



FEDERAL TRANSIT ADMINISTRATION

Roadmap to Drafting a Public Transportation Agency Safety Plan (SSPP to PTASP Roadmap)

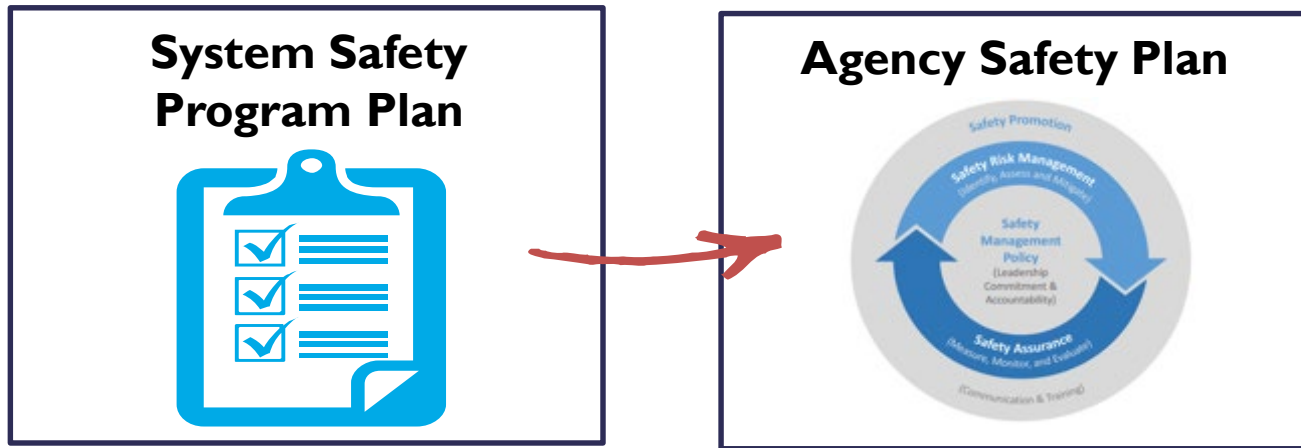


U.S. Department of Transportation
Federal Transit Administration

Today's Presentation

- Major differences between SSPP and Agency Safety Plan
- Using the FTA's Roadmap
- Signs of effectiveness
- Resources

What are the Major Differences?



Major Difference	SSPP	Agency Safety Plan
Regulatory Structure	Compliance-based	Performance-based
Responsibility for Safety	Safety department	Accountable executive
Approach	21 fixed safety program elements	Integrated, systemwide processes that are scalable and flexible
Safety Decision Making	Hazard analysis available, if requested	Safety risk analysis integral to decision making and investments

Overview of the Roadmap

- Goes section by section through the PTASP rule (Part 673) and compares to relevant sections in Part 659
- Provides differences between the SSPP requirements and PTASP requirements
- Provides considerations for transitioning SSPP content to PTASP content where applicable
- Only reviewing Subpart C – SMS sections today



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Safety Management Policy

Organizational commitment is key

Safety Management Policy

§673 Public Transportation Agency Safety Plan (PTASP)

Rule Section

§659 System Safety Program Plan (SSPP)

Elements

Differences between Agency Safety Plan and SSPP Requirements and Transition Considerations

Requirements and Transition Considerations

Safety Management Systems – Safety Management Policy

673.23(a)

A transit agency must establish its organizational accountabilities and responsibilities and have a written statement of safety management policy that includes the agency's safety objectives.

659.19(a)

A policy statement signed by the agency's chief executive that endorses the safety program and describes the authority that establishes the system safety program plan.

659.19(b)

A clear definition of the goals and objectives for the safety program and stated management responsibilities to ensure they are achieved.

This section specifies that the Agency Safety Plan Safety Management Policy must establish the transit organization's accountabilities and responsibilities for the SMS and must contain the transit agency's safety objectives. Organizational accountabilities and responsibilities in an SMS, as discussed in the FTA's National Safety Plan, typically focus on leadership commitment to allocate necessary human and financial resources to fulfill the transit organization's safety objectives, as well as leadership commitment to establish and carry out an employee safety reporting program. Safety objectives typically include a broad description of the agency's overarching safety goals, which would be based upon that agency's unique needs.

In addressing these requirements, the RTA may consider revising its existing policy statement and/or SSPP language to describe any new organizational accountabilities and responsibilities that reflect requirements in Part 673, including all activities related to the implementation of SMS. The RTA also may choose to revise the safety objectives listed within its SSPP to reflect prioritized safety objectives and the goal of continuous improvement in safety performance.

