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2017 Joint SSO and RTA Workshop

Breakout Session 1: Lessons Learned from FTA Safety Management System (SMS) Pilot Program

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Overview

- Pilot Program purpose and structure

- CTA Pilot

  - Timeline and milestones

  - Initial lessons learned

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Pilot Program Purpose

- Safety Management Systems (SMSs) are new to the transit industry.

- Most SMS guidance comes from other industries.

- FTA is developing and testing technical assistance materials and tools to help the transit industry adopt SMSs.

Components of an SMS

Safety Management Policy	Safety Risk Management
Safety Assurance	Safety Promotion

Pilot Program Participants

Chicago Transit Authority (CTA) Pilot

- Chicago Transit Authority

- Illinois Department of Transportation (State Safety Oversight Agency)

Maryland Bus Pilot

- Ride On, Montgomery County, MD

- Transit Services of Frederick County, MD

- VanGO, Charles County, MD

- Maryland Transit Administration, Office of Local Transit Support (state department of transportation)

CTA Pilot Timeline and Milestones

- Began in December 2014
- CTA has:
  - Assigned an SMS Implementation Lead and an SMS Implementation Team
  - Drafted a Safety Management Policy Statement
  - Offered Introduction to SMS training to managers
  - Conducted a safety culture survey
  - Developed an SMS Implementation Project Plan and Safety Risk Management sub-plan
  - Begun testing Safety Risk Management procedures

Initial Lessons from the CTA Pilot

- Leadership direction and engagement is critical.
  - SMS implementation should start at the top.
  - Leadership can help make time for SMS implementation despite the pressures of day-to-day operations.

- Participation by state oversight entities improves support to the agencies and reduce surprises.

- Planning and other project management best practices help to keep the effort on track efficiently.

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SMS Implementation at CTA

- Representation from each functional area

- Mid to Senior level managers

Sub Groups:

- Safety Risk Management

- Safety Assurance

- Employee Reporting

Current SMS Implementation Activities

- Safety Risk Management Pilot in Bus Operations
  - Start small and centralized
- Safety Assurance

  - Start with the data you already have, then move to data generated from SRM

- Employee Safety Reporting Program

  - Decide up front what you're willing to put on the table

SMS Implementation Challenges: Organizational

- Leadership changes

- Safety Department changes

- Militaristic rules and practices

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SMS Implementation Challenges: Cultural

- Trust building

- Changing the perceptions of front line managers

- Communicating new processes to employees

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SMS Implementation Challenges: Informational

- SMS is a decision making tool, and you need information to make good decisions

- Data gathering, usage, storage…

- Analysis capability

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SMS Implementation Challenges: Regulatory Oversight

You're being audited by your SSOA and you're in the middle of SMS implementation. What do you do?

- Discuss SMS implementation activities early.

- Set up separate meetings during the audit to describe how your current practices will change.

- Send a letter to formalize expectations around how SMS may impact the audit.

- Be prepared to show where SMS implementation will address any findings or recommendations.

2017 Triennial Audit

- Conducted under Part 659
- 21 Elements (and System Security)
- CTA's SMS was not part of the audit scope*

*Okay, so we had one session on SMS, but it was not for the purpose of generating findings!

Future Triennial Audits

- System Safety Program Plan (SSPP) →
Public Transportation Agency Safety Plan (PTASP)

- 49 CFR Part 674.29(a): the SSOA must evaluate whether the PTASP is:

  - Consistent with regulations implementing the PTASP

  - Consistent with the National Public Transportation Safety Plan

  - Compliant with the SSOA Program Standard

- The 21 SSPP elements are explicitly described in Part 659, whereas Part 674 defers to the PTASP rule for these requirements

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SSOA Role in SMS

- Generally

  - The transit agency is directly responsible for implementation of its SMS programs and processes...

  - But the SSOA has an inherent responsibility to be adequately knowledgeable about SMS

- Understand that the SMS is more than the set of documents, policies, and procedures, but it is what the agency is doing in practice

Program Standard

- There is no explicit requirement to include SMS

- Part 674 does not mention SMS (except in the Appendix)

- From the August 2017 Quarterly SSO Teleconference:

  "FTA has no expectation for the States to include SMS in their current program standard towards Part 674 certification."

  "An SSOA can include SMS in their program standard, but it is not a requirement for Part 674 certification."

  "The FTA will hold the SSOA accountable to its own standard."

Program Standard

- An agile Program Standard is important
  - Process for as-needed modifications separate from structured periodic review, with notice to transit agency
  - "SSPP/PTASP"
  - Flexibility to adapt the audit process and work with the transit agency as it develops its PTASP
  - Coordination with internal safety and security reviews
- Consider developing Standard Operating Procedures to supplement the Program Standard

Questions?

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