

FTA



FEDERAL TRANSIT ADMINISTRATION

Implementing Safety Management Systems (SMS) Authorities, Accountabilities, and Responsibilities

May 27, 2021



U.S. Department of Transportation
Federal Transit Administration

Webinar Objectives

- Discuss requirements for establishing SMS authorities, accountabilities, and responsibilities (AAR)
- Provide considerations for implementing SMS AAR

Agenda

- Public Transportation Agency Safety Plan (PTASP) regulatory requirement for establishing AAR
- Considerations for carrying out established AAR
- Transit agency presentations
- Q&A

OVERVIEW OF SMS AUTHORITIES, ACCOUNTABILITIES, AND RESPONSIBILITIES



AAR for Safety Management

The transit agency must establish the necessary AAR for the management of safety (§ 673.23(d))

Authorities, Accountabilities, and Responsibilities

Authorities

What is the position authorized to do?

Accountabilities

What is the position accountable for?

Responsibilities

What must the position do or oversee the accomplishment of?

This is just one way your agency could consider AAR!

AAR in an SMS



PTASP Requirement: Organizational Accountabilities and Responsibilities

- Transit agencies must establish organizational accountabilities and responsibilities (§ 673.23(a))
 - Including and beyond the Accountable Executive, Chief Safety Officer (CSO) CSO/SMS Executive, leadership and executive management, and key staff
- Organizational accountabilities and responsibilities are the basis for who does what in the SMS and who makes sure that it gets done

Which specific roles does the PTASP regulation mention?

The transit agency must establish AAR for the management of safety, as they relate to the **development and management of the transit agency's SMS**, for the following individuals:

- Accountable Executive
- Chief Safety Officer (CSO) or SMS Executive
- Agency leadership and executive management
- Key staff ([§ 673.23\(d\)](#))

Accountable Executive

- A single, identifiable person who has ultimate responsibility for carrying out the Agency Safety Plan (ASP) and the Transit Asset Management (TAM) Plan ([§ 673.5](#))
- Has control or direction over the human and capital resources needed to develop and maintain the ASP and TAM Plan ([§ 673.5](#))
- Signs the ASP ([§ 673.11\(a\)\(1\)](#))
- Typically held by the agency's General Manager, Chief Executive Officer, President, or similar position

Examples of Accountable Executive AAR in Action

- **Authorized** to complete certification in the Transit Award Management System
- The Board of Directors may hold the Accountable Executive **accountable** for ensuring action is taken to address substandard performance
 - When substandard performance is identified, the Accountable Executive must ensure that the agency develops and carries out a plan to address substandard performance
- The Accountable Executive may be **responsible** for sharing the ASP, including safety performance targets, with the Metropolitan Planning Organization

CSO/SMS Executive

- Adequately training individual with authority and responsibility for day-to-day implementation and operation of the SMS ([§ 673.5](#))
- Designated by the Accountable Executive and has a direct line of reporting to the Accountable Executive ([§ 673.5](#) and [§ 673.23\(d\)\(2\)](#))
- For rail modes, may not serve in other operational or maintenance capacities except those with a nexus to safety ([§ 673.5](#))

Examples of CSO/SMS Executive AAR in Action

- The CSO may be **authorized** to assign rules compliance monitoring tasks to front line supervisors and **authorized** to act on the results
- The Accountable Executive may hold the CSO **accountable** for ensuring that the agency conducts an annual ASP review
- The CSO may be **responsible** for reviewing reports submitted under the Employee Safety Reporting Program

Agency Leadership and Executive Management

- Members of leadership or executive management, other than the Accountable Executive or CSO/SMS Executive, who have authorities and responsibilities for day-to-day implementation and operation of an agency's SMS (§ 673.23(d)(3))
- This could include department heads, superintendents, supervisors, or other positions
 - Individuals with authorities and responsibilities for day-to-day implementation and operation of the agency's SMS may vary from agency to agency based on agency size or structure

Examples of Agency Leadership and Executive Management AAR in Action

- Agency leadership and executive management may be **authorized** to accept safety risk as part of the Safety Risk Management process
- The Accountable Executive may hold agency leadership and executive management **accountable** for modifying policies within their business unit to reflect the ASP
- Agency leadership and executive management may be **responsible** for providing subject matter expertise to the safety department upon request

Key Staff

- Individuals who support the agency in developing, implementing, and operating the agency's SMS
 - Other than the Accountable Executive, CSO/SMS Executive, and agency leadership or executive management ([§ 673.23\(d\)\(4\)](#))
- Key staff may vary among agencies depending on their structure, but could include:
 - Safety officers or other Safety Department workers who conduct Safety Risk Management activities
 - Frontline supervisors who conduct rules compliance testing as part of the agency's Safety Assurance activities
 - Training personnel who develop and deliver courses in the agency's comprehensive safety training program under Safety Promotion

Examples of Key Staff AAR in Action

- The CSO could **authorize** key staff to determine safety risk during the safety risk assessment process
- Key staff could be **accountable** for incorporating suggested ASP changes into a draft ASP during the annual ASP review and update process
- Key staff could be **responsible** for maintaining training records for workers covered under the agency's comprehensive safety training program

CONSIDERATIONS FOR IMPLEMENTING SMS AAR



Why focus on implementation?

