Carrying Out the Annual Agency Safety Plan Review

April 29, 2021

Webinar Objectives

- Discuss requirements for the annual Agency Safety Plan (ASP) review

- Provide sample approaches to conducting the annual ASP review

Agenda

- Public Transportation Agency Safety Plan (PTASP) regulatory requirement for the annual ASP review

- Considerations for the annual ASP review

- Transit agency presentations

- Q&A

PTASP REQUIREMENT FOR ANNUAL ASP REVIEW

Requirements for an Annual ASP Review

Each transit agency must establish a **process** and **timeline** for conducting an annual review and update of the ASP (§ 673.11(a)(5))

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Do I have to update my ASP annually?

✅ PTASP regulation requires agencies to *review* their ASP annually

❌ PTASP regulation does not require agencies to *update* their ASP annually*

* State Safety Oversight Agencies (SSOA) may require rail transit agencies (RTA) under their jurisdiction to complete an annual ASP update

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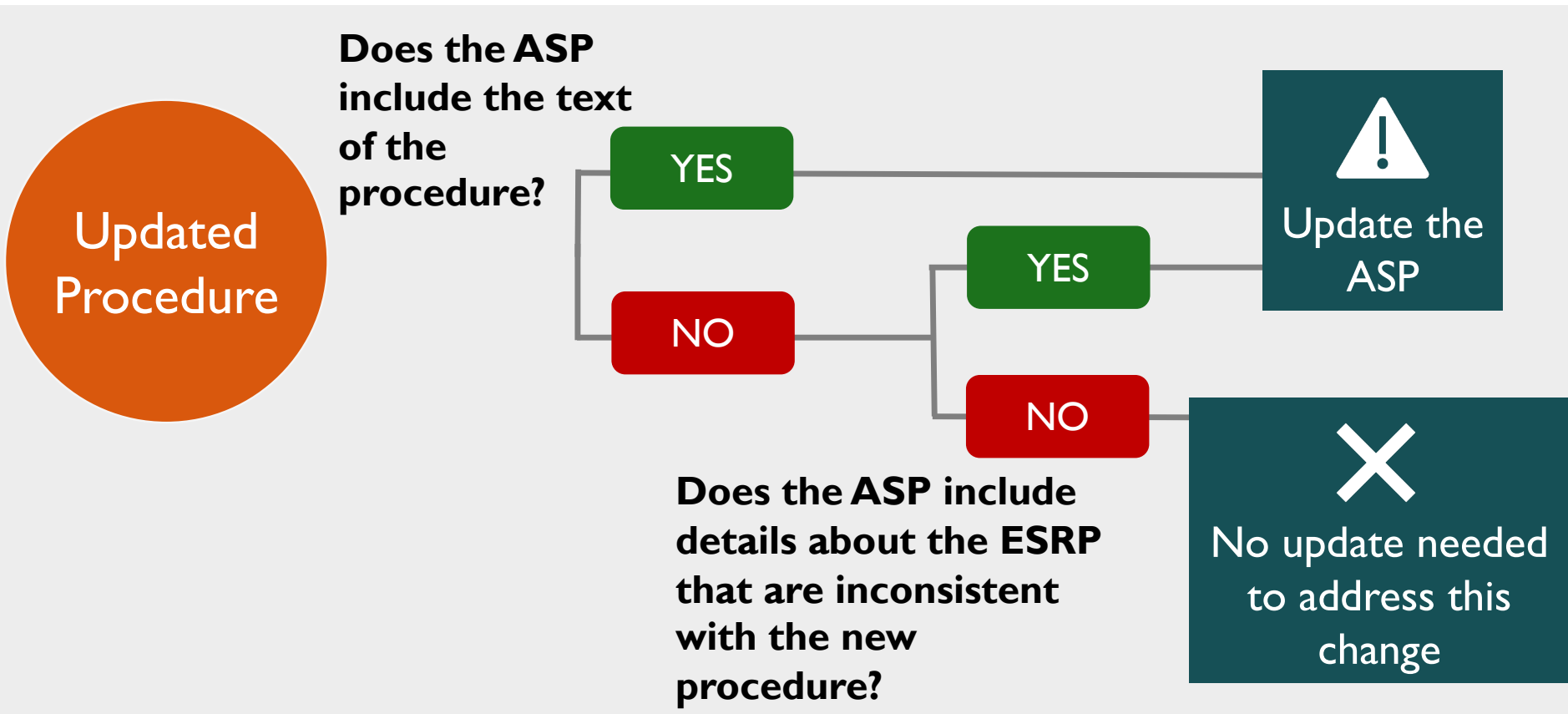
How do we know if we need to update our ASP?

