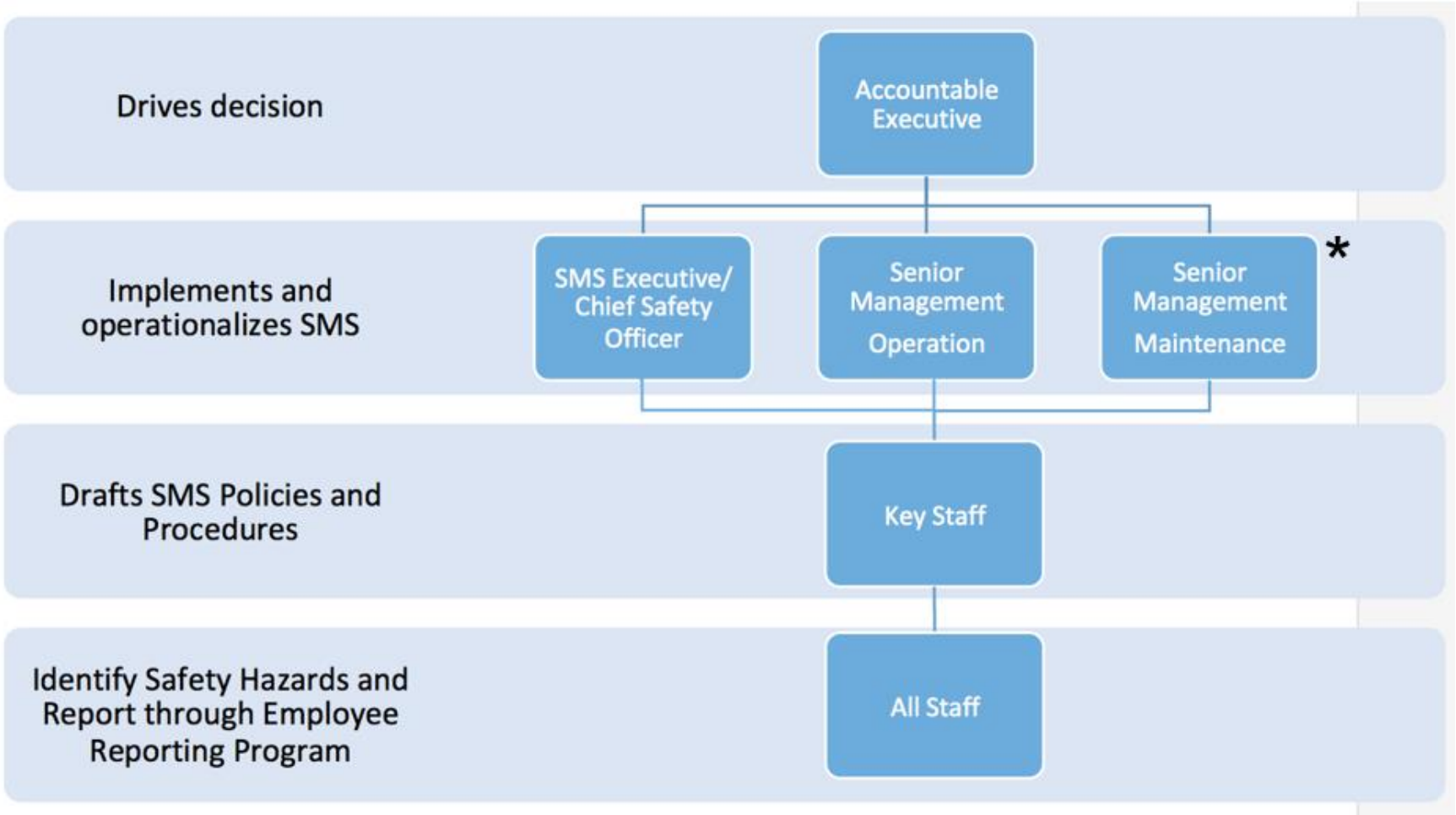
Agency #3 – (**81**) Safety Professionals….

…with **55,000** employees

Managing Safety – "By the Numbers"

- How many safety professionals do you have within your agency (vs. total # of employees)?
- It's clear that "Safety Management" *cannot* be the sole responsibility of the Safety Department.
- A transit agency's entire work force must help identify hazards, report practical drift, and contribute to the effective mitigation of safety risk.
- This will require strong leadership (from the top); as well as day-to-day hazard risk mitigation "ownership" at the departmental levels within a transit agency.

Role and Responsibilities-Overview



*Includes Executive leaders, from all agency functions or departments, that support revenue service operations.