Implementing AAR for these individuals is key to effectively carrying out and monitoring SMS functions

- The AAR assigned to these four positions generally function to set SMS processes in motion and keep them running successfully
- In turn, these individuals may authorize and establish responsibilities for safety among other agency workers

Where to begin?

- Transit agencies established AAR for the development and management of the transit agency's SMS in their **ASP**
- Transit agencies should ensure that AAR they specified in their ASP are carried out in their agency



Carrying out AAR Specified in the ASP

- If your agency has not already done so, consider how your agency implements these AAR
- For example, your agency could:
 - Update position descriptions and/or metrics for performance reviews
 - Add AAR-related elements to existing quality assurance activities, such as rules compliance testing



AAR in the ASP

- In general, the AAR your agency outlined in your ASP set up a framework for carrying out the SMS described in the ASP
- These are generally “big picture” AAR, such as accountability for the Safety Risk Management process, authority for setting up and managing the Employee Safety Reporting Process (ESRP,) etc.



Authorized to
set up and manage
the ESRP

Accountable for
day-to-day
operation of the
Safety Risk
Management
process

Beyond AAR in the ASP

- The AAR in the ASP may not describe all the AAR necessary to carry out each element of the ASP/SMS
- Your agency may find benefit in considering “lower level” AAR, as needed, to carry out the ASP
 - For example, your CSO may be authorized to set up and manage the ESRP
 - Your agency may set up AAR for day-to-day operations of the ESRP

CSO

Authorized to
set up and manage
the ESRP

Supervisor

Responsible for
staffing ESRP
hotline

Identifying Areas with AAR Gaps

Authorities

Who is authorized to carry out this element of the ASP or SMS?

Is everyone authorized for this element or parts of this element officially authorized?

Accountabilities

Who is accountable for this element of the ASP or SMS?

Is everyone with accountability for this element or parts of this element officially assigned accountability?

Responsibilities

Who is responsible for executing or for overseeing this element of the ASP or SMS?

Is everyone with responsibilities for this element officially assigned responsibility?

Identifying Areas with AAR Gaps

To identify any areas that may have gaps in AAR, your agency may consider the following questions for each SMS element:

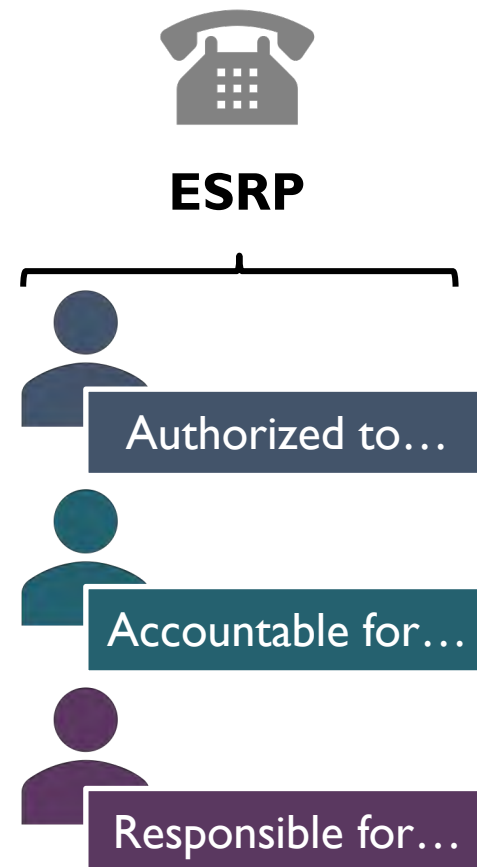
- Who contributes to setting up this element of the SMS?
- Who assists with or contributes to the implementation, operation, and oversight of this SMS element?
- Who allocates resources to support the objectives of this SMS element – that is who has the AAR to ensure we have the people or finances we need to support this element?

Example: ESRP AAR

- Consider the ESRP – does your agency define and carry out AAR necessary to ensure the ESRP is carried out and implemented? For example:
 - AAR for running the ESRP (i.e., answering hotline calls, performing intake of emails or written reports, etc.); or
 - AAR for responding to reports submitted through the ESRP, etc.
- Some agencies may have had an employee safety reporting process in place prior to the ASP, so they may have AAR already in place for the ESRP

Example: ESRP AAR

- These agencies may, however, need to assign AAR for elements of the ESRP that they did not previously carry out
- For example, an agency's previous safety reporting process may not have included a process to inform reporters of actions taken to address their submitted safety concerns

