

FTA

FEDERAL TRANSIT ADMINISTRATION



PTASP Documentation and Recordkeeping

March 31, 2021



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Webinar Objectives

- Discuss requirements of the PTASP regulation for documentation and recordkeeping
- Provide sample approaches to PTASP documentation and recordkeeping

Agenda

- PTASP requirement for documentation and recordkeeping
- Documentation and recordkeeping in practice
- Transit agency presentations
- Q&A

PTASP REQUIREMENT FOR DOCUMENTATION AND RECORDKEEPING



Three Elements of the Documentation and Recordkeeping Requirement ([§ 673.31](#))

1 Maintain documents

2 Make documents available upon request

3 Keep documents for a minimum of three years

Three Elements of the Documentation and Recordkeeping Requirement ([§ 673.31](#))

I Maintain documents

- Documents that set forth the Agency Safety Plan (ASP), including those related to implementing the Safety Management System (SMS)
- Results from SMS processes and activities
- Documents included in whole, or by reference, that describe the programs, policies, and procedures used to carry out the ASP

Three Elements of the Documentation and Recordkeeping Requirement ([§ 673.31](#))

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Make documents available upon request

- FTA
- Other Federal entity (ex.: National Transportation Safety Board)
- State Safety Oversight Agency (SSOA), if applicable

Three Elements of the Documentation and Recordkeeping Requirement ([§ 673.31](#))

3

Keep documents for a minimum of three years

- Minimum of three years after creation

DOCUMENTATION AND RECORDKEEPING IN PRACTICE



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Documentation and Recordkeeping Beyond the ASP

- Consider starting by asking:
 - What documents or records did we create when we wrote our ASP?
 - Which documents or records describe our...
 - Safety Risk Management process
 - Safety Assurance process
 - Safety Promotion process
 - Safety Management Policy Statement

Documentation and Recordkeeping Beyond the ASP

- Agencies must also maintain documents related to implementing the SMS and results from SMS processes and activities
- Each of the four SMS elements will require and produce documents and records
 - Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion

Example Safety Management Policy Documents and Records



Safety Management Policy

Evidence that the Policy was distributed throughout the agency



Data or other information used to set or revise safety objectives



List of key staff, executive management, and agency leadership



Revision history

Agendas and meeting minutes for meetings where the Policy is discussed



Example Employee Safety Reporting Program (ESRP) Documents and Records

Training presentations and records



Emails sent to the ESRP about safety concerns



Employee Handbook that details worker protections for reporting to the ESRP

Spreadsheets of compliance data from relevant departments used to assess a safety concern



Employee Code of Conduct that outlines the behaviors that are not protected under the ESRP



Documentation of actions taken to address a reported safety concern

Example Safety Risk Management Documents and Records

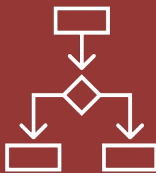


Safety Risk Register or other records for tracking safety concerns

Forms used to conduct a safety risk assessment



Information used to prioritize hazards



Information used to help assess the likelihood and severity of a potential consequence



Documentation of any management decisions to implement or forgo mitigations

Communication with department head on safety risk mitigations



Example Safety Assurance Documents and Records

Ride along evaluations



**Internal compliance
audit check sheets and
final reports**



**Vehicle and
infrastructure monthly
inspections**

**Safety performance
monitoring data and
reports**



**Safety event
investigation notes and
reports**



**Mitigation monitoring
documentation**

Example Safety Promotion Documents and Records



**Safety training
program curriculum by
worker type**

**Materials used to
disseminate safety and
safety performance
information**



**Safety training
program completion
tracking**



**Training on hazards
and safety risk relevant
to workers' roles and
responsibilities**



**Job description and/or
labor agreements
including completion
of the safety training
program**

**Communication with
department head on
safety risk mitigations**



Documentation and Recordkeeping Beyond the ASP

- Those are only a few examples of the kinds of documents and records your agency will maintain
- Consider the following document management practices for your documents and records
 - Document and record handling business practices
 - Roles and responsibilities for documents
 - Availability
 - Taking full advantage of the data generated by an SMS

Considerations for Document and Record Handling

- “How do I know which document to open?”
 - System-wide naming conventions can help organize documents and records on a shared platform and make it easier and faster to retrieve them
- “How do I know I am looking at the right version?”
 - Tracking revisions to documents by including revision or version numbers and dates can help identify the most recent version
 - A brief description of the change from previous iterations can help quickly identify the relevant changes
 - Revising older versions to include the date the version was superseded can help minimize the use of outdated versions

Considerations for Roles and Responsibilities

- “Who should use these documents and records?”
 - Restricting access to editing rights for documents and records can help inadvertent document or record revision or deletion
 - Establishing clear ownership of documents and records can help streamline version control
- “How will we communicate updates to the relevant people/departments?”
 - Establishing the audience for certain documents and records can help streamline the distribution process when updates are made
 - Establishing roles and responsibilities for communicating updates can help manage the distribution process

Considerations for Making Documents and Records Available to External Entities

- “How would we respond to a request from FTA to share our documents and records?”
 - As discussed earlier, your agency must make documents and records relating to ASP implementation and SMS available to the FTA or other Federal entities, such as the National Transportation Safety Board, and the SSOA (if applicable)
 - Planning ahead and setting up a process for sharing data externally upon request can help streamline your agency’s response when a request is made
 - For rail transit agencies, your SSOA may establish requirements for how and where your agency shares documents