Accountable Executive – Champion for Safety

- Role – Serves as the Champion for Safety with ultimate accountability for SMS implementation
- Responsibilities:
  - Designate a Chief Safety Officer/SMS Executive
  - Allocate resources to develop and maintain the Agency Safety Plan and TAM plan
  - Approve the SMS implementation strategy
  - Support communication of SMS information
  - Present the Agency Safety Plan for Board approval

Accountable Executive – Champion for Safety

Why is the Accountable Executive the Champion for Safety?

- SMS implementation will require resources
- The Accountable Executive has the authority to make policy decisions, establish priorities, and direct and allocate resources
- SMS roles and responsibilities must be established
- Resistance to change within the agency should be expected

Chief Safety Officer/SMS Executive

Why is the CSO/SMS Executive accountable for SMS implementation?

- SMS implementation is an interdisciplinary management system
- Communicates directly with the Accountable Executive and agency leadership on SMS implementation needs
- As an executive level position, the CSO/SMS Executive has the power to procure technical and staffing resources

Accountable Executive & CSO/SMS Executive-Creating the Right Culture

- Verifies the agency has effective and documented processes for managing safety risk
- Promotes open discussions regarding limitations (at the department level) to address safety risk
- Creates a management environment willing to “learn” how it is that hazards and risk levels exist
- Requires and verifies that the management team is engaging the front-line to identify and solve safety risk conditions

Accountable Executive & CSO/SMS Executive-Creating the Right Culture

- Regardless of agency size and structure, key attributes of a SMS includes:
  - Clear lines for safety communication
  - Accountability for safety performance at the highest level and throughout the agency
  - Formal definitions for the management levels that have authority to make decisions regarding safety risk tolerability
  - Acknowledgment that front-line employees are critical to SMS success through their role in reporting safety hazards

Agency Leadership and Executive Management

Chief Executive Officers, Senior Operational Leaders, etc.

- Role – Ensure incorporation of safety management practices in the agency's operational areas
- Responsibilities:
  - Designate representatives from operations, maintenance, and other revenue service support functions to serve as Key Staff
  - Encourage SMS training for staff
  - Take ownership of safety management processes and activities as they are implemented

Agency Leadership and Executive Management

Chief Executive Officers, Senior Operational Leaders, etc.

Why is Agency Leadership and Executive Management involved with SMS implementation?

- Agency departments are the direct beneficiaries of SMS
- Staff have the opportunity to document and manage safety concerns
- Concerns are examined and risk levels are evaluated
- Staff drive and support the level of safety culture within the agency

Key Staff - Subject Matter Experts

- Role – Serve as subject matter experts representing their departments during SMS implementation
- Responsibilities:
  - Provide expertise on how to adapt existing departmental practices to work in concert with SMS
  - Identify departmental data and information resources to support SMS decision making
  - Meets and updates the CSO/SMS Executive

Key Staff – Subject Matter Experts

Why are Key Staff important for SMS implementation?

- SMS is a multi-disciplinary endeavor
- Key Staff may be organized into an SMS Implementation Team with regular meetings and work sessions
- These individuals are familiar with their department's processes and practices and can voice ideas, concerns, and solutions for SMS implementation that works in concert with their practices and duties

How will this change what we currently do?

- Agency leadership (at all levels) needs to further examine emerging safety concepts, to include:
  - The role of the organization
    - *remember "Veronica"……??*
  - Practical Drift

The Organizational Accident and Practical Drift

The Organizational Accident

"Organizational accidents have multiple causes involving many people operating at different levels of their respective companies."

--James Reason, "Managing the Risks of Organizational Accidents."

The Organizational Accident

"When causal chains are limited to technical flaws and individual failures, the ensuing responses aimed at preventing a similar event in the future are equally limited: they aim to fix the technical problem and replace or retrain the individual responsible. Such corrections lead to a misguided and potentially disastrous belief that the underlying problem has been solved."