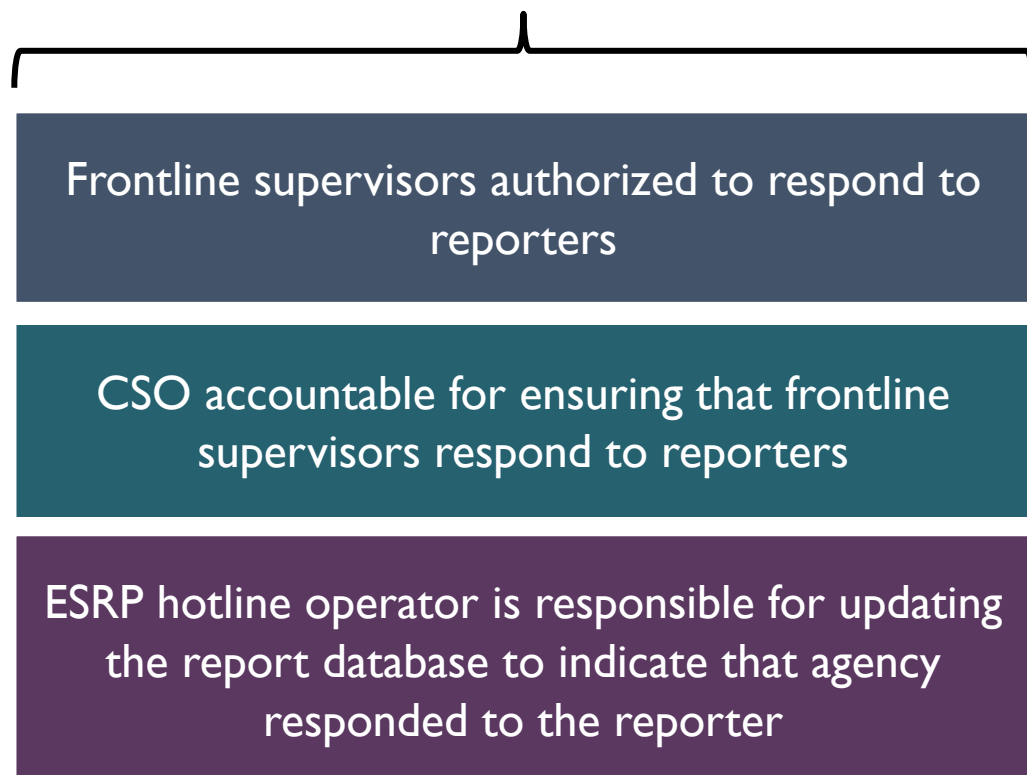


Example: ESRP AAR

The transit agency may implement new AAR to ensure that the agency carries out the requirement to inform reporters of actions taken to address their submitted safety concern



