



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

September 3, 2026

Ms. Nora Leerhsen
Acting President
Chicago Transit Authority
567 W. Lake Street
Chicago, I.L. 60661

Dear Ms. Leerhsen:

The Federal Transit Administration (FTA) conducted a Focused Agency Safety Plan Audit of the Chicago Transit Authority (CTA) pursuant to its authority under 49 U.S.C. § 5329(f)(1) and 49 CFR Part 670. FTA notified CTA of this audit through Special Directive 25-3, dated December 8, 2025.

The audit assessed CTA's implementation of its Agency Safety Plan requirements related to preventing assaults on transit workers. FTA conducted this audit using a combination of virtual and on-site activities and an extensive review of documentation provided by CTA.

Enclosed with this letter is FTA's Focused Agency Safety Plan Audit Final Report for CTA. The report identifies findings and associated corrective actions that CTA must take to demonstrate compliance with applicable Federal safety requirements.

Pursuant to 49 U.S.C. § 5329(f) and 49 CFR § 670.21(c), within 30 days of this letter, CTA must develop and submit corrective action plans to FTA that address all findings listed in the attached report. FTA will review and approve (with revisions as necessary) CTA's corrective action plans and will monitor CTA's progress in resolving each finding and required action. FTA will conduct scheduled meetings with CTA to review its progress until FTA determines these meetings are no longer needed or may be conducted with less frequency.

Corrective action plans must include primary points of contact and expected timelines for implementation and completion. Failure to resolve the corrective actions satisfactorily may result in additional oversight or enforcement action, up to and including the withholding of Federal transit funds, as authorized by law.

If you have any questions regarding the audit or the requested documentation, please contact Jeremy Furrer, Division Chief for Safety Policy and Promotion, Office of Safety Management, at jeremy.furrer@dot.gov, or me at (202) 366-5080 or via email at joseph.delorenzo@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo".

Joe DeLorenzo

Associate Administrator for Transit Safety and Oversight and
Chief Safety Officer

Enclosure: Focused Agency Safety Plan Audit Final Report: Chicago Transit Authority (CTA)

cc: Jeffrey Hulbert, Vice President, Safety, CTA
Kelley Brookins, FTA Region 5 Regional Administrator

Focused Agency Safety Plan Audit Final Report: Chicago Transit Authority (CTA)

Office of Transit Safety and Oversight
Federal Transit Administration
September 3, 2026

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Executive Summary

From January through March 2026, the Federal Transit Administration (FTA) conducted an audit of the Chicago Transit Authority's (CTA) implementation of its Agency Safety Plan (ASP) requirements related to preventing assaults on transit workers. This audit was conducted pursuant to FTA's authority under 49 U.S.C. 5329(f)(1) and implementing regulations at 49 CFR Part 670.

On December 8, 2025, FTA issued Special Directive (SD) 25-3 to CTA, requiring immediate, measurable corrective actions to reduce assaults on transit workers and passengers and to address unsafe system conditions contributing to elevated rates of violent crime on CTA's bus and rail system.

SD 25-3 identified two findings related to CTA's failure to:

- Update its Agency Safety Plans (ASPs); and
- Maintain a safe operating environment for workers and passengers, including failure to implement adequate mitigations to address a years-long pattern of elevated worker assaults, customer assaults, and serious violent crime.

Through SD 25-3, FTA also informed CTA of the initiation of an audit of CTA's ASPs related to preventing assaults on transit workers. This audit intends to assess CTA's compliance with 49 CFR Part 673 (Part 673), Public Transportation Agency Safety Plans (PTASP), and CTA's implementation of its ASPs. The audit also includes an evaluation of the sufficiency of the agency's responses to FTA's directives focused on mitigating the safety risk associated with assaults on transit workers.

The PTASP regulation at Part 673 establishes requirements for transit agencies to address safety concerns, including the risk of assaults on transit workers:

- The PTASP regulation requires transit agencies to establish and implement Safety Management System (SMS) processes to regularly and continually identify hazards and their potential consequences, assess the level of safety risk, implement appropriate safety risk mitigations to lower that safety risk, and assess the effectiveness of the safety risk mitigations over time. Hazards include those associated with assaults on transit workers and personal safety events.
- The PTASP regulation also establishes specific requirements focused on addressing assaults on transit workers, including the role of the joint labor-management safety committee, the implementation of the safety risk reduction program, and the setting of annual performance targets for the number and rate of assaults on transit workers.

Taken together, these regulatory requirements help ensure transit agencies are effectively mitigating these risks and continually assessing their actions to improve the safety of their systems for workers, passengers, and the general public.

As part of this review, FTA examined materials provided by CTA, including the Bus and Rail ASPs required under the PTASP regulation, documentation regarding CTA's implementation of the ASPs as it relates to assaults on transit workers, and documentation regarding the role and actions of CTA's safety committee and safety risk reduction program. In addition, FTA conducted virtual and on-site interviews to further understand CTA's implementation of its ASPs and the safety risk reduction program.

As a result of its review, FTA has determined CTA is non-compliant with certain Part 673 requirements related to hazard identification, safety risk assessment, monitoring the effectiveness of safety risk mitigations, annual safety performance assessment, continuous improvement, de-escalation training, and the integration of a joint labor-management safety committee into these processes, including through the required safety risk reduction program. With this report, FTA is issuing 11 findings of non-compliance. [Appendix A](#) of this report lists each finding and the corrective actions required for closeout. In addition, this report provides six non-binding recommendations for CTA's consideration. Adoption of these recommendations is not mandatory.

Introduction

Federal Requirements and Relevant FTA Actions

FTA has adopted the principles and methods of SMS as the basis for enhancing the safety of public transportation in the United States. FTA follows the principles and methods of SMS under the authority of 49 U.S.C. 5329 and as established in FTA's Public Transportation Safety Program. See 49 CFR § 673.3.

[Part 673](#) requires operators of public transportation systems that receive Federal funds under the FTA [Urbanized Area Formula Grants \(Section 5307\)](#) and rail transit agencies subject to the FTA [State Safety Oversight \(SSO\) Program](#) to develop an ASP that includes the processes and procedures to implement an SMS, which is a comprehensive, collaborative, and systematic approach to managing safety. SMS brings management and labor together to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more precisely.

Since no two public transportation systems are alike, the regulation sets scalable and flexible minimum standards for ASPs, including requirements for the identification, assessment, and mitigation of risk and strategies to minimize exposure to hazards; a comprehensive safety training program; safety performance targets; and a process and timeline for conducting an annual review and update of the ASP.

In 2019, FTA published a [Federal Register Notice](#) highlighting that in cases where a transit agency identifies hazards associated with assaults on transit operators, the PTASP regulation

requires the agency to use the SMS Safety Risk Management (SRM) processes documented in its ASP to assess the associated safety risk and, based on the results of the safety risk assessment, identify safety risk mitigations or strategies as necessary to address the safety risk. In 2022, in response to increasing trends in assaults on transit workers, FTA issued Special Directives to nine transit agencies, including CTA, requiring each to submit documentation on whether and how they are addressing the risk of assaults on transit workers using their SMS. In 2024, FTA issued General Directive 24-1 to all transit agencies subject to the PTASP regulation, requiring each to conduct a safety risk assessment, identify safety risk mitigations or strategies, and provide information to FTA on how it is assessing, mitigating, and monitoring the safety risk associated with assaults on transit workers.

Beginning in 2023, FTA implemented the new National Transit Database (NTD) requirements of the Infrastructure Investment and Jobs Act (IIJA), which expanded NTD reporting for assaults on transit workers. In April 2024, FTA updated the PTASP regulation to incorporate statutory changes in the IIJA, such as joint labor-management safety committees and safety risk reduction programs, and revised the National Public Transportation Safety Plan (National Safety Plan) to establish new safety performance measures to support required PTASP safety performance target setting, including for the number and rates of assaults on transit workers.

CTA System Overview

CTA operates one of the largest combined heavy rail and bus transit systems in the United States, providing more than a million passenger trips each weekday across the City of Chicago and 35 surrounding suburbs, supported by a workforce of more than 11,000 employees.

CTA's buses operate 127 routes (1,526 route miles) and serve 10,715 bus stops. CTA's rail system connects eight rail lines, named by color (224.1 miles of track), and serves 146 stations, making it the third busiest heavy rail service in the United States. In addition, CTA provides service to both O'Hare International Airport and Midway International Airport.

Audit Approach

FTA's Focused Agency Safety Plan Audit of CTA evaluates compliance with Federal PTASP requirements by auditing CTA policy and related documentation required by Part 673 and CTA's implementation of that policy. FTA received and reviewed CTA's Rail and Bus ASPs, as well as documentation related to activities for SRM, Safety Assurance, the joint labor-management safety committee, the safety risk reduction program, the transit worker safety reporting program, and safety risk mitigations. For a detailed list of materials reviewed, see [Appendix B](#). Of particular note are the following:

- **Agency Policy:** FTA reviewed agency SMS processes and policies (as defined in the ASPs and referenced documents) to confirm compliance with the process requirements established by Part 673.

- **Policy Implementation:** FTA reviewed a range of agency records and documentation to verify the agency is carrying out SMS activities as defined in the agency's approved ASPs and to confirm how the agency is implementing the SMS processes as they relate to assaults on transit workers.

Following a review of the agency's document submissions, FTA used virtual and on-site audit interviews with key agency personnel to verify SMS implementation activity.

Findings and Recommendations

The findings established in this report identify areas of non-compliance with Part 673 requirements related to hazard identification, safety risk assessment, monitoring the effectiveness of safety risk mitigations, annual safety performance assessment, continuous improvement, de-escalation training, and the integration of a joint labor-management safety committee into these processes, including through the required safety risk reduction program. Compliance with these requirements is essential to CTA's ability to ensure the effectiveness of its safety efforts.

To achieve compliance, CTA must implement the required corrective actions identified for each finding.

In addition to the 11 findings noted, FTA is also making six recommendations in this report. Recommendations suggest actions that may support and improve CTA's SMS, but these actions are not mandatory. CTA may choose whether to implement these recommendations. These recommendations are listed in the report below and in [Appendix A](#).

Finding 1: CTA's safety risk management process does not consider, as a source for hazard identification, safety concerns identified through activities to monitor information reported through any internal safety reporting programs, as required at §§ 673.25(b)(2)(iii) and 673.27(b)(4).

Finding 2: CTA has not implemented a compliant safety risk assessment process, as required at § 673.25(c).

Finding 3: CTA has not met requirements to monitor its operations to identify any safety risk mitigations that may be ineffective, as required at § 673.27(b)(2).