Safety Management Policy

§ 673.23 SMS Management Policy

Establish a written statement of safety policy, communicated throughout the agency, that includes:

- Safety objectives for the agency.
- Employee safety reporting program.
- Accountability and safety responsibilities for:
 - Accountable Executive,
 - Chief Safety Officer,
 - Agency Leadership, and
 - Key Staff Responsible for Safety

Relevant SSPP Sections:

- §659.19(a) – Policy Statement
- §659.19(b) – Goals and Objectives
- §659.19(c) – Management Structure
- §659.19(e) – SSPP Activities and Tasks

***See Roadmap, pages 18-23 and National Safety Plan, pages 15-22**

Signs of Effectiveness:

- **Visible evidence** of leadership commitment, demonstrated by example
- **Clear lines** of safety accountabilities **throughout** the organization
- SMS activities are **fully resourced**
- Employees **express confidence and trust** in the organization's reporting program

Safety Management Policy - Example

673.23(b)

A transit agency must establish and implement a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.

NA

This is a new requirement, although many RTAs have safety hotlines or other systems for collecting information from employees. The employee safety reporting program required in Part 673 allows employees who identify safety hazards and risks in their day-to-day duties to directly notify senior personnel, without fear of reprisal, so that the hazards and risks can be mitigated or eliminated. In addressing these requirements, RTAs can modify their existing employee safety reporting systems and documents to assure they meet FTA's employee safety reporting expectations, including comprehensiveness and accessibility, and that they address protections for employees who report safety conditions, as well as identify behaviors that would result in disciplinary action.

Employee Safety Reporting Program – not required under Part 659, but required under Part 673. Some agencies may already have a program in place, others will need to develop and implement an Employee Safety Reporting Program.



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Safety Management Policy

Question:

Does your transit agency currently have a policy statement that reflects agency leadership's commitment to safety?



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Safety Risk Management

SMS is about managing safety risk

Safety Risk Management

**§673 Public Transportation
Agency Safety Plan (PTASP)**
Rule Section

**§659 System Safety Program Plan
(SSPP)**
Elements

**Differences between Agency Safety Plan and SSPP
Requirements and Transition Considerations**
Requirements and Transition Considerations

Safety Management Systems – Safety Risk Management

673.25(a)

Safety Risk Management process. A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process must be comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.

659.19(f)

A description of the process used by the rail transit agency to implement its hazard management program, including activities for:

- (1) Hazard identification;
- (2) Hazard investigation, evaluation and analysis;
- (3) Hazard control and elimination;
- (4) Hazard tracking; and
- (5) Requirements for on-going reporting to the oversight agency relating to hazard management activities and status.

Part 673 proposes a more comprehensive process for identifying and managing safety risks. It encourages the use of new safety analysis tools by adequately staffed and trained safety personnel and RTA departments, groups and committees, and subject matter experts. Also, safety risk management feeds into the SMS safety assurance process to ensure that safety risk mitigations are evaluated for effectiveness over time. In addressing these new requirements, the transit agency can update its SSPP language describing its hazard management process to reflect the new approach to safety risk management, including definitions and criteria related to safety risk management terms and activities (to be consistent with SMS concepts and terms under Section 673.5). The SSPP section can be revised to include the new organizational and reporting structure developed for safety risk management, the new tools used to support safety risk analysis and evaluation, the new roles of the adequately trained and staffed safety or SMS department in supporting and conducting safety risk analysis, and any new requirements for coordinating with and reporting to the SSOA regarding the implementation and results of the safety risk management process.

At a minimum, FTA expects each transit agency to apply its safety risk management process to its existing operations

Safety Risk Management

§ 674.25 Safety Risk Management

Establish a process to:

- Identify safety hazards and consequences.
- Assess the safety consequences associated with the identified safety hazards.
- Prioritize safety hazards based on the level of risk.
- Implement safety risk mitigations.

Relevant SSPP Section:

- §659.19(f) – Hazard Management

***See *Roadmap*, pages 23-28 and
National Safety Plan, pages 22-24**

Signs of Effectiveness:

- Uses **all relevant and available data**
- Assesses hazards **systematically and in a timely manner**
- Identifies **trends and actionable** information
- Relies on **subject matter expertise**
- Provides **accountability** for risk acceptance
- Ensures **trained and qualified** safety analysts
- Develops **meaningful mitigations** and **effectiveness targets**

Safety Risk Management - Example

673.25(c)(1)

Safety risk assessment. A transit agency must establish methods or processes to assess the safety risks associated with identified safety hazards.