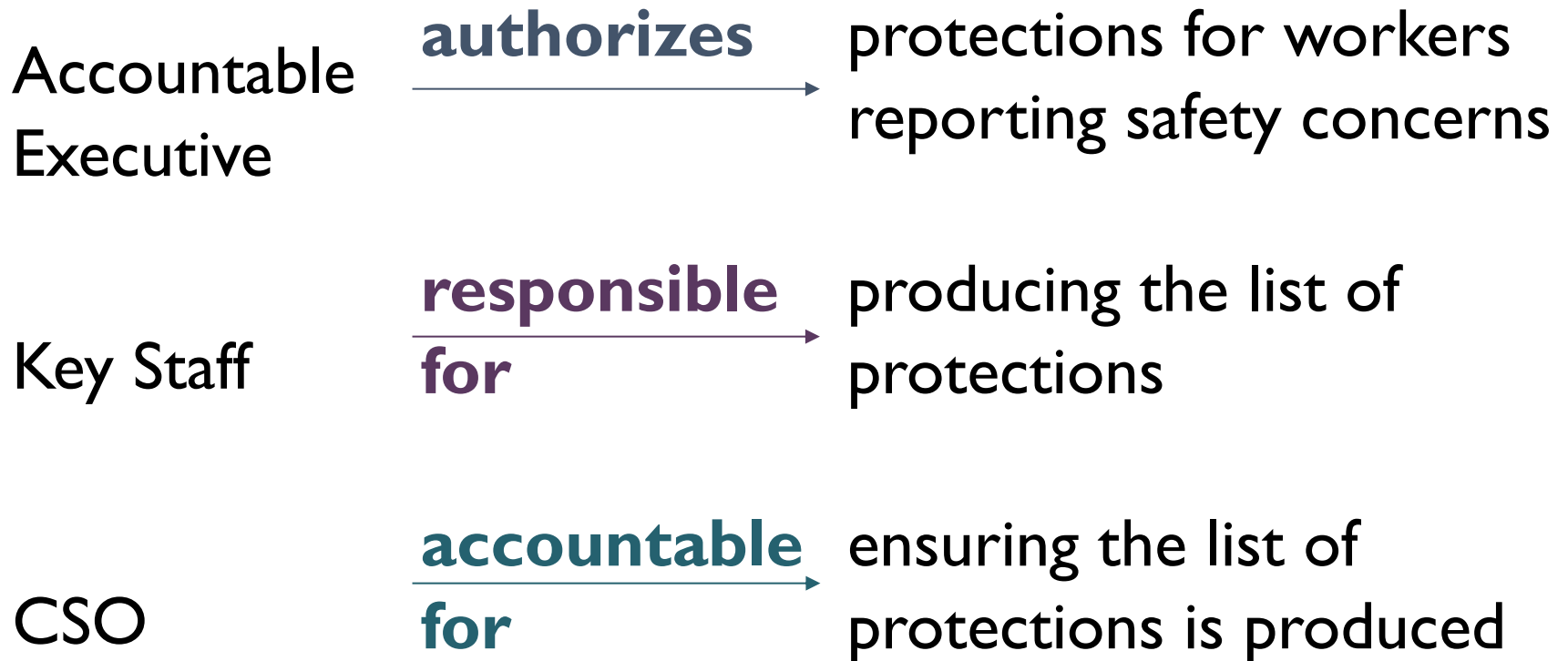
ESRP



Example: ESRP AAR

- Some agencies may not have previously implemented a safety reporting program at all
- Let's look at a few aspects of an ESRP where agencies may identify AAR gaps
 - Protections for workers reporting safety concerns (§ 673.23(b))
 - Ensuring all workers have access to the ESRP (§ 673.23(b))
 - Reviewing and responding to ESRP reports (§ 673.29(b))

Example: AAR for Protections for Workers Reporting Safety Concerns



Example: AAR for Ensuring Contractors have Access to the ESRP

Accountable
Executive

delegates
responsibility to

contractor management
to ensure their workers
have access to the ESRP

Contractor
Management

responsible for

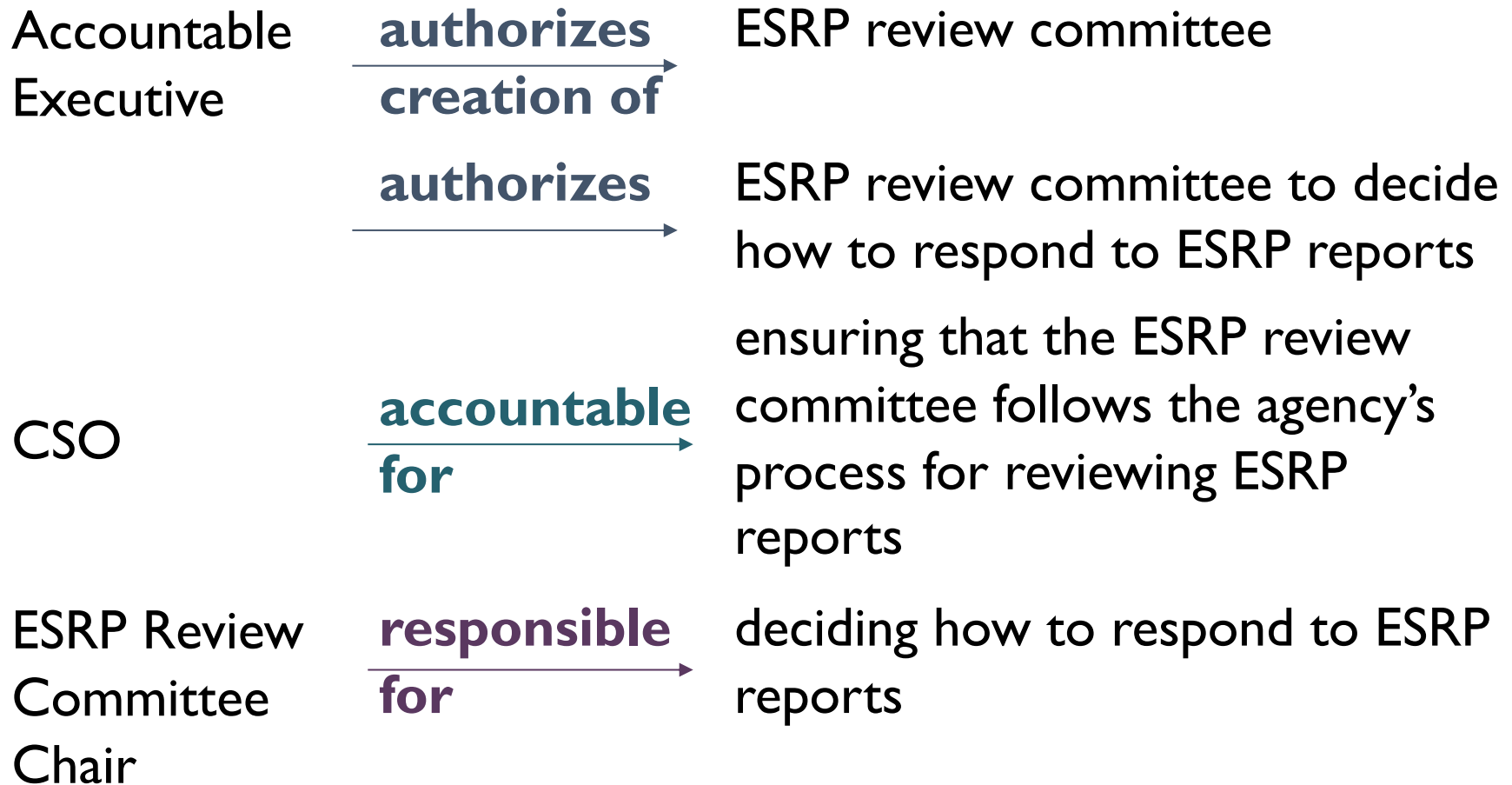
ensuring their workers
have access to the ESRP

