



U.S. Department of Transportation
Federal Transit Administration

2022 FTA JOINT STATE SAFETY OVERSIGHT AND RAIL TRANSIT AGENCY HYBRID WORKSHOP

OCTOBER 25-27, 2022 WASHINGTON, D.C



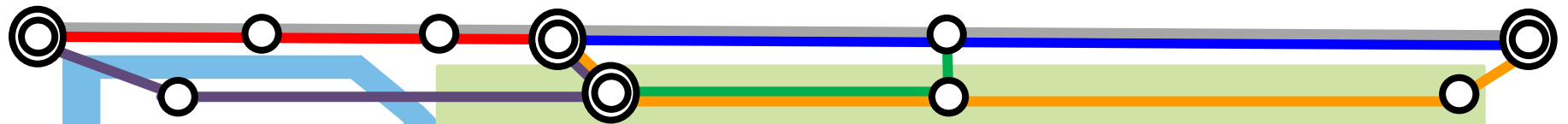
Top-3 FTA Audit Findings - RTAs

Timothy Braxton

Program Manager, Office of Safety Review

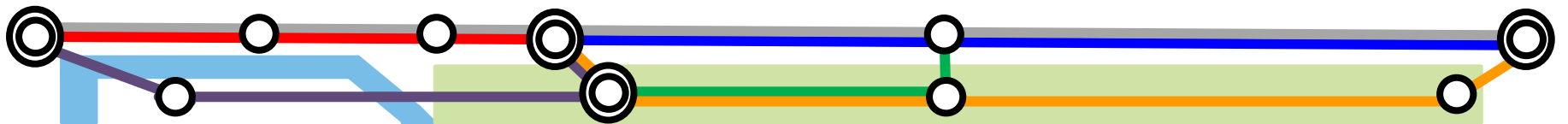
Office of Transit Safety and Oversight

Federal Transit Administration



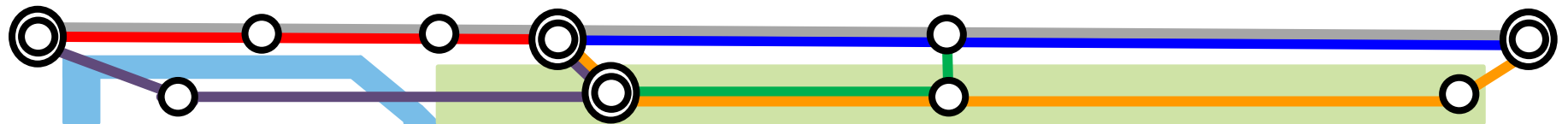
SSOA Audit Program Agenda – For RTAs

- Overview
- Audit Cycle
- Top-3 FTA Audit Findings - RTAs
- Questions



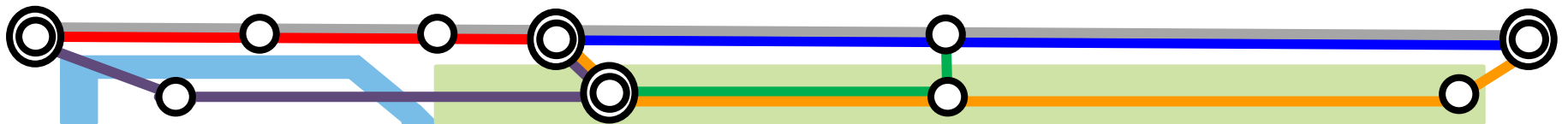
SSOA Audit Program Overview

- 49 CFR Part 674.11 requires FTA will audit each State's compliance at least triennially, consistent with 49 U.S.C. 5329(e)(9).
- FTA has completed 6 Audit Cycles since 2005
 - Currently conducting Cycle 7
- Cycle 7 - From May 2019 – August 2023
 - Combination of virtual, on-site and hybrid audits



