The Path Towards Safety Management Systems Implementation

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2016 FL Safety Summit

U.S. Department of Transportation
Federal Transit Administration

Overview

- FTA Rulemaking Update

- SMS FTA Framework Review

- Implementing SMS

- SMS Development Project Plan

- Employee Safety Reporting

- Technical Assistance and Resources

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FTA SAFETY RULEMAKING UPDATE

Rulemaking Timeline

Regulatory Requirement	Federal Register Publication
Transit Asset Management NPRM	Published 9/30/15 Final Rule under development
Public Transportation Safety Program NPRM	Published 8/14/15 Final Rule under development
National Public Transportation Safety Plan	Published 2/5/16 Final Rule under development
Public Transportation Agency Safety Plan NPRM	Published 2/5/16 Final Rule under development
Interim Provisions Safety Certification Training Program NPRM	Effective 5/28/15 Final Rule under development
State Safety Oversight Final Rule	Published 3/16/16
Transit Worker Assault NPRM	Under Development Statutory due date March 2017

Public Transportation Safety Program

- "Umbrella" document for all other Safety rulemakings and guidance

- Formally establishes FTA's safety policy - Safety Management Systems (SMS)

- Sets rules of practice under FTA's enforcement authority

- Commits FTA to creating and implementing a National Public Transportation Safety Plan

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Transit Asset Management

- Transit Asset Management (TAM)
  - Business model designed to keep transit networks in a State of Good Repair (SGR)
- TAM uses condition of assets for transit agencies to prioritize and guide funding

National Public Transportation Safety Plan

It is not a rule

- It is…
  - FTA's strategic plan for improving transit safety performance
  - A policy document
  - A communication tool
  - A repository of standards, guidance, best practices, tools, technical assistance, and other resources

Public Transportation Agency Safety Plan

- Proposed rule would require transit agencies develop Agency Safety Plan
  - Agency Safety Plan requires agencies to implement SMS
- Minimum requirements for Safety Plan:
  - Plan approval
  - Safety risk identification and evaluation
  - Strategies to minimize exposure to hazards
  - Annual review and update
  - Safety performance targets
  - Adequately trained Safety Officer - direct report to executive leadership
  - A comprehensive safety training program

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National Public Transportation Safety Certification Training Program

- Authorizes training program for Federal and State employees who conduct safety audits of rail public transportation systems, and rail public transit employees directly responsible for safety oversight
  - Interim Provisions and NPRM only apply to rail fixed guideway systems
  - Bus agency participation is voluntary, but highly encouraged

Transit Worker Assault NPRM

- FAST Act requires NPRM (Notice of Proposed Rulemaking) on transit driver/operator safety and risk of assault
  - Transit Advisory Committee on Safety (TRACS) delivered report on best practices and recommendations for preventing and mitigating assaults
  - Next step - issue NPRM on protecting drivers/operators from risk of assault, considering
    1. Different safety needs of drivers of different modes
    2. Differences in operating environments
    3. Use of technology to mitigate driver assault risks
    4. Existing experience of agencies and operators that already are using or testing driver assault mitigation infrastructure
    5. Impact of the rule on future rolling stock procurements and vehicles currently in revenue service

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Congressional Report on Safety Standards

1. Review public transportation system safety standards and protocols to examine efficacy of existing standards

   - https://www.transit.dot.gov/regulations-and-guidance/safety/compendium-transit-safety-standards

2. Evaluate need to establish additional Federal minimum transit safety standards

3. Issue Final Report on review findings with comprehensive set of recommendations and further actions

SMS FTA FRAMEWORK REVIEW

SMS Framework

- Institutionalizes SMS components and sub-components

- Establishes a common language for transit community

- Provides platform for advancing SMS

SMS: Getting Ready
Safety Management Systems
SMS Framework
Federal Transit Administration
August 2015
U.S. Department *of* Transportation
Federal Transit Administration

What FTA wants…from a safety perspective

- Improved safety performance - make a safe industry even safer

- Increased accountability for safety decisions at highest levels of transit agency

- Greater consistency in identifying hazards and evaluating safety risk

- Increased use of data to monitor effectiveness of safety risk mitigations

- Strong safety culture within every transit system

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Formal SMS Definition

"SMS is the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigations. It includes systematic policies, procedures, and practices for the management of safety risk."