- In general, an agency will choose to update its ASP if it no longer reflects the agency's operating reality, such as:
  - Changes to your agency's management organization structure that impact the language or content of your ASP
    - New offices, departments, or key personnel and changed authorities, accountabilities and responsibilities
      - Ex.: Straightline Transit added a new Quality Assurance department that performs some safety performance monitoring and measurement activities and will update its ASP to reflect the new department

More Examples: How do we know if we need to update our ASP?

- Changes to your agency's system characteristics that impact the content or language of your ASP, such as:
  - New or discontinued routes, lines, or modes referenced in the ASP
- Changes to your agency's Safety Management System (SMS) or other safety processes referenced in the ASP, such as:
  - New or modified processes, policies, or procedures
  - Updated safety objectives or safety performance targets
  - Changes resulting from continuous improvement activities (not required for small public transportation providers)

Example:
Updated Employee Safety Reporting Program (ESRP) Procedure

Updated Procedure

Does the ASP include the text of the procedure?

YES

NO

YES

NO

Does the ASP include details about the ESRP that are inconsistent with the new procedure?

⚠️ Update the ASP

✕ No update needed to address this change

More Examples: How do we know if we need to update our ASP?

- Updates to reflect new or revised FTA policy, regulations, or other requirements for the ASP, such as:
  - Updates to the safety performance measures in FTA's National Public Transportation Safety Plan
- For rail transit only, updates to reflect new or revised requirements from your SSOA

What must agencies do if they update their ASP?

- Updated ASPs must be signed by the Accountable Executive (§ 673.11(a)(1))

- Updated ASPs must be approved by the Board of Directors or Equivalent Authority (§ 673.13(a))

- For rail transit agencies, the ASP must be reviewed and approved by the SSOA (§ 673.13(a))

When should we complete our first annual ASP review?

- Your agency may develop an ASP review process and timeline that complements your agency's existing review cycles and other activities

- Your agency may choose to use your initial certification date as the due date for your annual ASP review

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Documenting the ASP Review

- As part of your agency's PTASP documentation and recordkeeping practices, your agency will create a record to demonstrate that your agency completed its annual ASP review

- If your agency makes updates to the ASP as a result of your annual review, demonstrating that your agency carried out an annual review can be as simple as updating a revision log in the ASP

Documenting the ASP Review

- FTA does not require your agency to go through the signature and approval process unless the ASP was modified

- If the ASP was not updated, documentation demonstrating that your agency performed an ASP review could include an ASP review checklist (more on this in just a few slides), a memorandum, meeting notes, etc.