CSO

accountable for

ensuring all workers
have access to the
agency's ESRP

Example: AAR for Reviewing and Responding to ESRP Reports



Example: AAR for Taking Action to Address Substandard SMS Performance

- The Accountable Executive is responsible for taking action to address substandard performance in the agency's SMS (§ 673.23(d)(1))
- The agency holds the CSO accountable for ensuring that the safety department conducts hazard identification activities
- The safety department is authorized to conduct hazard identification activities

Example: AAR for Taking Action to Address Substandard SMS Performance

The agency assessed only one hazard over the previous six months; this could indicate that the existing hazard identification process is insufficient



The Accountable Executive authorizes the CSO to update the safety hazard identification process



The CSO updates the existing safety hazard identification process



The CSO reports on the revised process and the increase in hazard identification and assessment

Don't Forget Documentation!

- The PTASP regulation requires transit agencies to maintain documents that set forth the ASP, including those relating to the implementation of the SMS and the results of SMS processes and activities for a minimum of three years ([§ 673.31](#))
- Consider how your agency will document AAR across the agency, such as in the ASP, in job descriptions, etc.

TRANSIT PRESENTATIONS



FEDERAL TRANSIT ADMINISTRATION



David Moskowitz

Charlotte Area Transit System
Charlotte, NC

- Over 30 years of safety, security, emergency preparedness and healthcare experience
- Over 10 years as Public Transportation Safety, Security and Emergency Management
- WSO Certified Safety Executive and Safety & Security Director
- Completed TSSP and Public Transportation Safety Certification Training Program (PTSCTP) for Rail
- Has a Masters Degree and two Bachelor Degrees
- Is the Chief Safety Officer and SMS Manager for CATS responsible for developing, managing and implementing SMS/ASP for the agency
- Responded and managed incidents at the local, state and federal levels
- Some day-to-day responsibilities include managing the safety and security of all our modes of transportation and facilities, providing training, conducting audits, investigating incidents, review construction plans, and writing grants



FEDERAL TRANSIT ADMINISTRATION

Agency Characteristics and Services

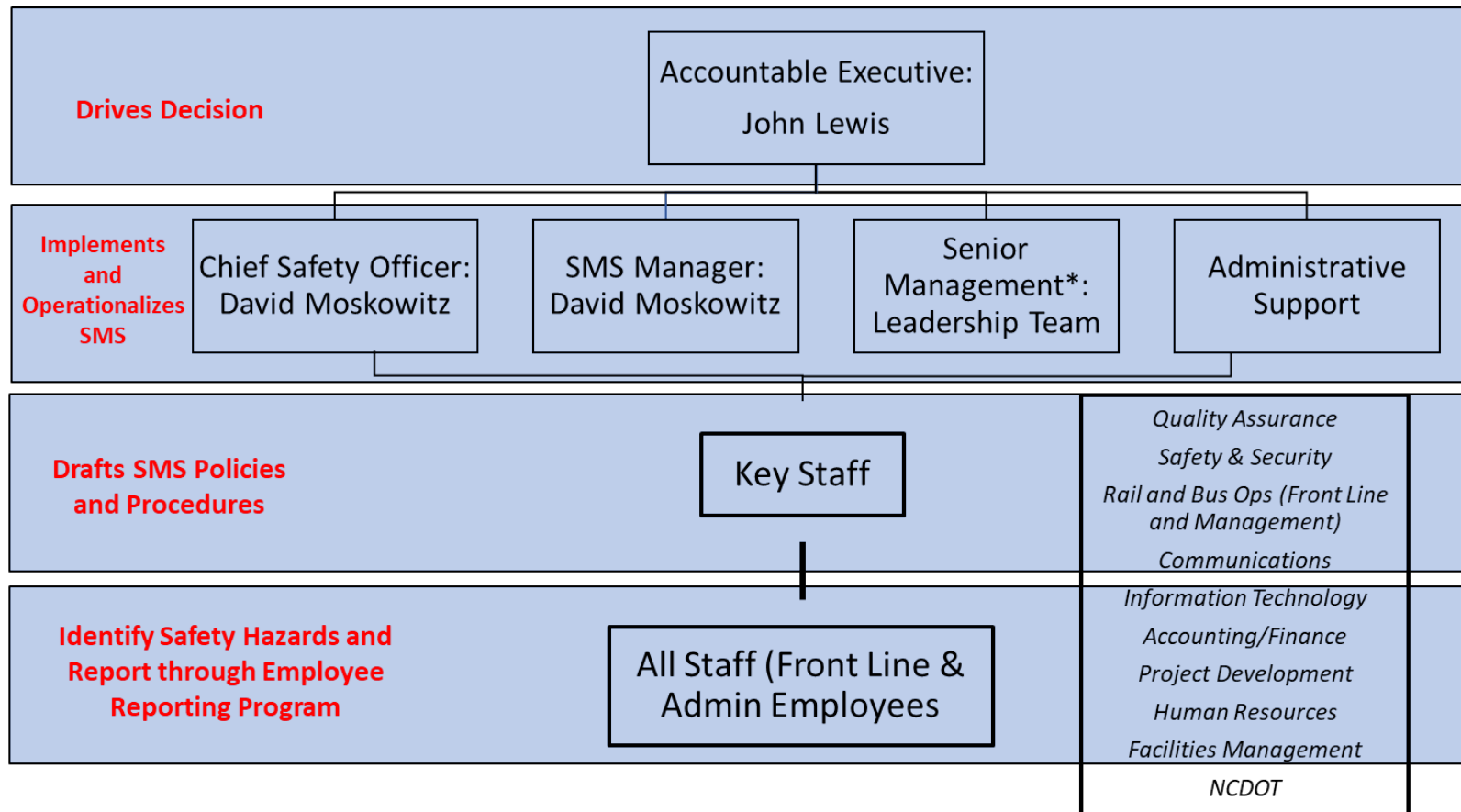
- CATS' Multi-modal services cover the Charlotte region
 - 304 Fixed Bus Routes
 - 16 Express Routes and 3 Regional Express Routes
 - 10 Neighborhood shuttles/circulators
 - 83 Special Transportation Services (STS) Routes
 - 51 Vanpools
 - 1 Light Rail Line (I-485 to UNC CLT)
 - 26 stations, including with 18.9 Miles of Double Track
 - 1 Streetcar Line (Phase II opening in 2021)
 - 17 Stops with 2.5 Miles of Double Track
- FY19 Rail ridership \approx 8.2 Million
- FY19 Bus ridership \approx 12.9 million
- LYNX ridership \approx 22,520 average daily