Finding 4: CTA has not established a process to assess its safety performance annually, as required at § 673.27(d)(1).

Finding 5: CTA has not developed or carried out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment, as required at § 673.27(d)(4).

Finding 6: CTA has not carried out the Safety Committee procedures required at § 673.19(c) that CTA established in its ASPs and JLSC Charter.

Finding 7: CTA's ASP approval process is inconsistent with the requirements at § 673.11(a)(1)(i).

Finding 8: CTA has not met requirements for the joint labor-management safety committee to identify safety deficiencies for purposes of continuous improvement and for the agency's annual safety performance assessment process to address the role of the safety committee, as required at §§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii), respectively.

Finding 9: CTA has not met requirements for the joint labor-management safety committee to identify and recommend safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program, and to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, as required at §§ 673.19(d)(3)(i) and (ii).

Finding 10: CTA has not met requirements for the safety risk mitigation process to include or incorporate by reference in the ASPs any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment as required at § 673.25(d)(5).

Finding 11: CTA has not met the requirement for de-escalation training established at § 673.29(a).

Audit Observations and Findings

Safety Risk Management

SRM is a process within a transit agency's ASP for identifying hazards and analyzing, assessing, and mitigating the safety risk of their potential consequences (§ 673.5). The PTASP regulation defines requirements for SRM processes at § 673.25, including requirements for hazard identification (§ 673.25(b)), safety risk assessment (§ 673.25(c)), and safety risk mitigation (§ 673.25(d)). Transit agencies must develop and implement an SRM process for all elements of their public transportation system (§ 673.25(a)).

Hazard Identification

Key Takeaway: FTA review of the CTA ASPs identified non-compliance with the requirement at § 673.25(b)(2)(iii) for the safety risk management process to consider, as a source for hazard identification, safety concerns identified through activities to monitor information reported through any internal safety reporting programs under § 673.27(b)(4). To achieve compliance, CTA must revise its ASPs to address this requirement and submit documentation to verify it is considering, as a source for hazard identification, safety concerns identified through monitoring of information reported through its internal safety reporting programs.

Applicable Requirement: The PTASP regulation defines requirements for hazard identification at § 673.25(b). Transit agencies must consider, as a source of hazard identification, safety concerns identified through Safety Assurance activities carried out under § 673.27. Under § 673.27(b)(4), the Safety Assurance process must include activities to “monitor information reported through any internal safety reporting programs.”

Audit Observations: CTA describes its hazard identification process at Section 4.2 of its Bus and Rail ASPs and Section 2.1.9 of its Safety Risk Management Plan. CTA gathers safety information and identifies hazards through various mechanisms, including its SafeLine employee reporting program; certain Safety Assurance-related activities, such as safety trend analysis of safety performance indicators, procurement, inspections, internal safety audits, and safety event investigations; training and evaluation records; the Joint Labor Safety Committee (JLSC); the Executive Safety Committee (ESC); and data and information from FTA and oversight bodies, the Illinois State Safety Oversight Agency (SSOA), and the Centers for Disease Control and Prevention (CDC).

CTA's approach includes identifying and documenting hazards at different levels within the organization. Local department managers identify, assess, analyze, and track hazards within their departments. Department “rap sessions” are often a source of hazards at the local level for

departments without a safety committee. The Infrastructure Maintenance Department (facilities maintenance, power and way, and utility service) is an example of a local department that holds monthly Employee Safety Committee meetings, where representatives from each trade group meet to document and discuss department hazards in its local hazard log. Every two weeks, a senior managerial infrastructure meeting is held to review and discuss the hazard log.

FTA's review of the CTA ASPs confirmed CTA's hazard identification process does not consider safety concerns identified through activities to monitor information reported through CTA's internal safety reporting programs. The CTA ASPs state CTA monitors its transit worker safety reporting program (SafeLine) daily. However, the processes in the ASPs do not consider safety concerns identified from any other CTA internal safety reporting programs, such as customer service inquiries, control center reporting, or targeted working groups.

The Safety Department is responsible for and maintains a Hazard Tracking Log for hazards escalated from local departments or submitted through a hazard log submission form. During audit interviews, CTA representatives explained that escalated hazards are issues that cannot be resolved at the local level, as well as hazards reported to the SafeLine employee reporting program and recommended for escalation at monthly SafeLine meetings. These hazards are typically high-risk or systemic issues affecting more than one location and require engagement from stakeholders across departments. The Safety Department chairs a monthly Hazard Log Committee meeting to review hazards for inclusion in the SRM process and to evaluate the progress on agency-wide items already in the SRM process. This Committee includes assigned representatives from Rail Transit Operations, Station Management, Rail Vehicle Maintenance, Bus Transit Operations, Bus Vehicle Maintenance, Infrastructure, Technology, Engineering, and Training and Workforce Development. The Committee and other stakeholder attendees vote on whether to add a submitted hazard to the Hazard Tracking Log or whether a local level could handle it more efficiently.

CTA submitted documentation confirming the Infrastructure Maintenance Department maintains a local department hazard log, which documents, among other information, the hazard description and potential hazard outcomes. CTA also provided hazard log submission forms that include the hazard descriptions, a list of real and potential consequences, current mitigations, if any, the responsible department, interfacing departments, and proposed analysis participants.

During a virtual interview, CTA noted that it currently lacks a software program to centralize all agency hazards, but it is working to identify one. CTA currently relies on spreadsheets. FTA confirmed during virtual and on-site interviews that local departments identify, assess, and resolve hazards, and that some of this is documented in localized safety committee logs.

FTA also confirmed that hazards are escalated to the Safety Department's Hazard Tracking Log if a local level cannot resolve the issue. At the time of escalation, CTA identifies the main stakeholder for the hazard, who must complete a hazard submission form. However, CTA stated that it does not have a formal process for elevating hazards to the Safety Department. At this

time, elevated hazards are primarily structural or cross-departmental issues, including issues that cannot be managed at the local level due to resource constraints or policy changes. With the Safety Department's Hazard Tracking Log, CTA is addressing specific hazard log requirements established in the SSOA Program Standard, which requires only certain information and excludes hazard consequences.

Finding 1: CTA's safety risk management process does not consider, as a source for hazard identification, safety concerns identified through activities to monitor information reported through any internal safety reporting programs, as required at §§ 673.25(b)(2)(iii) and 673.27(b)(4).

Actions required for closeout:

- CTA must revise its ASPs to ensure the safety risk management process considers, as a source for hazard identification, safety concerns identified through activities to monitor information reported through any CTA internal safety reporting programs and submit the revised ASPs to FTA.
- CTA must submit documentation that verifies it is considering, as a source for hazard identification, safety concerns identified through activities to monitor information reported through its internal safety reporting programs.

Safety Risk Assessment

Key Takeaway: FTA's review of CTA's safety risk assessment processes and implementation identified non-compliance with the safety risk assessment requirements established at § 673.25(c). Currently, CTA is not implementing the safety risk assessment processes established in its ASPs and Safety Risk Management Plan (i.e., documenting applicable assessments in a Safety Assessment Workbook) to assess the likelihood and severity of the potential consequences of identified hazards to inform prioritization of associated safety risk mitigations. In addition, CTA's safety risk assessment process does not ensure CTA documents all required elements of the safety risk assessments. To achieve compliance, CTA must revise its ASPs and Safety Risk Management Plan to define a process ensuring all required elements of its safety risk assessments are documented, and it must submit the revised ASPs and Safety Risk Management Plan to FTA. CTA also must submit documentation confirming it is implementing the processes described in its ASPs and Safety Risk Management Plan to assess and document the safety risk of the potential consequences of identified hazards to inform prioritization of associated safety risk mitigations.

Applicable Requirement: At § 673.25(c), FTA requires a transit agency to “establish methods or processes to assess the safety risk associated with identified hazards” and requires that “a

safety risk assessment includes an assessment of the likelihood and severity of the potential consequences of identified hazards, taking into account existing safety risk mitigations, to determine if safety risk mitigation is necessary and to inform prioritization of safety risk mitigations.”

Audit Observations: CTA describes its safety risk assessment process at Section 4.3 of the Bus and Rail ASPs and Section 2.2 of its Safety Risk Management Plan. CTA’s Safety Risk Management Plan states that one of the Hazard Log Committee’s responsibilities is “using subject matter experts to participate in safety risk assessments.” During interviews, CTA confirmed the Hazard Log Committee, in meetings chaired by the Safety Department, determines safety risk ratings through group discussion and an evaluation of the data associated with the issue.

Section 4.3.3 of the ASPs and Section 2.2.3 of the Safety Risk Management Plan state, “The Safety Assessment Workbook (SAW) is CTA’s format for documenting safety risk assessments and provides instruction, risk summaries, and key data points to determine likelihood rankings.” FTA reviewed SAWs provided by CTA for four safety risk assessments, all of which included an SRA or SRM tab documenting hazards, consequences, existing mitigations, individual severity and likelihood ratings, and an initial safety risk assessment ranking.

Despite the clear language in the ASPs and Safety Risk Management Plan regarding the use of a SAW to conduct and document safety risk assessment activity, the ASPs and Safety Risk Management Plan also contain a table (“Safety Risk Acceptance and Required Actions”), which indicates that CTA might not always use a SAW to conduct and document safety risk assessments. This table indicates that the requirement to use a SAW to support safety risk assessment is based on the results of a safety risk assessment. According to the table, a SAW is required to be used when CTA determines that a hazard ranking is “undesirable” and is recommended if the hazard ranking is “acceptable” and “acceptable with review.” The table does not address the use of a SAW for a rating of “unacceptable.” The table also notes that all safety risk assessment results are added to the CTA Hazard Tracking Log (discussed in the previous section of this report). FTA notes that the Hazard Tracking Log, while documenting final safety risk rankings, does not document the required safety risk assessment elements such as potential consequences.

During interviews, CTA representatives stated CTA’s decision to use a SAW is flexible, and SAWs are typically used when the safety risk ranking is high, the issue is systemic, and more than one location is affected. FTA notes this practice is not consistent with the “Safety Risk Acceptance and Required Action” table discussed above. FTA notes that, as designed, the SAW is not only a mechanism to document the results of a safety risk assessment, but serves as a tool to support the conduct of the safety risk assessment. Therefore, it is inappropriate to decide whether to use a SAW based on the results of the assessment.

FTA document reviews and on-site interviews with CTA representatives confirmed that for many hazards, CTA has not recorded safety risk assessment information in a SAW but has documented a hazard rating in its Hazard Tracking Log. FTA notes that in those instances, CTA does not maintain required safety risk assessment information, as the Hazard Tracking Log does not contain the hazard's potential consequences, a required element of the agency's safety risk assessment under § 673.25(c).

