Transitioning to Agency Safety Plan Implementation

December 17, 2020

Webinar Objectives

- Discuss the transition from Agency Safety Plan (ASP) development to implementation

- Present implementation plans and piloting as considerations for the transition

Agenda

- Notice of Enforcement Discretion

- ASP Implementation

  - Planning

  - Piloting and Testing

FTA
FEDERAL TRANSIT ADMINISTRATION

NOTICE OF ENFORCEMENT DISCRETION

COVID-19 Impacts

- Transit providers and State Departments of Transportation (DOTs) are experiencing unprecedented challenges

- Transit ridership has reached a plateau since July 2020 and remains down about **63 percent** nationally compared to the previous year

- The ongoing public health emergency may have impacted the industry's ability to comply with the requirements of the Public Transportation Agency Safety Plan (PTASP) regulation

FTA
FEDERAL TRANSIT ADMINISTRATION

Notice of Enforcement Discretion

FTA's December 11, 2020, Notice of Enforcement Discretion means that, until July 21, 2021, FTA will refrain from taking enforcement action if recipients and subrecipients are unable to certify that they have established a compliant ASP

What the Notice of Enforcement Discretion Means for Certification

- FTA expects affected recipients and subrecipients to continue to work toward meeting PTASP compliance and certification requirements as soon as reasonably practicable
- FTA expects recipients and subrecipients to certify promptly after establishing a compliant ASP

FEDERAL TRANSIT ADMINISTRATION

WHAT IS ASP IMPLEMENTATION?

PTASP Requirements for ASP Implementation

The PTASP regulation (49 CFR Part 673) requires applicable transit agencies to establish and implement a Safety Management System (SMS) as detailed in its ASP (§ 673.11 and 673.21)

FTA
FEDERAL TRANSIT ADMINISTRATION

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

FTA

Is our ASP our SMS?

- The ASP is the document (a physical thing) that describes the practices, policies, and procedures that makes up your agency's SMS

- The SMS in practice (an ongoing activity) is what happens when you carry out (or **implement**) the practices, policies, and procedures you described in your ASP
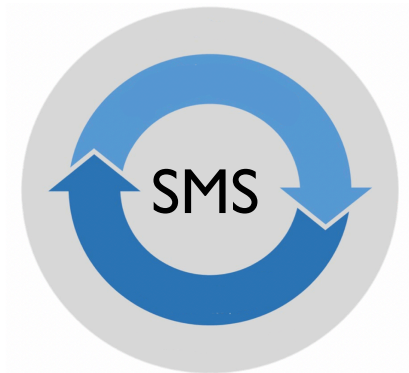
What does the § 673.31 documentation requirement mean?

The PTASP regulation requires that agencies maintain:

- The documents that set forth the ASP

  – The ASP and any associated documents, such as records of certification, old versions of the ASP, etc.

- The documents related to implementing the SMS

  – Any documents your agency produces that relate to SMS implementation, such as memoranda, meeting minutes, etc.

- The results from SMS processes and activities

  – Any documents your agency produces that relate to carrying out the activities you outlined in your ASP, such as safety risk registers, meeting minutes, data analyses, etc.

FEDERAL TRANSIT ADMINISTRATION

What is the difference between developing an ASP and implementing an ASP?

- Developing an ASP means documenting the policies, processes, and procedures necessary to meet PTASP requirements

- **Implementing** an ASP means putting the policies, processes, and procedures documented in the ASP into practice throughout your agency
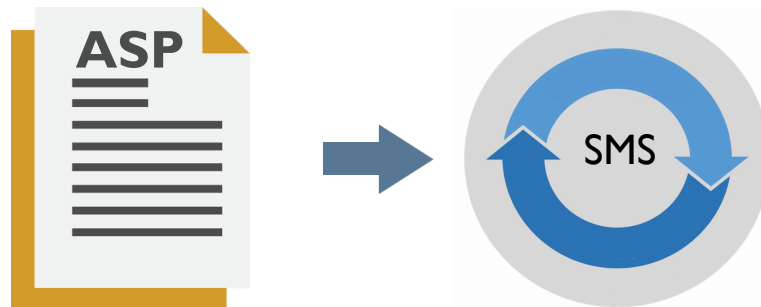
Example of Developing versus Implementing an ASP

- For example, your ASP may state that, "Employees will report safety concerns using our Employee Safety Reporting Hotline"

- The ASP may not detail how you will set up the hotline, train the individuals that will run the hotline, advertise the hotline, etc. – this is where an implementation plan can help!