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SMS answers these critical questions

1. What are our **most serious** safety concerns?

2. How do we **know** this?

3. What are we **doing** about it?

4. Is what we are doing **working**?

5. How do we **know** what we are doing is working?

SMS Framework Components

Safety Management Policy Sub-Components

Safety Management Policy

- Safety Management Policy Statement
- Safety Accountabilities & Responsibilities
- Integration with Public Safety & Emergency Management
- SMS Documentation & Records

Safety Management Policy

Safety Management Policy component provides organizational foundation for Safety Risk Management and Safety Assurance processes to thrive
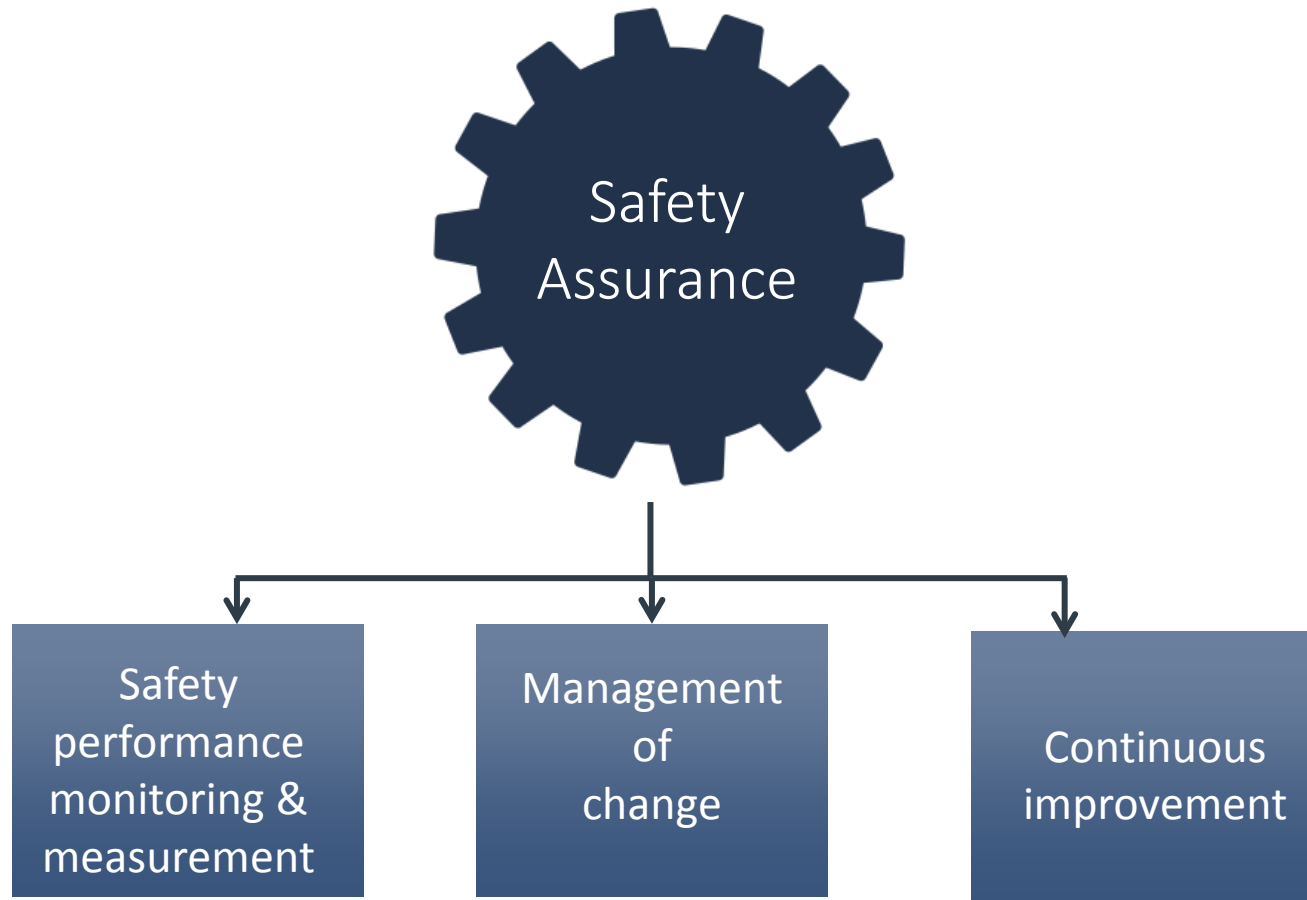
Safety Risk Management Sub-components

