



Risk-Based Inspection Program

Implementation Checklist

May 2025



The Federal Transit Administration (FTA) has prepared the following Checklist to assist State Safety Oversight Agencies (SSOAs) in complying with their responsibility to implement required actions included in the risk-based inspection (RBI) program special directives issued by the FTA on October 21, 2022, as required by 49 U.S.C. § 5329(k)(5).

This Checklist is organized by the six implementation required actions included in the RBI special directives. Under each SSOA required action, additional information is provided to help you determine how to comply with the RBI implementation requirements. The Checklist provides a table for each required action that includes:

- **Checklist Item** – The SSOA required actions reformatted into simple questions SSOAs can use to self-assess if their documentation addresses the requirements and demonstrates they have implemented their approved RBI Program for at least six months.
- **Documentation** – Suggestions for documentation SSOAs can consider submitting to demonstrate implementation of their RBI program.
- **Considerations** – Additional information SSOAs may consider to ensure compliance with the RBI implementation requirements, including considerations specific to certain activities that may not apply to all SSOAs' implementation submissions (i.e., unannounced inspections requiring an escort, immediate safety concerns, and event verification).

This guidance document is not legally binding in its own right and the Federal Transit Administration will not rely on it as a separate basis for affirmative enforcement actions or other administrative penalty. Conformity with this document (as distinct from existing statutes and regulations) is voluntary only, and nonconformity will not affect rights and obligations under existing statutes and regulations.

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General Considerations

- Provide documentation to demonstrate your implementation efforts for all six SSOA required actions under the RBI special directives.
- For each checklist item in Tracking #I001, include documentation for each RTA you oversee.
 - Exceptions: There are three scenarios within I001 that may not apply to all RTAs. Additional context for those items is provided later in this document.
- If you have not made any changes to your approved RBI Development Plan during implementation, provide all documentation from your approved RBI plan (i.e., the full RBI Development Plan submission package).
- If you made changes to your approved RBI Development Plan during implementation, provide 1) all documentation from your approved RBI plan, 2) a summary of all changes, and 3) all RBI Development Plan documentation with changes.
- Some documentation may be used to fulfill multiple checklist items within and across required actions. See the table below for suggested documentation examples that could fulfill multiple required actions.

Documentation	Relevant Required Actions
Inspection schedule	Tracking # I001 Tracking # I005
Inspection report(s)	Tracking # I001 Tracking # I005 Tracking # I006
CAP log	Tracking # I001
Data analysis results	Tracking # I004 Tracking # I006

Tracking # I001

SSOA Required Action

Submit documentation that confirms the SSOA has conducted risk-based inspections according to Program Standard requirements, including the areas of:

- Scheduling inspections
- Inspection reports
- Immediate safety concerns
- Inspections of equipment, infrastructure, and practices specific to each RTA
- Event verification*
- Ongoing monitoring
- Defects and corrective or remedial action
- CAPs and safety risk mitigation verification

*FTA amended the original “incident verification” language used in the RBI special directives and replaced it with the more comprehensive term “event verification.” The SSOAs were made aware of this change during their monthly calls with FTA, and it was further reinforced during the RBI webinars. The special directives were not updated or reissued to the SSOAs, but an updated version of the [RBI Program Toolkit](#) was published in January 2024 to reflect this change.

Checklist Items & Documentation

Tracking # I001		
Scheduling Inspections		
	Checklist Item	Documentation
	Did the SSOA schedule risk-based inspections with and without advanced notice for each RTA it oversees as listed in its policies and procedures?	<ul style="list-style-type: none">• Inspection schedule <u>for each RTA</u> <p>Considerations:</p> <ul style="list-style-type: none">• At a minimum, demonstrate risk-based inspections for the implementation period.• If the number and type (announced/unannounced) of inspections is not included in the inspection schedule, provide additional documentation outlining this information.• For an SSOA with multiple RTAs, FTA recommends the SSOA combines RBI scheduling information into one file for submission.

Tracking # I001

Scheduling Inspections (continued)