To achieve compliance with the safety risk assessment requirements of § 673.25(c), CTA must revise its ASPs and Safety Risk Management Plan to ensure that all required elements of safety risk assessments are carried out and documented.

Finding 2: CTA has not implemented a compliant safety risk assessment process, as required at § 673.25(c).

Actions required for closeout:

- CTA must revise its ASPs and Safety Risk Management Plan to define a process ensuring all required elements of safety risk assessments are consistently documented, including documentation of the hazard, potential consequences, and likelihood and severity determinations.
- CTA must submit the revised ASPs and Safety Risk Management Plan to FTA.
- CTA must submit documentation confirming it is implementing the safety risk assessment processes established in its ASPs and Safety Risk Management Plan.

Safety Risk Mitigation

Key Takeaway: FTA issues no findings or recommendations in this area. FTA's review confirms CTA has met regulatory requirements for identifying safety risk mitigations as required at § 673.25(d)(1) and has implemented a wide range of safety risk mitigations to address safety risk associated with assaults on transit workers. **Note:** *FTA has issued a finding later in this report (Finding 9) related to the Joint Labor-Management Safety Committee's responsibility to identify and recommend safety risk mitigations as part of the safety risk reduction program.*

Applicable Requirement: At § 673.25(d)(1), FTA requires transit agencies to “establish methods or processes to identify safety risk mitigations or strategies necessary as a result of the transit agency's safety risk assessment to reduce the likelihood and severity of the potential consequences. For large urbanized area providers, these methods or processes must address the role of the transit agency's Safety Committee.”

Audit Observations: CTA describes its processes for safety risk mitigation at Section 4.4 of the Rail ASP and the Bus ASP and Section 2.3.1 of its Safety Risk Management Plan. According to

CTA process documents, CTA applies the MIL-STD-882E order of preference to reduce safety risk to the lowest acceptable level practicable within the constraints of cost, schedule, and performance: 1) eliminate the hazard through design selection, 2) reduce risk through design alteration, 3) incorporate engineered features or devices, 4) provide warning devices, or incorporate procedures, training, signage, and personal protective equipment.

As stated in the previous section, CTA process documents describe CTA's Hazard Tracking Log, which the Safety Department uses to consolidate SRM information. CTA's Safety Department has the responsibility to determine immediate mitigations and document the mitigations in the Hazard Tracking Log. CTA provided a local hazard log and the Safety Department's Hazard Tracking Log to FTA for review. Both logs include safety risk mitigations and the owner or department responsible. CTA representatives told the FTA audit team that CTA uses a multi-tiered approach for safety risk mitigation that starts with local departments mitigating hazards whenever possible. If a hazard cannot be mitigated effectively at the local level, it is elevated to the Hazard Log Committee and recorded in the Hazard Tracking Log. At the Hazard Log Committee level, mitigations are developed collaboratively by CTA subject-matter experts, stakeholder business units, and data analysts who review the data and linkage to the issue.

Mitigation decisions also involve cross-functional discussions to ensure the mitigation will not introduce unintended negative consequences.

Assaults on Transit Workers

CTA has implemented a range of safety risk mitigations to address the safety risk associated with assaults on transit workers. In response to General Directive 24-1, CTA conducted a safety risk assessment related to assaults on transit workers. CTA provided FTA with an update on associated safety risk mitigations in advance of FTA's Focused ASP Audit. CTA's SRM process for assaults on transit workers included use of a SAW and involved a variety of internal stakeholders who participated in an analysis of transit worker assault data. That process included classification of details associated with the types of assault, the employee who was subject to that type of assault, and a breakdown of verbal and physical assaults, which provided an understanding of what occurred, what is occurring, and who is subject to different event types.

The table below presents assault-related safety risk mitigations, programs, and strategies currently underway or planned at CTA as discussed with CTA representatives during virtual and on-site audit interviews.

Strategy	Description
Operator Area Protective Barriers	CTA is in the process of installing barrier doors. For upcoming procurements, CTA is considering barriers that span the full width and height of the operator area.

Strategy	Description
Signage regarding surveillance and penalties	- CTA has posted signage on revenue service vehicles and in revenue facilities that states: “For your protection, any person who commits a crime against a customer or employee of CTA will be prosecuted to the fullest extent of the law.” - CTA has posted signage and audible announcements that states: “Any assault on a transit employee or rider will be prosecuted to the fullest extent of the law – which can result in imprisonment of up to 10 years and a criminal record.”
Bus Fare Communication and Signage	- CTA plans to: - add signage to ensure the required fare is clear and visible for riders; and - add “fare required” audio announcements that would play when bus doors open.
De-escalation Training	(Please see <i>De-escalation Training</i> section of this report.)
Video / Audio Surveillance	- CTA maintains more than 33,000 cameras that monitor buses, railcars, and revenue/non-revenue facilities and is replacing aging technology with high-definition cameras and enhanced lighting in areas identified as most vulnerable. - Cameras on new 7000 series railcars include passenger facing monitors to further communicate ongoing video surveillance to the public. - CTA has installed new camera monitors in rail station attendant booths in all rail stations to allow station personnel to monitor security from their booths. - All railcars have Passenger Intercom Units (PIUs) that allow riders to speak with operators to request assistance or report issues in need of immediate attention.
Artificial Intelligence (AI)-Based Technology: Video/Audio Surveillance	CTA has partnered with ZeroEyes, an AI-Based technology firm to launch a pilot program that utilizes AI technology to monitor for and alert security officials of brandished weapons. The technology uses 24/7 monitoring of rail system cameras.

Strategy	Description
Automatic Vehicle Location	• Bus: CTA uses the Clever Devices Intelligent Vehicle Network, which is installed on all CTA buses, and silent emergency alarms, which alert Control Center Operations and allows Control to covertly listen and identify vehicle location. • Rail: CTA uses SCADA, a control system that collects operational data, to control and manage rail service, including monitoring vehicle location.
Patrol Strategies	• CTA partners with the Chicago Police Department (CPD) and funds the Public Transportation Section of CPD, which provides dedicated sworn police resources. • CPD staffs the Strategic Decision Support Center (SDSC) 24/7, a technology center that grants CPD access to CTA’s camera and radio network, as well as City of Chicago street cameras, to support deployment of police resources and identification of offenders. • In 2022, CTA extended its Voluntary Special Employment Program (VSEP) agreement with CPD for additional sworn police officers who volunteer to patrol the CTA system on their days off and increased the program’s pay to a rate of one and a half times the officer’s regular hourly rate. • CTA maintains intergovernmental agreements for additional Police Officer support from the Evanston, Oak Park, and Forest Park police departments. • Staffing surge plan: ○ CPD Voluntary Special Employment Program (VSEP) doubling hours in 2026. ○ CPD Public Transportation Section increasing hours by approximately 33 percent. • Transit Rider Interaction Program (“TRIP”) Missions: Launched in January 2026, the TRIP Missions increase the physical presence of uniformed officers on the rail system to deter and more quickly respond to criminal behavior at stations and on trains. CTA focuses these missions on lines with the highest number of crimes, disturbances, or CTA

Strategy	Description
	code of conduct complaints. Missions last approximately 60 minutes per station. Missions include the following: ○ Contracted Security Guard Services: These are unarmed security guards and include K-9 security teams. ○ CPD Safety Outreach Missions: This is a community-oriented policing approach to engage riders across the CTA system, providing them with tips for smart transit travel and encouraging riders to report any suspicious activity (“see something, say something” campaign). ○ CTA and CPD Code of Conduct Missions: These daily weekday missions enforce CTA’s Code of Conduct, including violations such as interfering with CTA services, occupying more than one seat, smoking, and illicit behavior. ○ CPD Anti-Terrorism Surge and Operational Package (Opack) Deployments: Anti-terrorism and Opack teams patrol the CTA system and prioritize stations with high passenger density, in the subway, and in the central business district. Deployments include Anti-terrorism, Explosives Detection K-9, and Mobile Explosives Screening teams. ○ CTA and CPD Rail Surge Missions: These missions target the Red Line in areas where there are frequent overnight disturbances. ○ CTA Fare Enforcement Missions: CTA deploys security to sites where data indicate higher fare evasion rates. ● Bus Missions: CPD conducts bus missions on the corridors with higher levels of security incidents and assaults on transit workers. ○ Bus Ride-Along Missions: CPD officers are riding buses daily along the routes with the highest number of incidents, bus operator security concerns, and high fare evasion. ○ Bus Safe Corridor Missions: CPD officers are deployed to the bus stops along corridors targeted through bus operator feedback, customer complaints, and reported crime data.

Strategy	Description
Public Awareness Campaign & Customer Communication	CTA launched a campaign aimed at warning would-be offenders of the penalties for assaulting CTA employees and riders, which can result in imprisonment of up to 10 years and a felony record.
Authority Police Force	- The Joint Labor Safety Committee voted on 11/19/2024 to begin exploring the feasibility of obtaining a dedicated CTA police force. - CTA is waiting for a consulting firm to submit a feasibility study report.
Fare Evasion Mitigations	High-Barrier Fare Gates Pilot: CTA plans to identify station entrances that have a high number of fare evasions to determine whether to install high-barrier fare gates to replace the standard tripod turnstile. Fare Evasion Data: CTA is integrating Automated Passenger Counter data from its bus fleet in its calculations of fare evasion to allow for a more granular analysis of fare-evasion trends. For rail, CTA performs video audits to better estimate the level of fare evasion at the branch level. Fare Card Inspection Missions: Starting in 2026, CTA is inspecting fare cards to identify fare media being used by someone other than the authorized holder, which can lead to revoking the entitlement. Best Practice Research and Collaboration: CTA participates in the MIT Fare Evasion Working Group with peer agencies to explore strategies, best practices, and new options.

Strategy	Description
CTA Rider Suspension Policy	- Effective January 1, 2024, Illinois Public Act 103-0281 amended Ordinance No. 016-110 of the Regional Transportation Act to enact requirements for rider suspensions and accompanying confiscation of fare media to address passenger misconduct on transit vehicles and CTA property. Prohibited conduct that may subject a rider to suspended transit privileges includes assault, battery, criminal sexual assault, and public indecency, as defined in the Illinois Criminal Code. - On January 18, 2024, the CTA Transit Board approved the amended Ordinance 016-110, which amended Ordinance 006-75, Rules of Conduct for CTA Riders. - Anecdotal evidence collected during on-site interviews suggests that CTA has had difficulty enforcing the suspension policy, with repeat offenders continuing to ride the system. Some operators were unaware of the policy.

