Appendix J
Updated: January 31, 2019

Process for Review and Approval of
RTA SSPP including Checklist
And RTA SSP including Checklist

Procedure for ODOT SSO Program Review and Approval of RTA SSPP
Updated: January 29, 2014

This procedure follows the flowchart on the next page. A checklist for evaluating a draft RTA SSPP follows after the flowchart.

1. RTA submits draft/updated SSPP to ODOT SSO program for review and approval

   a. An initial submission is required to be submitted 180 days before planned passenger service

   b. Annual updates of the SSPP are required to be submitted to the ODOT SSO program in draft for review and approval by December 31

2. The ODOT SSO program reviewer uses last year's checklist (if the SSPP was previously reviewed and approved) to review the current draft RTA SSPP. The reviewer provides recommendations and suggested changes and completes the review with completion of the record-keeping table at the end of the checklist. The ODOT SSO program reviewer should add-to or change the existing checklist based on the new RTA SSPP submission, and document any changes or additions that have been made to the draft RTA SSPP in the appropriate checklist columns.

3. The ODOT SSO program reviewer determines if the current draft RTA SSPP is complete based on completion of the checklist.

   a. If the draft RTA SSPP is not complete/ready for approval, the ODOT SSO program reviewer documents the issues and requests changes or clarifications from the RTA. The recommendations and manner of communication for the recommendations are required to be documented in the record-keeping table at the end of the checklist. The ODOT SSO program reviewer and RTA communicate and determine what, if any changes are to be made to the existing document. Once the reviewer and the RTA are in agreement, then the RTA makes the negotiated changes and re-submits the updated draft RTA SSPP. If there are no changes to be made, then this process continues with 3b.

   b. If the draft RTA SSPP is complete and ready for approval, the ODOT SSO program reviewer provides the completed checklist and indicates that the draft RTA SSPP is ready to finalize. This communication with the RTA is required to be entered into the record-keeping table at the bottom of the checklist.

4. The RTA completes its internal approval and signatures, and submits the final SSPP and a transmittal letter to the ODOT SSO program. This transmittal letter should be from the RTA chief executive officer and indicates that the SSPP is up-to-date and approved. This updated RTA SSPP and transmittal letter is required by January 31.

5. The ODOT SSO program reviewer will formally approve the new RTA SSPP within 30 days in conjunction with the approval of the RTA annual report.

