Agency Safety Plan
Lessons Learned – Part I: Safety Risk Management

October 22, 2020
Today’s webinar is the first in a two-part series that highlights lessons learned from FTA’s voluntary Agency Safety Plan (ASP) reviews.


This series will share insights and recommendations for developing and implementing ASPs based on the results of over 230 voluntary ASP reviews.
### Lessons Learned in Today’s Webinar

1. **SRM versus Hazard Management**
2. **SRM Terminology, including Hazards and Consequences**
3. **Other SRM Lessons**
   - a. SRM Authorities, Accountabilities and Responsibilities
   - b. Safety Risk Acceptance
   - c. Use of Data and Information for SRM
   - d. Systemwide and Timely SRM
   - e. Use of Subject Matter Expertise in SRM
   - f. SRM Training and Qualification
FTA VOLUNTARY AGENCY SAFETY PLAN REVIEWS
Voluntary Agency Safety Plan Reviews

• FTA’s PTASP Technical Assistance Center (TAC) offers transit agencies and State Departments of Transportation voluntary ASP reviews
  – Agencies may submit complete drafts or individual sections for review

• The TAC reviews submitted materials using a checklist of the requirements established in the PTASP regulation
  – Agencies receive the completed checklist, including recommendations for addressing elements that do not meet requirements and suggestions for voluntary additions to the ASP
Voluntary Agency Safety Plan Reviews

Submit your ASP for a voluntary review as soon as possible to receive a review prior to the December 31, 2020 deadline

Don’t delay – the deadline to submit ASPs for PTASP TAC review is November 13, 2020
Icon Legend

PTASP requirement

There are resources about this topic in the PTASP Resource Library
AGENCY SAFETY PLAN
LESSONS LEARNED
Lesson 1: SRM Versus Hazard Management

Safety Risk Management, Not Hazard Management

• Some draft ASPs do not describe Safety Risk Management (SRM) and/or the required processes under SRM

• These ASPs often describe Hazard Management instead

A transit agency must develop and implement an SRM process comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation (§ 673.25(a))
Safety Risk Management

• A process within a transit agency’s ASP for identifying hazards and analyzing, assessing, and mitigating safety risk (§ 673.5)

• A transit agency must develop and implement an SRM process comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation (§ 673.25(a))
Lesson 1: SRM Versus Hazard Management

Key Characteristics of Hazard Management and SRM

**Hazard Management**
- Identifies and manages specific hazards after safety events or noncompliance occurs
- Hazards are not prioritized for intervention
- No long-term monitoring for effectiveness

**SRM**
- Proactively manages safety risk in response to a changing environment
- Hazards prioritized for intervention
- Continuous monitoring of effectiveness of safety risk mitigations
Lesson 1: SRM Versus Hazard Management

How is Safety Risk Management different from Hazard Management?

<table>
<thead>
<tr>
<th>Hazard Management</th>
<th>SRM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assumes systems – as designed – are sufficient to prevent hazards</td>
<td>Assumes systems are changing</td>
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<tr>
<td>Focused on preventing system failures and the “bad” outcomes of those failures</td>
<td>Focused on routine, ongoing capture and analysis of safety information to assess safety risk</td>
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<tr>
<td>Addresses failures through corrective actions</td>
<td>Supports decision-making on managing safety risk and allocating safety resources</td>
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</table>
Lesson 1: SRM Versus Hazard Management

Resources on Hazard Management and Safety Risk Management

- Hazard Management vs. Safety Risk Management Guide
- Safety Risk Management Fact Sheet
- Safety Risk Management webinar, slide 5
Safety Risk Management Definitions

• Some draft ASPs do not reflect the SRM definitions in the regulation

• Although agencies are not explicitly required to utilize the same definitions, ASPs submitted by agencies that do not incorporate these definitions also tend not to fully address PTASP requirements
  – Adding and using these definitions can help agencies fully address PTASP requirements
Lesson 2: SRM Terminology

