

FTA

FEDERAL TRANSIT ADMINISTRATION



Safety Promotion Lessons Learned

July 23, 2020



FTA

FEDERAL TRANSIT ADMINISTRATION

Webinar Objectives

- To review the requirements for Safety Promotion in the Public Transportation Agency Safety Plan (PTASP) regulation at 49 CFR Part 673
- To provide lessons learned regarding Safety Promotion based on reviews of Agency Safety Plans

PTASP REQUIREMENTS FOR SAFETY PROMOTION



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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



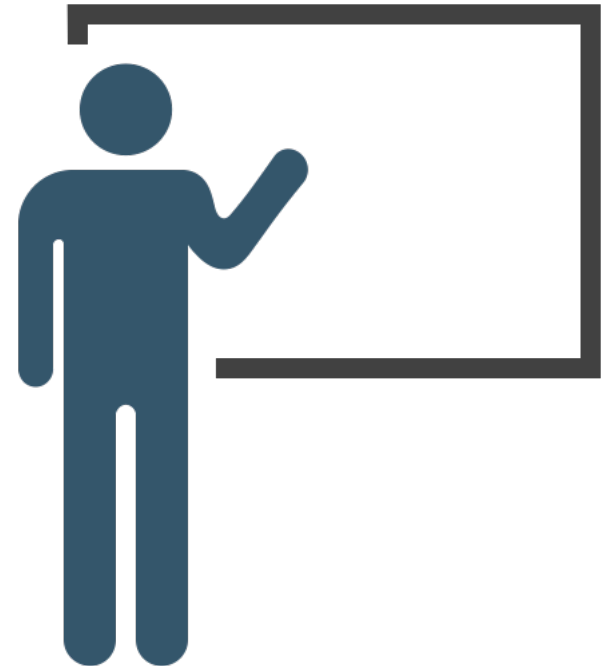
What is Safety Promotion?

- Safety Promotion is a combination of training and communication of safety information to support SMS at the transit system (§ 673.5)



Safety Training Requirement

- Transit agencies must establish and implement a comprehensive safety training program* for all employees and contractors directly responsible for safety (§ 673.29(a))
 - This training must include refresher training, as necessary (§ 673.29(a))
- * *This is a separate requirement from the Public Transportation Safety Certification Training Program regulation (49 CFR Part 672)*



Safety Communication Requirement

- Transit agencies must communicate safety and safety performance information throughout the organization, including information on:
 - Hazards and safety risk relevant to employee roles and responsibilities
 - Safety actions taken in response to reports submitted through the Employee Safety Reporting Program (ESRP) (§ 673.29(b))



SAFETY PROMOTION LESSONS LEARNED



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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



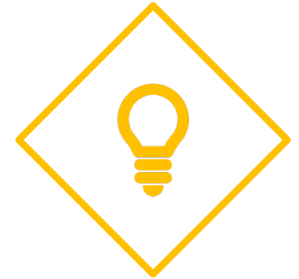
This slide includes resources available for Agency Safety Plans

PTASP Requirement for Training Employees and Contractors Directly Responsible for Safety



Transit agencies must establish and implement a comprehensive safety training program **for all employees and contractors** directly responsible for safety (§ 673.29(a))

Lessons Learned: Training Employees and Contractors Directly Responsible for Safety



- Some draft Plans do not describe what or who their agency identifies as “directly responsible for safety”
- Some draft Plans do not explicitly include both employees and contractors

**Safety Training
Applicability at
Straightline Transit**
All Straightline Transit
employees and
contractors undergo
some form of safety
training in order to
perform their jobs safely

Considerations for Training Employees and Contractors Directly Responsible for Safety



Consider:

- Explicitly defining “directly responsible for safety” by role(s) or responsibility(ies)
- Referencing training matrices or other documents listing the required relevant and applicable safety training for these individuals

Straightline Transit Positions Directly Responsible for Safety

Accountable Executive

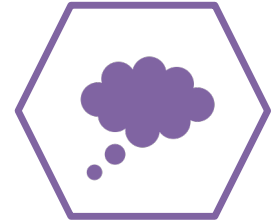
Chief Safety Officer

Department heads

Dispatch

Shift supervisors

Considerations for Training Employees and Contractors Directly Responsible for Safety



