



Biweekly Message Week of September 14, 2020

Learn. Share. Engage.

This issue of the *Biweekly Message* focuses on the Safety Assurance Compliance and Sufficiency Monitoring section of the Public Transportation Agency Safety Plan (PTASP) regulation (49 CFR § 673.27(b).

Featured Resources

The <u>Sample Agency Safety Plan (ASP) for Bus</u> <u>Transit Providers</u> offers sample content for Compliance Monitoring on pages 25-31.

For suggestions on how to address the Compliance Monitoring section of your ASP, see pages 19-20 the of <u>ASP Lessons Learned</u> document.

The <u>Guide to Developing the Safety Assurance</u> <u>Component of a Public Transportation ASP</u> contains details about Safety Performance Monitoring.

Ready to certify compliance with the PTASP regulation? The <u>Certification Fact Sheet</u> reviews the who, when, and how of certifying compliance.

Safety Assurance Webinar (July 11, 2019): Webinar Presentation | Webinar Recording

Safety Assurance ASP Section Lessons Learned Webinar (March 26, 2020): Webinar Presentation | Webinar Recording

Access the entire resource library by visiting FTA's <u>PTASP Technical Assistance Center website</u>.

Need Assistance?

Contact a PTASP Specialist today!

PTASP-TAC@dot.gov
 1-87 PTASP-AID
 1 (877) 827-7243

9 a.m. to 8 p.m. EDT, M-F

Did you know that FTA's Technical Assistance Center (TAC) offers voluntary reviews of draft ASPs?



Submit your ASP by November 13, 2020 to guarantee review by TAC.

For more information, see the <u>Agency Safety Plan Review: What</u> to Expect.

Coronavirus Disease 2019 (COVID-19)

FTA encourages transit agencies to stay informed and prepared for protecting personnel and passengers against COVID-19. For more information, visit FTA's COVID-19 web page.

Consider reviewing:

- FAQs from FTA Grantees
 Regarding COVID-19
- FTA's COVID-19 Resource Tool for Public Transportation (a one-stop-shop for Federal COVID-19 guidance and recommendations)





Q & A Highlights

Question 1:

How do you recommend we monitor our contracted operators to make sure they are following the Safety Management System (SMS) processes outlined in our ASP?

FTA Response:

There are many ways to monitor how well your contracted operators carry out your ASP and techniques may vary by agency. For example:

- Review their hazard documentation to ensure they identify and assess the consequences of those hazards.
- Review their safety risk mitigation documentation to verify that they reduce the likelihood and/or severity of the consequences of the hazard based on your agency's established safety risk assessment approach.

Upcoming Events

ASP Lessons Learned Webinar

When: October 22, 2-3:30 p.m. EDT

Register Here

Virtual PTASP Workshops

Workshop 1: September 29-30, 11:30-4:30 EDT

Register Here

Workshop 2: October 13-14, 11:30-4:30 EDT

Register Here

- Review their procedure monitoring records to confirm that they monitor compliance with and sufficiency of their operations and maintenance procedures.
- Assess the results of their safety event investigations to confirm that they identify underlying causal factors.
- Review their training records to confirm that they carry out refresher training as documented in your ASP.

Question 2:

What are some methods for monitoring the sufficiency of our maintenance procedures?

FTA Response:

You can monitor for sufficiency of maintenance procedures through a number of different methods, including the following:

• Conducting observations (or reviews) of normal maintenance activities to identify areas that may not be working as intended or where improvements could be made. For example, an observation of routine bus brake system maintenance may reveal differences in the ways technicians diagnose brake problems and determine needed repairs. Investigating these differences may help your agency identify where procedures and training may need to be revised or enhanced to ensure these procedures are performing as intended.





- Reviewing maintenance records, looking for discrepancies in bus brake maintenance, including the time required to complete specific maintenance activities, the parts used for repairs, and the performance of the brake systems over time.
- Conducting workshops or interviews with bus technicians to discuss their concerns and suggestions for improvements. Manufacturers and engineers also may provide insight in suggesting or reviewing procedures and assessing sufficiency.
- Reviewing your agency's other safety assurance activities, including safety event investigations, reports from employees, and monitoring of safety risk mitigations will also help you assess the sufficiency of maintenance procedures.

Sample ASP Section: Compliance Monitoring

The following is an excerpt from the <u>Sample ASP for Small Transportation Providers</u>.

Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

County Transit (CT) monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The Chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities. The Chief Safety Officer will endeavor to make use of existing CT processes and activities before assigning new information collection activities.

CT's Chief Safety Officer and Safety Committee review the performance of individual safety risk mitigations during bimonthly Safety Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the Safety Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution.





CT's Chief Safety Officer and Safety Committee also monitor CT's operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- Reviewing results from accident, incident, and occurrence investigations;
- Monitoring employee safety reporting;
- Reviewing results of internal safety audits and inspections; and
- Analyzing operational and safety data to identify emerging safety concerns.

The Chief Safety Officer works with the Safety Committee and Accountable Executive to carry out and document all monitoring activities.

Get Involved with the PTASP Community of Practice

We want to hear from you! Below are two of many topics for discussion. Start the conversation today to support your ASP development and learn from your peers.

- What are some of the activities your agency uses to <u>monitor compliance</u> with its operations procedures?
- What are some of the activities your agency uses to <u>monitor compliance</u> <u>with its maintenance procedures</u>?

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.