



Appendix J

Version: 10/01/2021

Public Transportation Agency Safety Plan (PTASP or ASP) Content

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Agency Safety Plans (ASPs)

Introduction

For more than twenty years, the transit industry has used a System Safety Program Plan (SSPP) to describe the intended Safety Program at a transit agency. Originally, this document was defined only as part of an American Public Transportation Association (APTA) industry standards and then in regulation from the Federal Transit Administration (FTA) for rail transit agencies (RTAs) in 49 CFR Part 659 (in effect from 1996 to April 2019). As part of FTA's enhanced transit safety program, a new regulation for all transit modes (except those transit modes already regulated for safety from another federal agency – Federal Railroad Administration or United State Coast Guard) has been completed, 49 CFR Part 673, and provides requirements for a Public Transportation Agency Safety Plan (PTASP or ASP). The ASP is intended to describe the transit agency's implementation of a Safety Management System (SMS) to assure authority, resourcing, safety performance improvement, and full compliance with the transit agency's safety program.

It is critical to understand that the RTA/RTA/RTA must have both a complete description of their safety program AND an ASP/SMS. The Safety Program Description is the scope of safety oversight and the ASP/SMS is an added function to assure that the transit agency safety program is properly resourced and managed for safety risk to a level as low as reasonably practicable (ALARP).

At the beginning of this transition to the ASP, most transit agencies have the most complete description of their safety program in only their SSPP. As the ASP is being developed to both replace the SSPP and to implement the SMS, it is currently necessary to also account for the full Safety Program Description (currently described in the SSPP) in order to account for the scope of what the SMS is intended to manage and the oversight of the Safety Program. For the references to the SSPP Elements that follow, the intent is that over time, the Safety Program Description will be developed into documents and accounted for separate from the ASP with only references in the ASP, in appendices would suffice (these separate documents are a part of the minimum standards for safety or safety program related control documents). This will then allow the ASP to focus more on the SMS, its implementation, and progress towards assuring and improving safety performance.

ASP/SMS Description

The following information is taken directly from the PTASP regulation and FTA guidance. In addition:

- ASP Conformance Checklist – This document includes FTA's extended guidance information provided as part of the FTA checklist for development and safety oversight review and approval of ASPs. This document includes the checklist and FTA's extended guidance by Checklist Item.
- Checklist to assure content of the previous SSPP – This document is an additional checklist to track the safety program description that was previously in the SSPP. This Safety Program Description content may be contained in the ASP, its appendices, or in referenced documents. The review of the completeness and appropriateness of the ASP is focused on



tracking where and how the safety program description is accounted for and referenced/related to the ASP and SMS organization.

- Blank ASP Conformance Checklist – This document is a blank template for use reviewing a RTA/RFGPTS ASP submitted to the NJDOT SSO program.

FTA has provided a website and a technical assistance center to answer questions about developing and approving the ASPs – <https://www.transit.dot.gov/PTASP-TAC>. The following documents are currently available from FTA on this website:

- Comparison of Definitions Part 673 versus Part 659
- Transition Roadmap Guidance on Using SSPPs to Develop PTASPs
- FTA Certification and Assurances
- RTA and SSOA PTASP Review Checklist
- Sample Agency Safety Plan Development, Review and Approval Timeline for RTAs and SSOAs
- Key Points for Development Agency Safety Plans for Recipients with Contractors and Other External Service Providers Fact Sheet
- National Safety Plan
- Introduction to Safety Performance Indicators and Targets
- Safety Performance Targets Guide
- CSO SMS Executive Fact Sheet
- Guide to Developing the Safety Management Policy Component of a PTASP
- The Role of the CSO in PTASP Implementation
- Development the Safety Management Policy Statement
- Guide to Developing the Safety Risk Management Component of a PTASP
- Sample Hazard Classification System
- Safety Risk Mitigations and Corrective Actions Guide
- Hazard Management vs. Safety Risk Management Guide
- Guide to Developing the Safety Promotion Component of a PTASP
- Safety Training Resources for Bus Transit Agencies
- Public Transportation Safety Certification Training Program and Agency Safety Plan Training Requirements

A summary of the over-arching requirements for the ASP are the following:

- The ASP and subsequent updates must be signed by the Accountable Executive and approved by the Board of Directors, or an Equivalent Authority.
- The ASP must document the processes and activities related to the SMS implementation
- The ASP must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.
- The ASP must address all applicable requirements and standards set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.
- The transit agency must establish a process and timeline for conducting an annual review and update of the ASP.



- RTA/RFGPTS must include or incorporate by reference in its ASP an emergency preparedness and response plan or procedures that addresses, at a minimum:
 - The assignment of employee responsibilities during an emergency
 - Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the transit agency's service area.

Additional requirements of the RTA/RFGPTS ASP are the following:

- The ASP may be developed for all transit modes or separately for transit modes.
- The RTA/RFGPTS must follow the recordkeeping requirements provided in Part 673.31.
- A State must draft and certify ASPs for small public transportation providers.
- Transit agencies under the jurisdiction of the United States Coast Guard (USCG) or the Federal Railroad Administration (FRA) are not required to develop ASPs for those transit modes of service.

The RTA/RFGPTS must certify that an ASP meeting the requirements of Part 673 has been completed by the deadline, July 20, 2020, and approved by the SSO program. On an annual basis, the RTA/RFGPTS must certify its compliance with Part 673. In addition, to the maximum extent practicable, the RTA/RFGPTS must coordinate with States and Metropolitan Planning Organizations (MPOs) in the selection of State and MPO safety performance targets.

Each RTA/rail transit agency must establish and implement an SMS that is appropriately scaled to the size, scope, and complexity of the transit agency. The following descriptions of the overall SMS Implementation requirements and the four SMS Components also include a summary of additional information and documentation related to each topic/component that are currently required to be included in the ASP.

Additional information and documentation related to the *SMS General Requirements*.

- Safety Plan Review and Modification (Element 4) – this requirement from the SSPP is also a part of the ASP/SMS general requirements
- National Public Transportation Safety Plan – the current version of this document provides a description of the FTA's transit-specific SMS
- Safety Data Acquisition (Element 9) – this data is the basis of the Safety Performance Measures and then Targets set for improvement.
- System Security Program (SSP)/System Emergency Preparedness Plan (SEPP) – this document is now a minimum standard for safety and the focus here is the overlap with the safety program.
- EOP/EMP – this documentation is required to be at least referenced in the ASP.
- Emergency Management Program (Element 11) – related to the SSP/SEPP and EOP/EMP, required to be at least referenced in the ASP.



Safety Management Policy (Part 673.23)

- The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals:
 - Accountable Executive
 - Chief Safety Officer or Safety Management System (SMS) Executive
 - Agency leadership and executive management
 - Key Staff
- Establish organizational accountabilities and responsibilities
- Written statement of safety management policy that includes the agency's safety objectives
- Establish and implement a process that allows employees to
 - Report safety conditions to senior management,
 - Protections for employees who report safety conditions, and
 - A description of employee behaviors that may result in disciplinary action.
- The safety management policy must be communicated throughout the agency.

Additional information and documentation related to *Safety Management Policy*.

- Policy Statement (Element 1) – the Safety Management Policy is a replacement for the SSPP Policy Statement.
- Purpose, Goals, and Objectives (Element 2) – safety program and SMS purpose, goals, and objectives continue to be required in the ASP/SMS Safety Management Policy.
- Management Structure (Element 3) – this is focused on the organization chart and flow down of authorities. This excludes the rail systems/physical plant description that will be accounted for in Safety Risk Management and Safety Assurance.
- Plan Implementation (Element 5) – The SMS and Safety Program implementation are now addressed in the ASP/SMS, so long as all of the content of the Safety Program Description is accounted for.

Safety Risk Management (Part 673.25)

- Safety Risk Management process
- Safety hazard identification
- Safety risk assessment
- Safety risk mitigation

Additional information and documentation related to *Safety Risk Management*.

- Hazard Management Process (Element 6) – this section from the SSPP is now the focus of the Safety Risk Management process described in this SMS component.
- Control documents for Operational Hazard Assessment, Safety Risk Management Plan, and Safety Risk Register – these documents are a part of and support Safety Risk Management.
- Safety Certification Process (Element 7) – focuses on the formal hazard analyses and risk assessments used in this process.



- System Modification (Element 8) – focuses on the formal hazard analyses and risk assessments used in this process
- Procurement (Element 21) – focuses on establishing safety-related controls on procurements based on risk assessments and safety-related requirements
- Coordination with other Risk Assessments and prioritization for public safety and threat and vulnerability assessments (TVAs) – this is focused on all-hazards and the overlap with the Safety Program.

Safety Assurance (Part 673.27)

- Safety Assurance process
- Safety performance monitoring and measurement
- Management of change
- Continuous improvement

Additional information and documentation related to *Safety Assurance*.

- Safety Performance Monitoring and Measurement – the results of these topics and processes may include corrective actions that flow into Continuous Improvement. Any unresolved safety risk or issues with risk mitigations may need to feedback to Safety Risk Management for reconsideration of proper risk mitigations.
 - Safety Data Acquisition (Element 9)
 - Incident Notification, Investigation, and Reporting (Element 10)
 - Emergency Management Program (Element 11)
 - Internal Safety Audit Program (Element 12)
 - Rules Compliance (Element 13)
 - Facilities and Equipment Inspections (Element 14)
 - Maintenance Audit and Inspection Program (Element 15)
 - Training and Certification Program (Element 16) – assuring training and competency
 - Compliance with Local, State, and Federal Safety Requirements (Element 18)
 - Hazardous Materials Program (Element 19)
 - Drug and Alcohol Program (Element 20)
 - Hours of Service/Fatigue Management (Element 22)
 - Roadway Worker Protection (Element 23)
 - Minimum document submission to the NJDOT SSO program (Element 24)
 - Control documents Rail Operating Rule Book, Roadway Worker Protection, Command and Control/Train Control Standard Operating Procedures (SOPs), Investigation Procedures, Procedure requiring review of SOPs related to Safety, Field Supervision SOPs, Inspection and Maintenance Manuals, SOPs, and Standards
- Management of Change – these SSPP elements and related safety program related documents and processes are all a part of Management of Change
 - Safety Certification Process (Element 7)
 - System Modification (Element 8)
 - Procurement (Element 21)



- Configuration Management (Element 17)
- Control documents Safety Certification Plan, Transit Asset Management Plan, and Configuration Management Plan.
- Continuous Improvement – these SSPP elements include processes that are a part of considering changes to the Safety Program or SMS to support Continuous Improvement.
 - Safety Data Acquisition (Element 9) – includes tracking and analysis of corrective action plans
 - Incident Notification, Investigation, and Reporting (Element 10)
 - Emergency Management Program (Element 11) – includes results of drills and exercises
 - Internal Safety Audit Program (Element 12)
 - Plan Review and Modification (Element 4)

Safety Promotion (Part 673.29)

- Competencies and Training
- Safety Communication

Additional information and documentation related to *Safety Promotion*.