6. Copy the new SSPP, checklist, and any other documentation to the ODOT SSO program electronic record storage location.

Figure J-1. RTA SSPP Update Review and Approval Process

Checklist for Reviewing and Approving the RTA System Safety Program Plan

Rail Transit Agency

ODOT SSO Program Reviewer _____   Date_____

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
1	Policy Statement	• A policy statement is developed for the System Safety Program Plan (SSPP). • The policy statement describes the authority that establishes the SSPP. • The policy statement is signed and endorsed by the rail transit agency's chief executive.			
2	Purpose, Goals and Objectives	• The purpose of the SSPP is defined. • Goals are identified to ensure that the SSPP fulfills its purpose. • Objectives are identified to monitor and assess the achievement of goals. • Stated management responsibilities are identified for the safety program to ensure that the goals and objectives are achieved.			
3	Management Structure	• An overview of the management structure of the rail transit agency is provided including an organization chart. • Organizational structure is clearly defined and includes: o History and scope of service, o Physical characteristics, and o Operations and Maintenance. • A description of how the safety function is integrated into the rest of the rail transit organization is provided. • Clear identification of the lines of authority used by the rail transit agency to manage safety issues is provided.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
4	Plan Review and Modification	• An annual assessment of whether the system safety program plan should be updated is specified. • The process used to control changes to the system safety program plan is described. • Specific departments and persons responsible for initiating, developing, approving, and issuing changes to the SSPP are identified. • Required coordination with the oversight agency regarding plan modification, including timeframes for submission, revision, and approval, is addressed.			
5	Plan Implementation	• A description of the specific activities required to implement the system safety program plan is included. • Tasks to be performed by the rail transit safety function, by position and management accountability, are identified and described. • A description of the methodologies used by the system safety function to achieve their safety responsibilities should be provided. • Safety-related tasks to be performed by other rail transit departments, by position and management accountability, are identified and described. • A task matrix (or an equivalent narrative description) showing: all identified safety responsibilities, interfaces among all rail transit units responsible for each task, and the key reports or actions required, should be provided.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
6	Hazard Management Process	• The process used by the rail transit agency to implement its hazard management program, including the role of the oversight agency in providing on-going monitoring, is described. • The hazard management process includes activities for: hazard identification, hazard investigation, evaluation, and analysis, hazard control and elimination, hazard tracking. • Requirements for on-going reporting to the oversight agency relating to hazard management activities and status are specified.			
7	Safety Certification Process	• A description of the safety certification process required by the rail transit agency to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for New Starts and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment.			
8	System Modifications	• The process used by the rail transit agency to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal safety certification, but which may have safety impacts, is described.			
9	Safety Data Acquisition	• The process used to collect, maintain, analyze, and distribute safety data is clearly defined. • The management process for ensuring that the safety function within the rail transit organization receives the necessary information to support implementation of the system safety program is clarified.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
10	Reportable Event Notification, Investigation, and Reporting	• A description is provided regarding the process used by the rail transit agency to perform reportable event notification, investigation and reporting. • Criteria for determining what accidents/incidents require investigation, and who is responsible to conduct specific investigations are developed. • A description of the procedures for performing investigations, including proper documentation and reporting of findings, conclusions reached, use of hazard resolution process to develop corrective action recommendations, and follow-up to verify corrective action implementation is provided. • Notification thresholds for internal departments/functions are defined. • Criteria are specified for notifying external agencies (NTSB, state oversight agency) of accidents and incidents. • Procedures are established for documenting and reporting on accident investigations. • Process used to develop, implement, and track corrective actions that address investigation findings is specified. • Coordination with the oversight agency is specified.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
11	Emergency Management Program	• The agency's emergency planning responsibilities and requirements are identified. • A description of the process used by the rail transit agency to develop an approved, coordinated schedule for emergency management program activities is provided. • Required meetings with external agencies regarding the emergency management program are specified. • The process used to evaluate emergency preparedness, such as annual emergency field exercises, is documented. • After action reports and implementation of findings are required. • The process is explained to be used by the rail transit agency for the revision and distribution of emergency response procedures. • The agency's responsibilities for providing employee training are identified. • The agency's responsibilities for providing familiarization training to local public safety organizations are identified.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
12	Internal Safety Audit Program	• A description of the process used by the rail transit agency to ensure that planned and scheduled internal safety reviews are performed to evaluate compliance with the SSPP is included. • Identification of departments and functions subject to review is performed. • Auditors must be independent from the first line of supervision responsible for the activity being audited. • A three-year audit schedule must be developed, reviewed, maintained and updated to ensure that all 21 SSPP elements are reviewed during the audit cycle. • The process for conducting reviews, including the development of checklists, and procedures for conducting audits and issuing of findings is described. • The SSPP must describe the requirement of an annual audit report that summarizes the results of individual audits performed during the previous year and includes the status of required corrective action items. This report must be submitted to the state oversight agency for review and approval. • The process for resolving problems and disagreements, report distribution, and follow-up on corrective action procedures is described. • The internal safety audit program process and reporting must be coordinated with the state oversight agency. • The internal safety audit program process should be comprehensive.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
13	Rules Compliance	• Operating and maintenance rules and procedures that affect safety are identified. • Operating and maintenance rules and procedures that affect safety are reviewed for their effectiveness and determinations are made regarding their need to be updated. • Description of process for developing, maintaining, and ensuring compliance with operating and maintenance rules and procedures. • Techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing/compliance checks. • Techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules. • Process for documenting results and incorporating them into the hazard management program.			
14	Facilities and Equipment Inspections	• Identification of the facilities and equipment that are subject to regular safety related-inspection and testing is provided. • A description of how safety-related equipment and facilities are included in a regular inspection and testing program is provided. • Use of a written checklist for conducting facility inspections. • Descriptions of how identified hazardous conditions are entered into the Hazard Resolution Process.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
15	Maintenance Audit and Inspection Program	• A list of systems and facilities subject to a maintenance program, along with established maintenance cycle and required documentation of maintenance performed for each item, is provided. • A description of the process for tracking and resolving problems identified during inspections is provided. • Use of a written checklist for conducting maintenance audits is required.			
16	Training and Certification Program	• A description of the training and certification program for employees and contractors is provided. • Categories of safety-related work requiring training and certification are identified. • Description of the training and certification program for employees and contractors in safety-related positions is provided. • The process used to maintain and access employee and contractor training records is described. • The process used to assess compliance with training and certification requirements is described.			
17	Configuration Management Process	• A description of the configuration management control process is provided and appropriate references are made to other rail transit agency documents governing this process. • Process for making changes is described. • Authority to make configuration changes is described and assurances are provided for formal notification of all involved departments.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
18	Compliance with Local, State and Federal Safety Requirements	• A description of the safety program for employees and contractors that incorporates the applicable local, state, and federal requirements is provided. • Safety requirements that employees and contractors must follow when working on, or in close proximity to, rail transit agency controlled property are identified. • Processes for ensuring the employees and contractors know and follow the requirements are described.			
19	Hazardous Materials Program	• A description of the hazardous materials program, including the process used to ensure knowledge of and compliance with program requirements is provided.			
20	Drug and Alcohol Program	• A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements is provided.			
21	Procurement	• A description of the measures, controls, and assurances in place to ensure that safety principles, requirements, and representatives are included in the rail transit agency procurement process is provided.			

