Lessons Learned from Voluntary Agency Safety Plan Reviews

FTA’s Public Transportation Agency Safety Plan (PTASP) Technical Assistance Center (TAC) provides voluntary reviews of draft Agency Safety Plans (ASPs) to help the transit industry meet the PTASP regulation (49 CFR Part 673) requirements by the July 20, 2020, compliance deadline. This article shares lessons learned from voluntary ASP reviews conducted by the TAC and are not related to or indicative of a triennial review. Applicable agencies and States can consider these lessons learned when drafting or reviewing their ASPs.

From the ASPs reviewed, the TAC found that most ASPs covered all PTASP requirements; however, in some cases, agencies could provide more details regarding Safety Management System (SMS) roles and responsibilities, processes, and activities. Following, are key takeaways and examples that are intended to help transit agencies and States draft or review ASPs.

Key Takeaway 1: Clarify Authorities, Accountabilities, and Responsibilities in SMS

The TAC found that draft ASPs generally meet the requirements for the Accountable Executive and Chief Safety Officer positions; however, they do not provide much detail regarding Agency Leadership and Executive Management or Key Staff positions (see § 673.23(d)). While draft ASPs outlined general authorities and accountabilities for Agency Leadership and Key Staff positions, these descriptions often did not identify SMS responsibilities. Job descriptions or other agency documentation may be helpful for developing the ASP; however, they may not include details that cover all PTASP requirements.

When determining SMS authorities, accountabilities, and responsibilities for Agency Leadership and Key Staff positions, consider reviewing PTASP requirements for each component of SMS and asking the following questions:

- How does the position issue approvals, maintain records, analyze and share data and information, develop procedures, and determine actions for SMS?
- How does the position assist or contribute to the operation and implementation of the agency’s SMS, including safety risk management and safety assurance activities?
- How does the position allocate resources to support SMS objectives?
- How does the position support safety communication throughout the agency?
Key Takeaway 2: Explain How Your Agency Will Carry Out SMS Requirements

The PTASP regulation states that the ASP “must document the processes and activities related to SMS implementation” (§ 673.11(a)(2)). The TAC found that the draft ASPs reviewed did not provide substantial detail about the actions or steps an agency will take to carry out specific requirements for the four SMS components, including:

- Safety Management Policy (§ 673.23)
- Safety Risk Management (§ 673.25)
- Safety Assurance (§ 673.27)
- Safety Promotion (§ 673.29)

To enhance these sections, consider describing processes and activities with defined steps, actions, timelines, and documentation requirements. Additionally, agencies could ask the following questions to help formulate a more defined description for how they will carry out SMS:

- What specifically will the agency do?
- Who will do it?
- How will it be done? (For example, what is the process, including steps in the process and actions?)
- What is the timeline?
- Where will the agency record the process and store related data or information?

The TAC is here to support you. To request an ASP review or other assistance, contact the TAC at PTASP-TAC@dot.gov or call 1-87-PTASP-AID (1-877-827-7243). Also, please visit the TAC Resource Library and exchange information with your peers in the PTASP Community of Practice forums. Other resources such as the ASP Review Checklist for RTAs and SSOAs, and the PTASP Checklist for Bus Transit are also available to help draft ASPs.