- Competencies and Training – from a safety perspective, it is critical that staff and those working around or on the rail systems are competent and receive periodic awareness or refresher training to support safety performance.
 - Training and Certification Program (Element 16)
 - Roadway Worker Protection (Element 23)
 - Emergency Management Program (Element 11) – specifically training and drills and exercises.
 - Training requirements for designated staff under Part 672, Safety Certification Training Program
- Safety Communication – communication of hazards, safety risks, safety performance, and responses from executives and management are critical. In addition, it is also critical that Safety Communication make it up the chain of command.
 - Hazard Management Process (Element 6)
 - Safety Data Acquisition (Element 9)
 - Compliance with Local, State and Federal Safety Requirements (Element 18)
 - Hazardous Materials Program (Element 19)
 - Drug and Alcohol Program (Element 20)
 - Hours of Service/Fatigue Management (Element 22)
 - Roadway Worker Protection (Element 23)
 - Any public safety communications



Safety Plan Documentation (Part 673.31)

This topic addresses all records generated as part of the SMS-related tasks and activities.

Responsibilities of the SSO Program

Based on the requirements of the NJDOT Fixed Guideway SSO Program Standard and 49 CFR Part 674, the RTA/RFGPTS is required to submit:

- An initial ASP
- Any subsequent updates to a previously approved ASP
- Annual reviews and updates (if needed) to the NJDOT SSO program for review and approval.

Note that all operating rules, procedures, and materials referenced in the RTA/RFGPTS ASP are to be submitted to the NJDOT SSO program with the ASP to ensure an efficient and complete review of the RTA/RFGPTS safety program, as documented in the ASP.

Per the SSO and ASP regulations, the RTA/RFGPTS is required to:

- Review its ASP at least annually
- Make any modifications, as needed to assure that the ASP is current and accurate, as well as progressing in maintaining or improving safety performance.

ASP Annual Review and Update

The RTA/RFGPTS completes the annual review for the previous calendar year (as described in Program Standard Section 4) and the CSO submits a letter to the NJDOT SSO program indicating that the review was completed and whether or not the ASP will be updated no later than April 30th. If there are no changes required for the ASP and the review has been completed, it should be indicated at this point in the review and approval process.

If updates are required, the CSO must submit the updated draft ASP to the NJDOT SSO program for review and approval no later than July 1st. Each updated draft ASP submitted to the NJDOT SSO program should include a summary that identifies and explains the changes.

The NJDOT SSO program staff reviews the draft ASP update to determine if there are any issues or if the draft ASP is ready for approval. The NJDOT SSO program uses a conformance checklist for the review of the ASP (included as part of this Appendix) and determines if the draft ASP update meets the federal and state program requirements.

If there are any issues with the draft ASP update, the NJDOT SSO program staff will provide the CSO with comments via the checklist. The NJDOT SSO program or the CSO may request a meeting to review and discuss ASP issues to assure an understanding of the needed changes and negotiate the timing of any necessary modifications to the draft ASP.



Once the review conformance checklist is complete and no issues remain, Conditional Approval (See Program Standard “Definitions”) of the draft Agency Safety Plan update will be issued to the CSO in writing, and provide the checklist used for the review by August 1st (or thirty (30) calendar days after receipt of the draft ASP). At this point in the update process, the CSO can finalize their updated ASP with appropriate signatures and transmittal letter, including approval by the board of directors (or equivalent) and submit the final ASP to the NJDOT SSO program for final approval no later than February 12th.

Upon receipt of the final RTA/RFGPTS ASP, the NJDOT SSO program will issue written approval of the ASP to the CSO within thirty (30) calendar days.

The Agency Safety Plan annual review timeline, including required submission dates is outlined in the table below:

ASP Annual Review/Approval Timeline

<u>Submission Dates:</u>	<u>Requirements for updating an ASP</u>
<u>No later than April 30th</u>	<u>CSO will send a letter to the NJDOT SSO program indicating whether or not the ASP will be updated and, if so, which sections will be affected. If there are no changes required for the ASP, it should be indicated at this point in the review and approval process.</u>
<u>No later than July 1st</u>	<u>CSO will submit the draft ASP update to the NJDOT SSO program for review and approval. Each updated draft ASP should include a summary that identifies and explains the changes.</u>
<u>August 1st or thirty (30) calendar days after receipt of the draft ASP</u>	<p><u>NJDOT SSO program will indicate the review status to the CSO in writing, including the checklist used for the review. A letter of Conditional Approval or required changes will be provided via the checklist to the CSO.</u></p> <p><u>If the draft ASP update receives a Conditional Approval, CSO can finalize the ASP with the appropriate signatures, including board of directors (or equivalent) approval.</u></p> <p><u>If the draft ASP update was not approved and requires changes, the NJDOT SSO program and the CSO will negotiate appropriate modifications and the timing of any needed modifications to the draft PTASP update.</u></p>
<u>No later than February 12</u>	<u>CSO submits the final ASP to the NJDOT SSO program.</u>
<u>Thirty (30) calendar days after receipt of the final PTASP</u>	<u>NJDOT SSO program will issue written approval of the ASP to the CSO.</u>



Out-of-Cycle Updates to Agency Safety Plan:

The NJDOT SSO program may require changes to an ASP based on:

- Revisions to the New Jersey Fixed Guideway SSO Program Standard
- 49 CFR Part 674 or 673
- Audit results
- Investigations
- Changing trends in safety data and information analysis.

Upon receipt of a written notification from the NJDOT SSO program for ASP modifications, the CSO and the NJDOT SSO program will negotiate a timeframe and set a deadline for completing the revision.

In the event the CSO significantly modifies its ASP for its own purposes and needs, the CSO will notify the NJDOT SSO program in writing and submit the modified ASP to the NJDOT SSO program for review and approval within thirty (30) calendar days of the effective date of the change.

Initial submittals. An RTA/RFGPTS new (or extension) rail system capital project (including a New Starts project) is required to make an initial submittal of an ASP (or appropriate modification to an existing ASP) to the NJDOT SSO program at least one-hundred eighty (180) calendar days before beginning revenue service operations.

The initial ASP will be reviewed and approved by the NJDOT SSO program in writing as part of the new rail system capital project safety certification process. The review and approval process for initial submittals generally follows the ASP update review and approval process discussed above and is generally a more thorough review and may take several revision cycles to complete. This is the reason for the long-lead time for the initial submittal.

Specific to New Starts projects, the NJDOT SSO program may conduct on-site Readiness Reviews to assess the capabilities of the RTA/RFGPTS to implement its ASP during passenger operations. This assessment may be conducted in conjunction with the NJDOT SSO program's review and approval of the initial ASP submission.

Updated:

- March 5, 2018 – initial release
- July 6, 2020 – significant modification to take into account the guidance from FTA on their website.
- October 1, 2021 – Removed reference to 659, revised the ASP annual review/update and SSO approval timeline; Replace rail property with RFGPTS

State:
RTA/RFGPTS:

Section A. Transit Agency Information

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	A-1. The RTA specifies transit agency name and address		
	A-2. The RTA specifies mode(s) of transit service covered by the ASP (673.11(b))		
	A-3. The RTA specifies SSOA and authority for State Safety Oversight (SSO) program.		
	A-4. The RTA identifies an Accountable executive that is:		
	A-4-a. Accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's transit system (673.23(d)(1)).		
	A-4-b. Accountable for ensuring action is taken to address substandard performance in the agency's SMS (673.23(d)(1)).		
	A-5. The RTA identifies a Chief Safety Officer (or SMS Executive) who:		
	A-5-a. Is designated by the Accountable Executive (673.23(d)(2)).		
	A-5-b. Holds a direct line of reporting to the Accountable Executive (673.23(d)(2) and 674.29(b)).		
	A-5-c. Is adequately trained (673.5 and 674.29(b)).		
	A-5-d. Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS (673.23(d)(2)).		
	A-5-e. Does not serve in other operational or maintenance capacities (673.5)).		

FTA Guidance – Requirements and Considerations:

A-1. The RTA specifies transit agency name and address

A transit agency must, within one calendar year after July 19, 2019, establish an Agency Safety Plan that meets the requirements of this part. Any rail fixed guideway public transportation system that had a System Safety Program Plan (SSPP) compliant with 49 CFR part 659 as of October 1, 2012, may keep that plan in effect until one year after July 19, 2019.

The RTA may want to consider revising available text from its SSPP to explain that its ASP responds to both FTA's requirements at 49 C.F.R. Part 673 and the State Safety Oversight (SSO) program established by the State with jurisdiction over the RTA.

A-2. The RTA specifies mode(s) of transit service covered by the ASP

A transit agency may develop one Public Transportation Agency Safety Plan for all modes of service, or may develop a Public Transportation Agency Safety Plan for each mode of service not subject to safety regulation by another Federal entity.

Just as with the SSPP, unless otherwise specified by the SSOA, an RTA with multiple modes of public transportation service may develop one ASP for all modes of its service, or it may develop an ASP for each mode of service that is not subject to safety regulation by another Federal entity. The RTA should review the SSOA's Program Standard to identify any requirements regarding the scope of the ASP, and then, accordingly, should determine whether the ASP will address multiple (if applicable) or single modes.

A-3. The RTA specifies SSOA and authority for State Safety Oversight (SSO) program

A State Safety Oversight Agency must review and approve an Agency Safety Plan developed by a rail transit agency, as authorized in 49 U.S.C. 5329(e) and its implementing regulations at 49 C.F.R. Part 674.

SSPPs also identify the SSOA and the authority for the State's oversight program.

A-4. The RTA identifies an Accountable executive that is:

The transit agency must identify an Accountable Executive. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive.

A-4-a. Accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's transit system

The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented, throughout the agency's public transportation system.

