



Safety Management Systems Techniques for Monitoring Operations and Maintenance Procedures

The Public Transportation Agency Safety Plan (PTASP) regulation requires each applicable transit agency to “monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance” ([49 CFR 673.27\(b\)\(1\)](#)).¹

The Safety Assurance component of an Agency Safety Plan (ASP) requires Safety Performance Monitoring and Measurement to help agencies ensure that established procedures are being followed and are sufficient. These monitoring activities help agencies verify that procedures work as expected, identify situations where practice has uncoupled from procedure (“practical drift”), and pinpoint areas where processes could be modified to maximize their safety impact.

Techniques for Monitoring Procedures

While monitoring procedures, agencies could consider the following questions:

- What indicators tell us whether the procedure is performed as intended?
- What indicators tell us whether the procedure has the intended effect?

To help answer those questions, agencies can use these common techniques for monitoring compliance with and the sufficiency of procedures:

- **Observations**, such as ride-alongs or job observations, provide a holistic view of procedural compliance and whether procedures have the intended effect.
- **Audits, reviews, and special studies** are comprehensive and structured examinations of how the agency implements procedures and the outcomes. They often focus on specific areas or disciplines, such as management of bus dispatch, operator training, or vehicle maintenance.

Examples of Methods to Monitor Maintenance Procedures

What activities could be used to monitor the sufficiency of vehicle preventative maintenance procedures?

- Audit vehicle maintenance logs
- Analyze vehicle breakdown trends
- Review technician work orders

¹ 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.

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- **Inspections** can check how well workers comply with procedures and indicate whether established procedures ensure the desired condition of vehicles, equipment, or infrastructure.
- **Operational testing**, such as using a speed radar gun or vehicle data systems, formally measures compliance with specific operations and maintenance procedures. The results of operational testing can also help agencies determine whether procedures have the intended effect.

Examples of Methods to Monitor Operations Procedures

What activities could an agency use to monitor compliance with Operations Control Center (OCC) shift change procedures?

- Observe OCC shift changes
- Observe training on OCC shift-change procedures
- Interview controllers/dispatchers on shift-change procedures
- Inspect OCC shift-change logs



The specifics of your compliance and sufficiency monitoring activities should be tailored to your agency's operations and procedures. Visit the [PTASP TAC Resource Library](#) for the Safety Management Systems Techniques for Monitoring Operations and Maintenance Procedures webinar [on-demand recording](#).



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- Learn and share through the PTASP Community of Practice
- Explore the PTASP Resource Library

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