659.19(f)

A description of the process used by the rail transit agency to implement its hazard management program, including activities for:

- (1) Hazard identification;
- (2) Hazard investigation, evaluation and analysis;
- (3) Hazard control and elimination;
- (4) Hazard tracking; and
- (5) Requirements for on-going reporting to the oversight agency relating to hazard management activities and status.

SSPPs are more narrowly focused on *hazards* as opposed to *safety risk management*. Therefore, to address the Part 673 provisions, the RTA can review the SSPP sections devoted to hazard investigation, evaluation and analysis (659.19(f)(2)), and hazard control and elimination (659.19(f)(3)), and update, as appropriate, to describe the methods or processes, including the activities, roles, and participation of different agency departments, used in the assessment and prioritization of safety risks. This includes the identification of when SMEs will be involved in the safety risk assessment process. Also, this section may reference or explain the levels of management that have authority to make decisions as a function of the level of safety risk(s) evaluated, including when decisions should be elevated.

Safety Risk Assessment Process— need to transform your SSPP Hazard Management program in to an SMS-based Safety Risk Assessment process



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Safety Risk Management

Question:

Does your agency's current hazard management process reflect SMS principles, such as identifying consequences associated with safety hazards and prioritizing safety hazards based on the level of risk?



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Safety Assurance

Continuous improvement depends on continual monitoring of risk

Safety Assurance

**§673 Public Transportation
Agency Safety Plan (PTASP)**
Rule Section

**§659 System Safety Program Plan
(SSPP)**
Elements

**Differences between Agency Safety Plan and SSPP
Requirements and Transition Considerations**
Requirements and Transition Considerations

Safety Management Systems – Safety Assurance

673.27(a)

Safety assurance process. A transit agency must develop and implement a safety assurance process, consistent with this subpart. A rail fixed guideway public transportation system, and a recipient or subrecipient of Federal financial assistance under 49 U.S.C. Chapter 53 that operates more than one hundred vehicles in peak revenue service, must include in its safety assurance process each of the requirements in (b), (c), and (d) of this section. A small public transportation provider only must include in its safety assurance process the requirements in (b) of this section.

NA

The SSPP does not discuss the nexus between safety performance and the condition of transit assets or compliance with operating rules. Instead, inspection and monitoring activities are documented as separate programs managed by different departments (e.g., track inspections by the track department, rules compliance reviews by the operations department). Results of these programs are only considered from a safety perspective when they are “entered into the hazard management process.”

In the opening of this section of its Agency Safety Plan, the transit agency may consider developing text to address the role of safety assurance in ensuring ongoing, integrated assessment of the agency’s safety performance across departments and functions. Each transit agency’s safety assurance activities should be scaled to the size and complexity of its operations. Through these activities, each transit agency should accurately determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing its SMS. Each transit agency must conduct an annual review of the effectiveness of its safety risk mitigations.

673.27(b)

659.19(i)

A description of the process used to collect, maintain, analyze, and

The SSPP does not require the collection of data and safety information to assess compliance with and sufficiency of maintenance and operations procedures, whereas the

Safety Assurance

§ 673.27 Safety Assurance

Establish and implement a process for:

- Safety Performance Monitoring and Measurement
- Management of Change
- Continuous Improvement

***See Roadmap, pages 28-38 and National Safety Plan, pages 25-26**

Relevant SSPP Sections:

- § 659.19(i) – Safety Data Collection & Analysis
- § 659.19(m) – Rules Compliance
- § 659.19(n) – Facility and Equipment Inspections
- § 659.19(o) – Maintenance Audits/Inspections
- § 659.19(u) – Procurement
- § 659.19(j) – Investigations
- § 659.19(l) – Internal Safety Reviews
- § 659.19(g) – System Modifications
- § 659.19(h) – Safety Certification
- § 659.19(q) – Configuration Management

Signs of Effectiveness:

- Safety Performance Indicators are **defined and monitored**
- **Effectiveness** of mitigations is **verified**
- Investigation **causal factors** include **organizational performance**
- Ops/maintenance processes **audited & analyzed for safety concerns**
- Changes are **proactively** assessed
- Areas for **improvement** are **acted upon**

Safety Assurance - Example

673.27(b)

Safety performance monitoring and measurement. A transit agency must establish activities to:

673.27(b)(3)

Conduct investigations of safety events to identify causal factors; and

659.19(j)

A description of the process used by the rail transit agency to perform accident notification, investigation and reporting, including:

- (1) Notification thresholds for internal and external organizations;
- (2) Accident investigation process and references to procedures;
- (3) The process used to develop, implement, and track corrective actions that address investigation findings;
- (4) Reporting to internal and external organizations; and
- (5) Coordination with the oversight agency.