A-4-b. Accountable for ensuring action is taken to address substandard performance in the agency's SMS

The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS.

Each RTA must identify an Accountable Executive within its organization who ultimately is responsible for carrying out and implementing its safety plan and asset management plan. An Accountable Executive should be a transit operator's chief executive; this person is often the president, chief executive officer, or general manager. As a preliminary matter, FTA distinguishes the role of the Accountable Executive from the role of a Board of Directors, or an Equivalent Authority. Pursuant to 49 C.F.R. 673.11(a)(1), the Accountable Executive must sign the safety plan; the Board of Directors or an Equivalent Authority must approve the safety plan in accordance with 49 U.S.C. 5329(d)(1)(A). Given the varying sizes and natures of transit systems, FTA defers to those systems in their designation of an Accountable Executive, so long as that single individual has the ultimate responsibility and accountability for the implementation and maintenance of the SMS of a public transportation agency; responsibility for carrying out the agency's transit asset management plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's public transportation agency safety plan and the agency's transit asset management plan.

For municipal government agencies, that individual could be a county executive or a mayor, or it could be the head of a city's department of transportation, the head of a city's department of public works, or a city manager. FTA has offered this non-exhaustive list of examples of Accountable Executives for illustrative purposes only. And while many individuals within a transit agency may be responsible for "implementing" SMS, the Accountable Executive is the individual with the ultimately responsibility for SMS implementation at the agency. FTA understands that at many smaller transit operators, roles and responsibilities are more fluid. However, FTA believes that, even in circumstances where responsibilities are either shared or delegated, there must be one primary decision-maker who is ultimately responsible for both safety and transit asset management. It is a basic management tenet that accountabilities flow top-down. Therefore, as a management system, safety and transit asset management require that accountability reside with an operator's top executive.

A-5. The RTA identifies a Chief Safety Officer (or SMS Executive) who:

A-5-a. Is designated by the Accountable Executive

The Accountable Executive must designate a Chief Safety Officer or SMS Executive.

A-5-b. Holds a direct line of reporting to the Accountable Executive

The Chief Safety Officer (SMS Executive) must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer (SMS Executive).

A-5-c. Is adequately trained

The Safety Plan identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA.

A-5-d. Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS

...who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS.

A-5-e. Does not serve in other operational or maintenance capacities

A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Given the different sizes of transit operators, and given the varying operating environments of transit systems across the nation, FTA is deferring to each RTA and SSOA to determine the appropriate direct reporting relationship with the Accountable Executive. FTA also defers to the RTA and SSOA to determine the level of training that is adequate for the Chief Safety Officer. Given the more complex operating environments of rail transit systems and the increased safety risks in these environments, FTA will not allow the Chief Safety Officers for rail transit agencies to have additional operational and maintenance responsibilities; it is necessary to have a single individual wholly dedicated to ensuring safety. FTA believes that this role should be a full-time responsibility at rail transit agencies, unless a rail transit agency petitions FTA to allow its Chief Safety Officer to serve multiple roles given administrative and financial hardships with having a single, dedicated, and full-time Chief Safety Officer.

Section B. Plan Development, Approval and Updates

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	B-1. The RTA provides the Accountable Executive's signature of the ASP (673.23(a)(1)) and date of signature.		
	B-2. The RTA provides the Board of Directors' or Equivalent Authority's approval of the ASP (673.23(a)(1) and 674.29(b)) and date of approval.		
	B-3. The RTA provides the Certification of compliance with Part 673 (673.11(a)(4), 673.13, 674.29(a)), including the name of the individual or entity that certifies the ASP and date of certification.		
	B-4. The RTA provides the Certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification (674.29(a)).		
	B-5. The RTA provides a process and timeline for conducting an annual review and update of the ASP (673.11(a)(5) and 674.29(b)), including the ASP version number and other relevant information.		

FTA Guidance – Requirements and Considerations

B-1. The RTA provides the Accountable Executive's signature of the ASP and date of signature.

The Plan, and subsequent updates, must be signed by the Accountable Executive...

The RTA may amend or prepare signature blocks and any formal adoption memorandum or other documents that may need to be attached to the ASP to demonstrate the required signature from the Accountable Executive.

B-2. The RTA provides the Board of Directors' or Equivalent Authority's approval of the ASP and date of approval.

... and approved by the agency's Board of Directors or an equivalent entity.

The RTA may amend or prepare signature blocks and any formal adoption memorandum or other documents that may need to be attached to the ASP to demonstrate the required approval from the Board of Directors or an Equivalent Entity.

B-3. The RTA provides the Certification of compliance with Part 673, including the name of the individual or entity that certifies the ASP and date of certification.

The Safety Plan must address all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan. Compliance with the minimum safety performance standards authorized under 49 U.S.C. 5329(b)(2)(C) is not required until standards have been established through the public notice and comment process.

B-4. The RTA provides the Certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification.

In determining whether to approve a Public Transportation Agency Safety Plan for a rail fixed guideway public transportation system, an SSOA must evaluate whether the Public Transportation Agency Safety Plan is in compliance with the program standard set by the SSOA.

Since the SSPP requirement pre-dates the National Public Transportation Safety Plan and the FTA's Public Transportation Safety Program, there is no already developed section in the SSPP where the RTA explains its compliance with Federal safety regulations. If the RTA chooses to address this requirement explicitly in the ASP, the RTA may consider briefly describing the FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan and clarifying its intention to comply with any minimum safety performance standards authorized under 49 U.S.C.. 5329(b)(2)(C). This section can also explain that FTA has not yet issued any such standards, and that any future FTA standards will be established through the public notice and comment process. This section can also identify any reviews or assessments the RTA may conduct, independently or jointly with the SSOA to ensure compliance with FTA's regulations and the SSOA program standard.

B-5. The RTA provides a process and timeline for conducting an annual review and update of the ASP, including the ASP version number and other relevant information.

Each transit agency must establish a process and timeline for conducting an annual review and update of its Safety Plan.

There may be many similarities between the process documented in the SSPP and the new process for the ASP. The RTA may consider modifying its current SSPP text (or developing new text) to:

- Reflect that the plan is now called a ASP instead of an SSPP;
- Update the content of existing processes and procedures that will now guide the annual review and update of the ASP;
- Ensure coordination with the requirement to have the Board of Directors or Equivalent Entity review and approve the updated ASP and the Accountable Executive sign the updated ASP; and
- Ensure compliance with the annual review and update requirements specified by the SSOA in its program standard.

Section C. Emergency Preparedness and Response Plan

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	C-1. The RTA provides or references an emergency preparedness and response plan or procedure that addresses, at a minimum addresses:		
	C-1-a. The assignment of employee responsibilities during an emergency (673.11(a)(6))		
	C-1-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area (673.11(a)(6)).		

FTA Guidance – Requirements and Considerations

C-1. The RTA provides or references an emergency preparedness and response plan or procedure that addresses, at a minimum:

An RTA must include or incorporate by reference in its Safety Plan an emergency preparedness and response plan or procedures that addresses, at a minimum,

C-1-a. The assignment of employee responsibilities during an emergency

the assignment of employee responsibilities during an emergency,

C-1-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area.

coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the transit agency's service area.

Historically, FTA's SSO program has required RTAs to have emergency preparedness plans through 49 C.F.R. 659.19(k). Further, FTA understands that the RTA may have developed an emergency preparedness and response plan that addresses these minimum requirements in accordance with regulations from other Federal and State agencies. To address this section, the RTA may consider including as an appendix, or incorporating by reference, its emergency preparedness and response plan, which, at a minimum, defines employee roles and responsibilities during emergencies and documents coordination with Federal, State, regional and local officials. The RTA also should review the SSOA's Program Standard to identify any other requirements regarding how the ASP should address the emergency preparedness and response plan or procedures, and also review its internal policies to identify any

specific considerations that should be in place to manage Sensitive Security Information (SSI), as defined by Federal Regulation 49 C.F.R. Part 1520.

Section D. Safety Performance Targets

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	D-1. The RTA specifies performance targets for fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-2. The RTA specifies performance targets for injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-3. The RTA specifies performance targets for safety events: Total number of reportable events and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-4. The RTA specifies performance targets for system reliability: Mean (or average) distance between major mechanical failures, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-5. The RTA specifies or references documentation that specifies performance targets are made available to the State to aid in the planning process (673.15(a)).		
	D-6. The RTA specifies, or references documentation that specifies, performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process (673.15(a)).		
	D-7. The RTA specifies, or references documentation that specifies, that the RTA coordinates with the State and MPOs in the selection of State and MPO safety performance targets, to the maximum extent practicable (673.15(b)).		

FTA Guidance – Requirements and Considerations

D-1. The RTA specifies performance targets for fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by rail transit mode.

D-2. The RTA specifies performance targets for injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode.

D-3. The RTA specifies performance targets for safety events: Total number of reportable events and rate per total vehicle revenue miles, by rail transit mode.

D-4. The RTA specifies performance targets for system reliability: Mean (or average) distance between major mechanical failures, by rail transit mode.

The Safety Plan must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan [Version 1.0, dated January 18, 2017, Page 32).

Pursuant to 49 U.S.C. § 5329(d), a Public Transportation Agency Safety Plan must include safety performance targets based on the safety performance measures in the National Safety Plan. The safety performance measures (fatalities, injuries, safety events and system reliability) selected by FTA are intended to provide “state of the industry” high-level measures and help focus individual agencies on the development of specific performance indicators and measurable targets relevant to their operations. These measures should also inform agencies as they identify actions they each would take to improve their own safety outcomes. Agencies should select performance targets that are appropriate to their operations and environment. Successful performance targets are specific, measurable, attainable, relevant, and time-bound (SMART). As part of the annual review of a Public Transportation Agency Safety Plan, each transit agency should reevaluate its safety performance measures and determine how the measures should be refined, sub-measures developed, and performance targets selected. FTA recognizes that each transit agency has its own operating policies that impact how performance is reported to the NTD. However, bringing greater attention to safety and reliability metrics will encourage more robust, consistent data reporting in the future.

D-5. The RTA specifies or references documentation that specifies performance targets are made available to the State to aid in the planning process.

D-6. The RTA specifies, or references documentation that specifies, performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process.

A State or transit agency must make its safety performance targets available to States and Metropolitan Planning Organizations to aid in the planning process.

D-7. The RTA specifies, or references documentation that specifies, that the RTA coordinates with the State and MPOs in the selection of State and MPO safety performance targets, to the maximum extent practicable.

