

FEDERAL TRANSIT ADMINISTRATION

## SSO Technical Assistance Webinar: Corrective Action Plans (CAPs)

**Addressing Corrective Actions** 

Office of Transit Safety and Oversight Federal Transit Administration



February 27, 2018

#### **Corrective Action Plan Overview**

- Corrective Action Plans
  - Definitions
  - Federal Requirements
  - SSOA and RTA Resolution
  - FTA Monitoring



#### **Definitions: Corrective Action Plan**

#### 49 CFR Part 659.5

A plan developed by the RTA that describes the actions the rail transit agency will take to minimize, control, correct, or eliminate hazards, and the schedule for implementing those actions

#### 49 CFR Part 674.7

A plan developed by a RTA that describes the actions the RTA will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a SSOA or FTA may require a RTA to develop and carry out a CAP.



## **Corrective Action Plans Requirements**

#### 49 CFR Part 659.37

- (a) The SSOA must require the development of a CAP for:
  - (1) Results from investigations in which the SSOA or RTA requires a CAP
  - (2) Findings from SSOA safety and security reviews
- (c) The CAP must be reviewed and formally approved by the SSOA

#### 49 CFR Part 674

674.27(a)(8) - The <u>program standard</u> must explain the process and criteria by which the SSOA may order an RTA to develop and carry out a CAP.

674.37(a) - The SSOA must review and approve the CAP before the RTA carries out the plan, an exception may be made for emergency CAPs to ensure immediate safety, provided the SSOA receives timely notification and provides subsequent review and approval



## **Corrective Action Plans Requirements**

#### 49 CFR Part 659.37

#### 49 CFR Part 674.37(a)

- (f) The RTA must provide the SSOA:
  - (1) CAP verification as described in the CAP or implementation of alternate actions
  - (2) Periodic reports requested by the SSOA describing CAP status no completely implemented
- (g) The SSOA must monitor and track the implementation of each approved CAP

The RTA must periodically report to the SSOA on its progress in carrying out the CAP. The SSOA may monitor the RTA's progress in carrying out the CAP through unannounced, on-site inspections, or any other means the SSOA deems necessary or appropriate



## **SSOA** and RTA Challenges

- Reporting Process
- Record Keeping
- Communication



# FTA Oversight SSOA Monitoring of CAPS

- Status Calls with SSOA
- Annual Reports
- FTA Audits



### **Questions?**

Eric Madison
Program Manager
Office of Safety Review
Office of Transit Safety and Oversight
202.366.0304

Eric.Madison@dot.gov