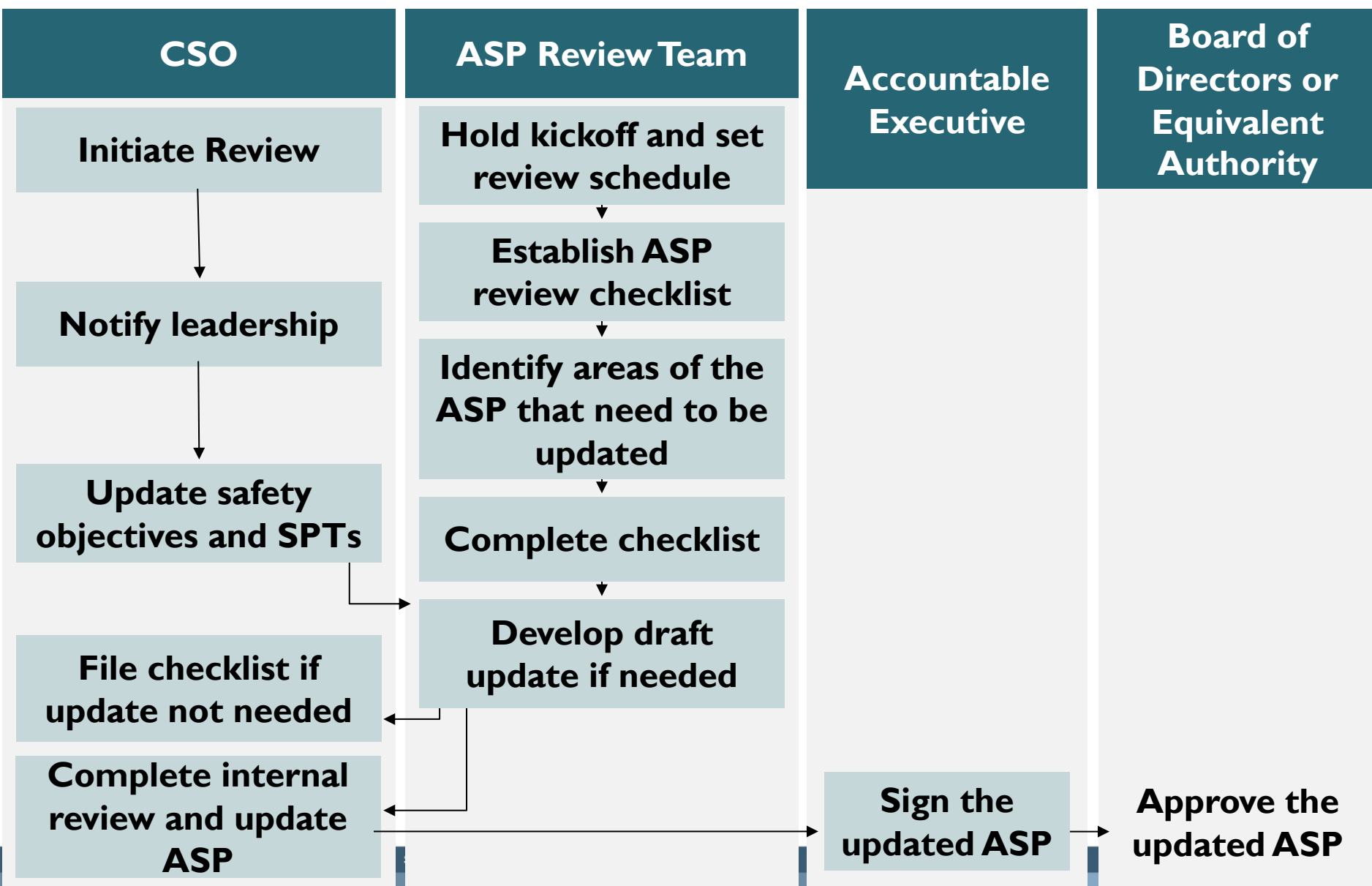# CONSIDERATIONS FOR ANNUAL ASP REVIEWS

Where to begin?

- Most agencies outlined or referenced a process and timeline for annual ASP reviews and updates in their ASP

- The annual ASP review process will vary among agencies based on their organizational structure, size and complexity, document handling and approval processes, etc.

  - The process and timeline your agency included in your ASP may differ from the considerations we present over the next several slides... and that's okay!