Safety Assurance

Transit agencies must develop and implement a Safety Assurance process (§ 673.27(a)). Safety Assurance is a set of processes within a transit agency’s SMS that functions to ensure the implementation and effectiveness of safety risk mitigations and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information (§ 673.5). The PTASP regulation defines requirements for Safety Assurance processes at § 673.27, including requirements for safety performance monitoring and measurement (§ 673.27(b)), management of change (§ 673.27(c)), and continuous improvement (§ 673.27(d)). Safety Assurance activities serve as a check on the SRM of a transit agency.

Monitoring the Effectiveness of Safety Risk Mitigations

Key Takeaway: FTA’s review of CTA’s policies identified non-compliance with the requirement to monitor the effectiveness of safety risk mitigations established at § 673.27(b)(2). To achieve compliance, CTA must demonstrate that it is following the processes described in its ASPs to identify safety risk mitigations that may be ineffective. **Note:** *FTA has issued a related finding regarding the JLSC’s role in supporting this activity (Finding 9).*

Applicable Requirement: At § 673.27(b)(2), FTA requires each transit agency to establish activities to “monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.”

Audit Observations: CTA describes processes related to safety risk mitigation monitoring in Section 4.4.2 of its ASPs and Section 2.3.4 of its Safety Risk Management Plan. According to CTA process documents, CTA uses two types of tools to monitor the effectiveness of safety risk mitigations: a SAW, as discussed above in the Safety Risk Assessment section of this report, and Mitigation Monitoring Plans (MMP).

According to the CTA ASPs, “to ensure effectiveness, implementation is conducted and validated through analysis, testing, demonstration, or inspection. Safety performance indicators should be established and monitored at intervals to assess ongoing mitigation performance. Setting a safety performance target may validate effective mitigation implementation. The CTA SAW has a Safety Assurance tab for tracking mitigation progress.”

In addition, the CTA ASPs and Safety Risk Management Plan introduce MMPs as tools to assess whether safety risk mitigations have been implemented correctly and are functioning as intended. The documents state “an MMP serves to either validate the effectiveness of the mitigation or to inform CTA that a different approach may be needed.” The ASPs and Safety Risk Management Plan note that an MMP should include input from the CTA subject matter experts who participated in the safety risk assessment and mitigation development and use quantitative data to verify effectiveness. During on-site interviews, CTA representatives explained that MMPs represent a more robust monitoring of safety risk mitigations than typical safety risk mitigation monitoring, but also stated that MMPs, when used, are documented in the Safety Assurance tab of the SAW. CTA process documents list the factors that determine whether an MMP should be established, which include mitigations implemented for safety risk ratings of “unacceptable;” potential consequences ranked with “catastrophic” or “critical” severity; and safety risk mitigations that require significant resources, trade-offs, or modifications. The Safety Risk Management Plan further explains the key components to include in an MMP and that the MMP will exist only long enough to verify the effectiveness of the mitigation. According to the Safety Risk Management Plan, CTA will either devise a new mitigation or re-evaluate the safety risk if a mitigation proves to be ineffective, inappropriate, or improperly implemented. At the end of the MMP’s established time frame, a manager with the appropriate authority to accept the safety risk will document the knowledge gained from monitoring and recommend next steps via a memorandum to the Chief Safety & Security Officer. CTA was unable to provide FTA with any examples of CTA’s development of an MMP.

CTA provided SAWs for four safety risk assessments. FTA’s review of these SAWs demonstrated an inconsistent use of SAWs to monitor safety risk mitigation effectiveness. In one case, CTA had established safety performance indicators and targets to support effectiveness monitoring but had not documented any related effectiveness determinations. In a second SAW, CTA had not documented any safety risk mitigation effectiveness monitoring information. In two additional SAWs, CTA included information regarding the effectiveness of some, but not all, of the identified safety risk mitigations.

During virtual interviews, CTA explained to FTA that in practice the agency does not use SAWs to track all safety risk mitigations. CTA noted that many safety risk mitigations are tracked in the CTA Hazard Tracking Log. FTA reviewed Hazard Logs submitted by CTA and confirmed that safety risk mitigations, when included in the Hazard Tracking Log, do not include information related to monitoring the effectiveness of the safety risk mitigation. During interviews, CTA representatives explained to FTA that monitoring activities begin when safety risk mitigations are moved to the second tab, “hazards to be monitored” and this movement occurs only after the Hazard Log Committee votes to move the mitigation to the monitoring phase. However, FTA notes that while the Hazard Tracking Log includes information on monitoring safety risk mitigation implementation, it does not indicate how CTA will monitor the effectiveness of the safety risk mitigation.

Finding 3: CTA has not met requirements to monitor its operations to identify any safety risk mitigations that may be ineffective, as required at § 673.27(b)(2).

Action required for closeout:

- CTA must submit documentation that confirms it is carrying out the processes described in its ASPs to identify safety risk mitigations that may be ineffective. *Note: If CTA chooses to revise its processes for identifying any safety risk mitigation that may be ineffective, inappropriate, or not implemented as intended, it must also submit to FTA the revised versions of the ASPs and Safety Risk Management Plan.*

Continuous Improvement

Key Takeaway: FTA’s review of CTA’s policies and implementation identified non-compliance with certain Part 673 requirements related to continuous improvement. To achieve compliance, CTA must revise its ASPs to define a process to assess its safety performance annually as required at § 673.27(d)(1) and to develop and carry out a plan to address any deficiencies identified through the annual safety performance assessment, as required by § 673.27(d)(4). FTA recommends CTA document in its ASPs a formal process that builds on its ongoing safety performance monitoring efforts to document, at year's end, whether each annual safety performance target was met. *Note: FTA has issued a related finding regarding the JLSC’s role in supporting this activity (Finding 8).*

Safety Performance Targets

Applicable Requirement: Section 673.11(a)(3) requires that a transit agency’s ASP “must include annual safety performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.” The National Safety Plan establishes 14 general safety performance measures for which transit agencies must set safety performance targets. Transit agencies must set targets for the different modes of transit service they provide.

Audit Observations: FTA did not identify any findings of non-compliance related to setting general safety performance targets and documenting them in the ASPs as required at § 673.11(a)(3). CTA has developed a formal process for setting general safety performance targets. CTA’s rail and bus ASPs list 15 safety performance measures and targets in Table 2.4.3. CTA establishes the safety performance targets based on a three-year rolling average of data that CTA reports to the NTD.

In virtual interviews and document submissions, FTA confirmed that CTA sets its annual safety performance targets upon certification of the previous year’s NTD data. CTA’s Performance Management Group is responsible for producing the underlying safety performance data and trends, and the SMS Team within the Safety Department compiles this data and calculates proposed targets, using the average of the previous three years of actual performance data. The Safety Department presents the proposed performance targets to the CSSO, JLSC, and Accountable Executive for review and approval. CTA maintains several spreadsheets to track performance and establish proposed safety performance targets, including rail and bus target trackers and a year-over-year analysis tracker.

Annual Performance Assessment – Identifying Deficiencies in the Agency’s SMS and Deficiencies in Performance Against Safety Performance Targets

Applicable Requirements: Section 673.27(d)(1) requires transit agencies to “establish a process to assess its safety performance annually.” This annual performance assessment must include (1) the identification of deficiencies in the transit agency’s SMS; and (2) deficiencies in the transit agency’s performance against required safety performance targets (§ 673.27(d)(1)(i)). For rail transit agencies, the process “must also address any specific internal safety review requirements established by their State Safety Oversight Agency” (§ 673.27(d)(1)(iii)).

Audit Observations (Identifying Deficiencies in the Agency’s SMS): CTA’s ASPs do not establish a process to assess its safety performance annually to identify deficiencies in the transit agency’s SMS. During on-site interviews, CTA representatives confirmed they do not conduct an annual assessment to identify deficiencies in the CTA SMS.

During on-site interviews, CTA personnel stated the agency addresses the requirement for the annual performance assessment through the Internal Safety Reviews (ISR) required by the SSOA. These reviews evaluate ASP implementation and SMS effectiveness and follow the SSOA’s required three-year cycle for auditing implementation of each element of the CTA Rail ASP once every three years. Section 673.27(d)(1)(iii) requires transit agencies to address internal safety review requirements established by their SSOA. However, FTA notes this requirement is in addition to the annual performance assessment requirements at § 673.27(d)(1)(i) related to identifying deficiencies in the SMS. The SSOA-required reviews examine ASP implementation over a three-year period. These internal safety reviews alone are insufficient to address the PTASP requirement for transit agencies to assess their safety performance to identify

deficiencies in their SMS annually. In addition, the ISR program does not apply to the CTA Bus ASP. To achieve compliance, CTA must define and carry out an annual process, which may be associated with its ASP review and update cycle, that defines how CTA will identify any deficiencies in its SMS.

Finding 4: CTA has not established a process to assess its safety performance annually, as required at § 673.27(d)(1).

Actions required for closeout:

- CTA must document a process in its ASPs for conducting an annual performance assessment as required at § 673.27(d)(1), including a process for how CTA identifies deficiencies in its SMS.
- CTA must submit documentation that confirms it has conducted the annual performance assessment required at § 673.27(d)(1), including the identification of any deficiencies in its SMS.

Audit Observations (Identifying Deficiencies in Performance against Safety Performance Targets): Section 6.3 of CTA's Rail and Bus ASPs describes that CTA upholds its commitment to continuous improvement by using its safety performance targets, including those for the safety risk reduction program, to inform the Accountable Executive of CTA's safety performance and to assist in evaluating the overall efficiency of the SMS in meeting its safety objectives. The CSSO presents this data to the Accountable Executive, Executive Safety Committee, and JLSC at least quarterly. The ASPs also describe the roles and responsibilities within this process of the Vice President of Performance Management, CSSO, JLSC, Executive Safety Committee, and the Accountable Executive.

CTA submitted documentation demonstrating that it continuously collects safety performance data and maintains safety performance tracking tools that log monthly data on the required safety performance measures. The tracking tools clearly highlight whether CTA missed or is projected to miss its safety performance targets. CTA formalizes rail safety performance data in dashboards that are shared quarterly with its SSOA, the Accountable Executive, and the Executive Safety Committee. Bus and rail safety performance data is also shared with the JLSC during scheduled meetings.

Recommendation 1:

FTA recommends CTA document in its ASPs a formal process that builds on its ongoing safety performance monitoring efforts to document, at year's end, whether each annual safety performance target was met.