- Transit agencies **do not have to address all** employees or contractors **the same way** in the comprehensive safety training program
- Not all employees or contractors who are “directly responsible for safety” have to receive all safety training included in your comprehensive safety training program
 - Consider what safety training is relevant to a specific category of employee or contractor (ex.: not all safety training applicable to a vehicle mechanic will be applicable to an operator, and vice versa)

Resources Available on Training Employees and Contractors Directly Responsible for Safety



Safety Promotion Fact Sheet

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/safety-promotion-fact>



Safety Training Resources for Bus Transit Agencies

- https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/safety/public-transportation-agency-safety-program/133516/safety-training-resources-bus-transit-agencies_1.pdf

Resources Available on Training Employees and Contractors Directly Responsible for Safety



PTASP Workshop Participant Guide, version 4, pages 22-23

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/ptasp-bus-workshop>



Safety Management Policy and Safety Promotion webinar,
May 2019, slides 19-23

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/ptasp-safety-management>

Resources Available on Training Employees and Contractors Directly Responsible for Safety



Agency Safety Plan Lessons Learned, Page 23

- <https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-05/ASP-Lessons-Learned-20200518.pdf>



Small Public Transportation Agency Sample Agency Safety Plan, Pages 14-15

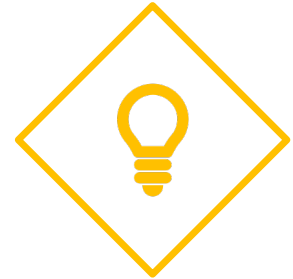
- <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-programs/safety/public-transportation-agency-safety-program/147941/sample-asp-small-public-transp-provider-20200226.pdf>

PTASP Requirement for a Comprehensive Safety Training Program



Transit agencies must establish and implement a **comprehensive safety training program** for all agency employees and contractors directly responsible for safety (§ 673.29(a))

Lessons Learned: Comprehensive Safety Training Program



Some draft Plans describe a safety training program for safety management only – they do not describe a comprehensive safety training program

Safety Training at Straightline Transit
Straightline Transit implements a comprehensive safety training program that addresses safety in all areas and at all levels in the transit system. Safety

Considerations for a Comprehensive Safety Training Program



- When establishing their comprehensive safety training program, agencies may find it helpful to begin by listing all existing safety training that their agency currently conducts
 - Agencies that have a single, consolidated training department that provides all training throughout the agencies can leverage that department's existing training matrices to develop the list of existing safety training
 - Other agencies may conduct training through multiple departments and they may need to survey departments to identify and list the safety training their agencies currently provide

Resources Available on a Comprehensive Safety Training Program



Safety Promotion Fact Sheet

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/safety-promotion-fact>



Safety Training Resources for Bus Transit Agencies

- https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/safety/public-transportation-agency-safety-program/133516/safety-training-resources-bus-transit-agencies_1.pdf

Resources Available on a Comprehensive Safety Training Program



- PTASP Workshop Participant Guide, version 4, pages 22-23
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- Safety Management Policy and Safety Promotion webinar, May 2019, slides 19-23

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/ptasp-safety-management>

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PTASP Requirement for Conveying Information on Hazards and Safety Risk



Transit agencies must communicate safety and safety performance information, including information on hazards and safety risks relevant to employees' roles and responsibilities (§ 673.29(b))

Lessons Learned: Conveying Information on Hazards and Safety Risk



Some draft Plans do not describe how the agency communicates information on hazards and safety risk relevant to employees' roles and responsibilities

Safety Communication at Straightline Transit
Straightline Transit communicates safety across all levels of the organization using a number of mechanisms. The first and most obvious mechanism is

Considerations for Conveying Information on Hazards and Safety Risk



- Consider all the mechanisms your agency currently uses to convey safety information
 - What ways does your agency include hazard and safety risk information in all relevant standard operating procedures (SOP)?
 - What ways does your agency train employees on hazards they may encounter in the workplace?

