

Appendix I. Agency Safety Plan Outline

Public Transportation Agency Safety Plan (PTASP or ASP) 49 CFR Part 673, July 19, 2018

**Proposed Outline
March 3, 2019**

Title Page
Approvals – Accountable Executive and Board of Directors

Table of Contents

Definitions – based on 673.5, along with some from 670, 672, and 674 (this could be an appendix)

Acronyms

Introduction – these next few sections are focused on process to address all of these requirements

- Applicability (673.1)
- Policy – explain how SMS and system safety are different and coexist (673.3)
- Transition from SSPP to ASP (673.11(e))
- Note any additional requirements from the SSO Program Standard, as applicable
- Review and Approval Deadline from FTA – 7/20/20 (673.11(a))
- Accountable Executive and Board of Directors approvals (673.11(a)(1))
- Modes that are covered by this ASP (673.11(b) and 673.11(f))

Safety Performance Measurement

- National Public Transportation Safety Plan – acknowledge any requirements and what the current version is (673.11(a)(4))
- Safety Performance Measures and Targets for Improvement (673.11(a)(3))
- Coordination with the State and MPO for Safety Performance Measures and Targets (673.15)

Safety Plan Review and Update

- Annual and as needed review and updates (673.11(a)(5))
- Certification of Compliance – ASP, how internal audits are involved, Training, TAM; FTA’s Certification and Assurance process, not sure what that looks like (673.11(a)(5) and 673.13) – SSPP Element 4 (overlap with SA continuous improvement)

Safety Management System (SMS) Implementation

Development of SMS at the RTA – reference SMS Implementation Plan and Progress document (673.11(a)(2))

Four components, general description (673.21) – scale the SMS to the size, scope, and complexity of its operation; establish processes and procedures

Integration with Public Safety and Emergency Management (673.11(a)(6)) – SSPP Element 11 Emergency Management (overlap in scope with SA)

Safety Management Policy (673.23) – final rule does not mention record keeping in this component, it is only listed separately – this Policy is typically signed by at least Accountable Executive, but not specifically required by the regulation; would be helpful to have all staff in the four categories mentioned sign.

Must include agency’s safety objectives (673.23(a))

Organizational Accountabilities and Responsibilities – necessary authorities, accountabilities, and responsibilities for the management of safety amongst other priorities (673.23(a) and (d))

Accountable Executive

Chief Safety Officer or SMS Executive

Agency leadership and executive management

Key staff

Employee Safety Reporting System (673.23(b))

Policy Communication Throughout Transit Agency (673.23(c))

SSPP Element 1. Policy statement and authority

SSPP Element 2. Goals and objectives

SSPP Element 3. Overview of management structure

SSPP Element 5. SSPP implementation activities and responsibilities

Safety Risk Management (673.25)

Safety Risk Management Process (673.25(a))

Safety Hazard Identification (673.25(b))

Establish methods or processes to identify hazards and consequences

Consider data and information for sources of hazards

Safety Risk Assessment (673.25(c))

Establish methods or processes to assess safety risks from hazards

Assessment of the likelihood and severity of the consequences, including existing mitigations, and prioritization of the hazards based on safety risk

Safety Risk Mitigation (673.25(d))

SSPP Element 6. Hazard management process (SRM and SP)

SSPP Element 7. Safety (and Security) certification (SRM and SA)

SSPP Element 8. System Modification (SRM and SA)

SSPP Element 21. Procurement (SRM and SA)

Includes TVA input from SEPP

Safety Assurance (673.27)

Safety Assurance Process (673.27(a))

Safety Performance Monitoring and Measurement (673.27(b))

Monitor compliance and sufficiency of procedures for operations and maintenance

Monitor operations to identify ineffective, inappropriate, or not implemented safety risk mitigations

Conduct investigations of safety events to identify causal factors

Monitor information from safety reporting systems

SSPP Element 9. Safety (and security) data collection and analysis.

SSPP Element 10. Accident/incident Investigations.

SSPP Element 11. Emergency management

SSPP Element 12. Internal safety audits.

SSPP Element 13. Rules compliance

SSPP Element 14. Facilities and equipment inspections.

SSPP Element 15. Maintenance audits and inspections.

SSPP Element 18. Local, state, and federal requirements.

SSPP Element 19. Hazardous materials program.

SSPP Element 20. Drug and alcohol program

RWP, TAM

Management of Change (673.27(c))

Process for identifying and assessing changes

If potential impact to safety performance, must evaluate in SRM

SSPP Element 7. System modification (SRM and SA)

SSPP Element 8. Safety (and security) certification (SRM and SA)

SSPP Element 17. Configuration management and control.

SSPP Element 21. Procurement (SRM and SA)

SSCP, CMP, TAM

Continuous Improvement (673.27(d))

Establish process to assess safety performance

Any deficiencies in safety performance, must develop and carry out a plan to address the identified safety deficiencies

SSPP Element 9. Safety (and security) data collection and analysis.

SSPP Element 10. Accident/incident Investigations.

SSPP Element 11. Emergency management

SSPP Element 12. Internal safety audits.

SSPP Element 4. SSPP control and update procedure, including minimum standards for safety.

Includes consideration of the SEPP Section 7 Modification of SEPP, and update of Emergency Operations/Management Plan and/or Procedures

Safety Promotion (673.29)

Competencies and Training (673.29(a))

SSPP Element 16. Training and certification program for employees and contractors. Includes Training and Drills and Exercises from SEPP, as appropriate
Need to reference Part 672 on Safety Certification Training requirements.

Safety Communication (673.29(b))

SSPP Element 6. Hazard Management, specifically Hazard Communication (SRM and SP)
SSPP Element 9. Safety (and security) data collection and analysis (SA and SP)
SSPP Element 18. Local, state, and federal requirements (SA and SP)
SSPP Element 19. Hazardous materials program (SA and SP)
SSPP Element 20. Drug and Alcohol Program (SA and SP)
This also includes safety communication and coordination with security program.

Record Keeping (673.31 and 673.11(c))

Maintain documents (in whole or by reference) set forth in its ASP that describe the programs, policies, and procedures that the agency uses to carry out its ASP, including those related to the implementation of its SMS, and results from SMS processes and activities, minimum three years. May be requested by FTA, SSOA, or others.

Appendices

Final 49 CFR Part 673
SMS Implementation Plan and Progress Document