Checklist Item	Documentation								
Did the SSOA follow its process and time frame for requesting access to each RTA, including a notification to the RTA prior to arrival for announced inspections, as listed in its policies and procedures?	<ul style="list-style-type: none">Provide the following <u>for each RTA</u> based on the number of RBIs conducted: <table><tr><th>Number of RBIs Conducted Per RTA</th><th>Documentation</th></tr><tr><td>One Risk-Based Inspection</td><td>One inspection report AND The related notification email OR other documentation demonstrating the notification approach for this inspection.</td></tr><tr><td>Two Risk-Based Inspections</td><td>Two inspection reports AND The related notification emails OR other documentation demonstrating the notification approach for these two inspections.</td></tr><tr><td>Three or more Risk-Based Inspections</td><td>Three inspection reports AND The related notification emails OR other documentation demonstrating the notification approach for these three inspections.</td></tr></table>	Number of RBIs Conducted Per RTA	Documentation	One Risk-Based Inspection	One inspection report AND The related notification email OR other documentation demonstrating the notification approach for this inspection.	Two Risk-Based Inspections	Two inspection reports AND The related notification emails OR other documentation demonstrating the notification approach for these two inspections.	Three or more Risk-Based Inspections	Three inspection reports AND The related notification emails OR other documentation demonstrating the notification approach for these three inspections.
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Did the SSOA follow its process and time frame for requesting access to each RTA, including a notification to the RTA after arriving onsite, for unannounced inspections requiring an escort as listed in its policies and procedures?	<ul style="list-style-type: none">Provide the following <u>for each RTA</u> based on the number of unannounced RBIs conducted that required an escort: <table><tr><th>Number of Unannounced RBIs Requiring an Escort Conducted Per RTA</th><th>Documentation</th></tr><tr><td>One Risk-Based Inspection</td><td>One inspection report</td></tr><tr><td>Two Risk-Based Inspections</td><td>Two inspection reports</td></tr><tr><td>Three or more Risk-Based Inspections</td><td>Three inspection reports</td></tr></table> <p>Considerations:</p> <ul style="list-style-type: none">If the initial notification time after arriving onsite and the time the escort arrived are not included in the inspection report, provide additional documentation with this information.Provide documentation for any RTAs with an unannounced RBI requiring an escort.If no unannounced RBIs requiring an escort occurred at the RTA during the implementation time frame, the SSOA will certify this instead of providing documentation.	Number of Unannounced RBIs Requiring an Escort Conducted Per RTA	Documentation	One Risk-Based Inspection	One inspection report	Two Risk-Based Inspections	Two inspection reports	Three or more Risk-Based Inspections	Three inspection reports
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Two Risk-Based Inspections	Two inspection reports								
Three or more Risk-Based Inspections	Three inspection reports								

Tracking # I001

Inspection Reports

	Checklist Item	Documentation								
	Did the SSOA issue risk-based inspection reports within the appropriate time frame to each RTA after risk-based inspection activities, as listed in the SSOA's policies and procedures?	<ul style="list-style-type: none">Provide the following <u>for each RTA</u> based on the number of RBIs conducted:<table><tr><th>Number of RBIs Conducted Per RTA</th><th>Documentation</th></tr><tr><td>One Risk-Based Inspection</td><td>One inspection report AND The related email to the RTA OR other documentation that demonstrates when this inspection report was provided to the RTA</td></tr><tr><td>Two Risk-Based Inspections</td><td>Two inspection reports AND The related emails to the RTA OR other documentation that demonstrates when these inspection reports were provided to the RTA</td></tr><tr><td>Three or more Risk-Based Inspections</td><td>Three inspection reports AND The related emails to the RTA OR other documentation that demonstrates when these inspection reports were provided to the RTA</td></tr></table>	Number of RBIs Conducted Per RTA	Documentation	One Risk-Based Inspection	One inspection report AND The related email to the RTA OR other documentation that demonstrates when this inspection report was provided to the RTA	Two Risk-Based Inspections	Two inspection reports AND The related emails to the RTA OR other documentation that demonstrates when these inspection reports were provided to the RTA	Three or more Risk-Based Inspections	Three inspection reports AND The related emails to the RTA OR other documentation that demonstrates when these inspection reports were provided to the RTA
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	Do the risk-based inspection reports issued by the SSOA for each RTA use objective language and reference objective data, including measurements and photographs, to document any issues noted during an inspection, as listed in its policies and procedures?	<ul style="list-style-type: none">Provide the following <u>for each RTA</u> based on the number RBIs conducted:<table><tr><th>Number of RBIs Conducted Per RTA</th><th>Documentation</th></tr><tr><td>One Risk-Based Inspection</td><td>One inspection report</td></tr><tr><td>Two Risk-Based Inspections</td><td>Two inspection reports</td></tr><tr><td>Three or more Risk-Based Inspections</td><td>Three inspection reports</td></tr></table>	Number of RBIs Conducted Per RTA	Documentation	One Risk-Based Inspection	One inspection report	Two Risk-Based Inspections	Two inspection reports	Three or more Risk-Based Inspections	Three inspection reports
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One Risk-Based Inspection	One inspection report									
Two Risk-Based Inspections	Two inspection reports									
Three or more Risk-Based Inspections	Three inspection reports									