SMS Authorities, Accountabilities, and Responsibilities

- How your agency established SMS authorities, accountabilities, and responsibilities
 - Following 49 CFR 673 CATS expanded the safety plan to include required key elements such as:
 - Leadership commitment to implement SMS/ASP at agency
 - Anonymous reporting system
 - Assurances to employees of no retaliation for reporting safety concerns
 - Ensuring all staff and contractors followed the approved Agency Safety Plan
 - Leadership identified key staff to serve as Accountable Executive, Chief Safety Officer, SMS Manager and SMS Workgroup

CATS SMS Organization Chart

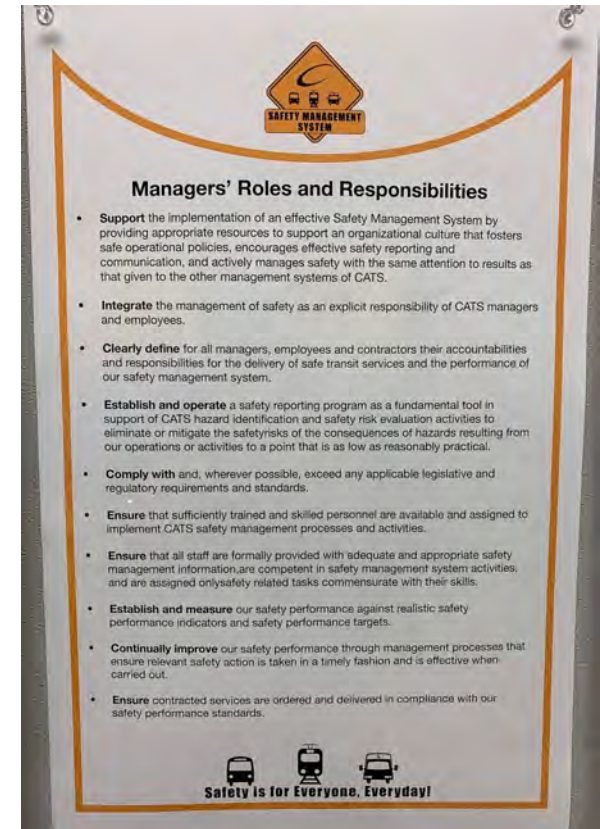
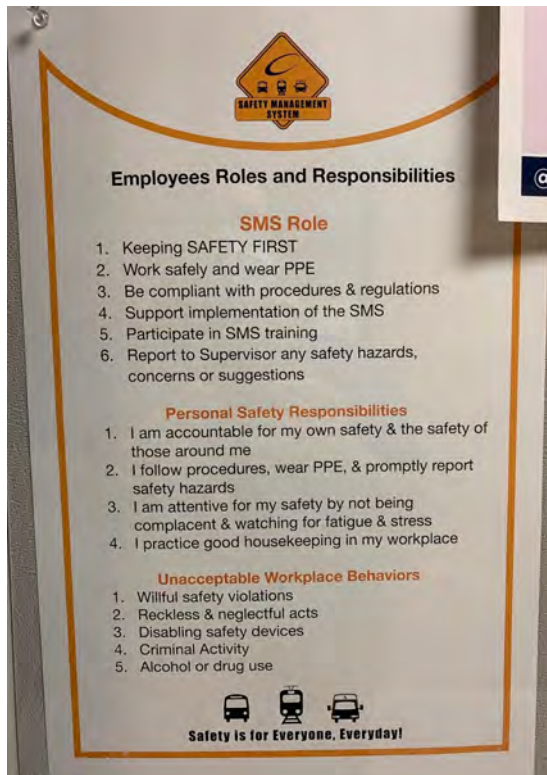


*Includes Executive leaders, from all agency functions or departments, that support revenue service operations.