Safety Risk Management

Hazard Identification & Analysis

Safety Risk Evaluation & Mitigation

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Safety Risk Management

Safety Risk Management activities are *forward looking*

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Safety Assurance Sub-Components

Safety Assurance

Safety Assurance activities monitor the *present*

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Safety Promotion Sub-Components

Safety Promotion

Safety Communication

Competencies and Training

Safety Promotion

Safety Promotion component supports organizational interactions required to build an effective SMS
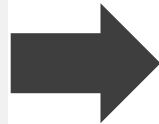
IMPLEMENTING SMS

Compliance Approach	Safety Management Systems Approach
Document current procedures and practices	Document strategies to address priority safety risks
Safety regulators are primary users of safety data	Safety regulators, and agency leadership, employees and stakeholders are *all* primary users of safety data
Focus on compliance with prescriptive regulations	Focus on measuring effectiveness of risk control strategies and achieving safety outcomes
Reactive – address safety concerns after accidents occur	Proactive – learn from close calls and address accident precursors to prevent events
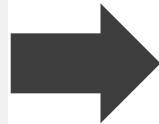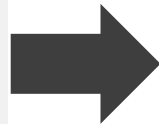
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Key Points on SMS Implementation

- Can take months to years, depending on agency

- Certain activities are more appropriate for some agencies than others

- Not a "check the box" exercise; the SMS must be realistic and practical

- Not just a safety department effort

  - Those responsible for managing and operating the SMS should be involved in developing it

- Critical success factor – CEO/executive leadership commitment

The SMS Implementation Process

Phase 1 **Prepare**	Phase 2 **Develop**	Phase 3 **Operationalize**
• **Engage key individuals and build a team** • **Get familiar with SMS implementation** • **Identify gaps — SMS policies, processes, and activities agency needs to develop** • **Make a plan for how to fill the gaps**	• **Design safety risk management process** • **Build safety assurance function** • **Determine SMS-related training and communication** • **Draft safety management policies to formally establish SMS processes and activities throughout agency**	• **Put SMS policies, processes, and activities into practice as they're approved by agency**
Key Outputs • **SMS gap analysis** • **SMS Development Project Plan** • **Safety Management Policy Statement**	**Key Outputs** • **Public Transportation Agency Safety Plan** (awaiting final rule) • **SMS policy documents**	**Key Outputs** • **A functioning SMS**

# SMS DEVELOPMENT PROJECT PLAN

What is an SMS Development Project Plan?

- Describes details of who, what, where, when, and how agency will build its SMS

- Formalizes processes and procedures necessary to develop, operationalize, and verify implementation of SMS elements

- Project Plan items must be realistic

- If agency changes approach to implementation, Plan must be updated to reflect change

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Why is an SMS Development Plan important?

- Formalizes and organizes SMS development

- Helps ensure key people are engaged and tasks are completed correctly

- Helps agency establish agreement and awareness on key aspects of SMS development

  – roles and responsibilities; key tasks; timelines and milestones; necessary resources and staffing

- Making key decisions early is efficient and minimizes disruption of day-to-day operations