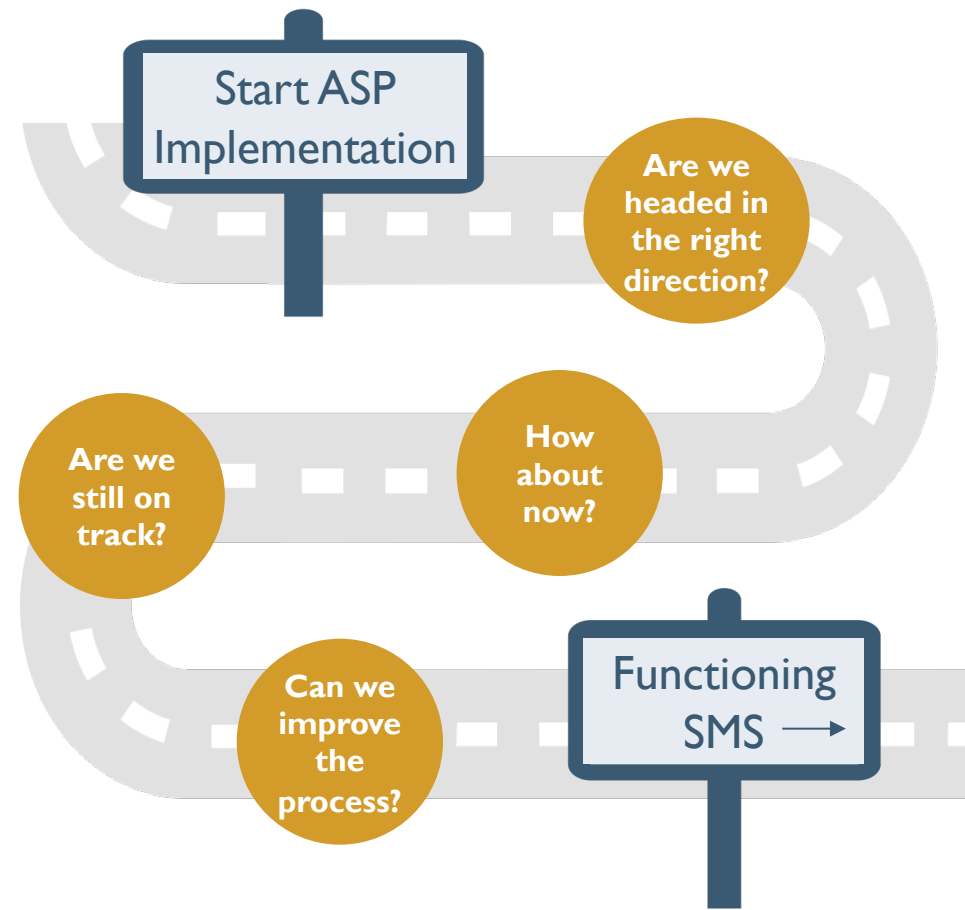# Example of Implementation with an Existing Program

- Some agencies may cite an existing Employee Safety Reporting Program (ESRP) program in their ASP

- **Implementation** in this case could include the steps you need to take to ensure that your existing ESRP program includes any special ASP requirements not already included

- In this example, the agency already implements an ESRP, but may need to rework the details, such as:

  - Incorporating worker protections into worker handbooks or policy manuals

  - Training ESRP personnel on how to document reports as input into the agency's Safety Risk Management (SRM) process

FEDERAL TRANSIT ADMINISTRATION

ASP Implementation

- As our examples show, some agencies will need to do some work to put the activities described in their ASP into action

- This may include new processes or existing processes that need to be reworked for the purposes of executing the ASP

- A goal of ASP implementation is to set up an SMS that works for you and is in compliance with the PTASP regulation

ASP Implementation

- During implementation, your agency will have many opportunities to assess how the approach described in your ASP does (or does not) meet your agency's needs and the requirements of the PTASP regulation

- Planning this implementation process can help you take full advantage of these opportunities (or checkpoints)

Start ASP Implementation

Are we headed in the right direction?