To the maximum extent practicable, a State or transit agency must coordinate with States and Metropolitan Planning Organizations in the selection of State and Metropolitan Planning Organization safety performance targets.

While many transit agencies may have voluntarily shared safety performance and state of good repair targets with local and State planning agencies, the requirement to do so is new. In addressing this new activity, in the ASP, the RTA may wish to document the process through which the transit agency shares its safety performance and state of good repair targets with its State and Metropolitan Planning Organizations. In addition, the RTA should consider indicating if it has representation on the Metropolitan Planning Organization Board, either directly or indirectly (i.e., elected officials serving on both the Metropolitan Planning Organization board and the transit agency board), and briefly describing how this representation can support the agency's process for making safety performance target available to the Metropolitan Planning Organization and State. The RTA also could reference relevant transportation planning documentation or legislation.

Section E. Development and Implementation of Safety Management System (SMS)

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	E-1. The RTA specifies, or references documentation that specifies, its establishment and implementation of a Safety Management (SMS) (673.11(a)(2) and 673.21).		
	E-2. The RTA specifies, or references documentation that specifies, that the SMS is appropriately scaled to the size, scope, and complexity of the RTA and includes Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion (673.21).		

FTA Guidance – Requirements and Considerations

E-1. The RTA specifies, or references documentation that specifies, its establishment and implementation of a Safety Management (SMS).

Each transit agency must establish and implement a Safety Management System under this part. A transit agency Safety Management System must be appropriately scaled to the size, scope and complexity of the transit agency...

E-2. The RTA specifies, or references documentation that specifies, that the SMS is appropriately scaled to the size, scope, and complexity of the RTA and includes Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.

...and include the following elements:

- (a) Safety Management Policy as described in § 673.23;
- (b) Safety Risk Management as described in § 673.25;
- (c) Safety Assurance as described in § 673.27; and
- (d) Safety Promotion as described in § 673.29.

This requirement will be assessed through evaluation of the Safety Management Policy, Safety Risk Management, Safety Assurance and Safety Promotion sections below.

Section F. Safety Management Policy

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	F-1. The RTA specifies, or references documentation that specifies, a written statement of safety management policy, including the agency's safety objectives (673.5, 673.21(a), and 673.23(a)).		
	F-2. The RTA specifies, or references documentation that specifies, an employee safety reporting program, that includes:		
	F-2-a. A process that allows employees to report safety conditions to senior management (673.23(b)).		
	F-2-b. Protections for employees who report safety conditions to senior management (673.23(b)).		
	F-2-c. A description of employee behaviors that may result in disciplinary action (673.23(b)).		
	F-3. The RTA specifies, or references documentation that specifies, communication of the safety management policy throughout the agency's organization (673.23(c)).		
	F-4. The RTA specifies, or references documentation that specifies, necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA's SMS among the key safety roles within the organization:		
	F-4-a. Accountable Executive (673.5, 673.23(d)(1), and 674.7).		
	F-4-b. Chief Safety Officer (or SMS Executive) (673.5, 673.23(d)(2), and 674.29(b)).		
	F-4-c. Agency Leadership and Executive Management (673.23(d)(3)).		
	F-4-d. Key Staff (673.23(d)(4)).		
	F-5. The RTA specifies, or references documentation that specifies, adequate methods to ensure implementation of ASP by all employees, agents and contractors (674.29(b)).		

FTA Guidance – Requirements and Considerations

F-1. The RTA specifies, or references documentation that specifies, a written statement of safety management policy, including the agency's safety objectives.

...and have a written statement of safety management policy that includes the agency's safety objectives.

Safety Management Policy is the foundation of the organization's SMS. The safety management policy statement clearly states the organization's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. It clearly delineates management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the organization's safety performance by requiring regular review of the safety policy by a designated Accountable Executive (general manager, president, or other person with similar authority). Within the context of the Public Transportation Agency Safety Plan, an organization's safety objectives will be articulated through the setting of performance targets based on, at a minimum, the safety performance measures established in the National Public Transportation Safety Plan. See 49 U.S.C. 5329(d)(1)(E).

F-2. The RTA specifies, or references documentation that specifies, an employee safety reporting program, that includes:

F-2-a. A process that allows employees to report safety conditions to senior management.

A transit agency must establish and implement a process that allows employees to report safety conditions to senior management...

F-2-b. Protections for employees who report safety conditions to senior management.

...protections for employees who report safety conditions to senior management, and...

F-2-c. A description of employee behaviors that may result in disciplinary action.

... a description of employee behaviors that may result in disciplinary action.

Each RTA will need to review its current employee reporting systems and ensure that they meet FTA's employee safety reporting expectations, including comprehensiveness and accessibility, and address protections for employees who report safety conditions as well as identify behaviors that would result in disciplinary action. In addition, the RTA will need to address any gaps related to the documentation and storage of the data, its retrieval and analysis, and any practices for communicating back to reporting employee. In addressing any identified gaps, the RTA will want to establish and communicate criteria and procedures for employee safety reporting across the organization. Each RTA will need to specify in documentation the new or modified employee reporting program as a fundamental source for safety concerns and hazard identification.

F-3. The RTA specifies, or references documentation that specifies, communication of the safety management policy throughout the agency's organization.

The safety management policy must be communicated throughout the agency's organization.

Each RTA will need to implement the necessary provisions for ensuring that the Safety Management Policy Statement is communicated to all employees, with explicit support from senior management, including the means as well as the criteria establishing when the statement should be updated or revised.

F-4. The RTA specifies, or references documentation that specifies, necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA’s SMS among the key safety roles within the organization:

A transit agency must establish its organizational accountabilities and responsibilities.

As a general action, each RTA will need to review and discuss authorities, accountabilities, and responsibilities as they relate to the development and management (or operation) of the SMS, in addition to established safety responsibilities. Each RTA will need to revise current SSPP text based on those meetings for inclusion in the ASP. The Accountable Executive is ultimately responsible for ensuring these authorities, accountabilities and responsibilities are established.

F-4-a. Accountable Executive.

The transit agency must identify an Accountable Executive. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency’s safety performance cannot be delegated and always rests with the Accountable Executive. The Accountable Executive is accountable for ensuring that the agency’s SMS is effectively implemented, throughout the agency’s public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency’s SMS.

F-4-b. Chief Safety Officer (or SMS Executive).

The Accountable Executive must designate a Chief Safety Officer (SMS Executive). The Chief Safety Officer (SMS Executive) must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer (SMS Executive). The Chief Safety Officer who has the authority and responsibility for day-to-day implementation and operation of an agency’s SMS...The Safety Plan identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA.

Given the different sizes of transit operators, and given the varying operating environments of transit systems across the nation, FTA is deferring to each RTA and SSOA to determine the appropriate direct reporting relationship with the Accountable Executive. FTA also defers to the RTA and SSOA to determine the level of training that is adequate for the Chief Safety Officer. Given the more complex operating environments of rail transit systems and the increased safety risks in these environments, FTA will not allow the Chief Safety Officers for rail transit agencies to have additional operational and maintenance responsibilities; it is necessary to have a single individual wholly dedicated to ensuring safety. FTA believes that this role should be a full-time responsibility at rail transit

agencies, unless a rail transit agency petitions FTA to allow its Chief Safety Officer to serve multiple roles given administrative and financial hardships with having a single, dedicated, and full-time Chief Safety Officer.

F-4-c. Agency Leadership and Executive Management.

Agency leadership and executive management. A transit agency must identify those members of its leadership or executive management, other than an Accountable Executive or Chief Safety Officer (SMS Executive), who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

Each RTA must identify agency leadership and executive management who would be responsible for the implementation of a transit agency's safety plan.

F-4-d. Key Staff.

A transit agency may designate key staff, groups of staff, or committees to support the Accountable Executive or Chief Safety Officer (SMS Executive) in developing, implementing, and operating the agency's SMS.

Each RTA must identify key staff, groups of staff, or committees who would support development, implementation, and operation of the RTA's SMS.

F-5. The RTA specifies, or references documentation that specifies, adequate methods to ensure implementation of ASP by all employees, agents, and contractors.

The Agency Safety Plan includes adequate methods to support the execution of the Plan by all employees, agents, and contractors for the rail fixed guideway public transportation system.

The SSOA must ensure that the RTA's ASP is sufficiently detailed and provides adequate methods to be carried out by employees, agents, and contractors.

Section G. Safety Risk Management

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	G-1. The RTA specifies, or references documentation that specifies, a Safety Risk Management process for all system elements (673.21(b), 672.25, and 674.29(b)).		
	G-2. The RTA specifies, or references documentation that specifies, a process for hazard identification, including identifying consequences of hazards (673.25(a), 673.25(b)(1), and 674.7).		
	G-3. The RTA specifies, or references documentation that specifies, a process to include FTA, the SSOA, and other oversight authorities as sources for hazard information (673.25(b)(2)).		
	G-4. The RTA specifies, or references documentation that specifies, a process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations (673.7, 673.25(c), and 674.7).		
	G-5. The RTA specifies, or references documentation that specifies, a process to prioritize hazards based on the safety risk (673.25(c)(2)).		
	G-6. The RTA specifies, or references documentation that specifies, a process to identify mitigations or strategies necessary as a result of safety risk assessments to reduce the likelihood and severity of the consequences of hazards (673.25(a) and 673.25(d)).		
	G-7. The RTA specifies, or references documentation that specifies, a process for safety risk management, with adequate means of risk mitigation (673.25 and 674.29(b)).		

FTA Guidance – Requirements and Considerations

G-1. The RTA specifies, or references documentation that specifies, a Safety Risk Management process for all system elements.

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.

49 C.F.R. Part 673 proposes a more comprehensive process for identifying and managing safety risks through the life cycle of a rail transit system. 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 RTA 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 Part 673.5). The SSPP section also 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.

G-2. The RTA specifies, or references documentation that specifies, a process for hazard identification, including identifying consequences of hazards.

A transit agency must establish methods or processes to identify hazards and consequences of the hazards.