  - Your agency may choose to change its ASP review process and timeline based on lessons learned from your agency's ASP review and update experience
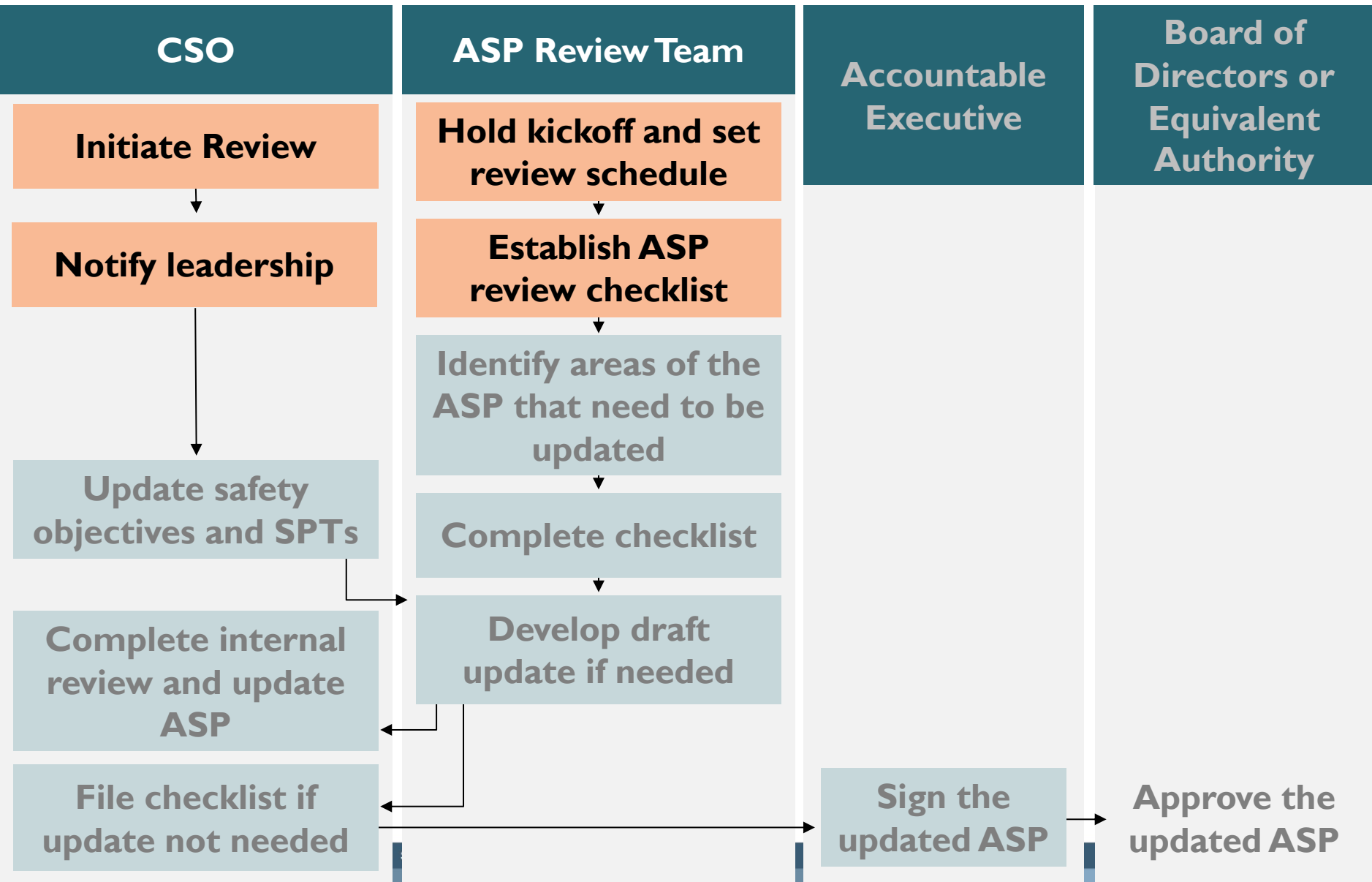
ASP Annual Review Checklist

- Agencies may consider using a checklist to guide the annual review process

- Consider checklist items such as:
  - Are each of the required PTASP regulation requirements still addressed in the ASP (particularly important if your agency does make changes to the ASP)?
  - Does your ASP accurately reflect how your agency carries out PTASP regulation requirements?

- You could also include a checklist item for each person/department that needs to review the ASP to help monitor the ASP review process

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Sample Annual ASP Review Process

CSO	ASP Review Team	Accountable Executive	Board of Directors or Equivalent Authority
Initiate Review	**Hold kickoff and set review schedule**		
Notify leadership	**Establish ASP review checklist**		
Update safety objectives and SPTs	**Identify areas of the ASP that need to be updated**		
	Complete checklist		
File checklist if update not needed	**Develop draft update if needed**		
Complete internal review and update ASP		**Sign the updated ASP**	**Approve the updated ASP**

Start Up Activities

CSO	ASP Review Team	Accountable Executive	Board of Directors or Equivalent Authority
Initiate Review	**Hold kickoff and set review schedule**		
Notify leadership	**Establish ASP review checklist**		
Update safety objectives and SPTs	**Identify areas of the ASP that need to be updated**		
Complete internal review and update ASP	**Complete checklist**		
	Develop draft update if needed		
File checklist if update not needed		**Sign the updated ASP**	**Approve the updated ASP**

Sample Annual ASP Review Process: Start Up Activities

- During this phase of an ASP review, the transit agency may find it helpful to consider the following questions:

  - Who is involved in the ASP review?