Are we still on track?

How about now?

Can we improve the process?

Functioning SMS →

ASP IMPLEMENTATION PLANNING

Implementation Planning

- Implementation planning, or an implementation plan, is **not required** by FTA

- Consider formalizing a plan or approach to implement your ASP

- An implementation plan describes the details of who, what, where, when, and how an agency will implement its ASP

- Consider leveraging project management expertise and project management best practices at your agency

Benefits of an Implementation Plan?

- Can formalize and organize the implementation of ASP

- Can help the agency establish agreement on and awareness of all key aspects of implementing the ASP, including:

  - Roles and responsibilities

  - Key tasks, timelines, and milestones – keep in mind that the full implementation process may not be complete by July 20, 2021

  - Necessary support (IT, training, etc.)

- By making key decisions up front, your agency can implement the ASP as efficiently as possible, while minimizing disruption to day-to-day operations

FEDERAL TRANSIT ADMINISTRATION

What other things could my implementation plan address?

- Areas that are new/different from existing operations

- Leveraging spokespeople or champions to help build understanding and engagement throughout the agency

- "Check-ins" or other milestone meetings that assess the agency's progress towards implementation

- Opportunities to use feedback throughout implementation as input into future ASP reviews and updates

What can an implementation plan look like?

Consider the following sections:

- **Plan overview**

- **Plan management**

- **Project management**

- **Implementation activities and timeline**

Implementation Plan Overview

Outcomes and objectives
Describe the agency's goal in executing the implementation plan

Discuss outcomes and objectives of the agency's ASP implementation and describe how these outcomes and objectives integrate with the agency's overall safety management goals and objectives

Purpose

Describe the purpose of the implementation plan and explain how it helps the agency achieve the outcomes and objectives stated in the previous section

Scope
Clarify the boundaries of the implementation plan

Identify the departments and functions affected by the plan and explain how the plan relates to other agency projects, plans, and processes, inside and outside the agency

FTA
FEDERAL TRANSIT ADMINISTRATION

Implementation Plan Management

Leadership Commitment

Confirm leadership's commitment to provide the resources and support necessary to execute the implementation plan and, by extension, the SMS and ASP

Revision and Document Control

Describe how the agency will record revisions to the plan

Implementation Plan Project Management

Leadership

Identify the individual(s) and supporting team(s) responsible for managing the execution of the implementation plan

Document Management

Describe how the agency will manage documents and records generated during implementation

Communication

Describe how the agency will manage implementation-related information, such as who gets the information, when and how often, what form it takes, and who is responsible for providing and transmitting information

FTA
FEDERAL TRANSIT ADMINISTRATION

Implementation Activities and Timeline

Tasks
Identify all tasks the agency must complete to implement its ASP

Break down work into manageable pieces and specify criteria to indicate whether a task is complete

