

# FTA

FEDERAL TRANSIT ADMINISTRATION



## **Implementing an Agency Safety Plan during the COVID-19 Public Health Emergency**

January 27, 2021



# FTA

FEDERAL TRANSIT ADMINISTRATION

# Webinar Objectives

- Discuss how Agency Safety Plan (ASP) implementation may be impacted by the coronavirus disease 2019 (COVID-19) public health emergency
- Present considerations for transit agencies implementing an ASP during COVID-19 recovery

# Agenda

- Notice of Enforcement Discretion
- COVID-19 and the transit industry
- COVID-19 and ASP implementation
- Transit agency presentations
- Q&A

# **NOTICE OF ENFORCEMENT DISCRETION**



FEDERAL TRANSIT ADMINISTRATION

# Background: Notice of Enforcement Discretion

- 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 has impacted the industry's ability to comply with the requirements of the Public Transportation Agency Safety Plan (PTASP) regulation

# 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, but no later than July 20, 2021



# **COVID-19 AND THE TRANSIT INDUSTRY**



FEDERAL TRANSIT ADMINISTRATION



# The Impact of COVID-19

- Many transit agencies have experienced significant changes during the COVID-19 public health emergency and the continuing impacts may bring additional changes over the next year
  - For example, restructuring or reorganization, reduced or eliminated modes of service, or changes to modes of service
- Consequently, your initial vision for implementing your ASP may no longer reflect what your agency is willing or able to support

# Example Impact of COVID-19

## Straightline Transit Operations

May 2019-May 2020



6 fixed bus routes



4 demand response vehicles



Operating hours: 4 AM to 11 PM

May 2020-indefinite



4 fixed bus routes modified schedule

2 fixed bus routes permanently suspended



4 demand response vehicles operating under restricted capacity



Operating hours: 6 AM to 9 PM

# **COVID-19 AND ASP IMPLEMENTATION**



FEDERAL TRANSIT ADMINISTRATION

# What does COVID-19 mean for ASP implementation?

- Some agencies may be experiencing long-lasting or permanent changes in their operations due to COVID-19
- Some agencies may be experiencing changes, but these changes may not have been significant or may no longer impact their operations
- Some agencies may anticipate further changes to their operations due to the economic impacts of COVID-19