Annual Performance Assessment – Plan to Address Deficiencies

Applicable Requirement: Section 673.27(d)(4) requires a transit agency to “develop and carry out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the safety performance assessment” required at § 673.27(d)(1).

Audit Observations: CTA’s ASPs state that “the Accountable Executive must direct action to address deficiencies identified by the agency-wide key safety performance indicators. The CSSO will then present the Accountable Executive with both the observed deficiency and recommendations for corrective action. The Accountable Executive will then direct action to resolve the deficiency. Such corrective actions will be documented, tracked, and monitored through CTA’s established corrective action plan process.” However, this process does not address deficiencies in the SMS or the required safety performance targets. FTA confirmed through interviews that in practice, these deficiencies are related only to the ISR findings and do not address missed safety performance targets or an annual assessment to identify deficiencies in the CTA SMS. As such, CTA has not developed or carried out a plan that meets the requirements of § 673.27(d)(4).

Finding 5: CTA has not developed or carried out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment, as required at § 673.27(d)(4).

Actions required for closeout:

- CTA must revise its ASPs to define its process for developing and carrying out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment.
- CTA must submit a plan to address any deficiencies identified through the annual safety performance assessment conducted pursuant to Finding 4, including any deficiencies associated with the comprehensive safety training program required under § 673.29(a).
- CTA must submit documentation that confirms implementation of the plan described above.

Safety Committee and the Safety Risk Reduction Program

Applicable Requirements: Transit agencies that serve an urbanized area with a population of 200,000 or more (large urbanized area providers) must establish a safety committee that is appropriately scaled to the size, scope, and complexity of the transit agency, and is convened by a joint labor-management process (§ 673.19(a)).

The safety committee must consist of an equal number of frontline transit worker representatives and management representatives. The labor organization that represents the plurality of the

transit agency's frontline transit workers must select frontline transit worker representatives for the safety committee (§ 673.19(b)).

Each large urbanized area provider must include or incorporate by reference in its ASP procedures regarding the composition, responsibilities, and operations of the safety committee (§ 673.19(c)).

The safety committee must undertake the following activities to oversee the transit agency's safety performance: (1) review and approve the ASP and any updates to the ASP; (2) set annual safety performance targets for the safety risk reduction program; and (3) support the transit agency's SMS by identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment; identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended; and identifying safety deficiencies for purposes of continuous improvement (§ 673.19(d)).

Establishment/Membership

Key Takeaway: FTA issues no findings or recommendations in this area. FTA confirmed CTA has established a joint labor-management safety committee that meets the membership requirements at §§ 673.19(a) and (b).

Audit Observations: CTA describes its JLSC in Section 8.2.2.8 of its ASPs and in Sections II and III of its JLSC Charter. FTA document reviews and interviews confirmed the JLSC was convened by a joint labor-management process and is comprised of an equal number of frontline transit worker representatives and management representatives. FTA conducted interviews with JLSC members and discussed member experiences supporting the JLSC. Frontline transit worker representatives confirmed they were appointed to the JLSC by the union president.

Safety Committee Procedures

Key Takeaway: FTA's review of CTA's policies and implementation identified non-compliance with certain Part 673 requirements related to Safety Committee procedures. FTA confirmed CTA's ASPs and the JLSC Charter include the minimum procedures and responsibility requirements established at §§ 673.19(c) and (d). However, CTA has not carried out the Safety Committee procedures it has established. Specifically, CTA has not adhered to the JLSC quarterly meeting schedule and required JLMSC training specified in the ASPs and JLSC Charter. In addition, FTA recommends CTA consider the development of refresher training and onboarding materials that address the JLSC activities required by the PTASP regulation.

Audit Observations: The CTA ASPs and the JLSC Charter restate the regulatory requirements for the safety committee's responsibilities, including the requirements that the JLSC reviews and approves the ASP, sets safety performance targets for the safety risk reduction program, identifies and recommends safety risk mitigations, identifies safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, and identifies safety deficiencies for the purposes of continuous improvement. The ASP references the JLSC Charter to address specific JLSC procedures.

The JLSC Charter addresses the minimum Safety Committee procedures required at § 673.19(c). The JLSC Charter describes the committee characteristics, components, and committee processes, including organizational structure; Chairperson; required JLSC training; administrative processes; compensation policy; decision-making; access to subject matter experts and the transit worker safety reporting program; and communication with the Board of Directors and the Accountable Executive.

The JLSC procedures in the CTA ASPs and JLSC Charter require the JLSC to meet quarterly. However, document reviews and on-site interviews confirmed that the JLSC has not met quarterly. In 2024, the JLSC met three times, and in 2025 the JLSC only met twice.

The JLSC Charter requires the JLSC to complete the free Safety Management Systems (SMS) Awareness course provided by the FTA's Transportation Safety Institute. Documented committee minutes for May and June 2024 meetings confirm that management representatives of the JLSC have reminded the entire JLSC of this requirement. However, during an interview with JLSC frontline transit worker representatives, FTA confirmed these members had not yet completed the required training.

During interviews, JLSC representatives were well-versed in CTA safety concerns and shared evidence of active participation in the discussion of specific safety concerns, including topics related to assaults on transit workers. They were less familiar, however, with the specific responsibilities required by the PTASP regulation, including setting targets for the safety risk reduction program, recommending safety risk mitigations (including in response to a missed safety risk reduction program annual safety performance target), and documenting safety risk mitigations relating to the safety risk reduction program in the ASP.

Finding 6: CTA has not carried out the Safety Committee procedures required at § 673.19(c) that CTA established in its ASPs and JLSC Charter.

Actions required for closeout:

- CTA must ensure that it carries out the Safety Committee procedures established in the CTA ASPs and JLSC Charter regarding JLSC meeting frequency and training requirements.
- CTA must submit verification of JLSC meeting frequency by submitting JLSC meeting minutes for the next four JLSC meetings.
- CTA must submit documentation confirming completion of required JLSC training, as defined in the JLSC Charter.

Recommendation 2:

FTA recommends CTA develop refresher training and onboarding content for JLSC members that focuses on the safety committee duties and related requirements established by Part 673, including:

- Review and approval of the ASP,
- Setting safety performance targets for the safety risk reduction program,
- Identifying safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program,
- Identifying and recommending safety risk mitigations, including mitigations associated with instances of a missed safety performance target for the safety risk reduction program,
- Documenting safety risk mitigations for the safety risk reduction program in the ASP, and
- Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Safety Committee Responsibilities and the Safety Risk Reduction Program

Review and Approval of the ASP (§§ 673.11(a)(1)(i) and 673.19(d)(1))

Key Takeaway: FTA's review of CTA policies and practices identified non-compliance with Part 673 requirements related to JLSC approval of the ASPs. FTA confirmed CTA has established a process for the JLSC to review and approve the ASPs annually. However, the

process includes the Accountable Executive signing the ASPs after they are approved by the JLSC and the CTA Board of Directors and CTA.

Applicable Requirements: The ASPs must be signed by the Accountable Executive and approved by the joint labor-management safety committee, followed by the transit agency's Board of Directors or an equivalent entity (§ 673.11(a)(1)(i)).

Audit Observations: CTA describes its ASP review and approval process in Section 2.8 of its ASPs. Subsection 2.8.3 of the Rail ASP states that after receiving the SSOA's approval, CTA initiates the internal ASP approval and signature process, which begins with review and approval by the JLSC, as documented in its meeting minutes. Upon approval by the JLSC, the ASP is presented to the Board of Directors for approval and signature by the Board Chairman. The ASP is then submitted to the Accountable Executive for final signature. The Rail ASP states, "The fully executed ASP will be resubmitted to [the SSOA] verifying its approval." Subsection 2.8.2 of the Bus ASP states that after the JLSC review and approval, as called for in a vote, the CSSO signs the ASP as both the JLSC Chairperson and the CSSO. The CSSO then escalates and presents the ASP to the Board of Directors for review and approval. CTA's Accountable Executive is the last ASP signatory. CTA's documented sequencing for ASP approval does not meet the regulatory requirements established in § 673.11(a). FTA clarifies the ASP review sequence in the preamble to the April 2024 PTASP final rule ([89 FR 25715](#)): "FTA has defined the Accountable Executive to have the responsibility for signing the ASP prior to it being sent to the Safety Committee for approval." To achieve compliance, CTA must revise its ASP review, update, and approval process to ensure the Accountable Executive signs the ASPs before they have been approved by the JLSC and the Board of Directors.

Finding 7: CTA's ASP approval process is inconsistent with the requirements at § 673.11(a)(1)(i).

Actions required for closeout:

- CTA must revise its ASP review, update, and approval process to ensure that the Accountable Executive signs the ASPs before they are approved by the JLSC and the Board of Directors.
- CTA must revise its ASPs to document this updated process and submit the revised ASPs that have been approved based on the revised, compliant process.

*Setting Annual Safety Performance Targets for the Safety Risk Reduction Program
(§§ 673.11(a)(7)(iii) and 673.19(d)(2))*

Key Takeaway: FTA issues no findings in this area. FTA confirmed the JLSC sets safety performance targets for the safety risk reduction program through the review and approval of the CTA ASPs. FTA recommends the JLSC set safety performance targets for the safety risk reduction program that reflect a reduction from the three-year rolling average of NTD data.

Applicable Requirements: The PTASP regulation requires safety committees to set annual safety performance targets for the eight safety risk reduction program performance measures established in the National Safety Plan (§§ 673.19(d)(2) and 673.11(a)(7)(iii)).

In addition, targets must be “based on the level of detail the large urbanized area provider is required to report to the NTD. The safety committee is not required to set a target for a performance measure until the large urbanized area provider has been required to report three years of data to the NTD corresponding to such performance measure.” (§ 673.11(a)(7)(iii)(C)).

Audit Observations: As discussed in greater detail above, CTA has developed a formal process for setting safety performance targets led by the SMS Team within the Safety Department. CTA’s ASPs identify 15 annual safety performance targets for the safety performance measures established by the National Public Transportation Safety Plan, including the 14 general safety performance measures and the eight safety performance measures for the safety risk reduction program. The ASPs state that targets are established using a three-year rolling average of data CTA reports to the NTD. The Safety Department presents the proposed performance targets to the CSSO, JLSC, and Accountable Executive for review and approval.

FTA confirmed the safety risk reduction program safety performance targets are based on a three-year rolling average of data that CTA reported to the NTD, established for all modes of CTA’s public transportation service, and set by the JLSC through a review and approval process.

