

# Guide to Developing the Safety Management Policy Component of a Public Transportation Agency Safety Plan

## Overview

The [Public Transportation Agency Safety Plan \(PTASP\) regulation](#) (49 C.F.R. Part 673) requires certain operators of public transportation systems that are recipients or subrecipients of FTA grant funds to develop Agency Safety Plans (ASP) including the processes and procedures necessary for implementing Safety Management Systems (SMS). Safety Management Policy (SMP) is one of the four SMS components. Each eligible transit operator must have an approved ASP meeting the regulation requirements by **July 20, 2020**.



## Safety Management Policy

SMP is the foundation of an agency's SMS—it includes information relevant to developing and carrying out the other SMS elements, and focuses on safety management policy, not all transit agency safety policies. Part 673 requires the following four SMP elements:

- Written statement with safety objectives
- Employee safety reporting program
- Communication of the SMP throughout the agency
- Establishment of authorities, accountabilities, and responsibilities

## Written Statement

The written statement must include safety objectives, which can be useful for recipients to drive safety improvements and priorities. Part 673 does not establish specific requirements for objectives; however, recipients may choose to develop objectives based on the following:

- Leadership goals and priorities
- Concerns or targeted areas for improvement
- Strategic and long-term goals
- Local, regional, or state priorities

Recipients may consider relevant audiences, key takeaways, and anticipated communication approaches to clearly convey organizational accountabilities and responsibilities. Recipients may engage senior management in developing the statement to help reinforce leadership commitment to SMS.

## Employee Safety Reporting Program

Recipients must establish and implement a process that allows all employees and contractors to report safety conditions that could include hazards, potential consequences, or any other information relevant to safety. The safety reporting program is an important source of safety information and is intended to help the Accountable Executive and other senior managers receive this information from across the transit agency.

Consider what safety information you need from employees when developing the process, methods, and protections for employee reporting. Important safety information may include:

- Safety hazards in the operating environment
- Policies and procedures not working as intended
- Events senior managers might not be aware of
- Information on why a safety event occurred

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Part 673 does not specify methods to report information. Recipients may consider:

- Hotline
- Paper form
- Email address
- SharePoint site or form
- Phone or tablet app
- Third party information collection service

Additionally, protections for employees who report safety conditions must be specified. Part 673 does not specify those protections; however, options include, but are not limited to:

- Occupational Safety and Health Administration whistleblower protections
- Confidential or non-punitive reporting program

The reporting program also must describe employee behaviors that may result in disciplinary action, and therefore would not be covered by protections.

## Safety Management Policy Communication

Recipients must demonstrate the SMP is communicated throughout the organization (e.g., via documentation and recordkeeping). Part 673 does not specify specific communication channels or methods, so recipients can identify the best approaches and formats (e.g., posters, videos, email, or training) for communicating different aspects of the SMP (see the [Safety Promotion fact sheet](#) for additional information). To ensure that SMP communications set realistic expectations, consider whether the transit agency is able to consistently deliver the outcomes as promised.

*The guidance in this document is not legally binding in its own right and will not be relied upon by the Federal Transit Administration as a separate basis for affirmative enforcement action or other administrative penalty. Compliance with the guidance in this document (as distinct from existing statutes and regulations) is voluntary only, and noncompliance will not affect rights and obligations under existing statutes and regulations.*

## Authorities, Accountabilities, and Responsibilities

Recipients must define and establish the following for the development and management of the transit agency's SMS:

- **Authorities:** what individuals are authorized to do
- **Accountabilities:** what individuals are accountable for, which cannot be delegated
- **Responsibilities:** what individuals must oversee the accomplishment of or do

Recipients may opt to include safety management authorities, accountabilities, and responsibilities in job or position descriptions. Required positions under Part 673 include the Accountable Executive, Chief Safety Officer or SMS Executive, agency leadership and executive management, and key staff. It is important to clearly communicate this information to avoid confusion or misunderstanding, especially when implementing new processes and activities. In addition to the roles identified in Part 673, an agency could consider engaging all employees and other stakeholders, such as the union. Broad engagement would support agency-wide buy-in on the ASP and efforts to prevent operator assault and other safety issues.

When establishing and implementing SMS—including SMP elements—recipients will generate ASP documentation which must be maintained for a minimum of three years. Recipients must provide these documents to FTA, other Federal entities, or State Safety Oversight Agencies upon request.

## Resources and Questions

Visit [FTA's Safety Training page](#) for information on SMS course offerings and registration and submit questions to [PTASP\\_OA@dot.gov](mailto:PTASP_OA@dot.gov).