    - Does this include the CSO, Safety Department, Department Heads, Accountable Executive (AE), etc.?

  - Who is responsible for the ASP review?

    - If the ASP review involves multiple people, who will perform each step and who is ultimately responsible for each step of the process?

  - How will we communicate about the ASP review?

    - If multiple departments or people are conducting their own ASP review, how will we share our review results?

Review Activities

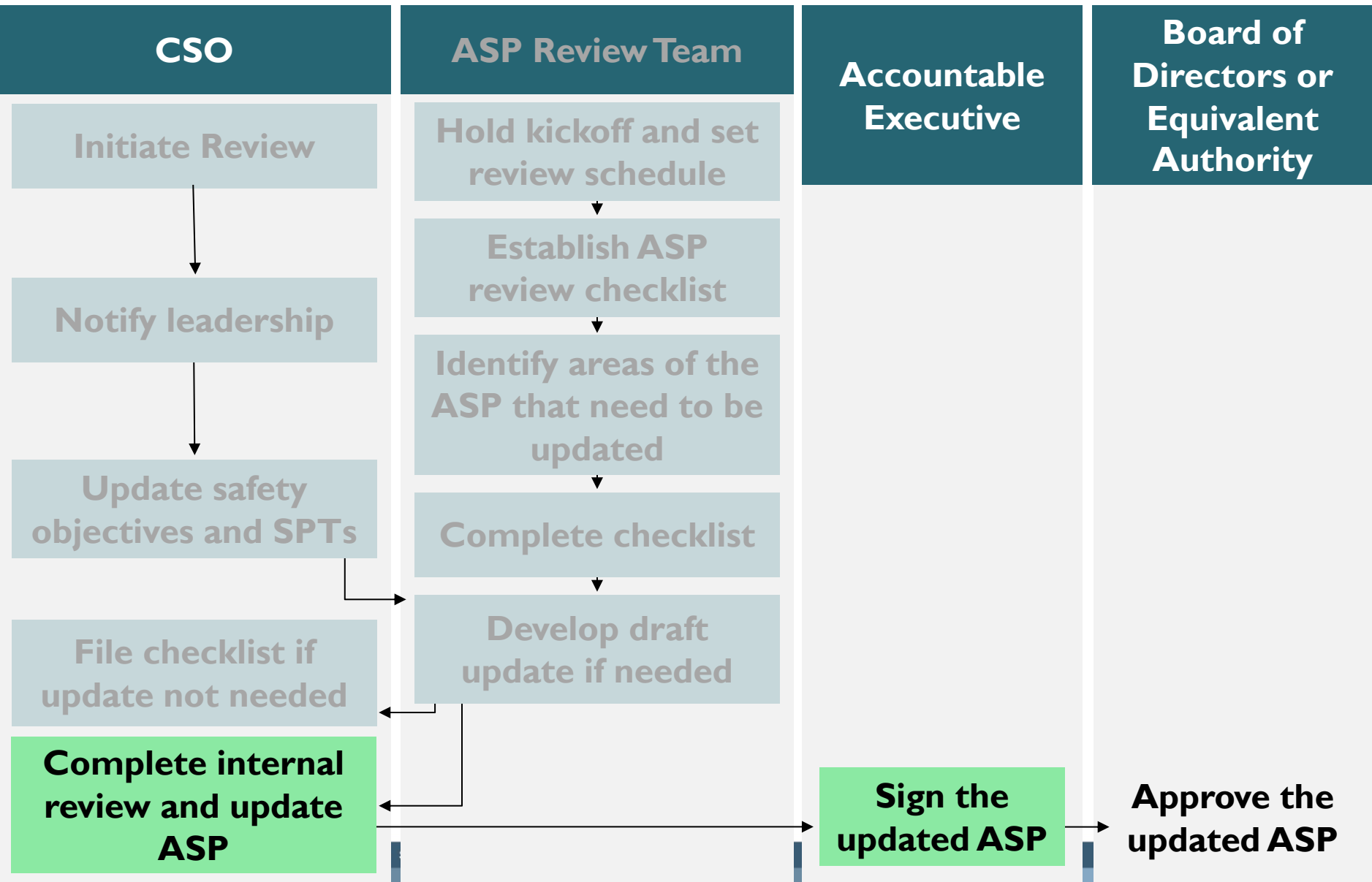| CSO	ASP Review Team	Accountable Executive	Board of Directors or Equivalent Authority
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File checklist if update not needed	Develop draft update if needed		
Complete internal review and update ASP		Sign the updated ASP	Approve the updated ASP