# COVID-19 and Changing Operations

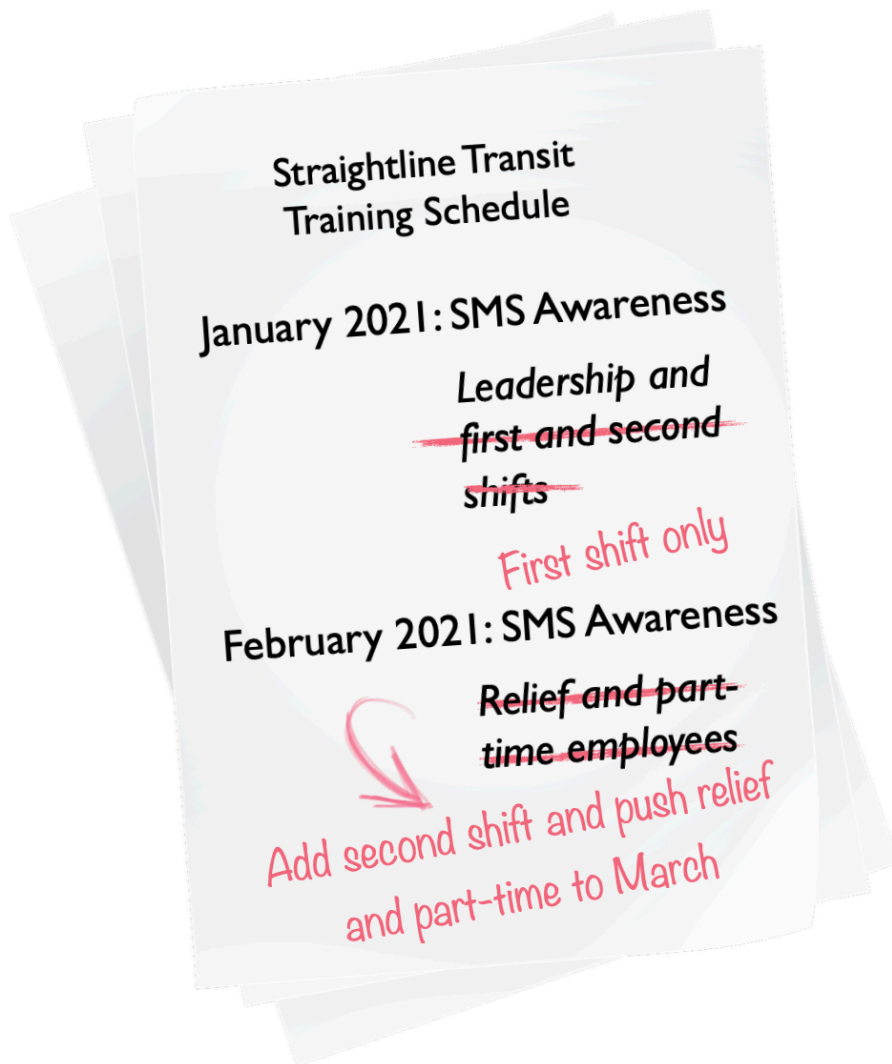
- Assessing how your agency's new operating reality matches, or doesn't match, with your previous operating reality can help identify appropriate areas for change
  - The processes you expected to implement may no longer be appropriate in your new service environment
  - Your agency may no longer have the resources necessary to implement an SMS in the way you planned
  - Your agency may need to reallocate existing resources to reflect changed priorities
- Your agency can revise your approach to reflect the resources you have available now and/or changes in your agency's priorities

# Ways ASP Implementation May Look Different During COVID-19

- Sequencing
  - Training
  - Policies and procedures
  - Systems



# Ways ASP Implementation May Look Different During COVID-19



- Right-sizing
  - Scope
  - Training
  - Policies and procedures
  - Systems

# Reengaging Stakeholders in the ASP

- Priorities related to the public health emergency may have shifted attention from the ASP
  - Many agencies continued their ASP development throughout the public health emergency; however, they may not have engaged external and internal stakeholders in the ASP as much, as the emergency took precedence
- As localities' response to the public health emergency stabilizes, transit agencies could resume coordination with external stakeholders on the ASP
  - Review and reinforce the importance of SMS and your agency's process for implementing your ASP
  - Board of Directors, city council, Metropolitan Planning Organization, first responders, State insurance pool, etc.



# Reengaging Internal Stakeholders in the ASP

- The response to the public health emergency also may have decreased transit agencies' internal coordination on the ASP and the SMS processes within
  - Some safety officers may not be engaged in the field in the same way as before the public health emergency
  - Consider new ways to message and maintain involvement while observing social distancing (emails, texts, flyers, recorded toolbox talks, direct calls, etc.)
  - Consider new or revised monitoring activities that fit into the agency's new operating environment

# Recalibrating ASP Implementation

- Agencies may modify their approach to implementing an ASP, potentially by including a plan or process
- FTA's December 2020 [Transitioning to ASP Implementation webinar](#) provides information on how agencies could use a voluntary ASP implementation plan to support their implementation process

# Recalibrating ASP Implementation

- Agencies could use pilot programs in their ASP implementation
- Pilot processes using COVID-19-related concerns, such as:
  - If your agency is considering increasing the number of passengers per vehicle, your agency could try out your Safety Risk Management process to assess the associated safety risk
  - Using existing briefings on your agency's response to COVID-19 to increase awareness of SMS processes

# TRANSIT PRESENTATIONS



FEDERAL TRANSIT ADMINISTRATION



**Roman Steichen**  
Director  
Transit Services of  
Frederick County, Maryland

Roman Steichen began his transportation career during college with the University of Maryland's Department of Transportation Services. Prior to joining Transit Services of Frederick County, Maryland, Roman worked in transportation at Johns Hopkins University.