Tracking # I001		
Immediate Safety Concerns		
	Checklist Item	Documentation
	If applicable, did the SSOA notify and follow up with each RTA for immediate safety concerns, as listed in its policies and procedures?	<ul style="list-style-type: none"> Provide a combination of the following to demonstrate notifications and follow up for all immediate safety concerns <u>for each RTA</u>: <ul style="list-style-type: none"> Email Inspection report Letter Other documentation that demonstrates the notification and follow up approach for immediate safety concerns <p>Considerations</p> <ul style="list-style-type: none"> Provide documentation for all instances where an immediate safety concern was identified by the SSOA. If no immediate safety concerns were identified for an RTA during the implementation time frame, the SSOA will certify this instead of providing documentation.
Tracking # I001		
Event Verification		
	Checklist Item	Documentation
	If applicable, did the SSOA verify that the safety event scene for each RTA had been repaired, as listed in its policies and procedures?	<ul style="list-style-type: none"> Provide a combination of the following for one safety event <u>for each RTA</u>: <ul style="list-style-type: none"> Email(s) Photograph(s) Investigation report Inspection report Other documentation that demonstrates RTA mitigations <p>Considerations</p> <ul style="list-style-type: none"> Provide documentation for any RTAs with safety events. If no safety events occurred at the RTA during the implementation time frame, the SSOA will certify this instead of providing documentation.
Tracking # I001		
Ongoing Monitoring		
	Checklist Item	Documentation
	Did the SSOA perform ongoing monitoring for each RTA, as listed in its policies and procedures?	<ul style="list-style-type: none"> A list of all ongoing monitoring activities for the implementation period <u>for each RTA</u> <p>AND</p> <ul style="list-style-type: none"> Documentation that demonstrates proof of one listed activity <u>for each RTA</u>. <ul style="list-style-type: none"> E.g., meeting minutes, field visit report, inspection report, etc.

Tracking # I001		
Defects and Corrective or Remedial Action		
	Checklist Item	Documentation
	Did the SSOA review and track RTA defects and associated corrective or remedial actions for each RTA, as listed in its policies and procedures?	<ul style="list-style-type: none"> • CAP log <u>for each RTA</u> • If defects are not captured in the CAP log, also provide one of the following, as applicable, for each RTA: <ul style="list-style-type: none"> ○ Defect log ○ Hazard log ○ Other documentation that demonstrates RTA defects and associated corrective or remedial actions
Tracking # I001		
CAPs and Safety Risk Mitigation Verification		
	Checklist Item	Documentation
	Did the SSOA verify progress towards the completion of CAPs and implementation of solutions to mitigate safety risk for each RTA, as listed in its policies and procedures?	<ul style="list-style-type: none"> • Provide one of the following, as applicable, <u>for each RTA</u>: <ul style="list-style-type: none"> ○ CAP log ○ Meeting minutes ○ Inspection report ○ Other documentation that demonstrates the SSOA verified progress towards the completion of a CAP and implementation of solutions to mitigate safety risk

Tracking # I002

SSOA Required Action

Submit documentation that demonstrates the SSOA has received safety data from each RTA it oversees, and that the data has been received in accordance with the policies and procedures for sharing the data. This includes receiving the safety data sets specified in the Program Standard, the processes for sharing the data, and submission time frames defined in the Program Standard.

Checklist Items & Documentation

Tracking # I002		
	Checklist Item	Documentation
	Does the documentation demonstrate the SSOA received safety program data from each RTA, as listed in its policies and procedures?	<ul style="list-style-type: none">• One example of safety program data <u>for each RTA</u>, including but not limited to:<ul style="list-style-type: none">○ Records of events, including primary source information from each RTA investigation if the RTA completed investigations on behalf of the SSOA○ Hazard records, including hazard source, associated consequences, safety risk ratings, and the status of any mitigations○ Safety risk mitigation records, including before and after risk ratings, and how the RTA monitors the implementation and effectiveness of safety risk mitigations○ Corrective action plans○ Records of near misses
	Does the documentation demonstrate the SSOA received maintenance data from each RTA, as listed in its policies and procedures?	<ul style="list-style-type: none">• One example of maintenance data <u>for each RTA</u>, including but not limited to:<ul style="list-style-type: none">○ Inspection and maintenance records and report forms○ Work orders○ Records of failures and defects○ Records of revenue vehicles out of service, including causal information○ Major maintenance activity schedule and progress○ Adherence to maintenance schedules, including reports and documentation of deferred maintenance
	Does the documentation demonstrate the SSOA received inspection data from each RTA, as listed in its policies and procedures?	<ul style="list-style-type: none">• One example of inspection data <u>for each RTA</u>, including but not limited to:<ul style="list-style-type: none">○ Inspection records and report forms○ Records of failures and defects○ Records speed restrictions○ Event and Safety Risk Mitigation Verification○ Adherence to inspection schedules, including reports and documentation of inspections not performed○ Capital project schedules and progress

Tracking # I003

SSOA Required Action

Submit documentation that confirms the administrative policies and procedures of the risk-based inspection data management system are followed. The documentation must demonstrate the data management system stores records according to the SSOA's policies and procedures for the risk-based inspection data management system and should demonstrate maintenance of the data management system.