Sample Annual ASP Review Process: Review Activities

- During this phase of an ASP review, the transit agency may find it helpful to consider the following questions:

  - Who has the authority to decide whether updates are necessary?

    - Does our CSO decide whether an update is necessary?

  - If updates are necessary, who is responsible for updating the ASP?

    - Who should review the updated ASP before it goes to the AE for signature and the Board or Equivalent Authority for approval?

Closeout Activities

CSO	ASP Review Team	Accountable Executive	Board of Directors or Equivalent Authority
Initiate Review	Hold kickoff and set review schedule		
Notify leadership	Establish ASP review checklist		
Update safety objectives and SPTs	Identify areas of the ASP that need to be updated		
	Complete checklist		
File checklist if update not needed	Develop draft update if needed		
Complete internal review and update ASP		Sign the updated ASP	Approve the updated ASP

Sample Annual ASP Review Process: Closeout Activities

- During this phase of an ASP review, the transit agency may find it helpful to consider the following question:

  – How will we document our annual review?

    - If your agency revises your ASP, you could document this in an ASP revision log

    - If your agency does not revise your ASP, you could document this through a memorandum, completed review checklist, etc.

Lessons Learned from Your Agency's ASP Review and Update Process

- Don't forget: the ASP annual review process is not "one size fits all"

- The ASP annual review process and timeline your agency outlined in your ASP may be different from the examples we provide… and that's okay!

- Start with your written processes and timeline and make changes based on lessons learned as you experience your first annual ASP review

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TRANSIT PRESENTATIONS

Brian P. Hinkle

Chief Safety Officer
Milwaukee Streetcar
(The Hop)
Milwaukee, WI

Biography

- Brian has served as the Chief Safety Officer for The Hop since 2018
- Prior to working for The Hop, Brian worked in the Safety Department for the City of Milwaukee Department of Public Works
  - Responsible for training for seven departments (around 2,000 full time employees) and all injury and ADA case management
  - Designated employer representative for the drug and alcohol program
- Brian served 12 years with the Milwaukee Police Department as a Police Officer and Police Sergeant
- Brian graduated from the University of Wisconsin Madison with a Bachelor's in Sociology

Agency Characteristics and Services

- Hop owned by City Of Milwaukee Dept. of Public Works

- Streetcar revenue service began November 2, 2018

- Current M Line route 4.04 miles

- 17 stations

- 5 Brookville Liberty vehicles

- Future plans include L-line extension (1.9 miles and Couture)

- City has 2 FTEs, AE, and Board of Directors

- Transdev current contractor (22 FTE)

Annual ASP Review

Agency's ASP review policies and procedures

– Written into the ASP is the process itself

– To summarize:

- AE delegates authority to CSO for oversight
- OMC conducts ongoing review to CSO
- Built in deadlines
    - SRC by September
    - SSO by November

Annual ASP Review

Agency's ASP review policies and procedures

– We had a starting point

– Small group was easy to assign tasks in PTASP

– Key components

- PTASP evolved from SSPP.
- SSPP was purposely written with PTASP on the horizon in 2018.
- PTASP drafts submitted to TAC for review.
- Data/progress shared with SSO.
- Completed in June 2020 and accepted by Board of Directors.
- Accepted by SSO July 14, 2020.