Milestones and Deliverables

Specify milestones and associated deliverables developed to complete a task
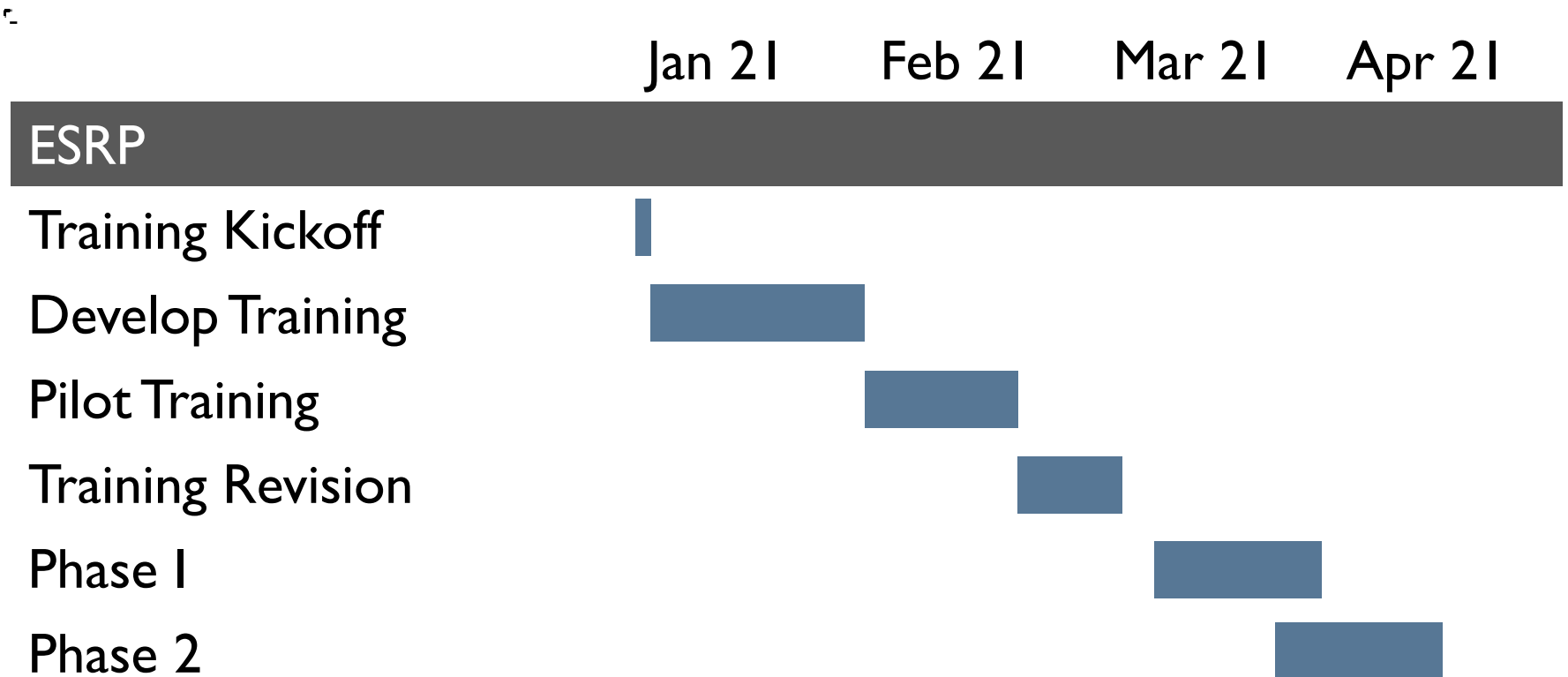
Roles and Responsibilities

Identify specific individuals, departments, and/or functions responsible for completing each of the tasks, milestones, and deliverables

Schedule

Provide a timeframe and target completion date for each task, milestone, and deliverable in a logical sequence

FTA
FEDERAL TRANSIT ADMINISTRATION

Implementation Activities and Timeline

A Gantt chart or similar project planning tool can help you resource your activities, integrate activities across your agency's departments or functions, track progress, and report on status.

	Jan 21	Feb 21	Mar 21	Apr 21
ESRP				
Training Kickoff	▮			
Develop Training	▬▬			
Pilot Training		▬		
Training Revision		▬		
Phase 1			▬	
Phase 2				▬

PILOTING SMS PROCESSES

Piloting SMS Processes

- Pilot activities are **not required** by FTA

- Pilot programs test out a new or changed process in a subsection of the agency

- Agencies may decide to pilot components of the ASP in part of the agency

  – For example, piloting one process in one garage, facility, or department

- The ASP applies to the entire agency and must ultimately be implemented agency-wide, but not necessarily in the exact same way

