

# FTA



FEDERAL TRANSIT ADMINISTRATION

## Safety Assurance Lessons Learned

March 26, 2020



U.S. Department of Transportation  
Federal Transit Administration

# Resources Regarding COVID-19

## Questions?

- <https://www.transit.dot.gov/frequently-asked-questions-fta-grantees-regarding-coronavirus-disease-2019-covid-19>
- Email: [FTAresponse@dot.gov](mailto:FTAresponse@dot.gov)

# Webinar Objectives and Topics

- Objectives
  - To review requirements for Safety Assurance in the Public Transportation Agency Safety Plan (PTASP) regulation at 49 CFR Part 673
  - To provide lessons learned on Safety Assurance based on reviews of Agency Safety Plans
- Topics
  - PTASP Requirements for Safety Assurance
  - Safety Assurance Lessons Learned

# **PTASP REQUIREMENTS FOR SAFETY ASSURANCE**



# PTASP Regulation Requirements



## **Agency Safety Plan**

Develop and certify an  
Agency Safety Plan



## **Safety Management System (SMS)**

Implement and operate a  
Safety Management  
System



## **PTASP Documentation**

Maintain documentation  
related to the Agency  
Safety Plan, SMS  
implementation, and  
results from SMS  
processes and activities

# SMS Components



# What is Safety Assurance?

*Safety Assurance* means processes within a transit agency's SMS that function to ensure:

- The implementation and effectiveness of safety risk mitigation, and
- That the transit agency meets or exceeds its safety objectives, through the collection, analysis, and assessment of information ( § 673.5)

# Why does Safety Assurance matter?

Safety Assurance helps ensure ...



Safeguards are in place and working as intended



Early identification of potential safety issues



Safety objectives are met

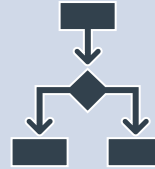


# Three Safety Assurance Processes

**Safety  
Performance  
Monitoring and  
Measurement**



**Management  
of Change**



**Continuous  
Improvement**



**Not required for small public  
transportation providers**

Unsure whether your agency counts as a small public transportation provider? See FTA's Applicability webinar for more information:

<https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-programs/safety/public-transportation-agency-safety-program/146966/ptasp-applicability-webinar.pdf>

# What is Safety Performance Monitoring and Measurement?

## Safety Performance Monitoring and Measurement

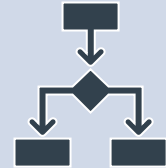


Transit agencies must establish activities to:

- Monitor system for compliance with, and sufficiency of, agency operations and maintenance procedures ( § 673.27(b)(1))
- Monitor operations to identify safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended ( § 673.27(b)(2))
- Investigate safety events to identify causal factors ( § 673.27(b)(3))
- Monitor information reported through any internal safety reporting program ( § 673.27(b)(4))

# What is Management of Change?

## Management of Change



- Transit agencies must establish a process for identifying and assessing changes that may introduce new hazards or impact the agency's safety performance ( § 673.27(c)(1))
- If a transit agency determines that a change may impact safety performance, then the agency must evaluate the proposed change through its Safety Risk Management process ( § 673.27(c)(2))
- *Not required for small public transportation providers*

# What is Continuous Improvement?

## Continuous Improvement



- Transit agencies must establish a process to assess their safety performance ( § 673.27(d)(1))
- If a transit agency identifies any deficiencies as part of its safety performance assessment, 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)(2))
- *Not required for small public transportation providers*

# **SAFETY ASSURANCE LESSONS LEARNED**



FEDERAL TRANSIT ADMINISTRATION

## Icon Legend



This slide includes a PTASP requirement



This slide includes lessons learned from FTA's Agency Safety Plan reviews



This slide includes considerations for Agency Safety Plans



This slide includes resources available for Agency Safety Plans

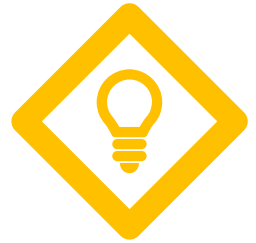
# PTASP Requirement for Documenting Processes and Activities



The Agency Safety Plan must document **processes and activities** related to SMS implementation ( § 673.11(a)(2))

**Safety Assurance at Central Transit**  
Central Transit's Safety Assurance processes include safety performance monitoring and measurement, management of change, and continuous improvement. Each of the

# Lessons Learned: Documenting Processes and Activities



Some draft Plans do not detail the actions or steps the agency will take to carry out specific requirements, such as Safety Assurance