SMS Authorities, Accountabilities, and Responsibilities

- How your agency took your SMS authorities, accountabilities, and responsibilities from the page of the ASP and put them into action
 - NCDOT Approved CATS ASP in June 2020
 - Updated CATS Rail Safety Policy
 - Posted copy of safety policy signed by all CATS Leadership
 - Posted Roles and Responsibilities of Employees and Management in Key Areas
 - NCDOT Approved Phase I of the Implementation Plan in December 2020
 - CATS Implementation

Posters Hanging Around Facilities



SMS Authorities, Accountabilities, and Responsibilities



- SMS Training for Managers and Frontline employees are being developed
- Drafted New Risk Registry and Safety Hazard Logs
- Rail Operations and Maintenance Staff were all provided with refresher training on their safety roles and responsibilities and reviewed the updated agency safety policy
- Staff was also provided with Safety Card that has the following information:
 - The various methods to report safety concerns
 - SMS Role of the Employee
 - Personal Safety Responsibilities
 - Unacceptable Workplace Behaviors

SMS Authorities, Accountabilities, and Responsibilities

- Your agency's experiences and lessons learned relating to SMS authorities, accountabilities, and responsibilities:
 - Understanding the various roles and responsibilities of frontline, management and leadership positions in the SMS Culture
 - Shifting the agency safety culture into the Safety Management Systems (SMS) structure/culture
 - Identifying the SMS specific staff and resources needed to successfully implement SMS at CATS
 - Hiring more safety staff
 - Upgrading software programs to document, manage, track and analyze all of the safety data that needs to be collected and analyzed



Kimberly Gayle

San Joaquin Regional Transit
District (RTD)



- Deputy Chief Executive Officer of the San Joaquin RTD
- Instructor, Fundamentals of Transit Grant and Funding, University of the Pacific
- Joined RTD in 2019 to lead the legislation and grants office
- Prior to joining the RTD, Ms. Gayle served as the Director for Policy Review and Development at the FTA
- Served in the California Department of Transportation for 30 years, working on highway and transit projects

San Joaquin RTD Characteristics & Services

Who We Are

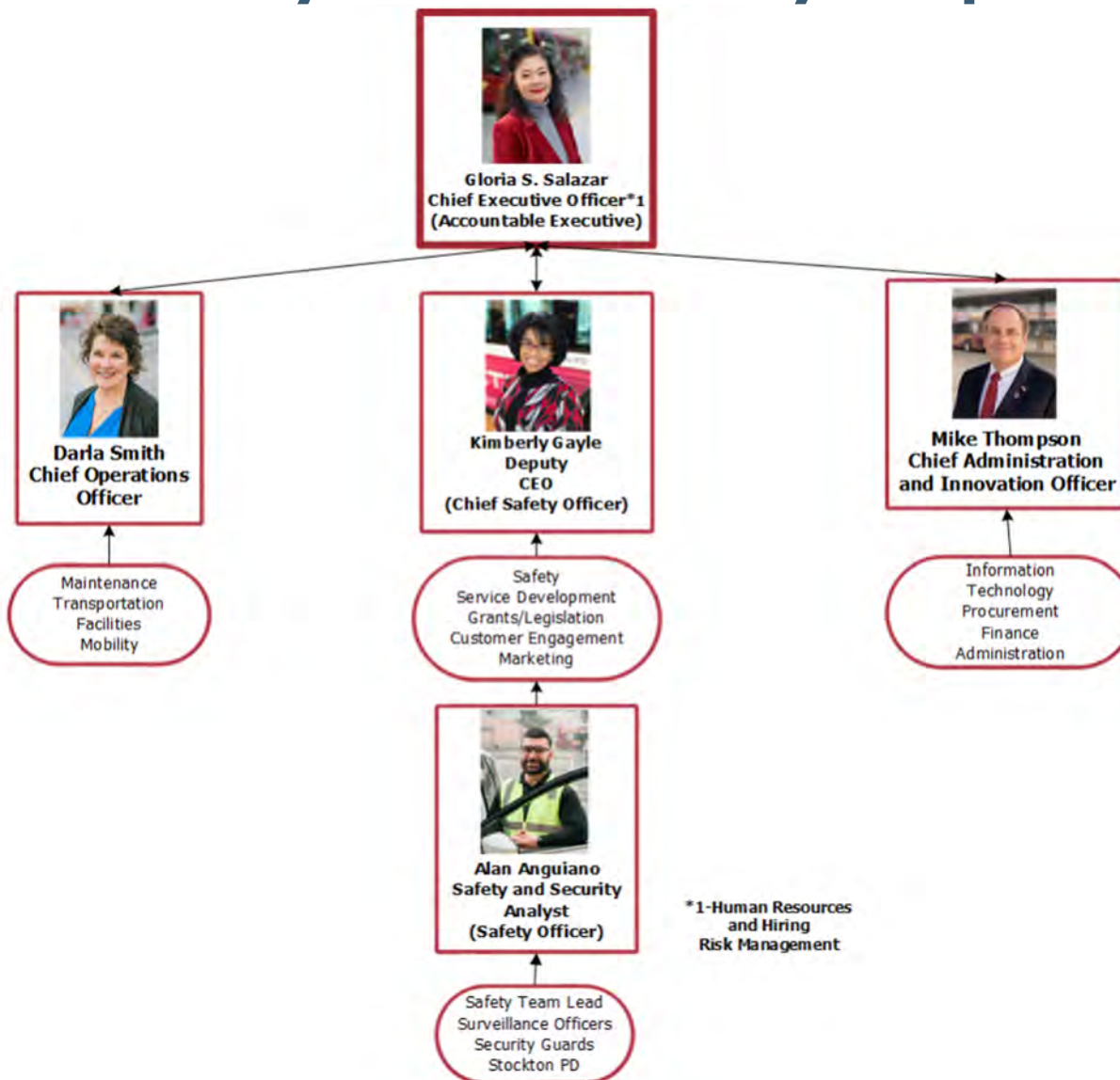
San Joaquin Regional Transit District is the regional transit provider for San Joaquin County, serving the Stockton Metropolitan Area, County with intercity, interregional, and rural transit services.

