

FTA



FEDERAL TRANSIT ADMINISTRATION

Management of Change

August 27, 2020



U.S. Department of Transportation
Federal Transit Administration

Webinar Objectives

- To review the requirements for Management of Change in the Public Transportation Agency Safety Plan (PTASP) regulation at 49 CFR Part 673
- To provide examples of activities transit agencies may undertake to meet this requirement

Applicability and Management of Change

- Small public transportation providers **are not required** to develop and implement a Management of Change process

Small Public Transportation Providers

- Provide public transportation
- Do not operate rail transit
- 100 or fewer vehicles in revenue service during peak regular service across all fixed-route modes
- 100 or fewer vehicles in revenue service during peak regular service in each non-fixed route mode

- All **other** bus providers and **all** rail providers **must** develop and implement a Management of Change process

PTASP REQUIREMENTS FOR MANAGEMENT OF CHANGE

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:

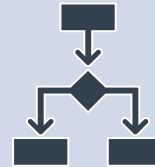
- The implementation and effectiveness of safety risk mitigation, and
- That the transit agency meets or exceeds its safety objectives, through the collection, analysis, and assessment of information (§ 673.5)

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:

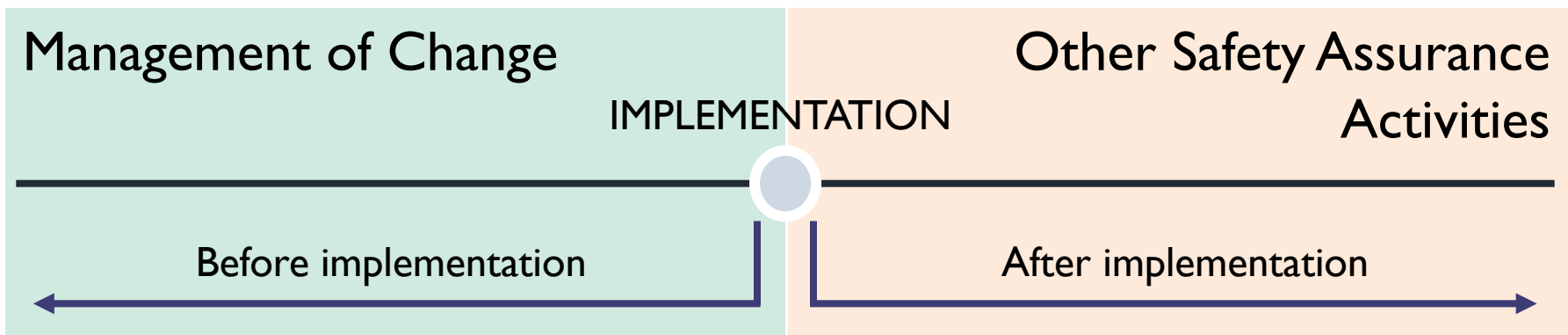
<https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-programs/safety/public-transportation-agency-safety-program/146966/ptasp-applicability-webinar.pdf>

PTASP Requirement for 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 (§ 673.29(b))
- If a transit agency determines that a change may impact its safety performance, then the agency must evaluate the proposed change through its Safety Risk Management Process (§ 673.27(c)(2))

When does Management of Change take place?

- Management of Change evaluates *proposed* or *future* non-safety changes
- Once a change is made, such as implementing a new procedure, it may be monitored through other Safety Assurance activities



MANAGEMENT OF CHANGE IN PRACTICE

Potential Impacts of Change in the Transit System

- Change may affect the appropriateness or effectiveness of existing risk mitigation strategies
- Change may inadvertently introduce new hazards and/or increase safety risk

Benefits of Management of Change

- Management of Change principles help a transit agency make informed decisions about and prepare for unintended impacts of proposed changes
 - Is the proposed change “worth” the associated impacts?
 - Are there ways to reduce the associated impacts to an acceptable level?



Isn't this just configuration management?