# Considerations for Documenting Processes and Activities



Consider describing processes and activities with defined steps, actions, timelines, and documentation requirements

| Step | Action                                                                                                                                     | Timeline               | Documentation                                                                           |
|------|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------------------------------------------------------------------|
| 1.   | Line supervisor inspects station using SOP 14: Station Inspections and Form 14                                                             | 1 per station per week | Form 14 kept on file in supervisor office and line supervisor enters into database      |
| 2a.  | For any observed non-compliance meeting the requirements for immediate action in SOP 14, line supervisor takes the listed immediate action | Within 1 hour          | Form 14 kept and entered as above, including information on the observed non-compliance |
| 2b.  | For any observed non-compliance not meeting the                                                                                            | Within 1 week          | Form 14 kept and entered as above, including information on                             |

# Considerations for Documenting Processes and Activities



Consider answering the following questions:



What specifically will my agency do?



Who will do it?



How will we do it?



What is the timeline?



Where will we record the process and store the data or information?

# Resources on Documenting Processes and Activities



## Lessons Learned from Voluntary Agency Safety Plan Reviews

- <https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/lessons-learned>



## Sample List of Documented Safety Risk Management and Safety Assurance Process Elements

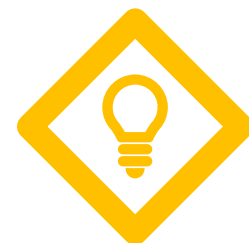
- <https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/sample-list-documented>

# PTASP Requirement for Acting on Safety Assurance Results



- The Accountable Executive ensures action is taken to address substandard performance in the agency's SMS ( § 673.23(d)(1))
  - Safety Assurance is one way agencies identify substandard performance in their SMS
- The Chief Safety Officer or SMS Executive is responsible for day-to-day SMS implementation and operation ( § 673.23(d)(2))
  - This includes acting on the Accountable Executive's direction to address substandard performance in the day-to-day implementation and operation
- Transit agencies must develop and carry out a plan to address the safety deficiencies identified as part of its continuous improvement process ( § 673.27(d)(2) – **Not applicable to small public transportation providers**)

# Lessons Learned: Acting on Safety Assurance Results



Some draft Plans do not describe how the agency will address substandard performance in their SMS as identified by required Safety Assurance activities

**Safety Assurance at Central Transit**  
Central Transit's Safety Assurance processes include safety performance monitoring and measurement, management of change, and continuous improvement. Each of the

# Considerations for Acting on Safety Assurance Results



Consider describing how your agency will respond to the output of their Safety Assurance activities

- For example, if your agency identifies a safety risk mitigation that is ineffective, how will you address the ineffective mitigation?
  - Run the hazard through the Safety Risk Management process to ensure the hazard is appropriately identified?
  - Reevaluate mitigation options through the Safety Risk Management process to identify an alternative?
  - Use subject matter expertise to help assess the ineffective mitigation?

# Resources for Acting on Safety Assurance Results



 Safety Assurance webinar, July 11, 2019, presentation and audio (slides 8, 15-18, and 43)

- <https://www.transit.dot.gov/regulations-and-guidance/safety/ptasp-safety-assurance-july-11-2019>

 Transit Safety Oversight Spotlight Newsletter, September 2019 (pages 4-5)

- <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/safety/133896/tso-spotlight-september-2019.pdf>

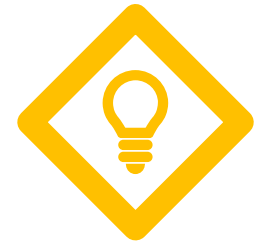
# **PTASP Requirement for Safety Performance Monitoring and Measurement**



- Monitor system for compliance with, and sufficiency of, operations and maintenance procedures ( § 673.27(b)(1))
- Monitor operations to identify ineffective or inappropriate safety risk mitigations or those not implemented as intended ( § 673.27(b)(2))
- Investigate safety events to identify causal factors ( § 673.27(b)(3))
- Monitor information reported through internal safety reporting programs ( § 673.27(b)(4))



# Lessons Learned: Safety Performance Monitoring and Measurement



Some draft Plans focus their attention on system changes or future activities and do not address how safety performance monitoring and measurement addresses the system as it exists

*Safety Performance Monitoring and Measurement  
Straightline Transit monitors and measures safety performance in its day-to-day operations. Straightline Transit accomplishes this through routine audits,*