SSOA Audit Program Overview

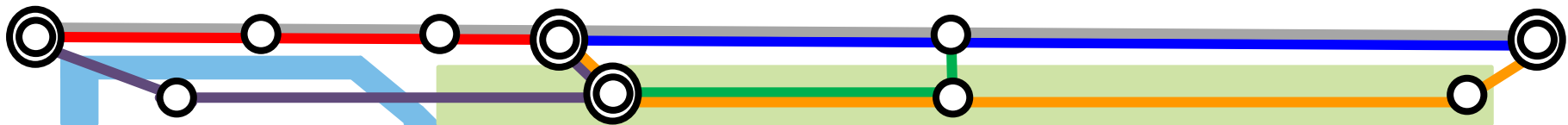
Audits CY2019	Audits CY2020 & CY2021	Audits CY2022	Cycle 8 Audits CY2023
<ul style="list-style-type: none">• CoPUC• MDPU• GDOT• MDOT• OHDOT• TxDOT• WSDOT• UDOT	<ul style="list-style-type: none">• DCFEMS• MoDOT• BSSO• NJDOT• PENNDOT• NY PTSB• WMSC• PREMA	<ul style="list-style-type: none">• ORDOT• NCDOT• TnDOT• CPUC• FDOT	<ul style="list-style-type: none">• CoPUC• GDOT• DCFEMS• MDOT• MDPU• TxDOT• WSDOT• OHDOT• UDOT



SSOA Audit Program Overview

- FTA’s SSO Audit Process
 - Consistent with previous Audit cycles, FTA’s Audit reviews 10 areas
 - Each Audit is conducted by FTA’s SSO Program Manager, contract support and FTA region as applicable
 - FTA targets 90-buissness days after on-site audit for Final Report
 - Audit CAPs are resolved in an ongoing manner between SSOA and FTA

FTA’s SSO Audit Areas	
1	Program Management
2	Grant Program
3	Program Standard
4	Staffing & Qualification of SSOA
5	Oversight of PTASP
6	Oversight of RTA Internal Reviews
7	Investigations
8	SSOA Triennial Audits
9	Corrective Actions
10	Annual Repots



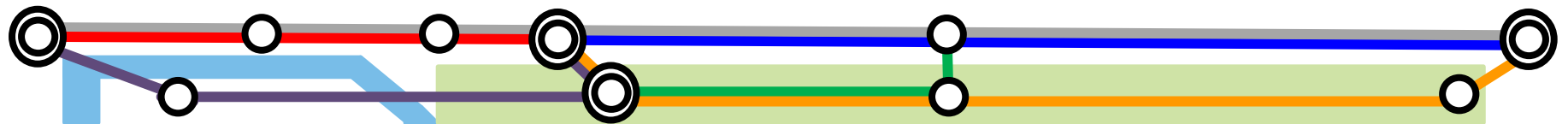
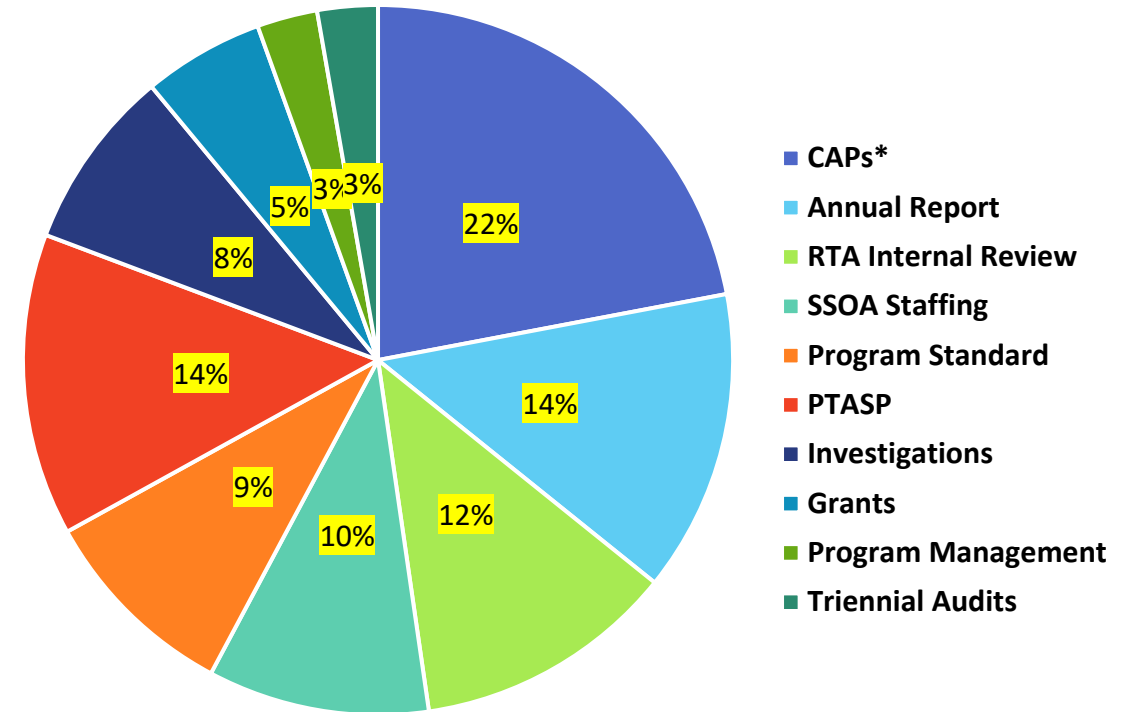
SSOA Summary of Cycle 7 Audits