Risk

- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard (§ 673.5)
- In other words, how often (likelihood) and how badly (severity) a safety concern might impact people, systems, or the environment

\[
\text{Likelihood (How Often?)} + \text{Severity (How Bad?)} = \text{Risk}
\]
Lesson 2: SRM Terminology

Hazard

• *Hazard* means any real or potential condition that can cause:
  – Injury, illness, or death
  – Damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system
  – Damage to the environment (§ 673.5)

• A hazard is not an event!
Consequence

• Not defined in § 673.5, but can be derived from the definition of hazard

• Transit agencies may choose to use the following definition:
  – **Consequence** means an effect of a hazard, involving injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment
Lesson 2: SRM Terminology

**Consequence**

- The potential effect of a hazard
- Is not a real or potential condition
- Has not yet occurred, but could be similar to something that previously occurred
- Under SRM, agencies allocate resources to mitigate the safety risk of the potential consequence or consequences of a hazard
A transit agency must establish methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences (§ 673.25)(d))
Event

**Event** means any accident, incident, or occurrence (§ 673.5)

- **Accident** means an event that involves any of the following:
  - A loss of life;
  - A report of a serious injury to a person;
  - A collision of public transportation vehicles;
  - A runaway train;
  - An evacuation for life safety reasons; OR
  - Any derailment of a rail transit vehicle, at any location, at any time, whatever the cause (§ 673.5)

- **Incident** means an event that involves any of the following:
  - A personal injury that is not a serious injury;
  - One or more injuries requiring medical transport; OR
  - Damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency (§ 673.5)
Event

- **Event** means any accident, incident, or occurrence (§ 673.5)

  - **Occurrence** means an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency (§ 673.5)
Lesson 2: SRM Terminology

Resources on Safety Risk Management Definitions

- Hazard Management vs. Safety Risk Management Guide
- Safety Risk Management Fact Sheet
- Safety Risk Management webinar, slides 8-14
Lesson 2: SRM Terminology

The Importance of the Difference Between Consequences and Events

- **Consequence** means a potential effect of a hazard
  - Improperly terminated electrical connections *could result in a fire*

- **Event** already occurred, meaning the hazard’s potential was realized
  - Improperly terminated electrical connections *caused a fire with significant property damage*

SRM is forward-looking – agencies allocate resources to proactively address what *could* happen
Lesson 2: SRM Terminology

The Importance of the Difference Between Hazards and Consequences

• When an agency becomes aware of a safety concern, it is important to correctly identify the origin of the safety concern – that’s the hazard

• If a consequence is mistaken for the hazard:
  – The agency might not fully understand the actual safety concern and its true potential (safety risk) and the condition could worsen
  – The agency may not identify other related consequences
Hazards and Consequences and Safety Risk Mitigation

In safety risk mitigation, agencies take action to reduce or eliminate the likelihood or severity of the consequence, not of the hazard.
Lesson 2: SRM Terminology

Resources on Hazards and Consequences

- **Hazard Management vs. Safety Risk Management** Guide
- **Safety Risk Management** Fact Sheet
- **Safety Risk Management** webinar, slides 9-13
- **Hazards and Consequences Self-Guided Learning Tool**
Lesson 3a: SRM Authorities, Accountabilities, and Responsibilities

SRM Authorities, Accountabilities and Responsibilities

- Some draft ASPs do not identify authorities, accountabilities, and responsibilities for the SRM process
- Consider clarifying who:
  - Receives, tracks, and monitors safety concerns
  - Identifies potential consequences
  - Decides when to escalate hazards and potential consequences for safety risk assessment
  - Performs safety risk assessments, etc.

The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety (§ 673.23(d))

FTA Federal Transit Administration
Lesson 3b: Safety Risk Acceptance

Safety Risk Acceptance

- Some draft ASPs do not assign management accountability for safety risk acceptance or for ensuring meaningful mitigations.
- Consider describing the process and accountabilities for accepting safety risk and for ensuring that meaningful mitigations are developed and implemented.