--NASA Columbia Accident Investigation Review Board

The Organizational Accident Approach:

- Broaden our scope in understanding the causes of accidents
- Focusing investigation solely on human errors will not provide significant safety improvement
- Need to understand organization's role to correct system-wide safety deficiencies
- Safety is not the *absence* of accidents
- Safety is the *presence* of defenses (mitigations) in processes, procedures, technology, and methods

Looking at Human Performance and Safety

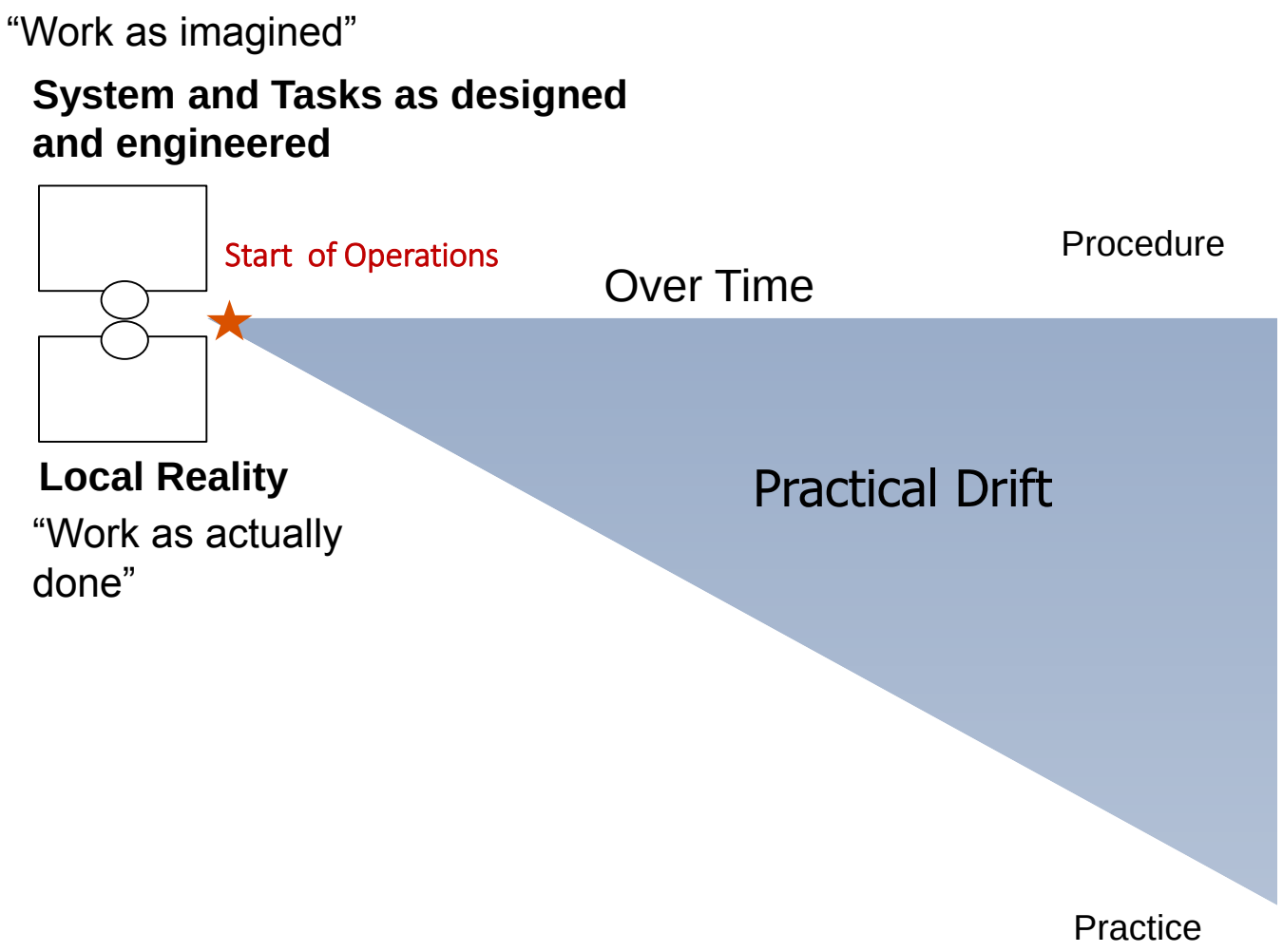
"Safety is never the only goal. People do their best to balance the different goals. As we know, systems are not automatically safe. Production pressures influence people's trade-offs."