Pilot Programs
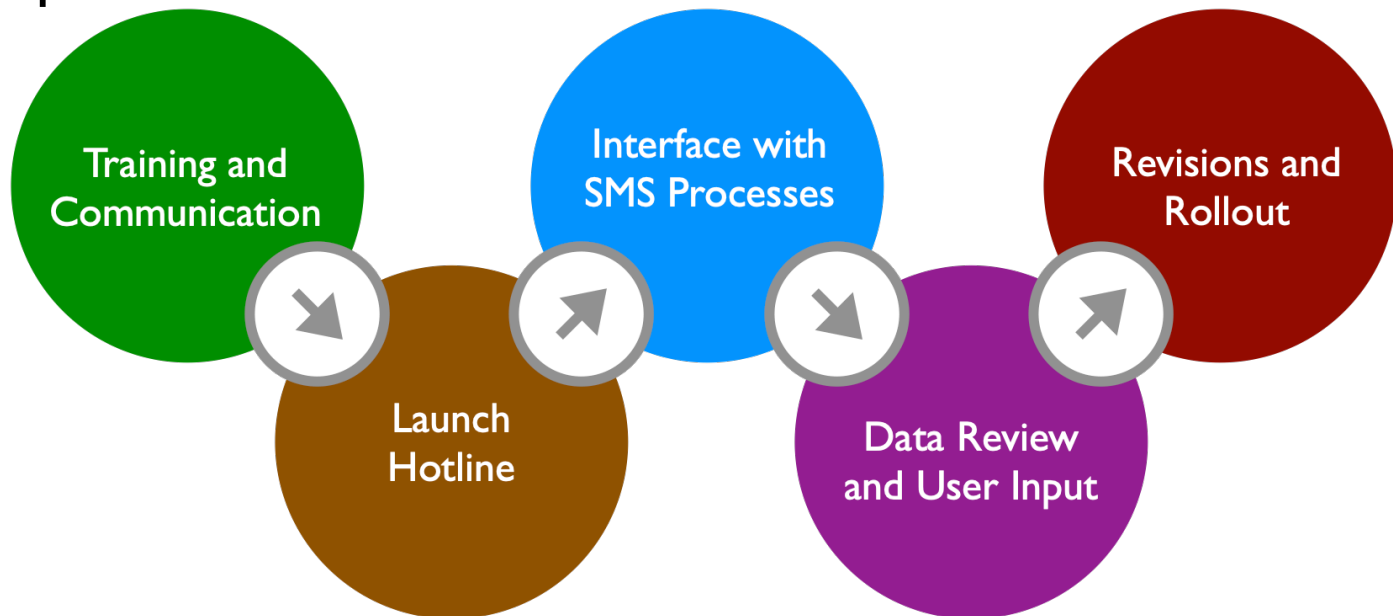
Pilot programs can help:

- Test your approach to implementation

- Build momentum

- Manage limited resources

- Ensure support structures, such as IT, are in place and meeting your agency's needs

Not All ASP Elements are Equally Suited to Pilot Programs

- Piloting processes that require significant buy-in could provide management with greater assurance before rolling the process out to the entire agency

  - For example, testing out the thresholds the agency selected for likelihood and severity by piloting the Safety Risk Management (SRM) process, or testing the ESRP

- Piloting processes that could be resource intensive could help the agency find the appropriate balance of resources

  - In our SRM example, the agency could pilot its multi-tiered committee process for safety hazard identification

- Piloting a process that does not have immediate indicators of performance, such as the Safety Management Policy Statement, may not provide value

Example: Piloting a new ESRP Reporting Method

- For example, Straightline Transit's ASP states that it operates both an existing paper-based ESRP and an ESRP hotline, which is under development

- Straightline Transit decides to pilot its ESRP hotline with its bus supervisors

Training and Communication → Launch Hotline → Interface with SMS Processes → Data Review and User Input → Revisions and Rollout
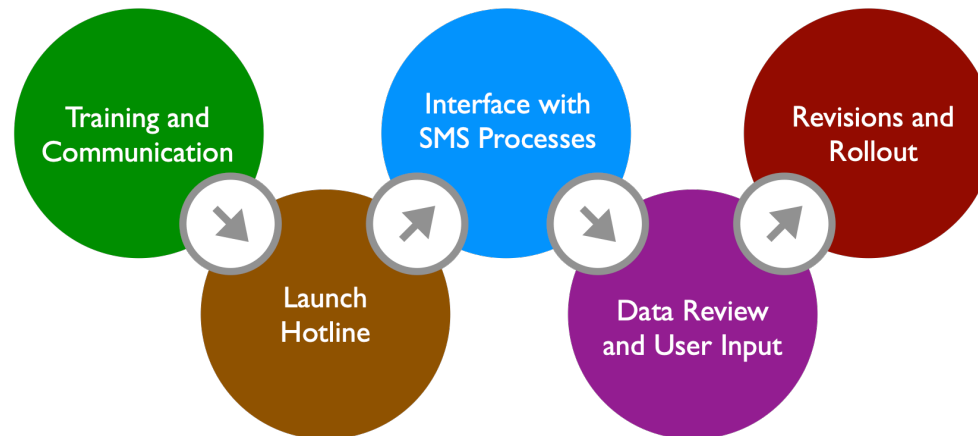
Example: Piloting a new ESRP Reporting Method