An RTA's investigation processes may proceed as it did under Part 659, with a few notable exceptions. First, the thresholds for notification and reporting safety events have changed and are now included in Section 674.7 and Appendix A to Part 674. Second, RTAs must notify FTA at the same time they notify their SSOAs of any accident meeting thresholds specified in Part 674. Third, SSOAs may have additional requirements, issued in their Program Standards, that must be incorporated into the PTASP. Finally, Section 673.27(b)(3) requires the RTA to identify "causal factors" in its investigations.

To address these changes, the RTA could revise its current SSPP (and related accident investigation procedures) to incorporate language and definitions that align with the definitions of Event, Accident, Incident, Occurrence, and Investigation. The RTA could also review and potentially expand (as appropriate) its accident investigation procedures and description of activities to align with Section 674.35 and as required in the SSOA Program Standard.



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Safety Assurance

Question:

Does your agency currently monitor safety mitigations for effectiveness?



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Safety Promotion

*Positive and responsive safety communications
builds trust and a strong safety culture*

Safety Promotion

§673 Public Transportation Agency Safety Plan (PTASP)

Rule Section

§659 System Safety Program Plan (SSPP)

Elements

Differences between Agency Safety Plan and SSPP Requirements and Transition Considerations Requirements and Transition Considerations

Safety Management Systems – Safety Promotion

673.29(a)

Competencies and training. A transit agency must establish and implement a comprehensive safety training program for all agency employees and contractors directly responsible for safety in the agency's public transportation system. The training program must include refresher training, as necessary.

659.19(p)

A description of the training and certification program for employees and contractors, including:

- (1) Categories of safety-related work requiring training and certification;
- (2) A description of the training and certification program for employees and contractors in safety-related positions;
- (3) Process used to maintain and access employee and contractor training records; and
- (4) Process used to assess compliance with training and certification requirements.

The training requirement is enhanced in Part 673 such that each transit agency must establish a comprehensive safety training program. Through the safety training program, each transit agency must require each employee that has responsibilities for safety to complete training, including refresher training.

To address these requirements, the RTA could consider reviewing and updating its existing SSPP training section to ensure that safety training for all employees and contractors is adequately covered, including refresher training. In addition to technical training on safety competencies by job description, this section also could include SMS training required by job position and any refresher training. Any new training records or processes for assessing compliance with training and certification requirements should be documented.

673.29(b)

Safety communication. A transit agency must communicate safety and safety performance information throughout the agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to

659.19(f)(5)

Requirements for on-going reporting to the oversight agency relating to hazard management activities and status.

FTA expects that each transit agency would define the means and mechanisms for effective safety communication based on its organization, structure, and size of operations. Based on existing requirements identified in the SSPP and the new Part 673 requirements, the RTA could review and revise (or develop as appropriate) its plans, policies, and procedures related to the communication of safety. The RTA could provide a brief overview regarding the organizational

659.19(r)

Safety Promotion

§ 673.29 Safety Promotion

Establish and implement:

- Comprehensive safety training program for all agency employees/contractors directly responsible for safety.
- Approach for communicating an agency's safety performance throughout the organization

Relevant SSPP Sections:

- §659.19(p) – Training and Qualification
- §659.19(r) – Safety Program for Employees and Contractors
- §659.19(s) – Hazard Materials
- §659.19(t) – Drug and Alcohol

***See Roadmap, pages 38-40 and National Safety Plan, pages 27-28**

Signs of Effectiveness:

- Personnel are **trained and competent** to perform their **duties**
- Training program is **monitored for effectiveness and updated**, as needed
- Safety communication tools and processes are **well-defined and used**
- All employees understand **their role with respect to safety**

Safety Promotion - Example

673.29(a)

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Safety Training Program– review and update existing safety training program to be “comprehensive” and include refresher training, as necessary



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Safety Promotion

Question:

