



Learn. Share. Engage.

This issue of the *Biweekly Message* focuses on Safety Management System (SMS) implementation during the COVID-19 public health emergency.

Featured Resources

The [FTA COVID-19 Resource Tool](#) provides a one-stop-shop for Federal COVID-19 guidance and recommendations, including information from the Centers for Disease Control and Prevention, the Occupational Safety and Health Administration, and the Environmental Protection Agency. This tool is updated weekly.

FTA has hosted a series of [COVID-19 Recovery Listening Sessions](#). Each session features a panel of transit industry professionals who describe the practices used by their agencies and answer questions submitted by participants.

The American Public Transportation Association and Community Transportation Association of America publish a biweekly [COVID-19 Recovery Vendor List for Public Transportation](#) with information on vendors and products that transit agencies may use in their COVID-19 response and recovery efforts.

FTA's [COVID-19 Recovery Discussion Forum](#) offers a platform for peer-to-peer exchange of transit COVID-19 ideas, questions, and resources.

These [Frequently Asked Questions from FTA Grantees Regarding COVID-19](#) provide clarity regarding how COVID-19 preparations impact certain FTA requirements.

Transitioning to Agency Safety Plan Implementation Webinar (December 17, 2020):

[Webinar Presentation](#) | [Webinar Recording](#)

Access the entire resource library by visiting FTA's [PTASP Technical Assistance Center website](#).

Need Assistance?

Contact the PTASP Technical Assistance Center (TAC) to speak with a specialist today!



PTASP-TAC@dot.gov

1-87 PTASP-AID



1 (877) 827-7243

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



Contact the TAC for **one-on-one technical sessions** for ASP support.



Submit your ASP to the TAC by **May 28, 2021** to guarantee review.

Important Update

Notice of Enforcement Discretion

FTA will refrain from taking enforcement action on compliance with the PTASP regulation until **July 21, 2021**.

Coronavirus Disease 2019 (COVID-19)

FTA encourages transit agencies to stay informed and prepared to protect personnel and passengers against COVID-19. For more information, visit [FTA's COVID-19 web page](#).



Q & A Highlights

Question 1:

Are we required to have an implementation plan or schedule included with our ASP?

FTA Response:

The PTASP regulation does not require an implementation plan. However, you may want to develop an implementation plan that formalizes the processes and procedures necessary for your agency to develop, operationalize, and verify implementation of each ASP element. You could establish roles and responsibilities, important tasks and timelines, and any necessary training or IT support. Making critical decisions up front allows your agency to implement its ASP as efficiently as possible and minimizes disruption to day-to-day operations. It helps ensure that key people are engaged and tasks are completed correctly the first time.

Question 2:

Our agency has already certified compliance with the PTASP regulation, but we are concerned about the effect COVID-19 may have on the implementation of some of our SMS processes. How do you recommend we test out those processes?

FTA Response:

You could use a pilot program to assess the efficacy of your implementation processes. A pilot program would also allow you to assess COVID-related concerns. For example, 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.

Question 3:

Now that a second Notice of Enforcement Discretion has been published and FTA is refraining from enforcing the PTASP regulation until July 21, 2021, should transit operators evaluate and, if needed, revise their Safety Performance Targets (SPTs) by July 2022? Or, is it acceptable for agencies to evaluate their SPTs by another date?

FTA Response:

Per 49 CFR § 673.11(a)(5)), a transit agency must establish a process and timeline for conducting an **annual** review and update of its ASP. A transit agency should be evaluating its SPTs to determine whether they need to be changed, as well. Given the diversity of transit systems across the country, FTA is deferring to transit agencies to determine the frequency

Upcoming Events

Implementing an ASP during the COVID-19 Public Health Emergency

When: Wednesday, January 27,
1:30 p.m. EST

[Register Here](#)



of ASP reviews and updates each year and the review process. The only requirement within the PTASP regulation is that the review occurs annually, anytime **within the year after the ASP was approved** by the Board of Directors or Equivalent Authority.

Question 4:

Is there anything in the PTASP regulation that would prohibit our agency from establishing a "risk council" that "deep dives" into all types of safety issues?

FTA Response:

Per the PTASP regulation ([49 CFR § 673.23\(d\)\(4\)](#)), a transit agency may designate key staff, groups of staff, or committees to support the Accountable Executive or Chief Safety Officer in developing, implementing, and operating the agency's Safety Management System as described in the ASP. You could describe the risk council in your ASP, or you could add it during your annual ASP update by following your agency's process for implementing changes to the ASP and documenting those changes, as necessary, in the ASP and/or referenced documentation.

The [PTASP Community of Practice](#) wants to hear from you!

- Due to impacts from the COVID-19 public health emergency, will you need to [scale back certain areas of your ASP](#)? If so, which areas?
- What [types of changes](#) has your agency made to implement its ASP as planned, due to the COVID-19 public health emergency?

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.