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

Procedure SSO-008: Rail Transit Agency (RTA) Safety Oversight and Risk Monitoring Procedure.

Current Version: January 29, 2019 [Note: all older versions of this procedure should be discarded]

Scope: This procedure explains the process and requirements for the activities that make up the ODOT SSO program risk monitoring of the Ohio RTAs. Risk Monitoring is a process used to address safety oversight of a transit agency's Safety Management System (SMS) Safety Assurance (and some aspects of Safety Risk Management) activities. As defined by the Federal Transit Administration (FTA), Safety Assurance means the processes within a transit agency's SMS that function to ensure the implementation and effectiveness of safety risk mitigation and the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Risk Monitoring Related Requirements: Risk Monitoring is used by the ODOT SSO program to stay informed about the risk environment at each Ohio RTA, as well as to be informed about changes in the risk environment, safety performance, and safety culture. This knowledge is used for systematic and risk-based safety oversight of the RTA safety program (as documented in the Agency Safety Plan and related minimum standards for safety). Risk Monitoring is accomplished through data and information collection and analyses as well as visits to the Ohio RTAs on a regular basis for meetings, investigations, audits, and inspections. These visits also include follow-up reviews of RTA corrective action plan (CAP) completion and effectiveness of those CAPs in mitigating the identified safety issues.

In order to perceive changes in the risk environment at the RTA, some time is needed between risk monitoring visits. In addition, this allows for the RTA to own their risk and time to continue their risk management and assessment processes.

The following are the requirements related to conduct of RTA Risk Monitoring (investigations, audits, and inspections) as defined in 49 CFR Part 674.

§ 674.25 Role of the State safety oversight agency.
(b) An SSOA [state safety oversight agency] must review and approve the Public Transportation Agency Safety Plan for every rail fixed guideway public transportation system within its oversight. An SSOA must oversee an RTA's execution of its Public Transportation Agency Safety Plan. An SSOA must enforce the execution of its Public Transportation Agency Safety Plan, through an order of a corrective action plan or any other means, as necessary or appropriate. An SSOA must ensure that a Public Transportation Agency Safety Plan meets the requirements at 49 U.S.C. 5329(f).

(c) An SSOA has primary responsibility for the investigation of any allegation of noncompliance with a Public Transportation Agency Safety Plan. These responsibilities do not preclude the Administrator from exercising his or her authority under 49 U.S.C. 5329(f) or 49 U.S.C. 5330.

(d) An SSOA has primary responsibility for the investigation of an accident on a rail fixed guideway public transportation system. This responsibility does not preclude the Administrator from exercising his or her authority under 49 U.S.C. 5329(f) or 49 U.S.C. 5330.

Scope of Data and Information Collection and Analyses: The following are the data and information collection and analysis sources and activities.

1. Tracking issues from results of, content of, or CAPs resolution from:
   a. Investigations (SSO Program Standard Section 6 and Appendix L)
   b. Internal Audits (SSO Program Standard Section 4)
   c. Triennial Audits (SSO Program Standard Section 5 and Appendix K)
   d. Daily Incident Log (RTA Communication and Coordination and SSO Program Standard Section 9)
   e. Hazard Log (RTA Communication and Coordination and Program Standard Section 9)

2. Analyses of the tracking issues based on these and other sources of risk information at the RTA

3. The ODOT SSO program staff also maintain a register of specific issues at each RTA that are being tracked as potential sources of risk. This list typically contains topics that indicate an actual or perceived risk may require mitigation. If an identified topic progresses to a point at which an immediate threat emerges, it will be addressed by the RTA in a timely fashion, as warranted. This monitoring is for potentially emerging or ongoing safety risks and is accomplished through a process as follows:
   a. If a specific potential safety issue is identified or experienced once, a note of that issue is made on the register along with any response or reaction from the RTA.
   b. If the specific or related potential safety issue is experienced again, or if the risk appears to be increasing to the point that it is becoming hazardous, then the ODOT SSO program staff actively start monitoring that potential risk through data collection and discussions with the appropriate RTA staff.
   c. If the specific or related potential safety issue is experienced a third time, this will require a visit by the ODOT SSO program staff to inspect, assess, and audit this situation. In some cases, these safety issues become state reportable events, and are required to be fully investigated by the Safety Department and potentially the SSOA staff.

4. Current events at the RTA, current safety performance – collected through committee meetings and on-site activities.

Scope of On-site Activities for Risk Monitoring: The ODOT SSO program staff visit the Ohio RTAs for quarterly meetings and at least once in between quarterly meetings. The content of these visits is defined by an agenda that focuses the on-site activities and meetings. These visits also include follow-up to previous visits, meetings, and review of safety performance (and culture). Activities typically completed during these visits are some or all of the following:

1. **Quarterly Meetings** – these meetings are used to go over CAPs status/progress and to go over current events at the RTA or with the SSO program.

2. **Additional Meetings** – these meetings may include any or all levels of executive management, management, supervision, and staff related to the rail system operations, maintenance, command and control, and projects.

3. **Audits and inspections** – these are usually targeted based on existing investigations or high-priority CAPs (open or closed). This activity might also include participation in internal audit activities or follow-up of those activities.

4. **CAP closures** – reviewing CAP closure evidence and effectiveness of the mitigations. It may be sufficient to just review records if the CAP was about training or completing work that is then recorded on a work order. The review of CAP closure evidence should be topics where an in

person inspection can be completed, a demonstration might be provided, or a follow-up discussion would provide additional information about the success of the CAP implementation. There is no intent to inspect every CAP in the field.

5. **Checking for new issues** – these new issues are collected through meetings and by visiting the rail systems, facilities, and infrastructure. Some of these activities are scheduled to assure that the entire rail system is visited and experienced by the ODOT SSO program staff over a certain period of time or a particular review topic may be selected.

6. **Current state of the rail system** – it is critical that the ODOT SSO program staff have experience with the current state of the rail systems and related infrastructure, including operations, maintenance, command and control, and projects.

Internal Audits, SSO Program Audits and Inspections, and the Triennial Audit: The RTA internal audits and the SSO program Risk Monitoring audits and inspections are intentionally independent, but also synergistic. In addition, CAPs resolution, closure, and assurance of success of those CAPs are related to those activities. The SSO Triennial Safety Program Audit (described in SSO Program Standard Section 5 and Appendix K) integrates with all of these audit and inspection activities, and is used to assure that safety oversight is applied to the entire safety program (including the minimum standards for safety).

Sample Agenda for Risk Monitoring Visits, Separate from and in Addition to Quarterly Meetings

- Review ongoing risk issues being monitored
- Select at least 5 CAP closures for review onsite, record of these onsite reviews will then be recorded in the tracking database; the CAPs selected should be topics that can be reviewed by inspection, demonstration, or interview
- Collect photographs (without people in them)
  - Rail vehicles and work equipment
  - Buildings – office and shops
  - Yards
- Consider a need for any Technical Training Plan (TTP) activities due for SSO staff

Updates:
- July 19, 2017 – initial release
- January 29, 2019 – minor wording changes to remove references to enforcement and proper focus on safety oversight and risk monitoring.