Considerations for Taking Full Advantage of the Data Generated by an SMS

- “How do we take advantage of the data generated by an SMS?”
 - The main driver of an SMS is information and an SMS will generate a lot of it
 - Ensuring that data can be accessed for analysis can help make the most of the benefits of a robust SMS

TRANSIT PRESENTATIONS



FEDERAL TRANSIT ADMINISTRATION



Josh Baker
Deputy CEO
AMTRAN
Altoona, PA

Biography

- 15+ years of public transportation managerial experience in shared ride paratransit and fixed route bus service
- Graduate of Pennsylvania State University
- MS in Business Administration from University of Pennsylvania
- Assists CTAA training efforts for front-line hiring and retention
- Chairman of the Pennsylvania Public Transportation Association Human Resource committee
- Vice-chair of Penn TRAIN

Agency Characteristics and Services

- Fixed-route (small Urban) provider for:
 - City of Altoona
 - Logan and Allegheny Townships
 - Borough of Hollidaysburg
- Service area – 25 sq miles
- 49 total employees
- 13 regular routes
 - 26 fixed-route buses (35')
 - 20 buses in peak service
- 500,000 unduplicated trips/year
- Operate six (6) days/week – 5:40 am – 10:30 pm

PTASP Documentation and Recordkeeping

- SMS Team
 - All departments
 - Assist from Safety Committee
- Company meetings/trainings for Agency-wide input and program review
- ESRP forms readily available in all departments
 - Variety of mediums
- SMS Team review
 - Assist from Safety Committee (where necessary)

PTASP Documentation and Recordkeeping

- Established protocols and responsibilities for each phase of program
 - Reporting
 - Investigations
 - documentation
- Record-keeping
 - Hard copies in one location
 - SMS Executive
 - Electronic in shared drive for SMS Team
- Ongoing training based on job responsibilities



Angelique Gaeta

Chief of System Safety &
Security
Santa Clara Valley
Transportation Authority
San Jose, California

Biography

- Manages VTA's System Safety & Compliance Unit, Environmental Health & Safety Unit, and Principal Safety Auditor Unit
- Manages VTA's Protective Services teams, including private security staff and fare inspectors
- Oversees Santa Clara County Sheriff and San Jose Police Department sworn personnel for VTA's supplemental law enforcement services contracts
- Graduate of the University of California, at Berkeley
- Law degree from Santa Clara University, School of Law, California

Agency Characteristics and Services

- Rail
 - 98 low-floor Kinkisharyo Light Rail Vehicles & Four (4) history trolleys
 - Three (3) lines, 42.2 miles of system network
 - Operating through six (6) cities
- Bus
 - 473 Buses Operating (maintain 511 buses)
 - 56 Routes including 17 frequent routes
 - Three (3) bus Rapid Transit (BRT) routes
- Paratransit
 - 230 cars, vans and shuttle buses
 - Operating throughout the County (345 square miles)

Agency Characteristics and Services

- Bay Area Rapid Transit (BART) – Silicon Valley Extension
 - Heavy Rail
 - 16 Miles of Track
 - Currently ten (10) miles through two (2) Campuses: Milpitas and Berryessa
 - Planning additional six (6) miles through downtown San Jose and into the City of Santa Clara
 - Connect entire Bay Area

PTASP Documentation & Recordkeeping

VTA's Records Management Program

- Agency-wide
- Led by a Records Management Team in the Technology Division
- Includes Policies, Procedures and Retention Schedules governing the care and management of agency records
- Developed with Office of the General Counsel to ensure statutory and regulatory compliance and legal requirements regarding public document requests

Goal: to manage organizational information so that it is timely, accurate, complete, cost-effective, accessible and useable

PTASP Documentation & Recordkeeping

Responsibilities

- Executive Management and Division Chiefs are responsible for:
 - Implementing micro records management programs within their area of responsibility
 - Appointing a Division Records Coordinator to oversee the program
- Coordinator records activities and coordinates submission & sharing information by a micro records management team charged with:
 - Official records submission
 - Official records publication on VTA intranet

PTASP Documentation & Recordkeeping

Example

- Operations Division – Procedure Update Approval Process
 - Rail Rules and Procedures Development (RRPD) committee – Initial Review
 - Rail System Safety Review Board (RSSRB) – Agency Approval
 - California Public Utilities Commission (CPUC) – State Approval
 - Division Records Coordinator – documents process, records approvals, and manages submissions & publications

PTASP Documentation & Recordkeeping

Record Keeping in General

- All VTA employees, contractors and agents are responsible for maintaining and preserving records for the agency as follows:
 - Maintaining and preserving records necessary to document VTA's official business activities
 - Filing records for their safe storage and efficient retrieval
 - Maintaining “non-record” materials separately from those required by statute or regulation
 - Maintaining records in compliance with VTA's Record Retention Policy

PTASP Documentation & Recordkeeping

Requests for Public Records

- VTA is a public transportation and congestion management agency
- Subject to the requirements of the Freedom Of Information Act (FOIA) and California's Public Records Act (PRA)
- Must provide records deemed "public" under the FOIA and the PRA
- Employees run all FOIA and PRA requests through the Office of the General Counsel for a coordinated response

PTASP Documentation & Recordkeeping

Records Management Program Software & Other Solutions...

- CleverCAD
- IndustrySafe
- SuccessFactors
- SAP

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

QUESTIONS AND ANSWERS