Training and Communication

- Straightline works with its training department to develop and implement a training and communications process for both its bus supervisory and ESRP hotline workers
  - Straightline documents questions and concerns raised by workers during the trainings

Launch Hotline

- Straightline launches the ESRP hotline
  - Straightline documents technical issues and common questions or concerns expressed by workers about the ESRP hotline system
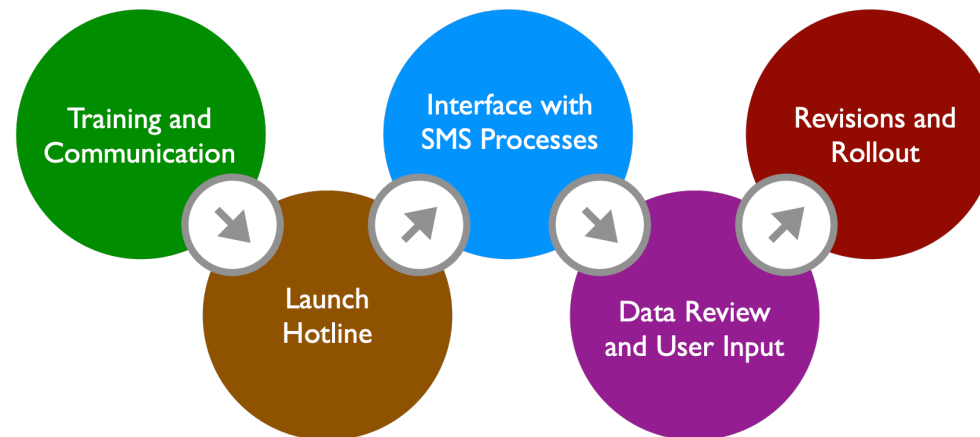
Training and Communication

Launch Hotline

Interface with SMS Processes

Data Review and User Input

Revisions and Rollout

Example: Piloting a new ESRP Reporting Method

Interface with SMS Processes

Data Review and User Input

- Straightline ESRP hotline workers interface with the Safety Risk Management (SRM) process managed by the safety department
  - Straightline documents any issues the workers run into when transferring information from the ESRP hotline to the safety department
- Straightline reviews ESRP reporting from bus supervisors both before and after the hotline is established to assess the quantity and quality of reporting
  - Straightline documents any discrepancies between the reporting periods

Training and Communication

Launch Hotline

Interface with SMS Processes

Data Review and User Input

Revisions and Rollout

Example: Piloting a new ESRP Reporting Method

Data Review and User Input

- Straightline conducts a user survey with the bus supervisors, the ESRP hotline workers, and the safety department
  - Straightline documents any areas of concern

Revisions and Rollout

- Straightline reviews its documentation and uses the information to revise its ESRP hotline approach (including training, communication, execution, interface with the SRM, etc.) before rolling the hotline out to the rest of the agency