The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety (§ 673.23(d))

FTA
Federal Transit Administration
Lesson 3b: Safety Risk Acceptance

Safety Risk Acceptance

Accountable for accepting safety risk and ensuring mitigations are developed and implemented

Authorized to accept safety risk and determine adequacy of mitigations

Responsible for determining adequacy of safety risk assessments and developing mitigations
Use of Data and Information for SRM

- Some draft ASPs do not clearly identify sources of information for hazard identification and safety risk assessment.
- However, documenting additional sources of hazard identification information and how this information is accessed can help clarify how the SRM process ensures its results accurately reflect the operations of the agency.

(1) A transit agency must establish methods or processes to identify hazards and consequences of the hazards.

(2) A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA. (§ 673.25(b))
Mechanic conducts condition assessment → Supervisor updates condition assessment report → Supervisor emails report to Safety Department → Safety analyst adds report data to database → Database used to support SRM process

Flow of Condition Assessment Data at Straightline Transit
Lesson 3d: Systemwide and Timely SRM

Systemwide and Timely SRM

- Some draft ASPs do not describe an SRM process that identifies hazards systemwide or assesses risk in a timely manner.
- Without systemwide hazard identification, we can leave areas of the system vulnerable to safety risk.
- SRM cannot be effective if safety concerns are not addressed in a timely fashion.

A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. (§ 673.25(a))
Some ASPs do not describe how the SRM process utilizes subject matter expertise to support the process.

Although there is no specific regulatory requirement to describe how the SRM process utilizes subject matter expertise, the process may work more effectively if the ASP clearly outlines how and when subject matter experts will be used to support SRM.
SRM Training and Qualifications

• Some ASPs do not describe training or qualifications for all workers who the agency designates as directly responsible for safety

• Agencies may consider including training on SRM processes for those workers who support the process and are directly responsible for safety

A transit agency must develop and implement a comprehensive safety training program for all agency employees and contractors directly responsible for safety in the agency’s public transportation system. (§ 673.25(a))
Lesson 3: Other SRM Topics

Other SRM Topics

- Potential Sources of Hazard Information for Bus Transit
- Safety Risk Management Fact Sheet
- Safety Risk Management webinar
- Safety Risk Management Agency Safety Plan Lessons Learned webinar
ASP Signature, Approval, and Certification

- Some draft ASPs mix up the requirements for ASP signature, approval, and certification
  - **Signature** – the Accountable Executive must *sign* the ASP (§ 673.11(a)(1))
  - **Approval** – the agency’s Board of Directors or Equivalent Authority must *approve* the ASP (§ 673.11(a)(1))
    - If the agency is an RTA, the SSOA must also approve the ASP (§ 673.13(a))
    - FTA recommends agencies include information such as the name of the approving body and the date and method of approval in their ASPs
  - **Certification** – the *recipient* must certify their compliance with the PTASP regulation in FTA’s Transit Award Management System (TrAMS) (§ 673.13(a))
• ASP certification in TrAMS is critical – your agency is not in compliance with regulation requirements until the recipient certifies compliance in TrAMS by no later than December 31, 2020 (§ 673.13(a))

• FTA recommends that agencies note the certification date in their ASP
Resources on ASP Signature, Approval, and Certification

Certifying Compliance with the PTASP Regulation

Certification Fact Sheet

PTASP ASP Review, Approval, and Certification webinar

Understanding the Agency Safety Plan Review, Approval, and Certification Process
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

• Visit FTA’s COVID-19 FAQs page for more information about the Notice
Upcoming Webinars

ASP Lessons Learned – Part 2: Safety Assurance and Safety Promotion
  – Thursday, November 19, 2020 at 2:00 PM ET

Transitioning to ASP Implementation
  – Thursday, December 17, 2020 at 2:00 PM ET
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

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

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