- Most agencies are familiar with processes like configuration management, engineering modification, and safety certifications
 - Focused on a narrow range of specific infrastructure or rolling stock changes and on safety-related changes
- Management of Change is an agency-wide process that applies to non-safety changes to all new and existing system elements

Agency-wide Management of Change

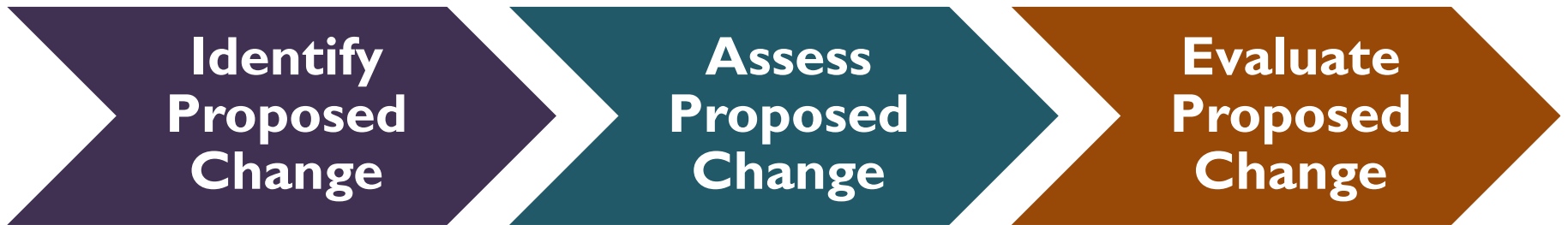
- Management of Change applies to all aspects of the transit system, such as:
 - Design and implementation of new systems or other capital projects
 - Changes or additions to existing systems or service
 - Changes to operations or maintenance procedures (existing or new)
 - Organizational changes, such as changes in departmental responsibilities
 - Procurement process changes
 - Changes to relevant laws, regulations, or policies

Management of Change in all Departments

- Management of Change applies to all departments of the transit system, such as:
 - Training
 - Procurement
 - Capital projects and new starts
 - Customer relations
 - Data management
 - Maintenance
 - Operations

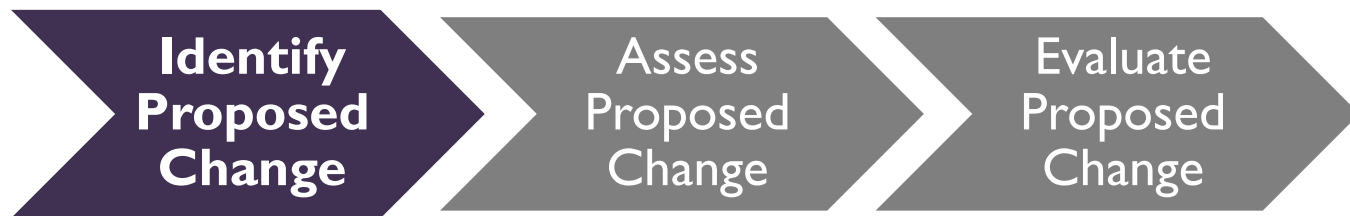


Management of Change Process



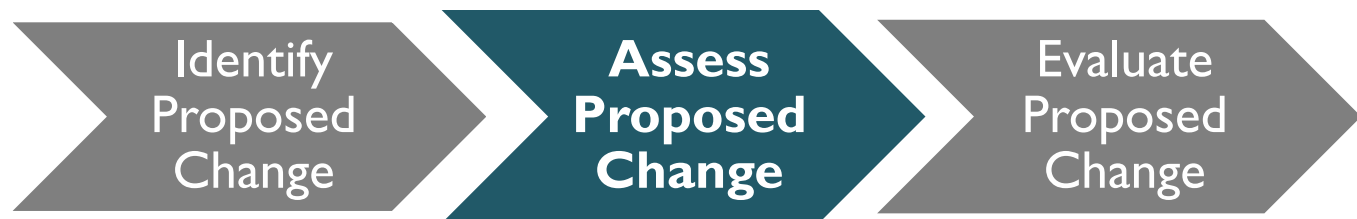
Identifying Changes

- Transit agencies must establish a process for identifying changes – this process may already exist within the agency
- Proposed changes can be initiated within or outside the transit agency