Key Elements of the Plan
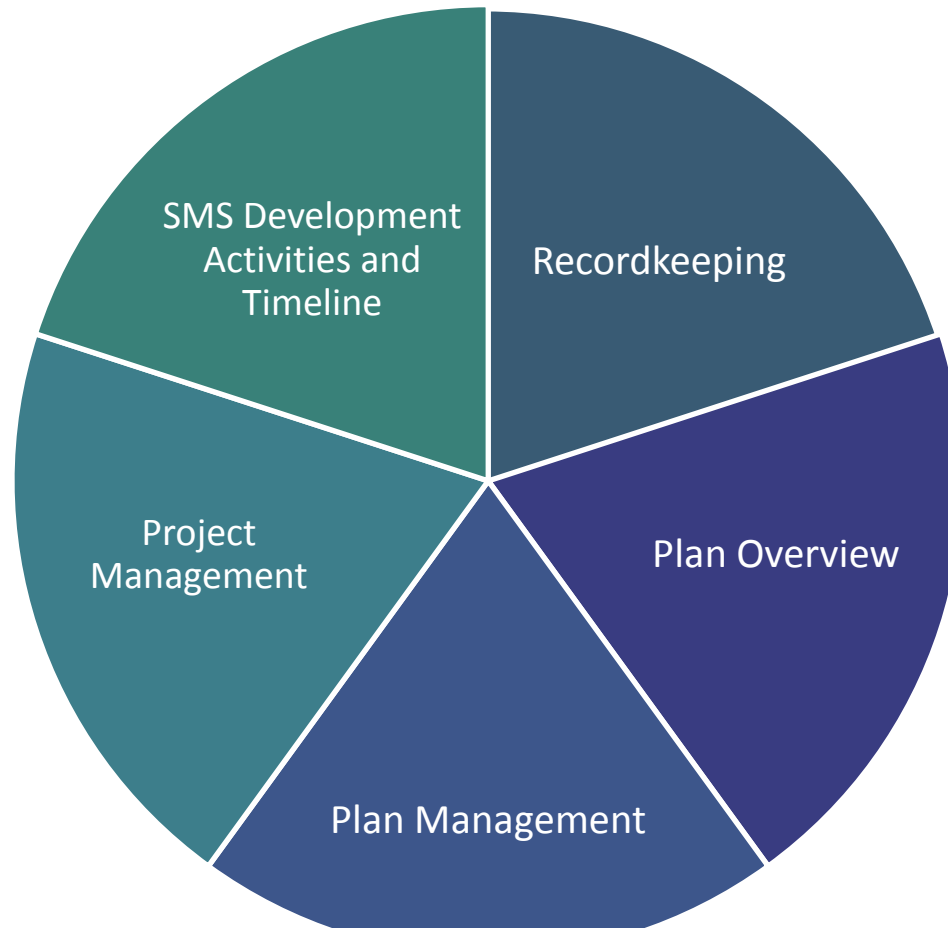
Recordkeeping

- Concurrences
  - Version number
  - Issue date
  - Signatures of all that approve Plan

- Document change record
  - Complete history of successive edits to Plan

Plan Overview

- Outcomes and objectives
- Purpose
- Scope

Plan Management

- Leadership commitment
- Revision and document control
- Inputs and updates

Project Management

- Leadership
- Support
- Tracking and accountability
- Document management
- Communication and coordination
- Budget

SMS Development Activities & Timeline

- Usually tracked in a Gantt Chart or similar planning tool
  - Tasks
  - Milestones and deliverables
  - Relationships and dependencies
  - Roles and responsibilities
  - Schedule

EMPLOYEE SAFETY REPORTING

Effective Safety Reporting - Attributes

- ## Training the messengers
  - People are not "natural messengers"

- ## Ease of reporting
  - Simple requisites

- ## Timely, accessible, and informative feedback
  - No feedback; program crumbles

- ## Protection
  - Information only used for the purposes it was collected

- ## Vehicle for change
  - Issues reported are solved

SMS and Safety Reporting: Facts

- SMS does not work without data

- Nobody knows actual system performance better than employees delivering service

- Power of safety reporting
  - Safety data capture on previously unanticipated safety deficiencies
  - Safety data to confirm effectiveness of existing safety risk mitigations

Safety Reporting Programs

- Types of safety reporting programs
  - Mandatory
  - Voluntary

- Employee reporting of safety hazards and concerns

- Near miss / close call reporting

- Confidentiality considerations

Close Call Reporting

- Primary purpose - improve overall safety
  - Encourages employees to voluntarily report unsafe conditions or acts that may otherwise go undetected
- Offers another tool to identify and assess safety risks in operations
- Participants must feel comfortable to report safety concerns without fear of potential discipline, reprisal, dismissal, or legal discovery

Employee Safety Reporting Pilot Program

- Office of Safety in conjunction with Office of Research to conduct pilot on Employee Safety Reporting programs

    - Including Close Call Reporting

- FTA will solicit participation from transit agencies

- Pilot will include rail and bus - large, medium, and small transit agencies

TECHNICAL ASSISTANCE AND RESOURCES

SMS Rail/Bus Pilot Program

- FTA currently working with a large multi-modal agency and plans to start pilots with mid-size and small bus agencies in near future

