

FTA

FEDERAL TRANSIT ADMINISTRATION

2017 SSO Training Workshop

Breakout Session #5 Corrective Action Plans

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U.S. Department of Transportation
Federal Transit Administration

April 25, 2017

Corrective Action Plan Overview

- Corrective Action Plans
 - Definitions and Observations
 - Requirements
- Discussion

Definitions: Corrective Action Plan

49 CFR Part 659.5

A plan developed by the RTA that describes the actions the rail transit agency will take to minimize, control, correct, or eliminate hazards, and the schedule for implementing those actions

49 CFR Part 674.7

A plan developed by a RTA that describes the actions the RTA will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a SSOA or FTA may require a RTA to develop and carry out a CAP.

Corrective Action Plans Requirements

49 CFR Part 659.37

- (a) The SSOA must require the development of a CAP for:
- (1) Results from investigations in which the SSOA or RTA requires a CAP
 - (2) Findings from SSOA safety and security reviews
- (c) The CAP must be reviewed and formally approved by the SSOA

49 CFR Part 674

674.27(a)(8) - The program standard must explain the process and criteria by which the SSOA may order an RTA to develop and carry out a CAP.

674.37(a) - The SSOA must review and approve the CAP before the RTA carries out the plan, an exception may be made for emergency CAPs to ensure immediate safety, provided the SSOA receives timely notification and provides subsequent review and approval

Corrective Action Plans Requirements

49 CFR Part 659.37

- (f) The RTA must provide the SSOA:
- (1) CAP verification as described in the CAP or implementation of alternate actions
 - (2) Periodic reports requested by the SSOA describing CAP status not completely implemented
- (g) The SSOA must monitor and track the implementation of each approved CAP

49 CFR Part 674.37(a)

The RTA must periodically report to the SSOA on its progress in carrying out the CAP. The SSOA may monitor the RTA's progress in carrying out the CAP through unannounced, on-site inspections, or any other means the SSOA deems necessary or appropriate

FTA Oversight

- Monthly One on One
- Annual Reporting
- Audit Process

DISCUSSION

CAP Concerns

- SSO Oversight Observations:
 - Does the SSOA receive complete CAPs from the RTA
 - Does the SSOA make formal SSOA approvals
 - How are you being informed of CAPs from outside sources

Discussion – CAP Development

- Are RTAs clear on the criteria for when a CAP must be developed and submitted for your approval?
- How does your state confirm that CAPs are developed for all required sources?
- Does your state ever get involved in the development of CAPs?

Discussion – CAP Development (Part 674 Specific)

- How would your state plan to coordinate with the RTA for emergency CAP development?
- How does your state plan to approve of the emergency CAPs?

Discussion – CAP Approval and Tracking

- How does your state formally communicate CAP approval?
- What challenges does your state have in tracking CAPs?
- Do the RTAs regularly incorporate all required CAP informational elements prior to SSOA approval?

Discussion – CAP Verification and Conflicts

- What types of verification activities are conducted to ensure CAP implementation?
 - By the RTA?
 - By the SSOA?
- What if the actions in the CAP are ongoing, how would you monitor ongoing implementation?

Questions?

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