Record-keeping of Approval Process

Date	Description of Issues/Discrepancies/Action	Resolution/Communication

Procedure for ODOT SSO Program Review and Approval of RTA SSP
Updated: January 29, 2014

This procedure follows the flowchart on the next page. A checklist for evaluating a draft RTA SSP follows after the flowchart.

1. RTA submits draft/updated SSP to ODOT SSO program for review and approval
   a. An initial submission is required to be submitted 180 days before planned passenger service
   b. Annual updates of the SSP are required to be submitted to the ODOT SSO program in draft for review and approval by December 31

2. The ODOT SSO program reviewer uses last year's checklist (if the SSP was previously reviewed and approved) to review the current draft RTA SSP. The reviewer provides recommendations and suggested changes and completes the review with completion of the record-keeping table at the end of the checklist. The ODOT SSO program reviewer should add-to or change the existing checklist based on the new RTA SSP submission, and document any changes or additions that have been made to the draft RTA SSP in the appropriate checklist columns.

3. The ODOT SSO program reviewer determines if the current draft RTA SSP is complete based on completion of the checklist.
   a. If the draft RTA SSP is not complete/ready for approval, the ODOT SSO program reviewer documents the issues and requests changes or clarifications from the RTA. The recommendations and manner of communication for the recommendations are required to be documented in the record-keeping table at the end of the checklist. The ODOT SSO program reviewer and RTA communicate and determine what, if any changes are to be made to the existing document. Once the reviewer and the RTA are in agreement, then the RTA makes the negotiated changes and re-submits the updated draft RTA SSP. If there are no changes to be made, then this process continues with 3b.
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5. The ODOT SSO program reviewer will formally approve the new RTA SSP within 30 days in conjunction with the approval of the RTA annual report.