# Lessons Learned: Safety Performance Monitoring and Measurement



Some draft Plans focus their attention on system changes or future activities and do not address how safety performance monitoring and measurement addresses the system as it exists

- For example, some draft Plans state that, if the agency **changes** a procedure, they will audit compliance with the new procedure

*Safety Performance Monitoring and Measurement  
Straightline Transit monitors and measures safety performance in its day-to-day operations. Straightline Transit accomplishes this through routine audits,*

# Considerations for Safety Performance Monitoring and Measurement



- Agencies must address the requirement for safety performance monitoring and measurement of the system **as it exists today**, not just in the future
- Agencies may use the same activities they establish to address the requirement for safety performance monitoring and measurement of the system as it exists today to assess future activities



# Resources for Safety Performance Monitoring and Measurement



 Safety Assurance webinar, July 11, 2019, presentation and audio (slides 8-10, 12-33)

- <https://www.transit.dot.gov/regulations-and-guidance/safety/ptasp-safety-assurance-july-11-2019>

 Transit Safety Oversight Spotlight Newsletter, September 2019 (pages 4-5)

- <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/safety/133896/tso-spotlight-september-2019.pdf>

# PTASP Requirements for Monitoring Sufficiency of Operations and Maintenance Procedures



Monitor the system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance ( § 673.27(b)(1))



# Lessons Learned: Monitoring Sufficiency of Operations and Maintenance Procedures



Some draft Plans do not address the requirement to monitor the **sufficiency** of operations and maintenance procedures

*Monitoring Sufficiency of Operations and Maintenance Procedures Section 1. In addition to monitoring compliance with procedures, Central Transit monitors the sufficiency of operations and maintenance procedures using routine*

# Considerations for Monitoring Sufficiency of Operations and Maintenance Procedures



Consider what information your agency has available and what data it could collect that could indicate whether procedures are sufficient

- What does this procedure ensure or prevent?
- What indicators tell me whether we were successful?



# Considerations for Monitoring Sufficiency of Operations and Maintenance Procedures



For example, consider a fatigue management procedure:

- What does this procedure ensure or prevent?
  - *Prevents safety-sensitive employees from working past our established 40-hour work week*



# Considerations for Monitoring Sufficiency of Operations and Maintenance Procedures



For example, consider a fatigue management procedure:

- What indicators tell me whether we were successful?
  - *Department schedules, reports in the employee safety reporting program related to fatigue management, clock in/clock out records, etc.*

| Employee ID | Scheduled Hours Week 7 2020 | Actual Hours Week 7 2020 |
|-------------|-----------------------------|--------------------------|
| 143928      | 36.5                        | 36.8                     |
| 153829      | 40.0                        | <b>40.7</b>              |
| 124481      | 40.0                        | 39.9                     |

# Resources for Monitoring Sufficiency of Operations and Maintenance Procedures



 Safety Assurance webinar, July 11, 2019, presentation and audio (slides 8, 12, 17)

- <https://www.transit.dot.gov/regulations-and-guidance/safety/ptasp-safety-assurance-july-11-2019>

 Transit Safety Oversight Spotlight Newsletter, September 2019 (pages 4-5)

- <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/safety/133896/tso-spotlight-september-2019.pdf>

# PTASP Requirement for System-wide Management of Change



Applicable agencies must establish a process for identifying and assessing changes that may introduce new hazards or impact safety performance ( § 673.27(c)(1))



**Remember**, small public transportation providers are **not** required to implement management of change activities

# Lessons Learned: System-wide Management of Change



Some draft Plans discuss management of change only as it relates to new vehicle series procurements or adding new service

*Management of Change*  
Central Transit assesses the impact of proposed changes system-wide. This includes changes to existing processes or procedures, proposed new processes or procedures, equipment modification or



# Considerations for System-wide Management of Change



- Consider specifying that the management of change process applies to all elements of the transit system
- Consider describing how your agency identifies changes throughout the agency, such as organization, budget, resources, operating environment, technology, equipment, policies or procedures, etc.