Pursuant to § 673.25(b)(1), each transit agency must establish a process for safety hazard identification, including the identification of the sources, both proactive and reactive, for identifying hazards and their associated consequences. Activities for hazard identification could include formalized processes where a transit agency identifies hazards throughout its entire system, logs them into a database, performs risk analyses, and identifies mitigation measures. These activities also could include safety focus groups, reviews of safety reporting trends, meetings with employees, scenario-based assessments, and What If? Analysis. A transit agency must apply its process for safety hazard identification to all elements of its system, including but not limited to its operational activities, system expansions, and state of good repair activities. FTA encourages transit agencies to take into account bicycle and pedestrian safety concerns, along with other factors, as agencies are conducting Safety Risk Management. A transit agency also should consider the results of its asset condition assessments when performing safety hazard identification activities within its SMS. The results of the condition assessments, and subsequent SMS analysis, will inform a transit agency's determination as to whether an asset meets the state of good repair standards under 49 C.F.R. part 625.

G-3. The RTA specifies, or references documentation that specifies, a process to include FTA, the SSOA, and other oversight authorities as sources for hazard information.

A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA.

G-4. The RTA specifies, or references documentation that specifies, a process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations.

A transit agency must establish methods or processes to assess the safety risks associated with identified safety hazards. A safety risk assessment includes an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations.

G-5. The RTA specifies, or references documentation that specifies, a process to prioritize hazards based on the safety risk.

A safety risk assessment includes...prioritization of the hazards based on the safety risk.

49 C.F.R. Part 659, and by extension the RTA SSPP, is more narrowly focused on hazards as opposed to safety risk management. Therefore, to address the 49 C.F.R. Part 673 provisions, the RTA can review the SSPP sections devoted to § 659.19(f)(2) and § 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. In § 673.25(c)(2), each transit agency must assess safety risks in terms of probability (the likelihood of the hazard producing the potential consequences) and severity (the damage, or the potential consequences of a hazard, that may be caused if the hazard is not eliminated or its consequences are not successfully mitigated), and must assess existing mitigations, to support the prioritization of hazards based on safety risks. The RTA can use existing SSPP text to address many of the requirements of this section. When reviewing and potentially updating this text, the RTA should consider how well the existing SSPP text ensures:

- Potential consequences for hazards are identified;
- Existing mitigations – or defenses – are identified and assessed for the current effectiveness in addressing the potential consequences (note: it is possible that existing mitigations may not be working as intended); and
- Both the likelihood and severity of the potential consequences of the hazard are established (with current mitigations included).

G-6. The RTA specifies, or references documentation that specifies, a process to identify mitigations or strategies necessary as a result of safety risk assessments to reduce the likelihood and severity of the consequences of hazards.

A transit agency must establish methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences.

In § 673.25(d), each transit agency must establish criteria for the development of safety risk mitigations that are necessary based on the results of the agency's safety risk assessments. 49 C.F.R. Part 659 is more narrowly focused on the control and elimination of individual hazards that may be identified as opposed to establishment of "methods or processes" to manage safety risk agency wide. The RTA should consider reviewing its existing SSPP language and potentially updating or expanding it to describe how it identifies when mitigations or strategies may be necessary to reduce the likelihood of severity of consequence. For example, the RTA may decide that the criteria for developing safety risk mitigations could be the identification of a safety risk, benefit-cost analysis, a system level change (such as the addition of new technology on a vehicle), a change to operational procedures, or the expansion of service. To further illustrate these examples, the RTA may color code different levels of safety risk ("red" as high, "yellow" as medium, and "green" as minor) and develop different types of safety risk mitigations to correspond to those levels.

Also, the RTA should review how the existing SSPP text describes its activities for evaluating existing versus proposed mitigations to ensure the agency is not unknowingly assuming increased safety risk or misallocating safety resources in the case that similar mitigations exist. The RTA also may wish to consider reviewing and/or revising, as appropriate, current text to ensure it defines participation by SMEs during mitigation development. This review should include descriptions of how the agency makes decisions to prioritize and assign resources to address safety risks.

In addition, the RTA should ensure that the ASP documents how mitigations will be implemented and monitored, including:

- Mitigation to be implemented;
- Responsible party (individual and/or department);
- Timeframe for implementation;
- Safety performance indicator; and
- Safety performance target.

This information will directly support mitigation monitoring for effectiveness under 49 C.F.R. 673.27(b)(2).

G-7. The RTA specifies, or references documentation that specifies, a process for safety risk management, with adequate means of risk mitigation.

In determining whether a Public Transportation Agency Safety Plan is compliant with 49 C.F.R. part 673, an SSOA must determine, specifically, whether the Public Transportation Agency Safety Plan sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail fixed guideway public transportation system.

The SSOA must ensure that the safety risk management process laid out in the RTA's ASP is sufficiently detailed and provides adequate methods to identify, assess and mitigate safety risks.

Section H. Safety Assurance

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-1. The RTA specifies, or references documentation that specifies, its methods or processes to develop and implement a Safety Assurance process covering Safety Performance Monitoring and Measurement Management of Change, and Continuous Improvement (673.27).		

FTA Guidance – Requirements and Considerations

H-1. The RTA specifies, or references documentation that specifies, its methods or processes to develop and implement a Safety Assurance process covering Safety Performance Monitoring and Measurement Management of Change, and Continuous Improvement.

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 paragraphs (b), (c), and (d) of this section. A small public transportation provider only must include in its safety assurance process the requirements in paragraph (b) of this section.

Each RTA must develop and implement processes for Safety Assurance, including (1) safety performance monitoring and measurement, (2) management of change, and (3) continuous improvement. Each RTA'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 RTA will need to establish its process for developing safety performance indicators and safety performance targets that are aligned with RTA safety objectives and represent the milestones that allow to track progress towards achievement of safety objectives. To accomplish this, each RTA will also need to revise its approach to the identification of the sources of safety data from service delivery-related functions, necessary to support safety performance monitoring. This will include the development of safety performance indicators and targets related not only to operational situations, but also related to effectiveness of mitigation strategies resulting from safety risk evaluation activities. Finally, each RTA will need to establish activities and criteria for analyzing data regarding remedial action for shortcomings in meeting safety performance targets, such that safety performance indicators and targets can be revised, as necessary.

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 (i.e., 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 opening this section of its ASP, the RTA should 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.

Safety Performance Monitoring and Measurement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-2. The RTA specifies, or references documentation that specifies, its methods or processes to monitor system for compliance with, and sufficiency of, the agency’s procedures for operations and maintenance (673.27(b)(1)).		
	H-3. The RTA specifies, or references documentation that specifies, its methods or processes to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended (673.27(b)(2)).		
	H-4. The RTA specifies, or references documentation that specifies, its methods or processes to conduct investigations of safety events to identify causal factors (673.27(b)(3)) and that address:		
	H-4-a. SSOA requirements for notifying the SSOA of accidents including time limits for and methods of notification and what information the RTA must submit to the SSOA (674.27(a)(6) and 674.33(a)).		
	H-4-b. FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system (674.33(a)). Accident is defined as any instance involving a fatality occurring at the scene or within 30 days following the accident, one or more persons suffering serious injury (673.5 and 674.7), property damage resulting from a collision involving a rail transit vehicle or any derailment of a rail transit vehicle (674 Appendix).		
	H-4-c. What must be included in any investigation report developed on behalf of the SSOA, including at a minimum, identification of factors that caused		

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	or contributed to the accident and setting forth a Corrective Action Plan as appropriate (674.35(b)).		
	H-4-d. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event (674.35(a)).		
	H-4-e. The process through which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate (674.35(b)).		
	H-4-f. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Program (674.35(c)).		
	H-5. The RTA specifies, or references documentation that specifies, its methods or processes to monitor information reported through any internal safety reporting programs (673.27(b)(4)).		

FTA Guidance – Requirements and Considerations

H-2. The RTA specifies, or references documentation that specifies, its methods or processes to monitor system for compliance with, and sufficiency of, the agency’s procedures for operations and maintenance.

A transit agency must establish activities to monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance.

Each RTA will need to review and revise its current SSPP text to ensure that its ASP addresses the following items related to monitoring compliance with and sufficiency of established procedures for operations and maintenance:

- Identification of all safety standards and requirements, both internal to the agency as well as in recognition of any SSOA or FTA safety standards and requirements that must be complied with and assessed for sufficiency. Related to Part 674 (SSO Rule), each RTA should draft/revise text to address:
 - Activities for reviewing safety standards and requirements to ensure they are current
 - Activities the RTA will implement to monitor compliance with documented safety standards and requirements
 - Activities to monitor compliance with its safety policies, procedures and protocols related to service delivery
 - Methods for collecting and compiling information regarding compliance monitoring activities

- Criteria for documenting and reporting non-compliance
- Criteria for when non-compliance findings would be evaluated through the Safety Risk Management process

H-3. The RTA specifies, or references documentation that specifies, its methods or processes to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

A transit agency must establish activities to monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

In § 673.27(b), each RTA must identify the data and information that it will collect from its operations, maintenance, and public transportation services so that it may monitor the agency's safety performance as well as the effectiveness of its SMS and safety risk mitigations. Each transit agency must monitor its operations and maintenance protocols and procedures, and any safety risk mitigations, to ensure that it is implementing them as planned and that mitigations are performing as intended.

H-4. The RTA specifies, or references documentation that specifies, its methods or processes to conduct investigations of safety events to identify causal factors (673.27(b)(3)) and that address:

A transit agency must establish activities to conduct investigations of safety events to identify causal factors.

H-4-a. SSOA requirements for notifying the SSOA of accidents including time limits for and methods of notification and what information the RTA must submit to the SSOA.

The SSO program standard must establish requirements for an RTA to notify the SSOA of accidents on the RTA's rail fixed guideway public transportation system. These requirements must address, specifically, the time limits for notification, methods of notification, and the nature of the information the RTA must submit to the SSOA... In addition to the requirements for accident notification set forth in an SSO program standard, an RTA must notify both the SSOA and the FTA within two hours of any accident occurring on a rail fixed guideway public transportation system. The criteria and thresholds for accident notification and reporting are defined in a reporting manual developed for the electronic reporting system specified by FTA as required in § 674.39(b), and in appendix A.

H-4-b. FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system (674.33(a)). Accident is defined as any instance involving a fatality occurring at the scene or within 30 days following the accident, one or more persons suffering serious injury, property damage resulting from a collision involving a rail transit vehicle or any derailment of a rail transit vehicle.