Checklist Items & Documentation

Tracking # I003		
	Checklist Item	Documentation
	Does the documentation demonstrate the SSOA maintains a data management system that stores records, as listed in its policies and procedures?	<ul style="list-style-type: none">• Screenshots of data management system file storage<ul style="list-style-type: none">○ For a tool or dashboard, provide images of the main screen and sample of additional views showing data/files○ For SharePoint or a similar system, provide images of the main folder and sample of subfolder containing files <p>OR</p> <ul style="list-style-type: none">• Other documentation that clearly and accurately describes RBI record storage in the data management system (e.g., narrative describing record storage)

Tracking # I004

SSOA Required Action

Submit documentation that confirms the SSOA has implemented the risk-based inspection prioritization process, including data analysis and inspection prioritization according to the timelines outlined in the Program Standard.

Checklist Items & Documentation

Tracking # I004		
	Checklist Item	Documentation
	Does the documentation confirm the SSOA performed analysis of safety data for each RTA according to the timelines, as outlined in its policies and procedures?	<ul style="list-style-type: none">• Data analysis results <u>for each RTA</u><ul style="list-style-type: none">○ Identify the safety program, maintenance, and inspection data included in the data analysis
	Does the documentation confirm the SSOA prioritized inspections based on its data analysis for each RTA according to the timelines, as outlined in its policies and procedures?	<ul style="list-style-type: none">• Inspection prioritization results <u>for each RTA</u>

Tracking # I005

SSOA Required Action

Submit documentation that the SSOA has conducted risk-based inspections for each RTA it oversees, and that those inspections are consistent and ongoing as defined by the SSOA's Program Standard.

Checklist Items & Documentation

Tracking # I005

	Checklist Item	Documentation								
	Does the documentation demonstrate the SSOA conducted risk-based inspections for each RTA it oversees?	<ul style="list-style-type: none">Provide the following <u>for each RTA</u> based on the number of RBIs conducted:<table><tr><th>Number of RBIs Conducted Per RTA</th><th>Documentation</th></tr><tr><td>One Risk-Based Inspection</td><td>One inspection report</td></tr><tr><td>Two Risk-Based Inspections</td><td>Two inspection reports</td></tr><tr><td>Three or more Risk-Based Inspections</td><td>Three inspection reports</td></tr></table>	Number of RBIs Conducted Per RTA	Documentation	One Risk-Based Inspection	One inspection report	Two Risk-Based Inspections	Two inspection reports	Three or more Risk-Based Inspections	Three inspection reports
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One Risk-Based Inspection	One inspection report									
Two Risk-Based Inspections	Two inspection reports									
Three or more Risk-Based Inspections	Three inspection reports									
	Does the documentation demonstrate the SSOA's risk-based inspections are consistent and ongoing as defined in its policies and procedures?	<ul style="list-style-type: none">Inspection schedule OROther documentation demonstrating the RBIs will continue beyond the implementation period								

Tracking # I006

SSOA Required Action

Submit documentation that the SSOA has inspected the full spectrum of activities each RTA conducts and that those inspections are prioritized based on relevant data, including safety program, maintenance, and inspection data.

Checklist Items & Documentation

Tracking # I006

	Checklist Item	Documentation								
	Does the documentation demonstrate or confirm the SSOA conducted inspections of equipment, infrastructure, and practices specific to each RTA and that those inspections were prioritized based on the analysis of safety program, maintenance, and inspection data?	<ul style="list-style-type: none">• Provide the following <u>for each RTA</u>:<ul style="list-style-type: none">○ Inspection report(s), based on the number of RBIs conducted, to address at least one of the three activities (inspections of equipment, infrastructure, and practices specific to each RTA): <table><tr><th>Number of RBIs Conducted Per RTA</th><th>Documentation</th></tr><tr><td>One Risk-Based Inspection</td><td>One inspection report</td></tr><tr><td>Two Risk-Based Inspections</td><td>Two inspection reports</td></tr><tr><td>Three or more Risk-Based Inspections</td><td>Three inspection reports</td></tr></table> <ul style="list-style-type: none">• Inspection prioritization results• Data analysis results<ul style="list-style-type: none">○ Identify the safety program, maintenance, and inspection data that was included in the analysis	Number of RBIs Conducted Per RTA	Documentation	One Risk-Based Inspection	One inspection report	Two Risk-Based Inspections	Two inspection reports	Three or more Risk-Based Inspections	Three inspection reports
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