Since joining Frederick County in 2018, Roman has served as the Deputy Director and Chief Safety Officer and is currently the Transportation Services Division Director.

# Agency Characteristics and Services

- Transit Services of Frederick County, MD
- City of Frederick – small urban (pop 72k)
- Frederick County – rural (population 265k – fastest growing county in MD)
- System operates County-wide (667 sq miles – largest county in MD)
  - Deviated fixed route / ADA Complementary paratransit
  - Non-ADA Paratransit with Taxi access program
  - Commuter assistance
- ~600k-700k annual passenger trips (pre-pandemic)
- Funding – FTA formula 5307, 5311, Rideshare; State SSTAP (paratransit); required local and overmatch

# Implementing an ASP During the COVID-19 Public Health Emergency

- Frederick ahead of the curve
- Helped pilot SMS/ASP for FTA with 2 other MD counties
  - Montgomery County: large urban
  - Frederick County: small urban/rural
  - Charles County: rural
- Plan development began in 2016
  - LOTS of trainings!
  - LOTS of time spent with FTA consultants
- Many plan iterations as SMS matured

# Implementing an ASP During the COVID-19 Public Health Emergency

- No need to take advantage of administrative relief
  - Final version approved by County Council March 2020
  - Self-certification of compliance September 2020
- Biggest modification to practices outlined in ASP
  - Previous in-person sessions moved to virtual platforms
    - Accident/Incident Review Board
      - Determine preventability vs fault
      - How can this be avoided in the future?
    - Safety Committee Meetings
      - Discuss safety-related issues on premises, on road
    - Email address established for confidential ESRP




# Implementing an ASP During the COVID-19 Public Health Emergency

- Example of ASP in action
  - Used Risk Assessment Matrix to determine likelihood of COVID transmission to driver from passenger with no modifications to operations
    - Result 2A

HAZARD RISK ASSESSMENT MATRIX

Frequency of Occurrence	Hazard Categories			
	1 Catastrophic	2 Critical	3 Serious	4 Minor
(A) Frequent	1A	2A	3A	4A
(B) Probable	1B	2B	3B	4B
(C) Occasional	1C	2C	3C	4C
(D) Remote	1D	2D	3D	4D
(E) Improbable	1E	2E	3E	4E

 Unacceptable  High  Medium  Low

# Implementing an ASP During the COVID-19 Public Health Emergency

- To mitigate risk of transmission, the following modifications were made, in conjunction with the Safety Committee, per ASP guidelines
  - Fare collection suspended
  - Front door boarding suspended (except ADA)
  - Face coverings required (supply kept on vehicles for passengers without)
  - Increased vehicle disinfection frequency
  - Encouraged physical distancing
  - Hand sanitizer stations installed at vehicle entry/exit doors
- Driver barriers are being installed in advance of resumed fare collection and front door boarding
  - Driver barriers serve double-duty
    - Safety (reduced risk of pathogen transmission)
    - Security (not covered by ASP, but still notable)

# Implementing an ASP During the COVID-19 Public Health Emergency

- Moving forward
  - Continued virtual safety and accident review meetings
  - Stay up to date with CDC best practices
  - Fleet disinfection daily to continue indefinitely
  - Face covering mandatory so long as CDC recommends
  - Settle in to “new normal”
  - ASP will continue to be modified as new safety practices are adopted

# TRANSIT PRESENTATIONS



FEDERAL TRANSIT ADMINISTRATION



**Jeff Hulbert**

Acting Vice President of Safety  
Chicago Transit Authority  
Chicago

Jeff Hulbert serves as Acting Vice President of Safety at the Chicago Transit Authority. Jeff recently returned to the Safety Department in this capacity after serving five years in the Law Department working in the Compliance, Policy, and Appeals division. During his time in Law, Jeff not only worked on various regulatory matters, but was also involved in numerous safety-oriented issues like OSHA investigations, State Safety Oversight Agency coordination, and SMS program development.