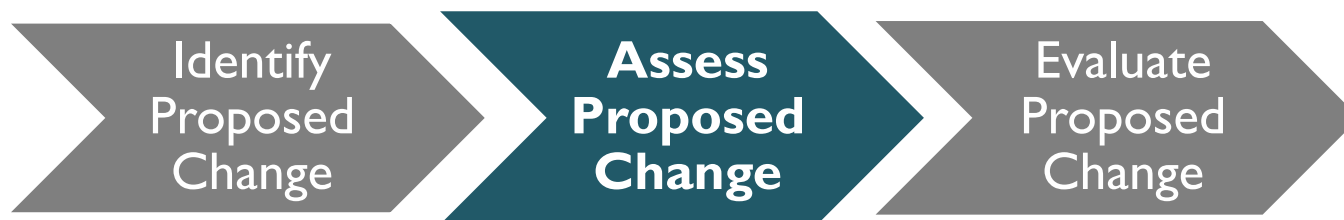
Assessing Changes

- Transit agencies must establish a process for assessing whether proposed changes could introduce new hazards into the system or could impact the transit system's safety performance
- Can use a centralized or decentralized approach to assessing changes



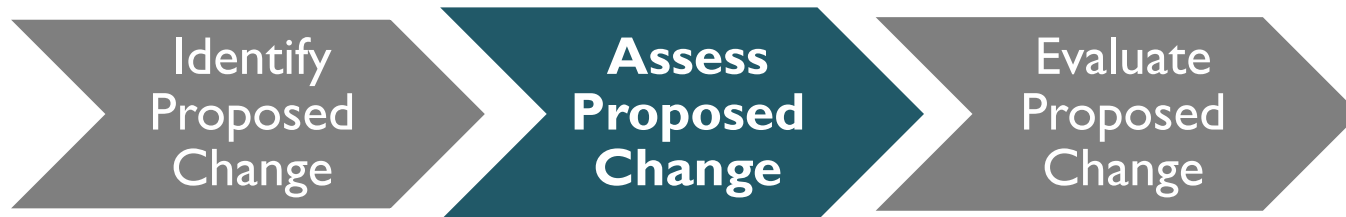
Centralized Approach for Assessing Changes

- In a *centralized* approach, a person or group assesses changes to determine whether a proposed change may have an unintended impact
 - Participation from the Safety Department
 - May set up sub-committees to handle technical changes



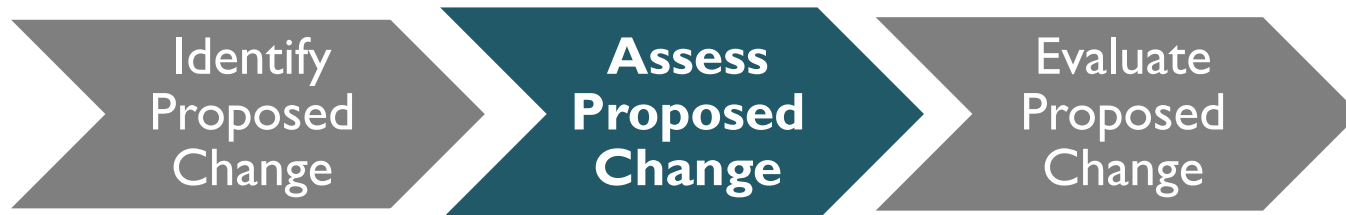
Decentralized Approach for Assessing Changes

- In a *decentralized* approach, individual departments evaluate proposed changes relating to their department to determine whether a proposed change may have an unintended impact
 - Guidance and oversight from the Safety Department

