

## Ohio Department of Transportation (ODOT) Rail Transit State Safety Oversight (SSO) Program

**Procedure SSO-006:** Annual Data Submission De-identification Procedure.

**Current Version:** January 28, 2019 [Note: all older versions of this procedure should be discarded]

**Scope:** This procedure explains the process and requirements for the RTA event investigations, internal audits, and corrective action plans (CAPs) data and information to be de-identified, coded, and delivered to the Federal Transit Administration (FTA) on an annual or as-needed/periodic basis. The focus of this procedure is assuring that the data and information provided to the FTA is both responsive to FTA's requirements while at the same time not providing any sensitive or personally specific information that is not necessary to meet the FTA's requirements.

**FTA Annual Data Submission Requirement:** The following are the requirements for the FTA Annual Data Submission as defined in 49 CFR Part 674.

### **§ 674.39 State Safety Oversight Agency annual reporting to FTA.**

- (a) On or before March 15 of each year, an SSOA must submit the following material to FTA:
- (1) The SSO program standard adopted in accordance with § 674.27, with an indication of any changes to the SSO program standard during the preceding twelve months;
  - (2) Evidence that each of its employees and contractors has completed the requirements of the Public Transportation Safety Certification Training Program, or, if in progress, the anticipated completion date of the training;
  - (3) A publicly available report that summarizes its oversight activities for the preceding twelve months, describes the causal factors of accidents identified through investigation, and identifies the status of corrective actions, changes to Public Transportation Agency Safety Plans, and the level of effort by the SSOA in carrying out its oversight activities;
  - (4) A summary of the triennial audits completed during the preceding twelve months, and the RTAs' progress in carrying out CAPs arising from triennial audits conducted in accordance with § 674.31;
  - (5) Evidence that the SSOA has reviewed and approved any changes to the Public Transportation Agency Safety Plans during the preceding twelve months; and
  - (6) A certification that the SSOA is in compliance with the requirements of this part.
- (b) These materials must be submitted electronically through a reporting system specified by FTA.

**Scope of Data to be De-identified:** The following are the data record types that need to be reviewed and de-identified.

1. **Investigation information and data** – all personal information should be removed and only a summary of the investigation detail should be provided to FTA. Each individual identified in the report information should be shortened to Operator, Supervisor, Maintainer, Contractor, Passenger/Patron, Pedestrian, Bicycle Operator, or other, as appropriate. The shortened description of the investigation should provide enough information for FTA to understand the event that occurred. All information provided in FTA's data collection tool should follow FTA's code requirements.
2. **Corrective actions** – all corrective actions provided to FTA should also be de-identified for individuals, as described for investigations.
3. **Triennial reviews/audits** – the new SSO rule now indicates that only a summary of the triennial report should be provided to FTA, not the entire report, as has been the requirement in the past.

**Updates:**

- April 8, 2016 – initial release
- January 28, 2019 – minor wording change to spell out FTA.