Within a reasonable time, an SSOA must issue a written report on its investigation of an accident or review of an RTA's accident investigation in accordance with the reporting requirements established by the SSOA. The report must describe the investigation activities; identify the factors that caused or contributed to the accident; and set forth a corrective action plan, as necessary or appropriate. The SSOA must formally adopt the report of an accident and transmit that report to the RTA for review and concurrence.

H-4-c. What must be included in any investigation report developed on behalf of the SSOA, including at a minimum, identification of factors that caused or contributed to the accident and setting forth a Corrective Action Plan as appropriate.

If an SSOA requires an RTA to investigate an accident, the SSOA must conduct an independent review of the RTA's findings of causation. In any instance in which an RTA is conducting its own internal investigation of the accident or incident, the SSOA and the RTA must coordinate their investigations in accordance with the SSO program standard and any agreements in effect.

H-4-d. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event.

If the RTA does not concur with an SSOA's report, the SSOA may allow the RTA to submit a written dissent from the report, which may be included in the report, at the discretion of the SSOA.

H-4-e. The process through which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate.

All personnel and contractors that conduct investigations on behalf of an SSOA must be trained to perform their functions in accordance with the Public Transportation Safety Certification Training Program.

H-4-f. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Program.

The Administrator may conduct an independent investigation of any accident or an independent review of an SSOA's or an RTA's findings of causation of an accident.

Each RTA must investigate safety events (as defined in Part 673 and Part 674) and any reports of non-compliance with applicable regulations, standards, and legal authority. FTA expects each RTA to establish procedures for conducting investigations and to ensure that these procedures address the requirements in the SSO program standard, including requirements for the RTA to notify the SSOA of accidents on the RTA's rail fixed guideway public transportation system; the time limits for notification, methods of notification, and the nature of the information the RTA must submit to the SSOA; thresholds for accidents that require the RTA to conduct an investigation; how the SSOA will oversee an RTA's internal investigation; the role of the SSOA in supporting any investigation conducted or findings and recommendations made by the NTSB or FTA; and procedures for protecting the confidentiality of the investigation reports (as appropriate). FTA may conduct an independent investigation of any accident or an independent review of an SSOA's or an RTA's findings of causation of an accident. Based on the SSOA program standard, RTA's may choose to address these requirements in their ASP or in separate procedures referenced in the ASP.

H-5. The RTA specifies, or references documentation that specifies, its methods or processes to monitor information reported through any internal safety reporting programs.

A transit agency must establish activities to monitor information reported through any internal safety reporting programs.

Internal safety reporting programs and activities provide each RTA with additional information for identifying safety concerns. Internal safety reporting programs include the Employee Safety Reporting Program and other internal reporting programs that may provide safety data or information to support the SMS. The number and types of internal safety reporting systems will vary based on the size and complexity of the agency. Most agencies likely have several relevant programs, although they may not currently term these programs as “safety reporting” programs. These programs could include drug and alcohol testing programs, fitness for duty programs, hours of service programs, customer complaints, or operations or maintenance compliance or inspection programs.

Management of Change

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-6. The RTA specifies, or references documentation that specifies, its methods or processes to identify and assess changes that may introduce new hazards or impact the RTA’s safety performance (673.27(c)(1)).		
	H-7. The RTA specifies, or references documentation that specifies, its methods or processes to evaluate any changes that may introduce new hazards or impact the agency’s safety performance through the RTA’s Safety Risk Management Process (673.27(c)(2)).		

FTA Guidance – Requirements and Considerations

H-6. The RTA specifies, or references documentation that specifies, its methods or processes to identify and assess changes that may introduce new hazards or impact the RTA’s safety performance.

A transit agency must establish a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance.

H-7. The RTA specifies, or references documentation that specifies, its methods or processes to evaluate any changes that may introduce new hazards or impact the agency’s safety performance through the RTA’s Safety Risk Management Process.

If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process.

RTAs must develop processes for identifying and assessing changes that may introduce new hazards or impact safety performance. If an RTA determines that a change might impact safety, then the transit agency would need to evaluate the change using Safety Risk Management activities established under § 673.25. These changes would include changes to operations or maintenance

procedures, changes to service, the design and construction of major capital projects (such as New Starts and Small Starts projects and associated certifications), organizational changes, and any other changes to a transit agency's system that may impact safety performance. Each rail transit agency should include a description of the safety certification process that it uses to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for News Starts and other major capital projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment. To document this process, Each RTA will need to review, and revise as necessary, text that addresses a comprehensive approach to change identification. Revisions will typically include:

- Identification of internal and external sources of change
- Documentation of communication and coordination activities to ensure appropriate departments/individuals receive notifications of change
- Use of documented field activities to help identify changes in the operational environment that may not have been planned
- Development and use of criteria to identify and determine the extent of changes in the operational environment that would trigger the initiation of management of change activities
- Use of documented criteria to ensure that information regarding management of change activity is distributed to all relevant service delivery functions.

Each RTA will need to review, and revise as necessary, language to address the use of documented criteria for determining when changes must be assessed through the Safety Risk Management process, prior to implementation, to ensure that accepted levels of safety performance are not jeopardized or diminished. This includes the development of criteria such that in principle, no operations under changed conditions that may pose a safety impact may continue until a safety risk evaluation is conducted. In addition, each RTA will need to identify and document how monitoring activities will be updated, as necessary, to address changes that do not go through the Safety Risk Management process, thus ensuring the change and related mitigations perform as intended so as not to negatively impact safety performance.

Continuous Improvement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-8. The RTA specifies, or references documentation that specifies, its methods or processes to assess the RTA's safety performance (673.27(d)(1)), including:		
	H-8-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA Program Standard (674.27(a)(4)).		
	H-8-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature (674.27(a)(4)).		
	H-9. The RTA specifies, or references documentation that specifies, its methods or processes to develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment (673.27(d)(2)).		

FTA Guidance – Requirements and Considerations

H-8. The RTA specifies, or references documentation that specifies, its methods or processes to assess the RTA's safety performance, including:

A transit agency must establish a process to assess its safety performance.

H-8-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA Program Standard.

H-8-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature.

The SSO program standard must explain the role of the SSOA in overseeing an RTA's execution of its Public Transportation Agency Safety Plan and any related safety reviews of the RTA's fixed guideway public transportation system. The program standard must describe the process whereby the SSOA will receive and evaluate all material submitted under the signature of an RTA's accountable executive. Also, the program standard must establish a procedure whereby an RTA will notify the SSOA before the RTA conducts an internal review of any aspect of the safety of its rail fixed guideway public transportation system.

H-9. The RTA specifies, or references documentation that specifies, its methods or processes to develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment.

If a transit agency identifies any deficiencies as part of its safety performance assessment, then the transit agency must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies.

Each RTA must conduct a safety performance assessment annually. The safety performance assessment can be completed in conjunction with the annual review and update to its overall safety plan as required by 49 U.S.C. 5329(d)(1)(D) and 49 C.F.R. 673.11(a)(5). FTA does not prescribe the format or content of the annual assessment and leaves it up to the RTA to design an approach that is appropriate for its size and complexity. The RTA can assess the performance of an SMS through audits, reviews, assessments, and other verification and follow-up actions. To document activities to address this requirement in the ASP, the RTA will need to update its internal safety review process and associated procedures and criteria to ensure consistency with PTASP SMS requirements and the comprehensive review of safety management processes and activities, as well as those safety programs established to deliver on outputs of SMS activities. The RTA will also need to lay out its approach to addressing any safety deficiencies under the direction of the Accountable Executive. Finally, the RTA should consider updating its text to document how it will communicate with SSOA regarding safety performance reviews, activities, and results.

Section I. Safety Promotion

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	I-1. The RTA specifies, or references documentation that specifies, its methods or processes to establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety (673.29(a)) that:		
	I-1-a. Includes employees and contractors (673.29(a)).		
	I-1-b. Includes refresher training, as necessary (673.29(a)).		
	I-2. The RTA specifies, or references documentation that specifies, its methods or processes to communicate safety and safety performance information throughout the agency's organization (673.29(b)).		
	I-3. The RTA specifies, or references documentation that specifies, its methods or processes to convey information on hazards and safety risks relevant to employees' roles and responsibilities (673.29(b)).		
	I-4. The RTA specifies, or references documentation that specifies, its methods or processes to inform employees of safety actions taken in response to reports submitted through an employee safety reporting program (673.29(b)).		

FTA Guidance – Requirements and Considerations

I-1. The RTA specifies, or references documentation that specifies, its methods or processes to establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety that:

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.

I-1-a. Includes employees and contractors.

I-1-b. Includes refresher training, as necessary.

FTA's requirements for a comprehensive safety training program address a statutory requirement under 49 U.S.C. 5329(d)(1)(G), which requires each operator of a public transportation system to establish “a comprehensive staff training program for the operations personnel and personnel directly responsible for safety” and includes “completion of a safety training program” and “continuing safety education and training.” Given the unique operating environments and operating systems of each transit agency, FTA is providing great latitude and flexibility in complying with these provisions. Each transit agency should determine for themselves the classes of employees who are directly responsible for safety in that unique system. These employees could include vehicle operators, maintenance staff, dispatchers, the Chief Safety Officer, the Accountable Executive, and other agency staff and management who have direct responsibility for safety. The training program should cover all levels of employees and contractors.

Through the safety training program, each transit agency must require each employee and contractor, as applicable, to complete training to enable the individual to meet his or her role and responsibilities for safety, and to complete refresher training, as necessary, to stay current with the agency's safety practices and procedures. To address this requirement, each RTA will need to review PTASP requirements, including its development of SMS processes and activities to identify where it needs new training developed or where current training must be revised and updated. Each RTA will need to develop a plan for updating job descriptions and training requirements appropriate for each employee, for example, front line employees, managers and supervisors and senior managers.

For each, the RTA will need to establish a plan to deliver the training as well as identify and deliver on refresher training requirements. Each RTA will also need to address training requirements, including updates to current training, for contractors. In addition, each RTA will need to ensure compliance with FTA safety training provisions. Finally, as necessary, the RTA will need to integrate SMS responsibilities training into skills-based training for appropriate operational personnel.

I-2. The RTA specifies, or references documentation that specifies, its methods or processes to communicate safety and safety performance information throughout the agency's organization.

A transit agency must communicate safety and safety performance information throughout the agency's organization.

I-3. The RTA specifies, or references documentation that specifies, its methods or processes to convey information on hazards and safety risks relevant to employees' roles and responsibilities.