Training and Communication

Launch Hotline

Interface with SMS Processes

Data Review and User Input

Revisions and Rollout
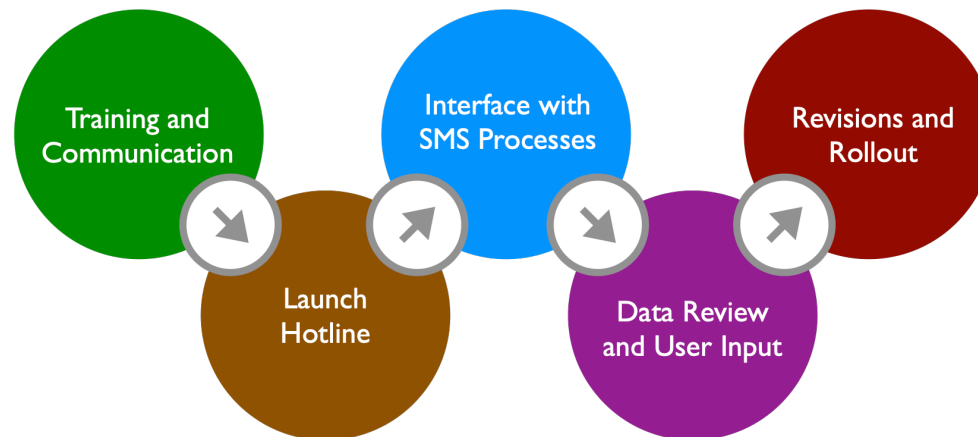
Example: Piloting the Safety Risk Management Process

Remember, piloting a process within a section of your agency gives you an opportunity to find out what works (and what doesn't work) before rolling out the process to the full agency

Straightline Transit ASP Pilot Plan

Pilot	Revise	Implement
West Main and Green Garages begin Safety Risk Management (SRM) process	Safety Department reviews data from West Main and Green garages and proposes updates based on lessons learned	Accountable Executive approves updates and the SRM is implemented throughout the agency

FTA
FEDERAL TRANSIT ADMINISTRATION

Example: Piloting the Safety Risk Management Process

Straightline Transit ASP Pilot Plan

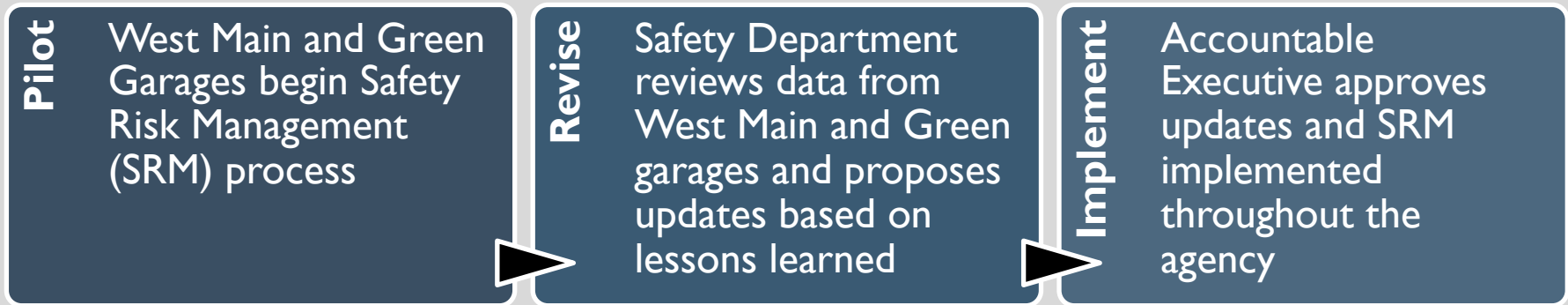| **Pilot**	**Revise**	**Implement**
West Main and Green Garages begin Safety Risk Management (SRM) process	Safety Department reviews data from West Main and Green garages and proposes updates based on lessons learned	Accountable Executive approves updates and SRM implemented throughout the agency

- After piloting the SRM process, your agency may implement safety risk mitigations

- Next, Straightline Transit may decide to pilot the requirement under Safety Assurance to monitor safety risk mitigations to ensure they are implemented as intended and having the desired effect

FEDERAL TRANSIT ADMINISTRATION

DOCUMENTATION

Documenting Changes to Your Approach

- You **do not** need to revise your ASP to reference an ASP implementation plan or pilot process

- Your implementation or pilot activities may lead to changes in the contents of your ASP

  - You do not necessarily need to immediately make these changes to your ASP

  - Follow your own established process, which may reflect guidance from your leadership or oversight (such as the Accountable Executive, Board of Directors, or Equivalent Authority, or State Safety Oversight Agency (for rail transit agencies only))

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 102
Charlottesville, VA 22901