# Resources for System-wide Management of Change



 Safety Assurance webinar, July 11, 2019, presentation and audio (slides 31-33)

- <https://www.transit.dot.gov/regulations-and-guidance/safety/ptasp-safety-assurance-july-11-2019>

 Transit Safety Oversight Spotlight Newsletter, September 2019 (pages 4-5)

- <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/safety/133896/tso-spotlight-september-2019.pdf>

# PTASP Requirement for Acting on Continuous Improvement



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



**Remember**, small public transportation providers are **not** required to implement continuous improvement activities

# Lessons Learned: Acting on Continuous Improvement



Some draft Plans discuss continuous improvement principles, but do not discuss how the agency will address identified safety deficiencies

*Central Transit Continuous Improvement Section 4c. If, during the course of the outlined continuous improvement activities, the employee conducting the activity identifies a safety deficiency, they must raise the deficiency to the attention of their*





# Considerations for Acting on Continuous Improvement



- Describe how your agency defines and validates safety deficiencies identified during safety performance assessments

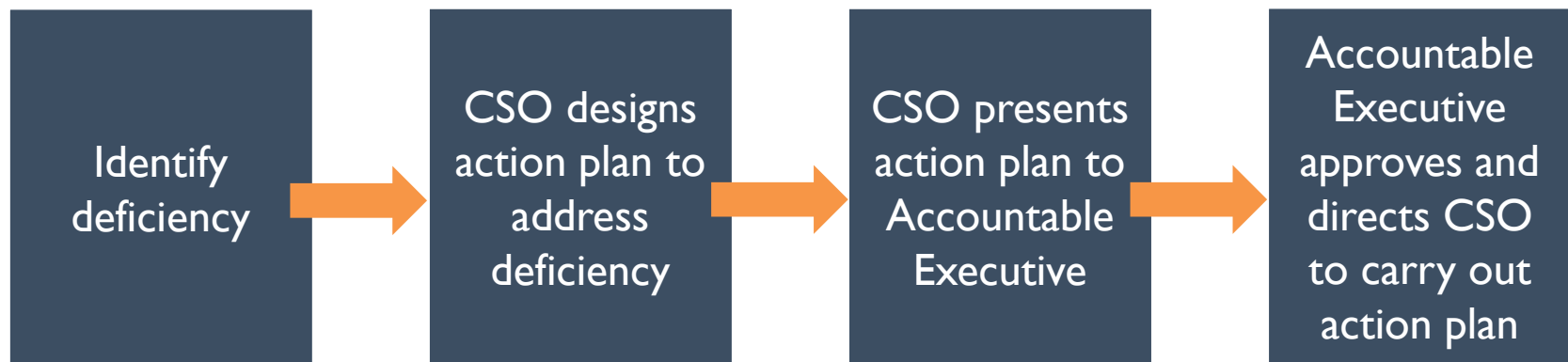


# Considerations for Acting on Continuous Improvement



Consider describing the process your agency uses to develop and carry out a plan to address the deficiency under the direction of the Accountable Executive

*Central Transit Continuous Improvement Deficiency Action Flow Chart*



**Remember**, small public transportation providers are **not** required to implement management of change activities

# Resources for Acting on Continuous Improvement



 Safety Assurance webinar, July 11, 2019, presentation and audio (slides 39-43)

- <https://www.transit.dot.gov/regulations-and-guidance/safety/ptasp-safety-assurance-july-11-2019>

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# Upcoming Webinars

## PTASP Webinar Series

- **Safety Promotion Agency Safety Plan Section Lessons Learned**

- Thursday, April 23, 2020 at 2:00 PM ET

## Q&A Sessions

- Session 1, Monday, May 18, 2020 at 2:00 PM ET

- Session 2, Thursday, June 18, 2020 at 2:00 PM ET

**Register at:** <https://www.transit.dot.gov/PTASP>

# PTASP Technical Assistance Center (TAC) Links and Contact Information



## Technical Assistance Center

- [www.transit.dot.gov/PTASP-TAC](http://www.transit.dot.gov/PTASP-TAC)

## PTASP Community of Practice

- [www.transit.dot.gov/PTASP-COP](http://www.transit.dot.gov/PTASP-COP)

## Frequently Asked Questions

- [www.transit.dot.gov/PTASP-FAQs](http://www.transit.dot.gov/PTASP-FAQs)

|                                                                                     |                                                                                     |                                                                                                        |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|  |  | <a href="http://transit.dot.gov/PTASP-TAC">transit.dot.gov/PTASP-TAC</a>                               |
|                                                                                     |  | 1 - 877 - 827 - 7243                                                                                   |
|                                                                                     |  | <a href="mailto:PTASP-TAC@dot.gov">PTASP-TAC@dot.gov</a>                                               |
|                                                                                     |  | PTASP Technical Assistance Center<br>943 Glenwood Station Lane, Suite 301<br>Charlottesville, VA 22901 |