A transit agency must convey information on hazards and safety risks relevant to employees' roles and responsibilities.

I-4. The RTA specifies, or references documentation that specifies, its methods or processes to inform employees of safety actions taken in response to reports submitted through an employee safety reporting program (673.29(b)).

A transit agency must inform employees of safety actions taken in response to reports submitted through an employee safety reporting program.

To address § 673.29(b), each RTA must ensure that all employees are aware of any policies, activities, and procedures that are related to their safety-related roles and responsibilities. Safety communications may include information on hazards and safety risks

that are relevant to the employee's role and responsibilities; explain reasons that a transit agency introduces or changes policies, activities, or procedures; and explain to an employee when actions are taken in response to reports submitted by the employee through the employee safety reporting program. 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. Therefore, to address this requirement in the ASP, each RTA will need to document its approach to safety communication. Each RTA may consider the following as it documents its safety communication policies and activities:

- Documentation of how safety and safety performance information will be communicated throughout the organization.
- Documented criteria to trigger the communication of safety and safety performance information throughout the organization.
- Documented policies and/or procedures to communicate information related to SMS activities to appropriate personnel throughout the agency.
- Employees are made aware of safety management priorities and safety concerns at the organizational level and as they relate to their own duties and responsibilities.
- Communication of safety concerns and hazards to appropriate groups and individuals as it relates to their responsibilities.
- Communication of actions taken by the RTA to address safety concerns and hazards reported by employees through the employee safety reporting program.
- Communication of safety concerns, safety risks and safety performance to executive management.
- Documented policies and/or procedures for communicating safety performance and SMS information to FTA and the SSOA.
- How to ensure communication, and the means, are effective.

Section J. Corrective Action Plans

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	J-1. The RTA specifies, or references documentation that specifies, when the RTA must develop and carry out a CAP (674.37(a)).		
	J-2. The RTA specifies, or references documentation that specifies, how the RTA will submit CAPs to the SSOA for review and approval (674.37(a)).		
	J-3. The RTA specifies, or references documentation that specifies, how the RTA will manage immediate or emergency corrective actions (674.37(a)).		
	J-4. The RTA specifies, or references documentation that specifies, the required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions (674.37(a)).		
	J-5. The RTA specifies, or references documentation that specifies, how the RTA must periodically report to the SSOA on its progress in carrying out CAPs (674.37(a)).		

FTA Guidance – Requirements and Considerations

J-1. The RTA specifies, or references documentation that specifies, when the RTA must develop and carry out a CAP.

J-2. The RTA specifies, or references documentation that specifies, how the RTA will submit CAPs to the SSOA for review and approval.

J-3. The RTA specifies, or references documentation that specifies, how the RTA will manage immediate or emergency corrective actions.

In any instance in which an RTA must develop and carry out a CAP, the SSOA must review and approve the CAP before the RTA carries out the plan, however, an exception may be made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that the SSOA has been given timely notification, and the SSOA provides subsequent review and approval.

J-4. The RTA specifies, or references documentation that specifies, the required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.

A CAP must describe, specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.

J-5. The RTA specifies, or references documentation that specifies, how the RTA must periodically report to the SSOA on its progress in carrying out CAPs.

The RTA must periodically report to the SSOA on its progress in carrying out the CAP.

As specified in FTA's SSO rule, a CAP is "a plan developed by an 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 an SSOA, FTA or an RTA may require that RTA to develop and carry out a CAP." FTA considers CAPs the result of a joint effort between RTAs and SSOAs, to be developed in a collaborative manner, particularly since both an SSOA and RTA have a shared and critical interest in safety. FTA expects that the RTA should be given the opportunity to present a CAP to an SSOA for its review and approval, particularly since the RTA is most familiar with the risks and hazards within its system. While FTA does not believe it is the responsibility of the SSOA to develop CAPs for an RTA, ultimately it is the responsibility of the SSOA, as the oversight agency, to ensure that RTAs are developing and implementing appropriate CAPs. This process must be documented and implemented by the RTA and overseen by the SSOA. It includes:

- Establishing when the RTA must develop and carry out a CAP reviewed and approved by the SSOA.
- Establishing that the SSOA must review and approve each CAP before the RTA carries it out, unless it is an immediate or emergency CAP, which must be subsequently reviewed and approved by the SSOA following the process outlined in the SSOA's program standard.
- Establishing that each CAP to be reviewed and approved by the SSOA must describe, specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.
- Establishing that the RTA must periodically report to the SSOA on its progress in carrying out CAPs as specified in the SSOA program standard.
- Establishing that 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.

Section K. Documentation, Definitions and Acronyms

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	K-1. The RTA specifies, or references documentation that specifies, how the RTA will document key processes and procedures required to carry out the SMS that are not included or referenced elsewhere in the (ASP)(673.31).		
	K-2. The RTA specifies, or references documentation that specifies, how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created (673.31).		
	K-3. The RTA specifies, or references documentation that specifies, how the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to any SMS documentation maintained by the RTA upon request (673.31).		
	K-4. The RTA specifies, or references documentation that specifies, applicable definitions from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		
	K-5. The RTA specifies, or references documentation that specifies, applicable acronyms from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		

FTA Guidance – Requirements and Considerations

K-1. The RTA specifies, or references documentation that specifies, how the RTA will document key processes and procedures required to carry out the SMS that are not included or referenced elsewhere in the ASP.

At all times, a transit agency must maintain documents that set forth its Public Transportation Agency Safety Plan, including those related to the implementation of its SMS, and results from SMS processes and activities.

K-2. The RTA specifies, or references documentation that specifies, how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created.

A transit agency must maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that the agency uses to carry out its Public Transportation Agency Safety Plan...A transit agency must maintain these documents for a minimum of three years after they are created.

K-3. The RTA specifies, or references documentation that specifies, how the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to any SMS documentation maintained by the RTA upon request.

These documents must be made available upon request by the Federal Transit Administration or other Federal entity, or a State Safety Oversight Agency having jurisdiction.

K-4. The RTA specifies, or references documentation that specifies, applicable definitions from Part 673, Part 674, and the SSOA Program Standard.

See definitions in § 673.5 and §674.7.

K-5. The RTA specifies, or references documentation that specifies, applicable acronyms from Part 673, Part 674, and the SSOA Program Standard.

See definitions in § 673.5 and §674.7.

Part 673 requires each transit agency to keep records of its documents that are developed in accordance with this part. FTA expects a transit agency to maintain documents that set forth its ASP, including those related to the implementation of its SMS such as the results from SMS processes and activities. For the purpose of reviews, investigations, audits, or other purposes, this section requires each transit agency to make these documents available to FTA, SSOAs, and other Federal agencies as appropriate. A transit agency must maintain these documents for a minimum of three years. In addressing this new requirement, the RTA could identify the gaps between current safety program documentation and the PTASP rule requirements. The RTA could also review and revise (or develop new), as appropriate, policies and/or procedures that pertain to the documentation of PTASP and the results of its SMS processes and activities, as well as the control of these documents. Finally, the RTA could include information explaining how it ensures that documents are maintained, as required, and providing documents requested by the FTA or its SSOA.

Section L. SSOA Compliance Assessment

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	L-1. The ASP is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan (674.29(a)).		
	L-2. The ASP is in compliance with the SSOA's Program Standard (674.29(a)).		
	L-3. The ASP is approved by the RTA's board of directors or equivalent entity (674.29(b)).		
	L-4. The ASP sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system (674.29(b)).		
	L-5. The ASP includes a process and timeline for annually reviewing and updating the ASP (674.29(b)).		
	L-6. The ASP includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA (674.29(b)).		
	L-7. The ASP identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA (674.29(b)).		
	L-8. The ASP includes adequate methods to support the execution of the ASP by all employees, agents, and contractors for the rail transit system (674.29(b)).		
	L-9. The ASP sufficiently addresses other requirements under the regulations at 49 CFR Part 673 (674.29(b)).		

FTA Guidance – Requirements and Considerations

L-1. The ASP is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan.

L-2. The ASP is in compliance with the SSOA's Program Standard.

L-3. The ASP is approved by the RTA's board of directors or equivalent entity.

L-4. The ASP sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system.

L-5. The ASP includes a process and timeline for annually reviewing and updating the ASP.

L-6. The ASP includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA.

L-7. The ASP identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA.

L-8. The ASP includes adequate methods to support the execution of the ASP by all employees, agents, and contractors for the rail transit system.

L-9. The ASP sufficiently addresses other requirements under the regulations at 49 CFR Part 673.

In determining whether to approve the RTA's Agency Safety Plan, an SSOA must evaluate whether the Agency Safety Plan is consistent with the FTA's regulations implementing such Plans; is consistent with the National Public Transportation Safety Plan; and is in compliance with the program standard set by the SSOA. In determining whether the Agency Safety Plan is compliant with 49 CFR part 673, an SSOA must determine, specifically, whether the Agency Safety Plan is approved by the RTA's board of directors or equivalent entity; sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system; includes a process and timeline for annually reviewing and updating the safety plan; includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA; identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA; includes adequate methods to support the execution of the Agency Safety Plan by all employees, agents, and contractors for the rail transit system; and sufficiently addresses other requirements under the regulations at 49 CFR part 673.

One of the most significant changes in the SSO program for SSOAs and RTAs is the transition from the simple review and-approval of an RTA's SSPP under 49 C.F.R. Part 659 to the more hands-on, proactive role required for SSOAs in evaluating the effectiveness of an RTA's safety program and SMS. This means that SSOAs will need to make determinations based on their own expertise and authority. Rather than working from a set of prescriptive Federal standards, SSOAs must develop their own locally-developed state safety program standards and hold RTAs accountable to those standards. Above all, SSOAs must ensure that the Agency Safety Plan -- and the SMS it documents -- is appropriate for the size and complexity of the RTA.

**Public Transportation Agency Safety Plan (PTASP or ASP)
Development and Review Checklist**

State:

Rail Property:

Section A. Transit Agency Information

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	A-1. The RTA specifies transit agency name and address		
	A-2. The RTA specifies mode(s) of transit service covered by the ASP (673.11(b))		
	A-3. The RTA specifies SSOA and authority for State Safety Oversight (SSO) program.		
	A-4. The RTA identifies an Accountable executive that is:		
	A-4-a. Accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's transit system (673.23(d)(1)).		
	A-4-b. Accountable for ensuring action is taken to address substandard performance in the agency's SMS (673.23(d)(1)).		
	A-5. The RTA identifies a Chief Safety Officer (or SMS Executive) who:		
	A-5-a. Is designated by the Accountable Executive (673.23(d)(2)).		
	A-5-b. Holds a direct line of reporting to the Accountable Executive (673.23(d)(2) and 674.29(b)).		
	A-5-c. Is adequately trained (673.5 and 674.29(b)).		
	A-5-d. Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS (673.23(d)(2)).		
	A-5-e. Does not serve in other operational or maintenance capacities (673.5).		

