





Understanding PTASP Safety Training and Communication Requirements

FTA's <u>Public Transportation Agency Safety Plan (PTASP)</u> regulation (49 CFR Part 673) includes requirements for safety promotion, defined in §673.5 as "a combination of training and communication of safety information," which is a key component of each transit agency's Safety Management System (SMS). The information provided in this article can assist transit agencies and States developing Agency Safety Plans on behalf of small public transportation providers in their jurisdiction as they develop programs and processes to meet these requirements by the compliance deadline. ¹

Safety Promotion Is About More Than Just Safety Management

Safety promotion applies to all safety topics, not just safety management. For example, topics addressed in safety training and communication may relate to workplace safety, defensive driver training, the Occupational Safety and Health Administration's Bloodborne Pathogens training, an agency's Employee Safety Reporting Program (ESRP), and helping employees understand safety risk and safety-related information associated with their jobs. Safety promotion covers all safety-related information that employees need to perform their jobs safely.

Comprehensive Safety Training Program

Transit agencies and States must establish and implement a comprehensive safety training program for employees and contractors who are directly responsible for safety in the agency's public transportation system (§ 673.29(a)). FTA does not define which individuals are "directly responsible for safety." It is the responsibility of the transit agencies to identify these roles.

For example, a large bus transit agency may specify that roles such as bus operators, supervisors, dispatchers, managers, maintenance staff, safety department personnel (including the Chief Safety Officer), and the Accountable Executive are directly responsible for safety and will therefore participate in the agency's comprehensive safety training program. Each role may complete different safety training requirements depending upon the respective job functions. A small bus transit agency may decide that contractors who provide and dispatch demand

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¹ 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.







response service are directly responsible for safety and may require contractors to submit relevant training plans for these positions.

Transit agencies and States may consider setting training requirements for the Board of Directors or other individuals involved in developing, implementing, or performing safety management activities. Bus transit agencies and states may consider referencing voluntary training requirements identified in FTA's <u>Public Transportation Safety Certification Training Program</u> regulation (49 CFR Part 672), and rail transit agencies may also reference their required training under Part 672.

Safety training program requirements could be demonstrated in an Agency Safety Plan by referencing documented training activities. Agencies may leverage their current safety training programs and enhance existing programs to reflect any new agency processes and procedures for their SMS. Some examples of documented safety training activities an agency or State could reference include the following:

- Class rosters and sign-in sheets,
- On-the-job training checklists,
- Safety training program matrices that list all required training for applicable roles, and
- Toolbox talk and safety presentation records

The comprehensive safety training program must include refresher training (§ 673.29(a)); however, Part 673 does not specify the requirements of a transit agency's refresher training. Each transit agency or State Department of Transportation developing Agency Safety Plans on behalf of small public transportation providers in their jurisdiction must determine what the refresher training will include and how often it must be completed.

Safety Communication

Agency Safety Plans must describe or reference documentation to explain how safety and safety performance information is communicated throughout the organization to employees and relevant contractors. This must include communication about hazard and safety risk information relevant to employees' roles and responsibilities (§ 673.29(b)). For example, safety stand-downs, bulletins, committee meetings, and toolbox talks provide opportunities to discuss hazard and safety risk information with employees and contractors. These activities allow a transit agency's management to collect information from frontline employees regarding safety concerns and safety performance that it may not have obtained otherwise. This information can then be entered into the agency's safety risk management process.

Transit agencies must inform employees of safety actions taken in response to reports submitted through the ESRP (§ 673.29(b)). For example, if an employee reports a hazard in the





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work environment through the ESRP, a safety department representative may follow up directly with the reporting employee to report what actions were taken to address the hazard. Alternatively, if the employee reported the hazard anonymously, the safety department may post the action on a bulletin board in the reporting employee's facility. Depending on the nature of the report, the safety department could communicate the results to the entire agency through a recurring safety newsletter. This type of feedback demonstrates the value of the ESRP and encourages its use by employees and contractors.

If you have any questions regarding how to address Part 673's requirements for safety training and communication, please contact the PTASP Technical Assistance Center (TAC) by email, at PTASP-TAC@dot.gov, or by phone, at 1-87-PTASP-AID (1-877-827-7243). For more information, please see the following resources available in the TAC library:

- <u>Guide to Developing the Safety Promotion Component of a Public Transportation</u>
 <u>Agency Safety Plan</u>
- Safety Training Resources for Bus Transit Agencies
- <u>Public Transportation Safety Certification Training Program and Agency Safety Plan</u>
 Training Requirements
- Safety Management Policy and Safety Promotion Webinar



PTASP Technical Assistance Available Now

- Access one-on-one Agency Safety Plan support
- Learn and share through the PTASP Community of Practice
- Explore the PTASP Resource Library

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