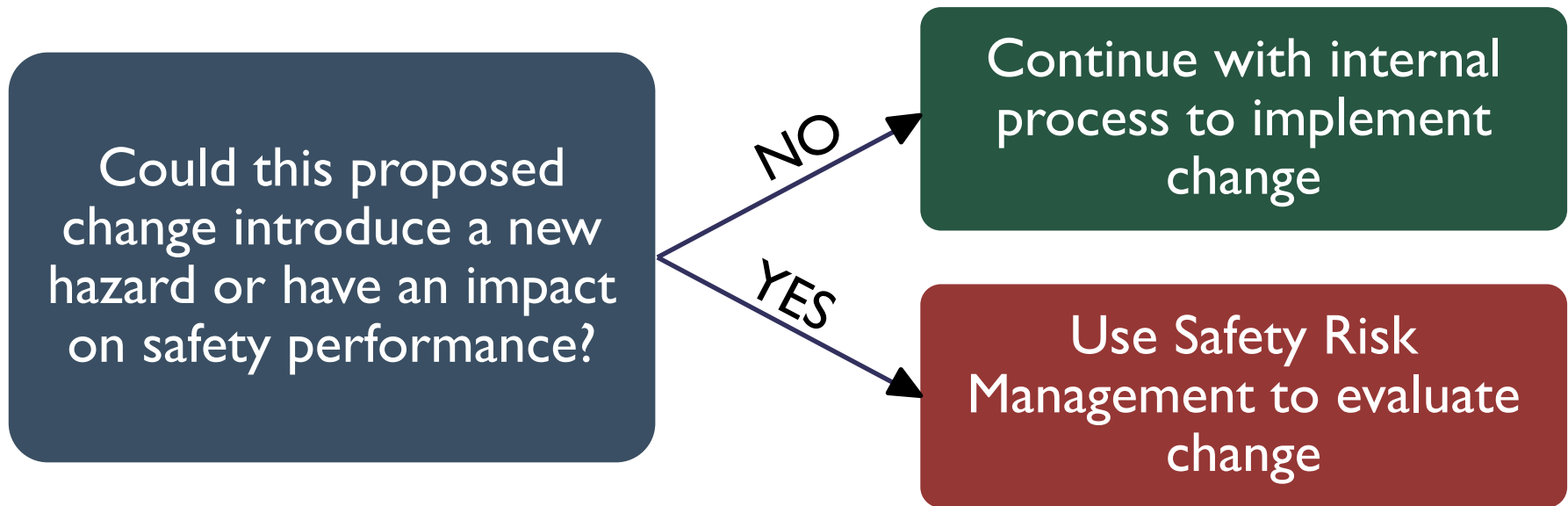


Which is Better: Centralized or Decentralized?

- There are pros and cons to both centralized and decentralized approaches to assessing changes for unintended impacts
- Some agencies may use a hybrid approach
 - Such as assessing engineering changes within the engineering department, but assessing other changes within an agency-wide Management of Change committee

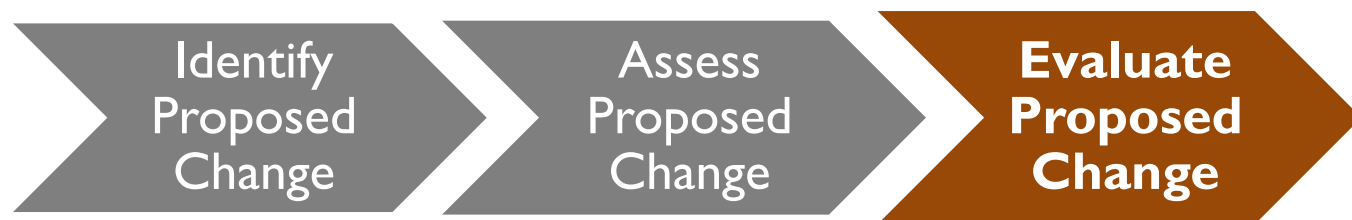


Evaluating Proposed Changes



Methods for Evaluating Proposed Changes

- Transit agencies may use their general Safety Risk Management process that they use to evaluate hazards across the agency to evaluate proposed changes
 - Transit agencies may also establish a separate Safety Risk Management process expressly for evaluating proposed changes



Closing the Loop on Management of Change

- Transit agencies document their process for Management of Change in their Agency Safety Plan and any relevant associated procedures
- Transit agencies also document the results of their Management of Change process, for example:
 - What was the proposed change?
 - How did we identify, assess, and evaluate the proposed change?
 - Did we implement the proposed change and are there any associated follow up activities?

Resources on Management of Change



Joint SSO and RTA PTASP Workshop Participant Guide, page 32

<https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/2019-fta-joint-sso-and>



PTASP Bus Workshop Participant Guide, version 5, page 40-41

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

Resources on Management of Change



Safety Assurance webinar, July 2019, slides 30-33

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



Safety Assurance Lessons Learned webinar,
March 2020, slides 35-38

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

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

- **Compliance Monitoring**
 - Wednesday, September 16, 2020 at 2:00 PM EDT
- **ASP Reviews Lessons Learned**
 - Thursday, October 22, 2020 at 2:00 PM EDT

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