Considerations for Conveying Information on Hazards and Safety Risk



- Consider how to communicate safety information
 - What information does this individual need to do their job?
 - How can we ensure they understand what is communicated?
 - How can we ensure they understand what action they must take as a result of the information?
 - How can we ensure the information is accurate and kept up-to-date?

Resources Available on Conveying Information on Hazards and Safety Risk



Safety Promotion Fact Sheet

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Safety Training Resources for Bus Transit Agencies

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Resources Available on Conveying Information on Hazards and Safety Risk



PTASP Workshop Participant Guide, version 4, pages 23-24

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/ptasp-bus-workshop>



Safety Management Policy and Safety Promotion webinar,
May 2019, slides 25-27

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/ptasp-safety-management>

Resources Available on Training Employees and Contractors Directly Responsible for Safety



Agency Safety Plan Lessons Learned, Page 23

- <https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-05/ASP-Lessons-Learned-20200518.pdf>



Small Public Transportation Agency Sample Agency Safety Plan, Page 15

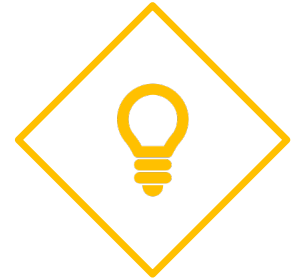
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PTASP Requirement for Communication about Activities Taken in Response to the ESRP



Transit agencies must inform employees of safety actions taken in response to reports submitted through an ESRP (§ 673.29(b))

Lessons Learned: Communication About Activities Taken in Response to the ESRP



Some draft Plans do not describe how the agency communicates safety actions it takes in response to reports submitted through the agency's ESRP

Straightline Transit ESRP

Follow-up: After each report submitted through the ESRP is vetted through the process outlined in the previous section, the Safety superintendent assigns a safety officer to respond

Considerations for Communication about Activities Taken in Response to the ESRP



Consider how your agency will respond back to the reporter, a subset of the agency, or the entire agency as appropriate

- Some agencies may allow anonymous reports, so they may not always be able to respond back to the reporter
- Some reports submitted to the ESRP may not require implementing a safety solution (ex.: individual reports may not “trigger” the agency to change how they do business, but the agency may track these reports to look at aggregate data)
- Some safety actions may not impact all employees/contractors

Resources Available on Communication about Activities Taken in Response to the ESRP



Safety Promotion Fact Sheet

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Resources Available on Communication about Activities Taken in Response to the ESRP



PTASP Workshop Participant Guide, version 4, pages 18, 20, 23-24

- <https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/ptasp-bus-workshop>



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Notice of Enforcement Discretion

- In light of the extraordinary operational challenges presented by the COVID-19 public health emergency, FTA issued a Notice of Enforcement Discretion effectively extending the PTASP compliance deadline from July 20, 2020 to December 31, 2020
 - <https://www.transit.dot.gov/safety/public-transportation-agency-safety-program/public-transportation-agency-safety-plan-ptasp>
- Visit FTA's COVID-19 FAQs page for more information about the Notice
 - <https://www.transit.dot.gov/frequently-asked-questions-fta-grantees-regarding-coronavirus-disease-2019-covid-19#COVID-19AdminRelief>

Upcoming Webinars

- **Management of Change**
 - Thursday, August 27, 2020 at 2:00 PM EDT
- **Compliance Monitoring**
 - Thursday, September 24, 2020 at 2:00 PM EDT
- **ASP Reviews Lessons Learned**
 - Date TBD

PTASP Technical Assistance Center (TAC) Links and Contact Information



Technical Assistance Center






- www.transit.dot.gov/PTASP-TAC

PTASP Community of Practice

- www.transit.dot.gov/PTASP-COP

Frequently Asked Questions

- www.transit.dot.gov/PTASP-FAQs

		transit.dot.gov/PTASP-TAC
		1 - 877 - 827 - 7243
		PTASP-TAC@dot.gov
		PTASP Technical Assistance Center 943 Glenwood Station Lane, Suite 301 Charlottesville, VA 22901

Don't delay – the deadline to submit Agency Safety Plans
for PTASP TAC review is November 13, 2020