Developing the Safety Promotion 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 Promotion (SP) 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 Promotion
SP outlines requirements for promoting both SMS practices and safety throughout a transit agency. Part 673 requires the following two SP elements:
• Competencies and training
• Safety communication

Competencies and Training
Part 673 requires recipients to establish and implement a comprehensive safety training program for all employees and contractors that are directly responsible for safety, including refresher training. Recipients may consider training for Board Members or others involved in approving or overseeing the ASP.

In addition to specifying who is directly responsible for safety and their training requirements, recipients may choose to define the competencies necessary to perform different job roles.

A competency:
• Combines the knowledge, skills, and abilities required to effectively fulfill job roles
• May cross various job roles and functions
• May be useful as an employee training topic
• Can be developed from a variety of sources

A training needs assessment can help recipients identify and provide training relevant to the specific needs of the employees and agency goals. When considering what training to provide on SMS, recipients may find it useful to focus on the specific tasks an individual must perform to manage safety (e.g., frontline employee SMS training on how to report safety conditions instead of general SMS concepts).

Note, the comprehensive safety training program is a separate requirement from the Public Transportation Safety Certification Training Program regulation (49 C.F.R. Part 672), which only applies to state safety oversight personnel and contractors, and designated personnel and contractors who are directly responsible for safety oversight.

Published June 2019
Safety Communication

Part 673 requires that recipients demonstrate through documentation and recordkeeping that safety and safety performance information is communicated throughout the agency’s organization.

Safety communications must:

- Include information on hazards and safety risk relevant to employees’ roles and responsibilities
- Inform employees of safety actions taken in response to reports submitted through an employee safety reporting program

A safety action doesn’t necessarily mean implementing a new safety solution. Safety actions taken in response to reports could primarily involve recordkeeping for later trend analysis. Recipients should consider responding to employee reports as a way to acknowledge and help encourage more employee reporting.

Recipients also may choose to consider what and how to communicate safety information. Relevant questions may include, but are not limited to:

- What information does this individual need to do their job?
- How can we ensure they understand what is communicated?
- How can we ensure they understand what action they must take as a result of the information?
- How can we ensure the information is accurate and kept up-to-date?
- Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

Resources and Questions

Visit FTA’s Safety Training page for information on SMS course offerings and registration and submit questions to PTASP_QA@dot.gov.

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.

Published June 2019