- Top 3 FTA Audit Findings – **For RTAs**

- RTA Internal Reviews
- PTASP
- Investigations / Notifications

*CAPs will be further discussed in separate Conference Agenda item

Total Audit Findings



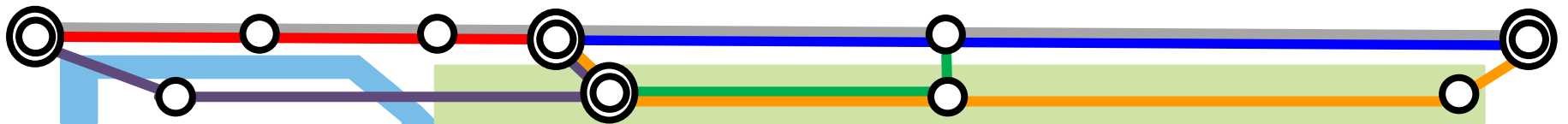
FTA Audit Finding 1 – RTA Internal Reviews

- **Requirement:**

- *Part 674.27(a)(4)* - The SSO program standard must explain:
 - The role of the SSOA in overseeing an RTA's execution of its PTASP and any related safety reviews of the RTA's system
 - The process whereby the SSOA will receive and evaluate all material submitted under the signature of an RTA's accountable executive
 - The procedure whereby an RTA will notify the SSOA before the RTA conducts an internal review of any aspect of the safety of its system.

- **RTA Internal Review Finding:**

- "SSOA did not ensure that the RTAs internally audit all PTASP elements over the three-year cycle"

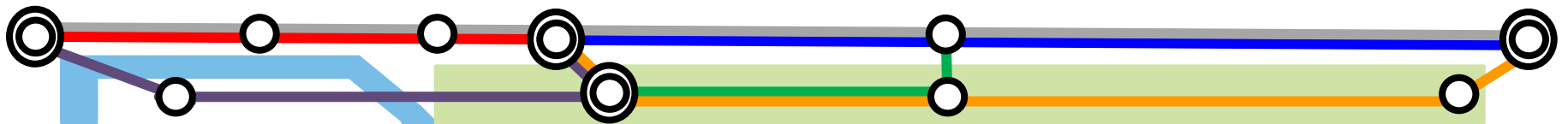


FTA Audit Finding 1 – RTA Internal Reviews

- **RTA Internal Review Issue:**
 - RTA did not review all elements of PTASP
 - Example 1: RTA did not have resources to conduct internal reviews
 - Example 2: RTA internal review schedule/ process does not include all PTASP elements
- **How to Improve Compliance:**
 - Review your internal review schedule, consider scheduling, notifications and coordination with SSOA for each year.
 - Ensure that all PTASP elements are addressed in three-year period.



Note that PTASP updates may include new content that will need to be added to internal review process



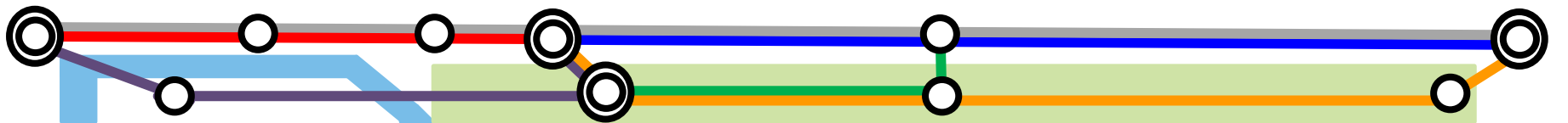
FTA Audit Finding 2 – PTASP

- **Requirement:**

- *Part 49 CFR Part 674.25* - An SSOA must oversee an RTA's execution of its Public Transportation Agency Safety Plan. An SSOA must enforce the execution of a Public Transportation Agency Safety Plan, through an order of a corrective action plan or any other means, as necessary or appropriate.

