

FTA

FEDERAL TRANSIT ADMINISTRATION

APTA Rail Conference/TRB

SMS Workshop and Safety Seminar

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Transit Safety Rulemaking and Guidance

Regulation	Rulemaking Timeline	Status
Public Transportation Agency Safety Plan 49 CFR Part 673	NPRM Published: 2/5/2016 Comment By: 4/5/2016	Final Rule in Development
Public Transportation Safety Certification Training Program 49 CFR Part 692	NPRM Published: 12/3/2015 Comment By: 2/1/2016	Final Rule in Development
Preventing Transit Worker Assault NPRM	NPRM Expected: 2017	NRPM in Development
National Public Transportation Safety Plan	Proposed National Safety Plan Published: 2/5/2016 Comment By: 4/5/2016	Final Guidance Published: 1/17/17
Public Transportation Safety Program 49 CFR Part 670	NPRM Published: 8/14/2015 Comment By: 10/13/2015	Final Rule Published: 8/11/2016 Effective: 9/12/2016
Bus Testing 49 CFR Part 665	NPRM Published: 6/23/2015 Comment By: 8/24/2015	Final Rule Published: 8/1/2016 Effective: 10/31/2016
Transit Asset Management 49 CFR Part 625	NPRM Published: 9/30/2015 Comment By: 11/30/2015	Final Rule Published: 7/26/2016 Effective: 10/1/2016
State Safety Oversight 49 CFR Part 674	NPRM Published: 2/27/2015 Comment By: 4/28/2015	Final Rule Published: 3/16/16 Effective: 4/15/16

Why SMS

- FTA safety oversight structure is not based on a large inspector force
- Agencies will have to rely on strong internal safety processes to drive safety improvements
- SMS processes allow for a proactive versus reactive safety stance
- SMS is scalable, to support a diverse industry

SMS regulation can ...

- Mandate certain safety processes
 - Are processes compliant?
 - Are there gaps in the documented processes?
- Mandate record-keeping
 - Provides evidence of SMS in action
 - Manifestation of actual working practices
- Mandate the development of safety policy documents

SMS can adapt/scale to ...

- Support “what can go wrong” discussions at smaller agencies lacking large safety staffs
- Analyze “things that can hurt us” to prevent protracted debates about “the hazard.”
- Lessen the paperwork burden of extensive hazard analysis efforts and documentation for smaller organizations
- Rely on informed judgment when lacking data

SMS Challenges

- Compliance may be on paper only
- Small transit agencies do not have large safety staffs to perform SMS safety processes without greatly simplifying the processes
- Is there just “one way” to perform a hazard analysis? Lack of common understanding
- If safety data is not readily available, hazard likelihood may be inaccurately assigned

How can we assess an SMS?

- Are SMS processes defined, documented, understood and applied?
- Are hazards defined and risks understood?
- What processes are in place to monitor and review efficacy of the SMS itself?
- Does an agency use its experience with SMS to improve its SMS?
- Do prevailing attitudes and behaviors support safety?

How can SMS fail?

- Risk Assessments are not performed when appropriate
- Hazards are not properly identified
- Risk is underestimated
- Risk mitigations are not implemented
- Inadequate tracking of safety deficiencies
- Inadequate supervision
- Insufficient training for the tasks to be performed

Evidence of a weak SMS

- Mitigation measures are absent or inadequate
- Hazards are not being identified and properly analyzed
- Organization has failed to detect non-compliance with safety processes
- The organization is not improving its SMS based on its experiences
- The safety culture has created conditions that are allowing for accidents to occur

Challenges to SMS in transit

- Regulation cannot bring about safety culture changes or improvements
- How do we prevent agencies from merely complying with minimum SMS requirements versus embracing SMS concepts and reinforcing strong safety culture
- FTA lacks broad inspector force to assess SMS

Safety Culture

- Can only be strengthened through leadership and deep organizational commitment to:
 - Safe work processes
 - Informed culture
 - Safety Reporting
 - Learning
 - Justice
 - Continuous Improvement

Industry Dialogue

- How does FTA move from simple compliance to emphasis on safety?
- How does FTA foster strong safety culture industry-wide?
- How can FTA facilitate learning from incidents, accidents and near-misses?

Questions?

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