-Dr. Sydney Dekker (Video)

Practical Drift

*"**Practical Drift"** means the slow and inconspicuous, yet steady, uncoupling between written procedures and actual practices during provision of services.*

Imperfect Systems – The Practical Drift

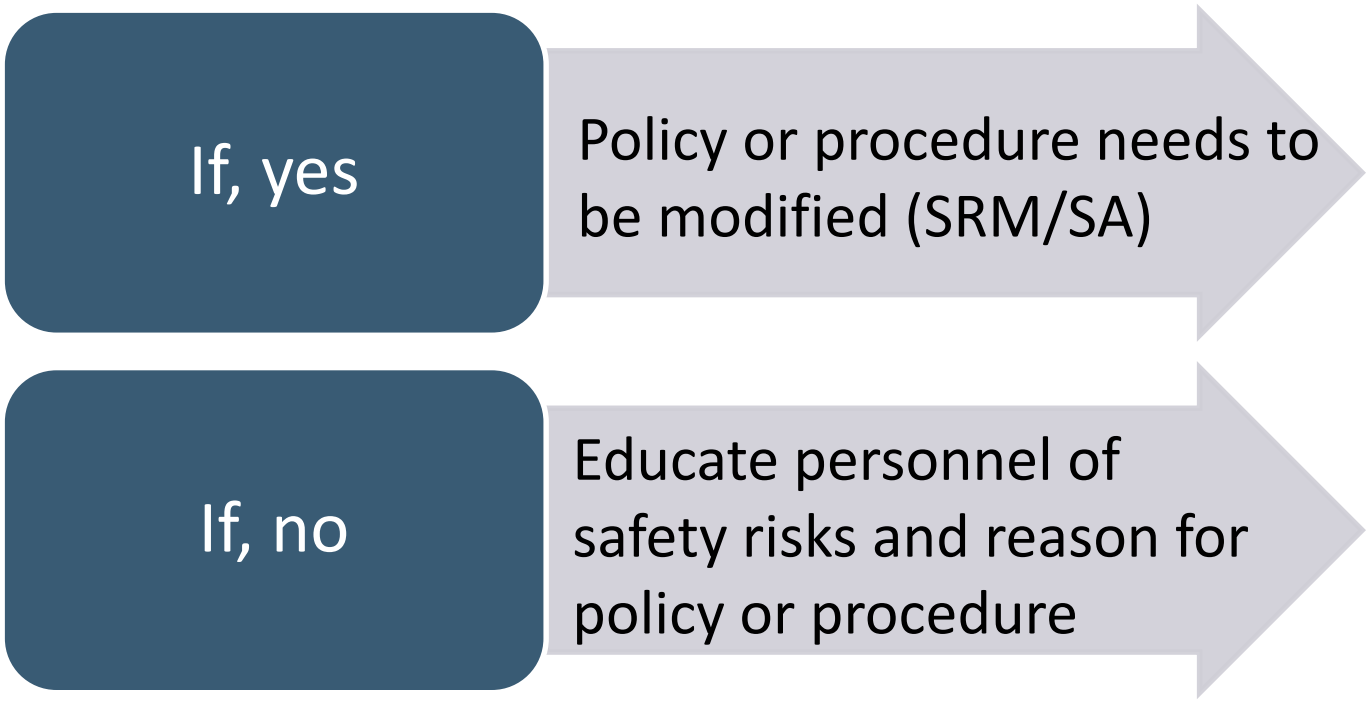


"Uncoupling of practice from procedure"
Why? What happened?

- Service delivery pressures
- Procedure no longer practical
- Short-cuts are more efficient
- Supervisor allows it
- Informal processes
- Training inadequately conveyed safety risk
- Employees who will be using the process or procedure had no input into its development

Managing Practical Drift

- Determine if the policy or procedure has been modified in operations and if the “actual” use is safer or better than the written intent.



Public Transportation Agency Safety Plan (PTASP)

49 CFR Part 673-PTASP Rule

Date	Action
July 19, 2018	The PTASP rule is published and final.
July 19, 2019	Effective date—this is the date the rule takes effect. The PTASP does not have to be developed by this date.
July 20, 2020	Compliance deadline—this is the final deadline for the PTASP certification. The RTA's PTASP must be reviewed an approved by the SSOA and certified by the RTA by this day.

49 CFR Part 673-PTASP Rule

The rule is made of four subparts, including: General; Safety Plans; Safety Management Systems; and Safety Plan Documentation and Recordkeeping

Subpart	PTASP Rule Outline
Subpart A	673.1 Applicability 673.3 Policy 673.5 Definitions
Subpart B	673.11 General requirements 673.13 Certification of compliance 673.15 Coordination with metropolitan, statewide, and non-metropolitan planning processes
Subpart C	673.21 General requirements 673.23 Safety management policy 673.25 Safety risk management 673.27 Safety assurance 673.29 Safety promotion
Subpart D	673.31 Safety plan documentation 673.33 Safety plan records

Certification of the Agency PTASP

- The PTASP is different from SMS. It is a ***document***, the regulatory vehicle for administering SMS.
- Each transit agency, or State as authorized in 673.11(d), must certify that it has established a Public Transit Agency Safety Plan. A state Safety Oversight Agency must review and approve a PTASP developed by rail fixed guideway systems, as authorized in 49 U.S.C.5329(e) and its implementing regulations at 49 CFR part 674.