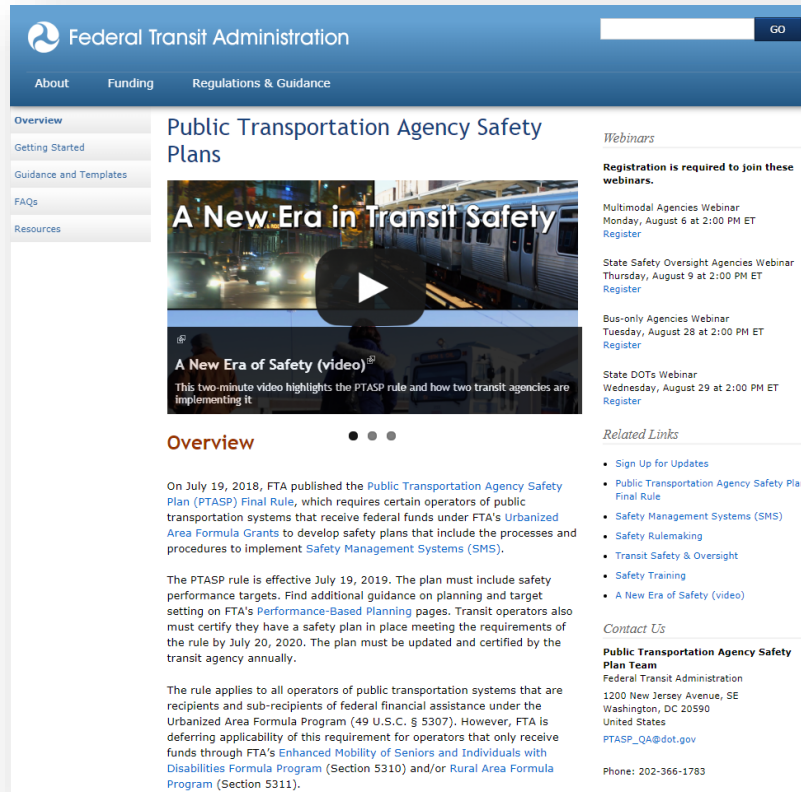
Does your agency currently have a safety training program/curriculum?

Summary

- SSPP processes and activities support SMS / Agency Safety Plan – FTA’s Roadmap can help!
- Key considerations for SMS/Agency Safety Plan:
 - *Organizational commitment* to SMS is key
 - SMS is about *managing* safety risk
 - *Continuous improvement* depends on continual monitoring of risk
 - *Positive and responsive safety communication* builds trust and a strong safety culture

More Information and Follow-up Questions

- Questions: PTASP_QA@dot.gov
- Other questions? Call the TSO Main Number at 202-366-1783



The screenshot shows the Federal Transit Administration (FTA) website. The header includes the FTA logo and navigation links: About, Funding, and Regulations & Guidance. The main content area is titled "Public Transportation Agency Safety Plans". Below the title is a video player with the title "A New Era in Transit Safety" and a play button. To the right of the video player is a section titled "Webinars" with a list of upcoming webinars: "Multimodal Agencies Webinar" (Monday, August 6 at 2:00 PM ET), "State Safety Oversight Agencies Webinar" (Thursday, August 9 at 2:00 PM ET), "Bus-only Agencies Webinar" (Tuesday, August 28 at 2:00 PM ET), and "State DOTs Webinar" (Wednesday, August 29 at 2:00 PM ET). Below the webinars is a section titled "Related Links" with a list of links: "Sign Up for Updates", "Public Transportation Agency Safety Plan Final Rule", "Safety Management Systems (SMS)", "Safety Rulemaking", "Transit Safety & Oversight", "Safety Training", and "A New Era of Safety (video)". At the bottom of the page is a "Contact Us" section with the FTA address, phone number, and email address.

Federal Transit Administration

About Funding Regulations & Guidance

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FAQs
Resources

Public Transportation Agency Safety Plans

A New Era in Transit Safety

A New Era of Safety (video)
This two-minute video highlights the PTASP rule and how two transit agencies are implementing it.

Overview

On July 19, 2018, FTA published the [Public Transportation Agency Safety Plan \(PTASP\) Final Rule](#), which requires certain operators of public transportation systems that receive federal funds under FTA's [Urbanized Area Formula Grants](#) to develop safety plans that include the processes and procedures to implement [Safety Management Systems \(SMS\)](#).

The PTASP rule is effective July 19, 2019. The plan must include safety performance targets. Find additional guidance on planning and target setting on FTA's [Performance-Based Planning](#) pages. Transit operators also must certify they have a safety plan in place meeting the requirements of the rule by July 20, 2020. The plan must be updated and certified by the transit agency annually.

The rule applies to all operators of public transportation systems that are recipients and sub-recipients of federal financial assistance under the Urbanized Area Formula Program (49 U.S.C. § 5307). However, FTA is deferring applicability of this requirement for operators that only receive funds through FTA's [Enhanced Mobility of Seniors and Individuals with Disabilities Formula Program](#) (Section 5310) and/or [Rural Area Formula Program](#) (Section 5311).

Webinars

Registration is required to join these webinars.

Multimodal Agencies Webinar
Monday, August 6 at 2:00 PM ET
[Register](#)

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Contact Us

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