Jeff's institutional knowledge and industry exposure helps him identify issues, collaborate with multiple stakeholders, and develop robust programs.

# Description of Agency

- A multi-modal transit system that operates fixed-route bus and rail transit services
- Operates the nation's second largest public transportation system and the third busiest heavy-rail transit system in the country
- On an average weekday, 1.6 million rides are taken on Chicago Transit Authority (CTA)
- CTA serves 35 suburbs, in addition to the City of Chicago
- Provides 81% of the public transit trips in the six-county Chicago metropolitan area
- 1,864 buses that operate 129 routes and 1,536 route miles
- 1,492 rail cars that operate 8 routes and 224.1 miles of track with two routes operating 24-hour service every day

# PTASP Development

- Established and/or revised PTASP related timelines due to COVID-19
- Certification – no revisions of timeline
  - Value of being involved in the FTA pilot program the resources available and the overall reorientation towards safety. A lot of thought work and strong conceptual understanding of SMS going into the PTASP development.
  - CTA's PTASP was certified and approved on August 5, 2020 by SSOA
    - Accountable Executive signed it June 10, 2020
    - Chairman of the Board signed it on June 17, 2020
    - Sent to SSOA on July 30, 2020
  - Annual review and update process begins October 1 of each year
  - Implementation Plan is built into and contained within the PTASP
    - Four phases of implementation
    - In the certification letter, the SSOA recognized that “SMS implementation as set forth in the ASP is a process that will continue to unfold and be refined in the years ahead” and to continue to collaborate with CTA “to monitor SMS implementation and identify areas for prioritization or improvement.”

# Coordination

- Chicago Metropolitan Agency for Planning (CMAP) is CTA's MPO
  - Ongoing/existing coordination with CMAP e.g., TAM Plan, TIP, etc.
  - CMAP is very proactive and has strong understanding of their role- eager to help and start discussions around how to help
  - Chicago service boards have strong relationships and are accustomed to working collaboratively
  - Conversations around target setting are incorporated into existing relationships



# Operating in a Public Health Emergency

- No cuts to service, still moving 400-500k passengers/ day
- Additional safety tasks and functions related to social distancing, masks, signage, cleaning, etc.
  - Incorporated into existing assurance tasks and functions over time
  - Platform crowding monitoring
  - Not necessarily a punitive endeavor – reinforcement of company-wide emphasis and prioritization
- Daily COVID call with senior leadership to review positive cases, messaging, work environment, and emerging public health agency guidance.

# Operationalizing SMS concepts

- An already large challenge made far more challenging with additional constraints
  - Time / Manpower / Communication
- “Operationalizing” the conceptual framework spelled out in the PTASP
  - Defining roles and responsibilities, decision points, reporting formats and routing
  - Fully leveraging the data – moving from reactive to preventative, to predictive
  - Establishing methodologies to standardize and provide a common understanding

# QUESTIONS AND ANSWERS



# PTASP Technical Assistance Center (TAC) Links and Contact Information



## Technical Assistance Center

- [www.transit.dot.gov/PTASP-TAC](http://www.transit.dot.gov/PTASP-TAC)

## PTASP Community of Practice

- [www.transit.dot.gov/PTASP-COP](http://www.transit.dot.gov/PTASP-COP)

## Frequently Asked Questions

- [www.transit.dot.gov/PTASP-FAQs](http://www.transit.dot.gov/PTASP-FAQs)

		<a href="http://transit.dot.gov/PTASP-TAC">transit.dot.gov/PTASP-TAC</a>
		1 - 877 - 827 - 7243
		<a href="mailto:PTASP-TAC@dot.gov">PTASP-TAC@dot.gov</a>
		PTASP Technical Assistance Center 943 Glenwood Station Lane, Suite 102 Charlottesville, VA 22901