Section 673.11(a)(7) states the safety risk reduction program is intended “to improve safety performance by reducing the number and rates of safety events, injuries, and assaults on transit workers.” In the preamble to the April 2024 PTASP final rule ([89 FR 25718](#)), FTA clarifies expectations about how safety committees should set these safety performance targets, stating, “To reflect an annual reduction, the safety performance target must be set below the three-year rolling average. However, Safety Committees have flexibility regarding the amount of annual reduction defined by their targets, as long as the methodology uses a three-year rolling average of data reported to the NTD and the targets reflect an annual reduction.”

In practice, the JLSC may set a safety performance target for the safety risk reduction program that does not represent a reduction from the three-year rolling average. FTA confirmed that not all of the safety performance targets for the safety risk reduction program documented in CTA’s

2025 Version 5 ASPs, including major events, collisions, injuries, and assaults on transit workers, reflect a reduction from the three-year rolling average.

Recommendation 3:

As a best practice, FTA recommends the CTA JLSC set safety performance targets for the safety risk reduction program that reflect an annual reduction by setting the safety performance target below the three-year rolling average of associated data reported to the NTD.

Supporting the Transit Agency's SMS and the Safety Risk Reduction Program (§§ 673.11(a)(7) and 673.19(d))

Key Takeaway: FTA's review of CTA policies and implementation identified non-compliance with certain Part 673 requirements related to the JLSC's role in supporting CTA's SMS. Specifically, FTA has determined:

- CTA has not met requirements for the joint labor-management safety committee to support the transit agency's SMS by: (1) identifying safety deficiencies for purposes of continuous improvement; (2) identifying and recommending safety risk mitigations to address instances of a missed safety performance target set for the safety risk reduction program); and (3) identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program (§§ 673.19(d)(3)(i)-(iii)); and
- CTA has not established a compliant process to incorporate safety risk mitigations identified and recommended by the JLSC for the safety risk reduction program into the ASPs for implementation (§ 673.11(a)(7)(iv)).
- In addition, FTA recommends CTA work to increase frontline transit worker awareness of the JLSC and how concerns can be shared with the JLSC.

Applicable Requirement: Section 673.19(d)(3)(iii) requires joint labor-management safety committees to support the operation of the transit agency's SMS by "identifying safety deficiencies for purposes of continuous improvement as required at § 673.27(d), including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program."

Section 673.27(d)(1)(ii) requires that for large urbanized area providers, the agency's annual safety performance assessment process must address the role of the safety committee.

Audit Observations: As discussed earlier, CTA uses three policy documents to define the responsibilities and processes of the JLSC: the Rail and Bus ASPs and the JLSC Charter. The CTA ASPs and referenced policy documents restate the responsibility required in

§ 673.19(d)(3)(iii) for the JLSC to identify safety deficiencies for the purposes of continuous improvement. However, as discussed in Finding 3, CTA's ASPs do not define a process to assess the agency's safety performance annually. Accordingly, the ASPs also do not meet the requirement at § 673.27(d)(1)(ii) for such process to address the role of the safety committee.

FTA document reviews confirmed that the ASPs and the JLSC Charter do not define processes for how the JLSC supports the annual continuous improvement process to identify deficiencies in the agency's performance, including instances where CTA fails to meet an annual safety performance target set by the JLSC for the safety risk reduction program.

Finding 8: CTA has not met requirements for the joint labor-management safety committee to identify safety deficiencies for purposes of continuous improvement and for the agency's annual safety performance assessment process to address the role of the safety committee, as required at §§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii), respectively.

Actions required for closeout:

- CTA must revise its ASPs and JLSC Charter to define the process by which the JLSC will identify safety deficiencies for purposes of continuous improvement as required at § 673.27(d)(1)(ii).
- CTA must submit documentation that confirms the JLSC is performing its required role to identify safety deficiencies for purposes of continuous improvement, including any instance where CTA has not met an annual safety performance target set for the safety risk reduction program.

Applicable Requirement: Section 673.19(d)(3)(i) requires joint labor-management safety committees to support the operation of the transit agency's SMS by "[i]dentifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program."

In addition, § 673.19(d)(3)(ii) requires joint labor-management safety committees to support the operation of the transit agency's SMS by "[i]dentifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program."

Audit Observations: Section 4.4.1 of the CTA ASPs restates the responsibility required in § 673.19(d)(3)(i) for the JLSC to identify safety risk mitigations, including to support the safety risk reduction program and the associated performance targets. However, CTA's ASPs do not define a process for the JLSC's identification and recommendation of these mitigations.

Further, CTA's JLSC Charter restates the responsibility required in § 673.19(d)(3)(ii) for the JLSC to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. However, neither the JLSC Charter nor the CTA ASPs define a process for the JLSC's identification of ineffective safety risk mitigations as required.

On-site interviews confirmed that the JLSC has not recommended safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program. For example, data confirm CTA did not meet its 2024 SRRP Heavy Rail and Motorbus major events targets and 2025 SRRP Heavy Rail and Motorbus injuries targets. Further, on-site interviews confirmed that the JLSC has not identified safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

Finding 9: CTA has not met requirements for the joint labor-management safety committee to identify and recommend safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program, and to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, as required at §§ 673.19(d)(3)(i) and (ii).

Actions required for closeout:

- CTA must revise its ASPs and JLSC Charter to define the process by which the JLSC will identify safety risk mitigations, and identify safety mitigations that may be ineffective, inappropriate, or were not implemented as intended, including in response to instances where CTA has missed a safety performance target set by the JLSC for the safety risk reduction program.
- CTA must submit the revised ASPs to FTA.
- CTA must submit documentation that confirms the JLSC has recommended safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program and has identified safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Applicable Requirement: Section 673.25(d)(5) requires that when the joint labor-management safety committee, “as part of the transit agency's safety risk reduction program, identifies and recommends under § 673.19(c)(6) safety risk mitigations, including mitigations relating to vehicular and pedestrian safety events involving transit vehicles or assaults on transit workers, based on a safety risk assessment conducted under § 673.25(c), the transit agency must include or incorporate by reference these safety risk mitigations in its ASP pursuant to § 673.11(a)(7)(iv).”

Per § 673.23(d)(1)(i), the Accountable Executive of a large urbanized area provider must implement safety risk mitigations for the safety risk reduction program that are included in the ASP under § 673.11(a)(7)(iv).

Audit Observations: Section 3.2.1 of the Rail and Bus ASPs states the Accountable Executive is “responsible for implementing safety risk mitigations for the safety risk reduction program that are included in the ASP.” In addition, Section 4.4.1 of the ASPs restates the required responsibility for the JLSC to identify and recommend safety risk mitigations as a part of the safety risk reduction program. However, as noted previously, neither CTA’s ASPs nor the JLSC Charter define a process for how the JLSC will carry out this responsibility. In addition, the ASPs do not describe that safety risk mitigations recommended by the JLSC as part of the safety risk reduction program will be included or incorporated in the ASP, nor did CTA include any such safety risk mitigations in their 2025 Rail and Bus ASPs.

Finding 10: CTA has not met requirements for the safety risk mitigation process to include or incorporate by reference in the ASPs any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment as required at § 673.25(d)(5).

Actions required for closeout:

- CTA must revise its ASPs and any applicable referenced documents to define the process by which CTA will include or incorporate by reference in the ASPs any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment.
- CTA must submit these revised materials.

Audit interviews confirmed JLSC frontline transit worker representatives raise concerns during JLSC meetings and provide input regarding hazards and potential safety risk mitigations.

However, during interviews with frontline workers and supervisors from CTA’s bus and rail divisions, the individuals interviewed were largely unaware of the JLSC and its role in supporting the agency’s SMS, including the JLSC’s role in reporting hazards and the identification of safety risk mitigations. Individuals interviewed did not know who the JLSC frontline worker representatives are and how safety concerns from frontline workers could be provided to JLSC frontline worker representatives to support JLSC safety activities.

Recommendation 4:

FTA recommends CTA and the JLSC work to increase frontline worker awareness of the JLSC and the mechanisms and channels available to escalate the concerns transit workers face within the transit system related to assaults on transit workers.

Transit Worker Safety Reporting Program

Key Takeaway: FTA did not identify any findings of non-compliance in this area. CTA has defined processes for transit workers to report safety concerns, to review these concerns, and to manage them through CTA’s established SRM processes. However, FTA recommends CTA review how its transit workers use the CTA transit worker safety reporting program to confirm that workers understand how to report safety concerns, including concerns related to assaults on transit workers and to evaluate the effectiveness of its safety concern identification and reporting training required at § 673.29(a)(1) to increase awareness of reporting mechanisms and ensure that CTA transit workers understand that the transit worker safety reporting program should be used to report safety issues and concerns.

Applicable Requirement: Section 673.23(b) requires transit agencies to “establish and implement a process that allows transit workers to report safety concerns, including assaults on transit workers, near-misses, and unsafe acts and conditions to senior management.” The process must include “protections for transit workers who report” and “a description of transit worker behaviors that may result in disciplinary action.”

Audit Observations: CTA describes its transit worker safety reporting program in Section 3.3 of both its Rail and Bus ASPs (p. 35 Bus and p. 39 Rail). Safety Programs & Culture oversees the employee safety reporting program. The Safety Department maintains a log of reported concerns and monitors the SafeLine reporting program daily. Reporters may report safety concerns to their manager, the Safety Department, Control Center Operations, or to the SafeLine program.

SafeLine can be accessed through a phone number, email address, reporting website, or by using a QR code. The ASPs describe examples of safety concerns to report, which include close calls or near misses, unsafe conditions and acts, and assault of a transit worker. The ASPs state that no disciplinary action will be taken against an employee who communicates a safety concern or report of incident unless such disclosure indicates they have committed an illegal act; gross misconduct or negligence; have shown a deliberate or willful disregard of CTA rules, policies, and procedures; or have provided intentionally false or misleading information. The ASPs also state that the Safety Department will make efforts to provide direct feedback to reporting parties. Employees can also expect notices regarding actions taken on bulletin boards and in quarterly Safety & Security Newsletters. CTA’s Employee Safety Reporting Procedures Standard Operating Procedure similarly explains reporting procedures and Safety Department responsibilities and states that employees and contractors are encouraged to report non-emergency safety concerns, hazards, or other relevant conditions confidentially.

The Safety team holds monthly SafeLine meetings to track and trend issues year-over-year. If a SafeLine report reveals a systemic issue rather than an isolated incident, the Safety Department will formally escalate it to CTA’s Hazard Tracking Log so it can be continuously monitored while long-term mitigations are put in place. CTA confirmed that it is working to educate

frontline workers on what to report in SafeLine, as individuals often report routine maintenance requests rather than actual safety hazards.