6. Copy the new SSP, checklist, and any other documentation to the ODOT SSO program electronic record storage location.
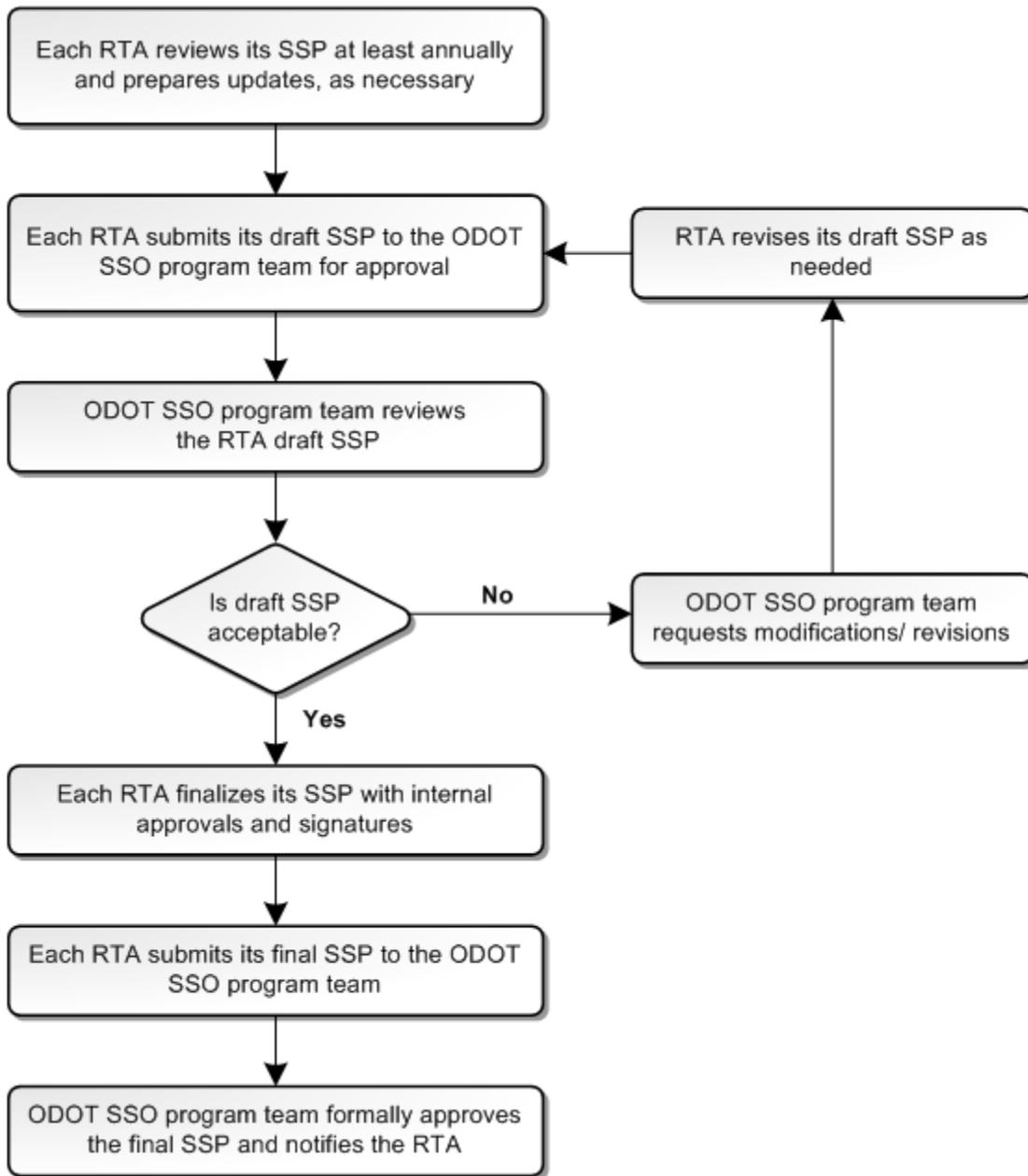
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│ Each RTA reviews its SSP at   │
│ least annually and prepares   │
│ updates, as necessary         │
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              ▼
┌──────────────────────────────┐        ┌──────────────────────────┐
│ Each RTA submits its draft SSP│◄───────│ RTA revises its draft SSP │
│ to the ODOT SSO program team  │        │ as needed                 │
│ for approval                  │        └──────────────────────────┘
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┌──────────────────────────────┐                    │
│ ODOT SSO program team reviews │                    │
│ the RTA draft SSP             │                    │
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              │                                      │
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        ◇ Is draft SSP       ── No ──► ┌──────────────────────────┐
          acceptable? ◇                │ ODOT SSO program team     │
              │                        │ requests modifications/   │
             Yes                       │ revisions                 │
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│ Each RTA finalizes its SSP    │
│ with internal approvals and   │
│ signatures                    │
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│ Each RTA submits its final SSP│
│ to the ODOT SSO program team  │
└──────────────────────────────┘
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│ ODOT SSO program team formally│
│ approves the final SSP and    │
│ notifies the RTA              │
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Figure J-2. RTA SSP Update Review and Approval Process