- **PTASP Finding:**

- “SSOA did not ensure the RTAs’ PTASPs included all Part 673 and 674 requirements.”

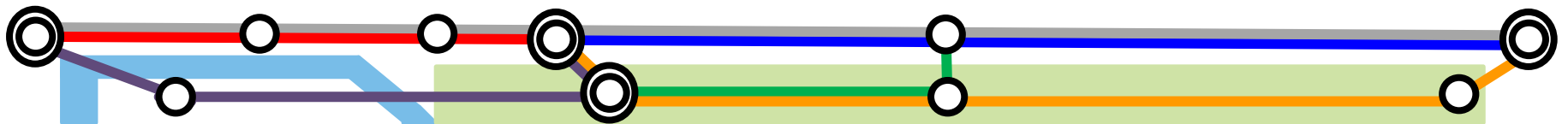


FTA Audit Finding 2 – PTASP

- **PTASP Issue:**
 - PTASP does not include Part 673 requirements
 - Example: PTASP does not include safety performance targets as specified in Part 673
 - Example: Employee Safety Reporting Program, 673.23(b) elements
- **How to Improve Compliance:**
 - Ask for FTA's technical assistance center review of PTASP, make your own checklists.
 - Ensure RTA PTASP has clear details for Part 673 requirements.

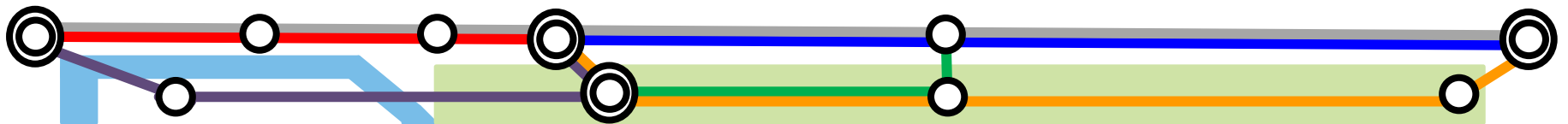


Many PTASPs did not incorporate the recommendations made by FTA's technical assistance center



FTA Audit Finding 3 – Investigations & Notifications

- **Requirement:**
 - *Part 674.33(a)* - In addition to the requirements for accident notification set forth in an SSO program standard, an RTA must notify both the SSO and the FTA within two hours of any accident occurring on a rail fixed guideway public transportation system.
- **Accident Notification Finding:**
 - “SSOA did not ensure that the RTA provided notification of all accidents within two hours.”

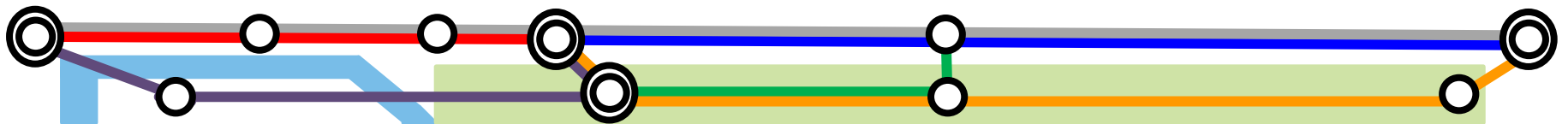


FTA Audit Finding 3 – Investigations & Notifications

- **Notification Issue:**
 - Notification not provided to SSOA and FTA within 2-hours
 - Example 1: Notification was provided over 24-hours after the accident
 - Example 2: SSOA does not have documentation supporting 2-hour notification
- **How to Improve Compliance:**
 - Digital notification to SSOA from Control Center, etc.
 - Document trace showing 2-hour notification provided (email, text, etc.)



Understand reportable events for SSOA notification



Contact Information

Timothy Braxton

Program Manager, Office of Safety Review

Office of Transit Safety and Oversight

Federal Transit Administration

timothy.braxton@dot.gov

202-366-1646