Comparing the PTASP and the System Safety Program Plan (SSPP)

SSPP vs. PTASP

SSPP	Agency Safety Plan
Establishes system safety 21 fixed program elements	Establishes the Safety Management System Four SMS components; a flexible and scalable system
Safety is generally confined to the safety department and distinct safety processes	Safety is broadened to a core organizational function that focuses on management of safety risk through all aspects of a transit agency's operations
Focuses on compliance and documentation of safety programs Assumes technical compliance with engineered solutions will result in safe operations	Describes the interactions between safety programs and adds safety processes that support SSPP elements Safety priorities and investments are a key part of decision-making and always considered when balancing safety and productivity

SSPP Elements

- The SSPP consists of 21 elements supporting system safety and was established by Part 659.
- The SSPP reflects the current safety practices in place at rail transit agencies (RTAs) and some bus-only agencies, as well.

SSPP Elements

- Part 673, establishing the PTASP, has replaced the SSPP and Part 659.
- The PTASP, based on the SMS approach, builds on current RTA safety practices and activities detailed in the SSPP.
- While Part 673 requires new processes and activities and many elements of an existing SSPP can be used to build the new PTASP sections.

PTASP Development

- The development of the PTASP is the responsibility of the RTA and is not simple copy and paste of the 21 SSPP elements.
- However, many of the processes documented in the SSPP may serve as good starting points for PTASP development.

PTASP Development

- In and of itself, the SSPP content does not satisfy the PTASP requirements.
- The SSPP has a number of elements that support safety risk management, however, these elements do not individually satisfy the requirements of Part 673.
  - Example: 659.19(f) (hazard management process) does not meet the requirement of 673.25 (safety risk management process).

What is Different?

- The SSPP documented a number of required safety programs and activities. The PTASP will document how the transit agency manages risk, using many of those programs and activities to identify safety concerns, assess risk, mitigate risk, and monitor performance.
- The PTASP documents how these programs and activities support the agency's safety management process.

What is Different?

- 49 CFR Part 673 proposes a more comprehensive process for identifying and managing safety risks through the life cycle of a rail transit system. This includes:
  - New safety analysis tools used by adequately-staffed and trained safety personnel
  - Involvement with RTA departments, groups, and committees
  - Participation of subject matter experts in safety risk assessments and mitigation development

What is Different?

- Documentation of how safety risk management feeds into the safety assurance process, to ensure that safety risk mitigations are ***evaluated for effectiveness over time***.
- In addressing these new requirements, the RTA will need to develop new processes to address the safety risk management requirements and develop language in its PTASP to document the new/modified activity.

Next Steps and Wrap-Up

The SMS Implementation Process

Phase 1 Prepare	Phase 2 Develop	Phase 3 Operationalize
• Designation CSO/SMS Executive • Designate SMS Project Manager (if desired) • Clarify SMS roles • Dedicate resources to SMS • Build an SMS implementation team	• Ongoing communications • Educate employees as SMS is designed and developed • Communicate SMS activities to the Board and to the SSOA (if applicable) • Meet milestones in the SMS Implementation Plan	Put SMS policies, procedures, and processes into practice
Key Outputs • Develop the SMS Implementation Plan • Draft the Agency Safety Plan	***Key Outputs*** • Certify the Agency Safety Plan by July 20, 2020 • Complete SMS policy documents	***Key Outputs*** • Implement the Agency Safety Plan • Management and oversight of SMS

Next Steps to Consider for Executives

- Identify the Accountable Executive
- Appoint a Chief Safety Officer/SMS Executive
- Communicate SMS implementation roles and responsibilities to appropriate staff
- Develop an SMS Implementation Plan (and schedule)
- Build an SMS Implementation Team with Key Staff and ensure members receive SMS training
- Continue to balance adherence to your agency's current SSPP and other FTA and State requirements while developing your PTASP

Working with Your SSOA

- Meet and coordinate with your SSOA to:
  - Review the SSOA Program Standards and identify agency processes already established for the PTASP development
  - Discuss the SSOA's process for reviewing and approving your agency PTASP and subsequent auditing/inspections conducted during your PTASP implementation period
- Routinely communicate progress to your SSOA

7. Closing Comments