- Through this program, FTA:
  - Provides onsite training, guidance, technical assistance, and expertise to help agencies implement SMS
  - Establishes agencies as role models for SMS implementation
  - Will apply lessons learned to develop guidance materials and technical assistance tools for transit industry
  - Develops insights on how to support industry-wide transition to SMS

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FTA Bus Safety Program

- Voluntary onsite reviews

- Orientation seminars

- Ongoing outreach

- Safety Training and Resource website

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Voluntary Onsite Reviews	**Orientation Seminars**
Safety Training and Resource Website	**Industry Coordination and Outreach**

FTA Bus Safety Program and SMS

- Seminars and presentations now include information on what SMS is and steps to consider for voluntary SMS implementation

- Onsite reviews focus on bus technical safety and include preliminary SMS Gap Analysis

  - Gives reviewed agency head start on SMS implementation

- Onsite review taking place at Lee Tran, Fort Myers - June 14 - 16

FTA's New Safety and Training Resource Website

http://safety.fta.dot.gov/
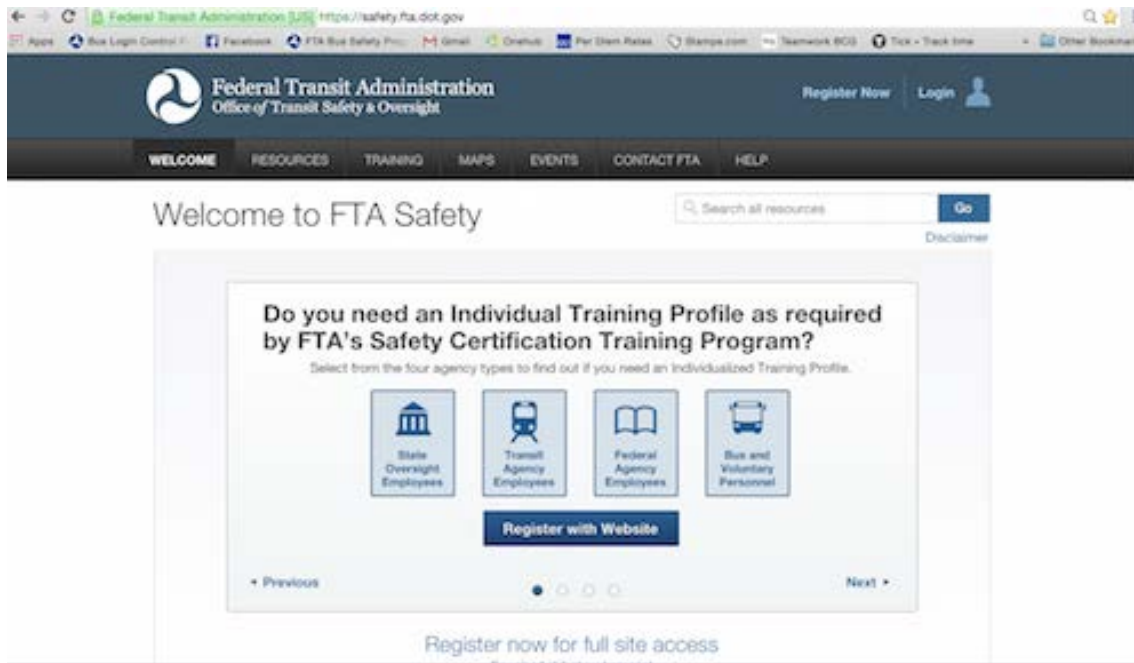
- SMS information

- Training

- News & Events

- Emails to registered users

Key Resources

Read, watch, and participate

- Review FTA's *SMS Framework*

- Participate in webinars explaining new regulations and guidance

- Visit FTA's YouTube page to view previous webinars

  - Read our newsletter *TSO Spotlight*

Get trained

Through FTA's safety website:

- Take the *SMS Awareness* online course

- Sign up for classroom courses

- Request an Individual Training Profile (ITP)
  - Courses based on your role

Sign up to receive updates

Sign up for GovDelivery

- FTA announcements and new documents

- https://public.govdelivery.com/accounts/USDOTFTA/subscriber/new

Questions? Comments? Email us at **FTASafetyStakeholder@dot.gov**

Thank you !

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