Guide to Developing the Safety Assurance Component of a Public Transportation Agency Safety Plan

Overview

The Public Transportation Agency Safety Plan (PTASP) regulation (49 CFR Part 673) requires certain operators of public transportation systems that are recipients or subrecipients of FTA grant funds to develop Agency Safety Plans (ASP) that include the processes and procedures necessary for implementing Safety Management Systems (SMS). Safety Assurance is one of the four SMS components.

Safety Assurance

Safety Assurance means as “processes within a transit agency’s SMS that function to ensure the implementation and effectiveness of safety risk mitigation and the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information” (§673.5). Safety Assurance helps to ensure that mitigations put in place to manage safety risk are carried out and working as intended, potential safety issues are identified early, and safety objectives are met.

Safety Assurance focuses on three processes:

- Safety performance monitoring and measurement (§ 673.27(b)),
- Management of change (§ 673.27(c)), and
- Continuous improvement (§ 673.27(d)).

Safety Assurance requirements are not the same for all transit agencies. Small public transportation providers (defined in §673.5) only need to meet requirements for safety performance monitoring and measurement. All other applicable public transportation agencies must also meet additional requirements under Safety Assurance including management of change and continuous improvement.
Safety Performance Monitoring and Measurement

To address PTASP regulation requirements, all applicable transit agencies must establish processes and activities to monitor the safety performance of their systems and the effectiveness of their safety management efforts. Specifically, each transit agency must:

- Monitor its system for compliance with operations and maintenance procedures, and establish methods to verify that procedures are sufficient (§ 673.27(b)(1));
- Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended (§ 673.27(b)(2));
- Conduct investigations of safety events, including accidents, incidents, and occurrences (defined in §673.5), and identify causal factors (§ 673.27(b)(3)); and
- Monitor information reported to it through any internal safety reporting programs, including the employee safety reporting program (§ 673.27(b)(4)).

Transit agencies may adopt various methods to collect and use information to support safety performance monitoring and measurement activities, such as:

- Reviewing existing rule-check programs and datasets on compliance with operations and maintenance procedures;
- Leading workshops and discussions with supervisors and training instructors to assess the performance of procedures;
- Reviewing the results of maintenance inspections;
- Observing transit operations;
- Conducting audits, reviews, and assessments;
- Using safety performance indicators and targets;
- Conducting trend or statistical analyses; and
- Consulting subject matter experts.

Additionally, while not required, mitigation monitoring plans can help ensure that the agency documents and performs monitoring activities to confirm that mitigations are effective, appropriate, and fully implemented. For more information on mitigation monitoring plans, see the Safety Assurance Webinar (July 2019) and the Safety Assurance ASP Section Lessons Learned Webinar (March 2020).
Management of Change

Rail transit agencies and other applicable transit agencies that do not meet the definition of small public transportation providers must address management of change in their ASPs. Small public transportation providers are not required to address this requirement.

Through management of change, a transit agency evaluates proposed or future changes that may impact the agency’s safety performance. To address PTASP regulation requirements, applicable agencies must develop processes for identifying and assessing changes that may introduce new hazards or impact safety performance. (§ 673.27(c)(1)).

These processes may cover organizational and budgetary changes; staffing changes; changes to operations or maintenance procedures; changes to service or service environment; the design and construction of major capital projects (such as New Starts and Small Starts projects and associated certifications); and modifications to equipment, vehicles, and facilities, to name a few.

Per § 673.27(c)(2), if a transit agency determines that a change might impact safety, then the transit agency will need to evaluate the change using the Safety Risk Management process established under § 673.25.

Applicable transit agencies could establish committees or processes for identifying these changes on a routine basis, assessing their potential impacts, and determining whether and how the agency should address the changes.

Continuous Improvement

Rail transit agencies and other applicable transit agencies that do not meet the definition of small public transportation providers also must address continuous improvement in their ASPs. Small public transportation providers are not required to address this requirement.
Continuous improvement helps a transit agency assess its overall safety performance and how well its SMS is working, and identify and address any issues. As specified in § 673.27(d)(1), each applicable transit agency must establish a process to assess its safety performance.

Assessments could be based on annual reviews, how well the agency is meeting its required safety performance targets and additional agency-wide or mode-specific targets, and/or how well the agency has accomplished the safety objectives specified in the Safety Management Policy Statement. Assessments also may be tied to the annual review and update of the ASP.

If a transit agency identifies any deficiencies as part of its safety performance assessment, then 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)).

The plan could include efforts to address underlying hazards and potential consequences through Safety Risk Management, changing data collection or analysis techniques to better understand what is really going on, and/or testing and evaluating new approaches to SMS processes.

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Grantees and subgrantees should refer to FTA’s statutes and regulations for applicable requirements.