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Annual ASP Review

Process Management assets
   – We played to our strengths
        Small agency=short list of stakeholders
        New agency=no long term bad habits
        Less turnover=longer relationships
        No experience=more communication
        SSO triennial audit November 2019

Annual ASP Review

Experiences and lessons learned

-Process written into PTASP.

-PTASP review due to SSO in November each year.

-First review was quick and easy building muscle memory.

-Attend as many webinars as I can. Learn something each time.

Adrian Chavera
Chief Safety Officer
El Metro Transit
Laredo, Texas

- Chief Safety Officer at El Metro
- Member of the following committees and teams at El Metro:
    - SMS Committee
    - SMS Team
    - Safety Risk Assessment Team
    - Safety Planning and Advisory Committee
- Member of the American Society of Safety Professionals (ASSP)
- Member of the National Association of Safety Professionals (NASP)
- Joined El Metro on June 4, 2007
- 6 years Experience in Safety Prior to Joining El Metro

Agency Characteristics and Services

- El Metro is a small public transportation service provider for the City of Laredo, Texas and is the largest transit provider in the region.

- El Metro works with a fleet of over forty-seven fixed route buses, one trolley and fifteen demand-response "El Lift" vans.

- El Metro operates fixed route services seven days a week across 23 routes within the City of Laredo.

- El Metro operates El Lift Paratransit, which provides shared origin to destination public transportation to people with disabilities who are unable to use El Metro's fixed route buses.

Annual ASP Review

- How El Metro Transit initially established and carried out the agency's ASP annual review.
  - Initial ASP
  - Collaboration with Texas Department of Transportation (TxDOT) and Alliance Transportation Group (ATG)
  - El Metro leadership met with ATG
  - Fulfilled document request list sent by ATG
  - Safety Performance Targets sent for review to all leadership
  - Final draft distributed to all El Metro leadership for review
  - Laredo Mass Transit Board (City Council) Approval and Adoption
  - Laredo Webb County Area Metropolitan Planning Organization (LWCAMPO) and TxDOT
  - Certify Compliance in FTA's TrAMS

Annual ASP Review

- How El Metro Transit manages the overall process.
  - SMS Committee (All Leadership) must review agency operations.
  - CSO updates Safety Performance Targets with the LWCAMPO and TxDOT
  - CSO makes sure that all revision requests are turned in by deadline.
  - CSO will draft a revised ASP
  - CSO will deliver final draft of ASP to SMS Committee for review
  - The Laredo Mass Transit Board will review, approve and adopt the ASP
  - Accountable Executive signs and adopts the approved ASP
  - CSO Coordinates approved Safety Performance Targets to LWCAMPO and the Texas Department of Transportation
  - Grants Administrator will certify compliance of ASP in Category 2 in TrAMS.

Annual ASP Review Lessons Learned

- Second version of the ASP
- The following committees and teams were created to improve the communication and management of the ASP and SMS:
    - SMS Committee
    - SMS Team
    - Safety Risk Assessment Team
- Revised schedule of the ASP annual review process
- The modified schedule allows the internal stakeholders to have adequate time to review, adopt and update the ASP for compliance
- Documentation is kept electronically and in paper form for ready reference
- Recommended an action plan to involve the LWCAMPO and TxDOT to coordinate the selection of Safety Performance Targets
- FTA and PTASP-TAC documents, guides and webinars

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FTA Resources

- [PTASP Technical Assistance Center](#)

- [Small Transit Providers](#)

- [PTASP Agency Safety Plan Review, Approval and Certification: Webinar, Thursday, March 19, 2020](#)

- [Certifying Compliance with the Public Transportation Agency Safety Plan Regulation](#)

- [Agency Safety Plan Lessons Learned](#)

- [Public Transportation Agency Safety Plan Checklist For Bus Transit](#)

- [Safety Performance Targets Fact Sheet](#)

- [Safety Performance Targets Guide](#)

- [Understanding the Agency Safety Plan Review, Approval and Certification Process[1]](#)

Thank you!

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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

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Charlottesville, VA 22901

QUESTIONS AND ANSWERS