CTA submitted two SafeLine tracking logs (2025 and 2026) to FTA for review. The 2025 tracking log includes data on pending, monitored, and closed reports. The log includes the date of the report, the caller's information, a description of the issue, the location, the personnel assigned, the mode, category, and work order number, as well as other data and additional notes. The 2026 tracking log includes similar data but does not list any closed or monitored incidents. Overall, CTA received 114 reports to SafeLine in 2025 and 20 reports in January 2026.

During on-site interviews, some transit workers confirmed receiving information on SafeLine during training. However, the majority of frontline workers interviewed on-site were unaware of the hotline, and many simply do not report concerns at all. Interviewed frontline workers expressed concerns regarding lack of feedback from management related to actions taken in response to reported concerns. Some frontline workers shared that they try to raise concerns by using social media (i.e., Union Facebook page). Based on this feedback, it is unclear if CTA's transit worker safety reporting program sufficiently encourages transit workers to report their safety concerns related to assaults on transit workers and whether transit workers are aware of how to report such concerns.

Recommendation 5:

FTA recommends CTA review how its transit workers use the CTA transit worker safety reporting program to confirm that workers understand how to report safety concerns, including concerns related to assaults on transit workers, and to evaluate the effectiveness of its safety concern identification and reporting training required at § 673.29(a)(1) to increase awareness of reporting mechanisms and ensure that CTA transit workers understand that the transit worker safety reporting program should be used to report safety issues and concerns.

Recommendation 6:

FTA recommends CTA evaluate its methods for informing transit workers of safety actions taken in response to reports submitted through the transit worker safety reporting program required under § 673.29(b) to encourage reporting.

De-Escalation Training

Key Takeaway: FTA's review of CTA's policies and implementation identified non-compliance with § 673.29(a) requirements related to de-escalation training.

Applicable Requirements: At § 673.29(a)(1), FTA requires a transit agency to "establish and implement a comprehensive safety training program that includes de-escalation training, safety concern identification and reporting training, and refresher training for all operations transit

workers and transit workers directly responsible for safety in the transit agency's public transportation system. The training program must include refresher training, as necessary.” At § 673.29(a)(2), FTA further requires that “large urbanized area providers must include maintenance transit workers in the safety training program.”

Audit Observations: CTA describes its comprehensive safety training program in Section 8.1 Competencies & Training of both its Rail and Bus ASPs and defines de-escalation training in Subsections 8.1.11.4 and 8.1.6.4, respectively. The ASPs do not explicitly require de-escalation training for all personnel required by §§ 673.29(a)(1) and (2): all operations personnel, all transit workers directly responsible for safety, and all maintenance personnel.

All Operations Personnel: The ASPs do not require de-escalation training for “all operations personnel.” Instead, the ASPs use the term “frontline workforce” to identify the primary focus of de-escalation training. During on-site interviews, CTA representatives stated that the Safety Department has prioritized de-escalation training, beginning with the highest-risk major groups (i.e., new operators, Customer Service Assistance, Customer Service Representatives/station attendants, and then rail operators). CTA representatives stated that training has not yet been added for rail operators. CTA introduced de-escalation training to frontline staff in the fall of 2024 and incorporated de-escalation into the training of new operators beginning in March 2025. As of the documentation CTA provided dated January 20, 2026, 83 percent of bus operators and 11 percent of Customer Service Assistants completed the training. All completed training is tracked in CTA’s Learning Management System.

Transit workers directly responsible for safety: During interviews, CTA explained that it defines this category to encompass all individuals subject to the Public Transportation Safety Certification Training Program (PTSCTP). However, CTA confirmed that it has not yet established requirements for all such personnel to take de-escalation training.

All maintenance personnel: On-site interviews confirmed that CTA has not yet established a de-escalation training that includes all maintenance personnel as required.

In discussions with FTA, bus and rail frontline workers expressed an inconsistency in receiving de-escalation training; some individuals had received it, some had not, and some did not know about the training at all. CTA interviews confirmed that CTA has not established required de-escalation refresher training.

Finding 11: CTA has not met the requirement for de-escalation training established at § 673.29(a).

Actions required for closeout:

- CTA must revise its ASPs to require, as part of its comprehensive safety training program, de-escalation training for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety, and de-escalation refresher training as necessary, and submit the revised ASPs.
- CTA must submit a plan, including projected completion timelines, for implementing its de-escalation training for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety.

Appendix A: Findings and Recommendations

Findings and Actions Required for Closeout

FTA issues the following 11 findings of non-compliance and the associated actions required for the closeout of each finding.

Finding 1: CTA's safety risk management process does not consider, as a source for hazard identification, safety concerns identified through activities to monitor information reported through any internal safety reporting programs, as required at §§ 673.25(b)(2)(iii) and 673.27(b)(4).

Actions required for closeout:

- CTA must revise its ASPs to ensure the safety risk management process considers, as a source for hazard identification, safety concerns identified through activities to monitor information reported through any CTA internal safety reporting programs and submit the revised ASPs to FTA.
- CTA must submit documentation that verifies it is considering, as a source for hazard identification, safety concerns identified through activities to monitor information reported through its internal safety reporting programs.

Finding 2: CTA has not implemented a compliant safety risk assessment process, as required at § 673.25(c).

Actions required for closeout:

- CTA must revise its ASPs and Safety Risk Management Plan to define a process ensuring all required elements of safety risk assessments are consistently documented, including documentation of the hazard, potential consequences, and likelihood and severity determinations.
- CTA must submit the revised ASPs and Safety Risk Management Plan to FTA.
- CTA must submit documentation confirming it is implementing the safety risk assessment processes established in its ASPs and Safety Risk Management Plan.

Finding 3: CTA has not met requirements to monitor its operations to identify any safety risk mitigations that may be ineffective, as required at § 673.27(b)(2).

Action required for closeout:

- CTA must submit documentation that confirms it is carrying out the processes described in its ASPs to identify safety risk mitigations that may be ineffective. ***Note:** If CTA chooses to revise its processes for identifying any safety risk mitigation that may be ineffective, inappropriate, or not implemented as intended, it must also submit to FTA the revised versions of the ASPs and Safety Risk Management Plan.*

Finding 4: CTA has not established a process to assess its safety performance annually, as required at § 673.27(d)(1).

Actions required for closeout:

- CTA must document a process in its ASPs for conducting an annual performance assessment as required at § 673.27(d)(1), including a process for how CTA identifies deficiencies in its SMS.
- CTA must submit documentation that confirms it has conducted the annual performance assessment required at § 673.27(d)(1), including the identification of any deficiencies in its SMS.

Finding 5: CTA has not developed or carried out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment, as required at § 673.27(d)(4).

Actions required for closeout:

- CTA must revise its ASPs to define its process for developing and carrying out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the annual safety performance assessment.
- CTA must submit a plan to address any deficiencies identified through the annual safety performance assessment conducted pursuant to Finding 4, including any deficiencies associated with the comprehensive safety training program required under § 673.29(a).
- CTA must submit documentation that confirms implementation of the plan described above.

Finding 6: CTA has not carried out the Safety Committee procedures required at § 673.19(c) that CTA established in its ASPs and JLSC Charter.

Actions required for closeout:

- CTA must ensure that it carries out the Safety Committee procedures established in the CTA ASPs and JLSC Charter regarding JLSC meeting frequency and training requirements.

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- CTA must submit verification of JLSC meeting frequency by submitting JLSC meeting minutes for the next four JLSC meetings.
- CTA must submit documentation confirming completion of required JLSC training, as defined in the JLSC Charter.

Finding 7: CTA's ASP approval process is inconsistent with the requirements at § 673.11(a)(1)(i).

Actions required for closeout:

- CTA must revise its ASP review, update, and approval process to ensure that the Accountable Executive signs the ASPs before they are approved by the JLSC and the Board of Directors.
- CTA must revise its ASPs to document this updated process and submit the revised ASPs that have been approved based on the revised, compliant process.

Finding 8: CTA has not met requirements for the joint labor-management safety committee to identify safety deficiencies for purposes of continuous improvement and for the agency's annual safety performance assessment process to address the role of the safety committee, as required at §§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii), respectively.

Actions required for closeout:

- CTA must revise its ASPs and JLSC Charter to define the process by which the JLSC will identify safety deficiencies for purposes of continuous improvement as required at § 673.27(d)(1)(ii).
- CTA must submit documentation that confirms the JLSC is performing its required role to identify safety deficiencies for purposes of continuous improvement, including any instance where CTA has not met an annual safety performance target set for the safety risk reduction program.

Finding 9: CTA has not met requirements for the joint labor-management safety committee to identify and recommend safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program, and to identify safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, as required at §§ 673.19(d)(3)(i) and (ii).

Actions required for closeout:

- CTA must revise its ASPs and JLSC Charter to define the process by which the JLSC will identify safety risk mitigations, and identify safety mitigations that may be ineffective, inappropriate, or were not implemented as intended, including in response to instances where CTA has missed a safety performance target set by the JLSC for the safety risk reduction program.
- CTA must submit the revised ASPs to FTA.
- CTA must submit documentation that confirms the JLSC has recommended safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program and has identified safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Finding 10: CTA has not met requirements for the safety risk mitigation process to include or incorporate by reference in the ASPs any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment as required at § 673.25(d)(5).

Actions required for closeout:

- CTA must revise its ASPs and any applicable referenced documents to define the process by which CTA will include or incorporate by reference in the ASPs any safety risk mitigations identified and recommended by the joint labor-management safety committee for the safety risk reduction program based on a safety risk assessment.
- CTA must submit these revised materials.

Finding 11: CTA has not met the requirement for de-escalation training established at § 673.29(a).

Actions required for closeout

- CTA must revise its ASPs to require, as part of its comprehensive safety training program, de-escalation training for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety, and de-escalation refresher training as necessary, and submit the revised ASPs.
- CTA must submit a plan, including projected completion timelines, for implementing its de-escalation training for all operations personnel, all maintenance personnel, and all individuals directly responsible for safety.

Recommendations

FTA also issues the following eight recommendations to CTA. These suggestions, based on audit observations, would enhance and strengthen CTA's current SMS processes. CTA may decide whether to implement these recommendations.

Recommendation 1:

FTA recommends CTA document in its ASPs a formal process that builds on its ongoing safety performance monitoring efforts to document, at year's end, whether each annual safety performance target was met.