Checklist for Review of System Security Plan

Rail Transit Agency

ODOT SSO Program Reviewer_____   Date_____

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
1	Policy Statement	• A policy statement should be developed for the System Security Plan (SSP). • The policy statement should describe the authority that establishes the SSP, including statutory requirements and the rail transit agency's relationship with the oversight agency. • The policy statement is signed and endorsed by the rail transit agency's chief executive.			
1.1	Purpose	• The SSP should identify the purpose of the security program endorsed by the agency's chief executive. • The SSP should introduce the concept of "system security." • The SSP should introduce the concept of "emergency preparedness."			
1.2	Goals and Objectives	• The SSP should identify the goals of the SSP program endorsed by the agency's chief executive. • The SSP should identify the objectives of the SSP program endorsed by the agency's chief executive.			
1.3.	Scope	• Describe the scope of the SSP and Program.			
1.4	Security and Law Enforcement	• Describe the security and law enforcement functions that manage and support implementation of the SSP.			
1.5	Management Authority and Legal Aspects	• Describe the authority which oversees the operation and management of the rail transit agency, including its security/police function.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
1.6	Government Involvement	• Describe how the SSP interfaces with local, state and federal authorities to ensure security and emergency preparedness for the system.			
1.7	Security Acronyms and Definitions	• Provide a listing of acronyms and definitions used in the SSP.			
2.1	Background and History	▪ A description of the agency including general overview, a brief history and scope of rail transit services provided.			
2.2	Organizational Structure	• Organizational charts showing the lines of authority and responsibility as they relate to security and emergency preparedness.			
2.3	Human Resources	• Provide a categorization and break-down of all employees and contractors who work for/on the rail transit agency.			
2.4	Passengers	• Provide a description of the rail transit agency's ridership.			
2.5	Services and Operations	• Describe the rail transit agency's operations and services.			
2.6	Operating Environment	• Describe the rail transit agency's operating environment.			
2.7	Integration with Other Plans	• Describe how the SSP integrates with other plans and programs maintained by the rail transit agency.			
2.8	Current Security Conditions	• Description of the current security conditions at the rail transit agency and the types of security incidents experienced by the transit system and their frequency of occurrence.			
2.9	Capabilities and Practices	• Summary description of methods and procedures, devices, and systems utilized to prevent or minimize security breaches, including passenger education, campaigns, delay, detection, and assessment devices, and others that may be applicable.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
3.1	Responsibility for Mission Statement	• Identification of the person(s) responsible for establishing transit system security and emergency preparedness policy and for developing and approving the SSP.			
3.2	Management of the SSP Program	• Identification of the person(s) with overall responsibility for transit security and emergency preparedness, including day-to-day operations, SSP-related internal communications, liaison with external organizations, and identifying and resolving SSP-related concerns.			
3.3	Division of Security Responsibility	• Listing of SSP-related responsibilities of the personnel who work within the transit agency security/police function. • Listing of SSP-related responsibilities of other departments/functions, including their relationship to the security/police function. • Listing of security-related responsibilities for other (non-security/police) rail transit agency employees, including their relationship to the employee's other duties. • A SSP Program Roles and Responsibilities Matrix should be developed showing interfaces with other transit system departments/functions and the key reports or actions required. • The responsibilities of external agencies for supporting SSP development and implementation should be identified. • The committees developed by the rail transit agency to address security issues should be identified.			
4.1	Planning	• Identification of SSP activities and programs in place at the rail transit agency to support planning for system security and emergency preparedness.			
4.2	Organization	• Identification of the organization of SSP-related activities and programs and the ability to coordinate with external response agencies.			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
4.3	Equipment	• Description of the equipment used to support implementation of the SSP program.			
4.4	Training and Procedures	• Description of SSP-related training and procedures available to ensure employee proficiency.			
4.5	Exercises and Evaluation	• Description of SSP-related activities to ensure the conduct of emergency exercises and evaluation.			
5.1	Threat and Vulnerability Identification	• Description of the rail transit agency's activities to identify security and terrorism-related threats and vulnerabilities.			
5.2	Threat and Vulnerability Assessment	• Description of the rail transit agency's activities to assess the likely impacts of identified threats and vulnerabilities on the system and to identify particular vulnerabilities which require resolution.			
5.3	Threat and Vulnerability Resolution	• Description of how response strategies (both short- or long-term strategies) are developed for prioritized vulnerabilities, including the decision process used to determine whether to eliminate, mitigate, or accept security problems.			
6.1	Required Tasks for Goals and Objectives	• Identification of tasks to be performed to implement the goals and supporting objectives required to implement the SSP.			
6.2	Task Schedule	• General schedule with specific milestones for implementation of the security program, threat and vulnerability analyses, staff security training, and regular program reviews during the implementation process.			
6.3	Evaluation	• Description of the types of internal management reviews to be conducted, the frequencies of the reviews, and the person(s) responsible.			
7.1	Initiation of SSP Revisions	• Description of process used to initiate revisions to the security plan, gather input for the revisions, procedures for updating the security plan, and identification of responsible person(s).			

Number	Element Topic	Requirements Does the section contain or provide for the following:	Complete Yes — No	Page(s)	Reviewer Comments
7.2	Review Process	• Description of the process used to review and revise the security plan as necessary, including frequency of reviews, and responsible person(s).			
7.3	Implement Modifications	• Description of process used to communicate and disseminate new and revised procedures and other elements of the security plan to appropriate transit agency staff.			
7.4	Oversight Review	• Description of process used to make the SSP and accompanying procedures available to the oversight agency for review and approval.			
7.5	Confidentiality of SSP	• Description of the process used to ensure confidentiality of the SSP is maintained.			

Record-keeping of Approval Process

Date	Description of Issues/Discrepancies/Action	Resolution/Communication