Section B. Plan Development, Approval and Updates

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	B-1. The RTA provides the Accountable Executive's signature of the ASP (673.23(a)(1)) and date of signature.		
	B-2. The RTA provides the Board of Directors' or Equivalent Authority's approval of the ASP (673.23(a)(1) and 674.29(b)) and date of approval.		
	B-3. The RTA provides the Certification of compliance with Part 673 (673.11(a)(4), 673.13, 674.29(a)), including the name of the individual or entity that certifies the ASP and date of certification.		
	B-4. The RTA provides the Certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification (674.29(a)).		
	B-5. The RTA provides a process and timeline for conducting an annual review and update of the ASP (673.11(a)(5) and 674.29(b)), including the ASP version number and other relevant information.		

Section C. Emergency Preparedness and Response Plan

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	C-1. The RTA provides or references an emergency preparedness and response plan or procedure that addresses, at a minimum addresses:		
	C-1-a. The assignment of employee responsibilities during an emergency (673.11(a)(6))		
	C-1-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area (673.11(a)(6)).		

Section D. Safety Performance Targets

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	D-1. The RTA specifies performance targets for fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-2. The RTA specifies performance targets for injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-3. The RTA specifies performance targets for safety events: Total number of reportable events and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-4. The RTA specifies performance targets for system reliability: Mean (or average) distance between major mechanical failures, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-5. The RTA specifies or references documentation that specifies performance targets are made available to the State to aid in the planning process (673.15(a)).		
	D-6. The RTA specifies, or references documentation that specifies, performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process (673.15(a)).		
	D-7. The RTA specifies, or references documentation that specifies, that the RTA coordinates with the State and MPOs in the selection of State and MPO safety performance targets, to the maximum extent practicable (673.15(b)).		

Section E. Development and Implementation of Safety Management System (SMS)

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	E-1. The RTA specifies, or references documentation that specifies, its establishment and implementation of a Safety Management (SMS) (673.11(a)(2) and 673.21).		
	E-2. The RTA specifies, or references documentation that specifies, that the SMS is appropriately scaled to the size, scope, and complexity of the RTA and includes Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion (673.21).		

Section F. Safety Management Policy

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	F-1. The RTA specifies, or references documentation that specifies, a written statement of safety management policy, including the agency's safety objectives (673.5, 673.21(a), and 673.23(a)).		
	F-2. The RTA specifies, or references documentation that specifies, an employee safety reporting program, that includes:		
	F-2-a. A process that allows employees to report safety conditions to senior management (673.23(b)).		
	F-2-b. Protections for employees who report safety conditions to senior management (673.23(b)).		
	F-2-c. A description of employee behaviors that may result in disciplinary action (673.23(b)).		
	F-3. The RTA specifies, or references documentation that specifies, communication of the safety management policy throughout the agency's organization (673.23(c)).		
	F-4. The RTA specifies, or references documentation that specifies, necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA's SMS among the key safety roles within the organization:		
	F-4-a. Accountable Executive (673.5, 673.23(d)(1), and 674.7).		
	F-4-b. Chief Safety Officer (or SMS Executive) (673.5, 673.23(d)(2), and 674.29(b)).		
	F-4-c. Agency Leadership and Executive Management (673.23(d)(3)).		
	F-4-d. Key Staff (673.23(d)(4)).		
	F-5. The RTA specifies, or references documentation that specifies, adequate methods to ensure implementation of ASP by all employees, agents and contractors (674.29(b)).		

Section G. Safety Risk Management

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	G-1. The RTA specifies, or references documentation that specifies, a Safety Risk Management process for all system elements (673.21(b), 672.25, and 674.29(b)).		
	G-2. The RTA specifies, or references documentation that specifies, a process for hazard identification, including identifying consequences of hazards (673.25(a), 673.25(b)(1), and 674.7).		
	G-3. The RTA specifies, or references documentation that specifies, a process to include FTA, the SSOA, and other oversight authorities as sources for hazard information (673.25(b)(2)).		
	G-4. The RTA specifies, or references documentation that specifies, a process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations (673.7, 673.25(c), and 674.7).		
	G-5. The RTA specifies, or references documentation that specifies, a process to prioritize hazards based on the safety risk (673.25(c)(2)).		
	G-6. The RTA specifies, or references documentation that specifies, a process to identify mitigations or strategies necessary as a result of safety risk assessments to reduce the likelihood and severity of the consequences of hazards (673.25(a) and 673.25(d)).		
	G-7. The RTA specifies, or references documentation that specifies, a process for safety risk management, with adequate means of risk mitigation (673.25 and 674.29(b)).		

Section H. Safety Assurance

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-1. The RTA specifies, or references documentation that specifies, its methods or processes to develop and implement a Safety Assurance process covering Safety Performance Monitoring and Measurement Management of Change, and Continuous Improvement (673.27).		

Safety Performance Monitoring and Measurement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-2. The RTA specifies, or references documentation that specifies, its methods or processes to monitor system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance (673.27(b)(1)).		
	H-3. The RTA specifies, or references documentation that specifies, its methods or processes to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended (673.27(b)(2)).		
	H-4. The RTA specifies, or references documentation that specifies, its methods or processes to conduct investigations of safety events to identify causal factors (673.27(b)(3)) and that address:		
	H-4-a. SSOA requirements for notifying the SSOA of accidents including time limits for and methods of notification and what information the RTA must submit to the SSOA (674.27(a)(6) and 674.33(a)).		
	H-4-b. FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system (674.33(a)). Accident is defined as any instance involving a fatality occurring at the		

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	scene or within 30 days following the accident, one or more persons suffering serious injury (673.5 and 674.7), property damage resulting from a collision involving a rail transit vehicle or any derailment of a rail transit vehicle (674 Appendix).		
	H-4-c. What must be included in any investigation report developed on behalf of the SSOA, including at a minimum, identification of factors that caused or contributed to the accident and setting forth a Corrective Action Plan as appropriate (674.35(b)).		
	H-4-d. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event (674.35(a)).		
	H-4-e. The process through which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate (674.35(b)).		
	H-4-f. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Program (674.35(c)).		
	H-5. The RTA specifies, or references documentation that specifies, its methods or processes to monitor information reported through any internal safety reporting programs (673.27(b)(4)).		

Management of Change

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-6. The RTA specifies, or references documentation that specifies, its methods or processes to identify and assess changes that may introduce new hazards or impact the RTA's safety performance (673.27(c)(1)).		
	H-7. The RTA specifies, or references documentation that specifies, its methods or processes to evaluate any changes that may introduce new hazards or impact the agency's safety performance through the RTA's Safety Risk Management Process (673.27(c)(2)).		

Continuous Improvement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-8. The RTA specifies, or references documentation that specifies, its methods or processes to assess the RTA's safety performance (673.27(d)(1)), including:		
	H-8-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA Program Standard (674.27(a)(4)).		
	H-8-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature (674.27(a)(4)).		
	H-9. The RTA specifies, or references documentation that specifies, its methods or processes to develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment (673.27(d)(2)).		

Section I. Safety Promotion

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	I-1. The RTA specifies, or references documentation that specifies, its methods or processes to establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety (673.29(a)) that:		
	I-1-a. Includes employees and contractors (673.29(a)).		
	I-1-b. Includes refresher training, as necessary (673.29(a)).		
	I-2. The RTA specifies, or references documentation that specifies, its methods or processes to communicate safety and safety performance information throughout the agency's organization (673.29(b)).		
	I-3. The RTA specifies, or references documentation that specifies, its methods or processes to convey information on hazards and safety risks relevant to employees' roles and responsibilities (673.29(b)).		
	I-4. The RTA specifies, or references documentation that specifies, its methods or processes to inform employees of safety actions taken in response to reports submitted through an employee safety reporting program (673.29(b)).		

Section J. Corrective Action Plans

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	J-1. The RTA specifies, or references documentation that specifies, when the RTA must develop and carry out a CAP (674.37(a)).		
	J-2. The RTA specifies, or references documentation that specifies, how the RTA will submit CAPs to the SSOA for review and approval (674.37(a)).		
	J-3. The RTA specifies, or references documentation that specifies, how the RTA will manage immediate or emergency corrective actions (674.37(a)).		
	J-4. The RTA specifies, or references documentation that specifies, the required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions (674.37(a)).		
	J-5. The RTA specifies, or references documentation that specifies, how the RTA must periodically report to the SSOA on its progress in carrying out CAPs (674.37(a)).		

Section K. Documentation, Definitions and Acronyms

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	K-1. The RTA specifies, or references documentation that specifies, how the RTA will document key processes and procedures required to carry out the SMS that are not included or referenced elsewhere in the (ASP)(673.31).		
	K-2. The RTA specifies, or references documentation that specifies, how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created (673.31).		
	K-3. The RTA specifies, or references documentation that specifies, how the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to any SMS documentation maintained by the RTA upon request (673.31).		
	K-4. The RTA specifies, or references documentation that specifies, applicable definitions from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		
	K-5. The RTA specifies, or references documentation that specifies, applicable acronyms from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		

Section L. SSOA Compliance Assessment

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	L-1. The ASP is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan (674.29(a)).		
	L-2. The ASP is in compliance with the SSOA's Program Standard (674.29(a)).		
	L-3. The ASP is approved by the RTA's board of directors or equivalent entity (674.29(b)).		
	L-4. The ASP sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system (674.29(b)).		
	L-5. The ASP includes a process and timeline for annually reviewing and updating the ASP (674.29(b)).		
	L-6. The ASP includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA (674.29(b)).		
	L-7. The ASP identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA (674.29(b)).		
	L-8. The ASP includes adequate methods to support the execution of the ASP by all employees, agents, and contractors for the rail transit system (674.29(b)).		
	L-9. The ASP sufficiently addresses other requirements under the regulations at 49 CFR Part 673 (674.29(b)).		