Recommendation 2:

FTA recommends CTA develop refresher training and onboarding content for JLSC members that focuses on the safety committee duties and related requirements established by Part 673, including:

- Review and approval of the ASP,
- Setting safety performance targets for the safety risk reduction program,
- Identifying safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program,
- Identifying and recommending safety risk mitigations, including mitigations associated with instances of a missed safety performance target for the safety risk reduction program,
- Documenting safety risk mitigations for the safety risk reduction program in the ASP, and
- Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Recommendation 3:

As a best practice, FTA recommends the CTA JLSC set safety performance targets for the safety risk reduction program that reflect an annual reduction by setting the safety performance target below the three-year rolling average of associated data reported to the NTD.

Recommendation 4:

FTA recommends CTA and the JLSC work to increase frontline worker awareness of the JLSC and the mechanisms and channels available to escalate the concerns transit workers face within the transit system related to assaults on transit workers.

Recommendation 5:

FTA recommends CTA review how its transit workers use the CTA transit worker safety reporting program to confirm that workers understand how to report safety concerns, including concerns related to assaults on transit workers, and to evaluate the effectiveness of its safety concern identification and reporting training required at § 673.29(a)(1) to increase awareness of reporting mechanisms and ensure that CTA transit workers understand that the transit worker safety reporting program should be used to report safety issues and concerns.

Recommendation 6:

FTA recommends CTA evaluate its methods for informing transit workers of safety actions taken in response to reports submitted through the transit worker safety reporting program required under § 673.29(b) to encourage reporting.

Appendix B: Materials Reviewed

As part of this audit, FTA received and reviewed the following documentation:¹

- Organizational Charts:
 - 2026.01.20-CTA Org Chart - Executive Team.pdf
 - 2026.01.20-CTA Org Chart - Safety Department.pdf
 - 2026.01.20-CTA Org Chart - Security Department.pdf
- Agency Safety Plans:
 - 2026.01.20-2024 CTA Agency Safety Plan for BUS.pdf
 - 2026.01.20-2024 CTA Agency Safety Plan for RAIL.pdf
 - 2026.01.15-2025-CTA-ASP-Bus-v5-FINAL-SIGNED
 - 2026.01.15-2025-CTA-ASP-Rail-v5-FINAL-SIGNED
- Safety Performance Targets:
 - 2026.01.15-2025-CTA-ASP-Bus-v5-FINAL-SIGNED
 - 2026.01.15-2025-CTA-ASP-Rail-v5-FINAL-SIGNED
 - 2026.01.20-2022SPT Recommendation to Accountable Executive.pdf
 - 2026.01.20-2023Q3 CTA Safety Performance Review ILSSO 2023.12.05.pdf
 - 2026.01.20-2024CTA Agency Safety Plan for BUS.pdf
 - 2026.01.20-2024CTA Agency Safety Plan for RAIL.pdf
 - 2026.01.20-2024Q1 CTA Rail Safety Dashboard 2024.06.10.pdf
 - 2026.01.20-2024Q3 CTA Rail Safety Dashboard 2024.09.pdf
 - 2026.01.20-2024Q4 CTA Rail Safety Dashboard 2024.12.pdf
 - 2026.01.20-2025CTA Safety Risk Management Plan.pdf
 - 2026.01.20-2025Memo to MPO re SPTs.pdf
 - 2026.01.20-2025Q1 CTA Rail Safety Dashboard.pdf
 - 2026.01.20-2025Q2 CTA Rail Safety Dashboard.pdf
 - 2026.01.20-2025Q3 CTA Rail Safety Dashboard.pdf
 - 2026.01.20-2025Q4 CTA Rail Safety Dashboard
 - 2026.01.20-September 2025 Safety Report - Final.pdf
- Safety Risk Reduction Program:
 - 2025.12.15-CTA Security Enhancement Plan Dec 2025.pdf
 - 2026.01.15-2025-CTA-ASP-Bus-v5-FINAL-SIGNED
 - 2026.01.15-2025-CTA-ASP-Rail-v5-FINAL-SIGNED
 - 2026.01.20-CTA Outreach - Dec 2025.pptx
 - 2026.01.20-CTA SD 22-15 Response Letter.pdf
 - 2026.01.20-Homeless Outreach - 04.14.25.pdf

¹ File names were updated upon submission to include submission date and, at times, clarify content.

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- 2026.01.20-Innovation Studio Initiatives.docx
- 2026.01.20-TWA - Meeting Minutes 11.24.25.docx
- 2026.01.20-TWA - Meeting Minutes 9.10.25.docx
- 2026.01.20-TWA Meeting Minutes 1.15.25.docx
- 2026.01.20-TWA Meeting Presentation SRA Dashboard 1.15.2026.pptx
- Safety Risk Assessment:
 - 2026.01.20-CTA SD 22-15 Response Letter.pdf
 - 2026.01.20-GD 24-1 - Submittal Verification.pdf
 - 2026.01.20-TWA - Risk Assessment General Directive 24-1.xlsx
- Transit Worker Safety Reporting Program:
 - 2026.01.15-2025-CTA-ASP-Bus-v5-FINAL-SIGNED
 - 2026.01.15-2025-CTA-ASP-Rail-v5-FINAL-SIGNED
 - 2026.01.20-CTA NTD-Major Safety Event TWAs 20260116.xlsx
 - 2026.01.20-CTA General Rule Book.pdf
 - 2026.01.20-Employee Safety Reporting Procedures SOP.pdf
 - 2026.02.02-Safeline tracking log 2026.xlsx
- De-escalation Training:
 - 2026.01.20-Bus Operator De-Escalation Report
 - 2026.01.20-Customer Service Assistants De-escalation Report
 - 2026.01.20-De-escalation Course Agenda - Bus Operator
 - 2026.01.20-De-escalation Course Agenda - CSR-CSA (003)
- Safety Committee and Safety Risk Mitigations:
 - 2026.01.20-JLSC Meeting Minutes 2024.11.19
 - 2026.02.09- JLSC-Message to Overstreet 2025.03.13.pdf
 - 2026.02.09-JLSC-Agenda Communications 2023.08 no2.pdf
 - 2026.02.09-JLSC-Agenda Communications 2023.08.pdf
 - 2026.02.09-JLSC-ASP Recommendations 2025.03.07.pdf
 - 2026.02.09-JLSC-Communications 2025.03.10.pdf
 - 2026.02.09-JLSC-Request-Response re 103rd garage 2025.10-11.pdf
 - 2026.02.09-JLSC-Request-Response re Branches 2025.07.pdf
 - 2026.02.09-JLSC-Request-Response re Bus Stops 2026.01.docx.pdf
 - 2026.02.09-JLSC-Request-Response re Lighting 2024.01.pdf
- Safety Committee and Monitoring Mitigation Effectiveness
 - 2026.01.20-JLSC CTA Performance Targets Review May 5 2023
 - 2026.01.20-JLSC Meeting Minutes 2023.05.15
 - 2026.01.20-JLSC Meeting Minutes 2025.05.02
 - 2026.01.20-JLSC Meeting Minutes 2025.12.30
 - 2026.01.20-JLSC Meeting Notice of Agenda 2024.10.31
 - 2026.01.20-JLSC SPT Presentation May 11 2025

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- 2026.01.20-JLSC TWA Analysis Presentation July 19 2024
- 2026.01.20-JLSC TWA Presentation 2024.01.11
- 2026.01.20-Joint Labor Safety Committee Charter 01.2026
- 2026.01.20-Joint Labor Safety Committee Summary
- Safety Directive 22-15 Mitigations:
 - 2026.01.20-Safety Assessment Worksheet - Transit Worker Assault 2024.01.03
- General Directive 24-1 Mitigations:
 - 2026.01.20-TWA 2024 SRA Status Update
- Safety Directive 25-3: FTA-25-3-001 (ASP)
 - 2026.01.15-2025-CTA-ASP-Bus-v5-FINAL-SIGNED
 - 2026.01.15-2025-CTA-ASP-Rail-v5-FINAL-SIGNED
 - 2026.01.20-IDOT PTASP Rev 5-v2ReviewChecklist-2025-0616-signedPM06162025
- Safety Directive 25-3: FTA-25-3-002 (Security Enhancement Plan)
 - 2025.12.15 – CTA Security Enhancement Plan Attachment to CTA Letter to FTA.pdf
 - 2025.12.15 – CTA Security Enhancement Plan Dec 2025.pdf
 - 3.10.2026-CTA Cover Letter - FTA Revised Plan
 - 3.10.2026-CTA Revised Security Enhancement Plan
- Other Requested Documents:
 - 2026.03.19-CSA De-escalation-Training-2025-26.xlsx
 - 2026.03.19-SafeLineTrackingLog 2025-CTA.xlsx
 - 2026.03.19-Safety Performance Targets 2022-2025.xlsx
 - 2026.03.19-SRA-MOC-Rail-Safety-Training-Frequency.xlsx
 - 2026.03.19-InfrastructureMaintenanceHazardLog-March 26.xlsx
 - 2026.03.19-SMS-Hazard Log 2026.02.25.xlsx
 - 2026.03.19-SMS-SRM-HLC-SubmissionForm-BusMaintenancePigeonNorthParkGarage.docx
 - 2026.03.19-SubmissionFormStationDrainage-Washington-Wells-2026-01-06.docx
 - 2026.03.19-JLSC Meeting Minutes-Jan 7-2026-ASP vote.docx
 - 2026.03.19-JointLaborSafetyCommitteeMembers.docx
 - 2026.03.19-SMS-JLMSC-MM 2023.02.22.pdf
 - 2026.03.19-SMS-JLMSC-MM 2023.04.26.pdf
 - 2026.03.19-SMS-JLMSC-MM 2023.06.28.pdf
 - 2026.03.19-SMS-JLMSC-MM 2023.08.30.pdf
 - 2026.03.19-SMS-JLMSC-MM 2023.11.30.pdf
 - 2026.03.19-SMS-JLMSC-MM 2025.12.30.pdf
 - 2026.03.19-SMS-JSMSC-MM 2024.05.17.pdf
 - 2026.03.19-SMS-JSMSC-MM 2024.06.03.pdf
 - 2026.03.19-SMS-JSMSC-MM 2024.11.19.pdf
 - 2026.03.19-SAW-Louvers CAP 201307-SA-02 V final.xlsx

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- 2026.03.19-SAW-RWP Program-03-06-2025.xlsx
- 2026.03.19-SAW-TBTC 2023.05.24 v.4.3 final to IDOT.xlsx
- Surveillance Videos (folder)
- 2026.04.06-CTA Answers to FTA Inquiries - SPTs and CI - 4.2.2026.docx
- 2026.04.06-CTA Bus - SPT Tracker.pdf
- 2026.04.06-CTA Rail - SPT Tracker.pdf
- 2026.04.06-SPT Tracker - Year over Year Analysis.pdf