Services RTD Provides

- Bus Rapid Transit Express
- Local Stockton Metro Area
- Metro Hopper (Stockton)
- Countywide Hopper Service
- Commuter Bus Service
- Van Go! On-Demand Service
- ADA Paratransit Service



Safety Authority/Accountability/Responsibilities



SMS Authorities, Accountabilities, and Responsibilities

- RTD developed an SMS “Operations Plan” in conjunction with the PTASP to help clarify roles and responsibilities and provide detailed processes for implementing and operating SMS strategies.
- SMS Operations Plan includes roles and responsibilities focused on Transportation Operations and Maintenance staff/managers and contractors.

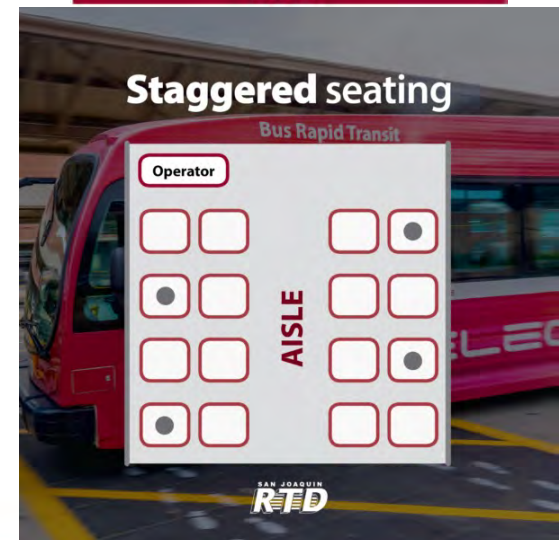
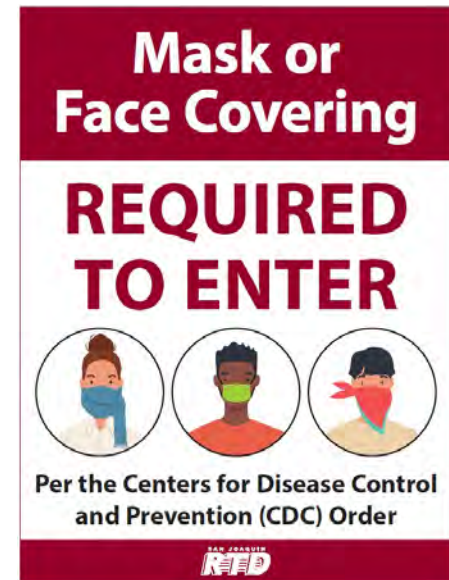


SMS Authorities, Accountabilities, and Responsibilities

- SMS Operations Plan identifies specified roles and responsibilities for Subject Matter Experts (SME).
- Includes roles and responsibilities of frontline employees in reporting and responding to safety concerns.
- SMS Operations Plan is a “living” document with regular updates and training.
- Reinforced roles and responsibilities for Safety Officer to ensure accountability and compliance.

Areas of SMS Application

- COVID-19 Awareness & Response Protocols
- COVID-19 Protections
- Traffic Safety at Transfer Center Tarmacs
- Transit Safety on Buses
- Public Safety at Facilities
- TSA Security Program for Commuter Service
- Transition From Contracted Service to “In-House” Delivery Consistent With SMS Principles & Application



Special Thanks to SMEs

- Gary Gleason (Technical Assistance with Agency Safety Plan creation)
- Ream Lazaro (Technical Assistance with SMS Operations Plan creation and implementation)



San Joaquin Regional Transit District

Through our Agency Safety Plan and SMS Operations Plan everyone at RTD has a responsibility for Safety.



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

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		PTASP Technical Assistance Center 943 Glenwood Station Lane, Suite 102 Charlottesville, VA 22901

QUESTIONS AND ANSWERS

