

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

Procedure SSO-010: Investigation Reporting Process.

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

Scope: This procedure describes the ODOT SSO Program process for safety event investigations at the Ohio Rail Transit Agencies (RTAs).

Safety Event Investigations Requirements:

§ 674.35 Investigations.

(a) An SSOA [State Safety Oversight Agency] must investigate or require an investigation of any accident and is ultimately responsible for the sufficiency and thoroughness of all investigations, whether conducted by the SSOA or RTA. 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.

(b) 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. 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.

§ 674.39 State Safety Oversight Agency annual reporting to FTA.

(b) These materials must be submitted electronically through a reporting system specified by FTA. [this includes investigation reports and corrective actions from these investigations]

Scope of Safety Event Investigations: At this time, the ODOT SSO program requires notification and investigation for criteria from both SSO Rules and a few additional significant hazardous conditions as defined in Procedure SSO-003 and Section 6 of the program standard. Safety event investigations are covered in Section 7 of the program standard.

Safety Event Investigation Procedure: Each Ohio RTA has developed standard investigation procedures, and those procedures are adopted and approved by the ODOT SSO program to allow the RTA to complete these investigations for the state. These investigation procedures are designated as minimum standards for safety and the current version of those documents are tracked in Appendix F for the Greater Cleveland Regional Transit Authority (GCRTA), and Appendix H for the Southwest Ohio Regional Transit Authority (SORTA) and the Cincinnati Bell Connector. The ODOT SSO program has the authority to join and/or lead any of these investigations, and is required to follow the local GCRTA or SORTA investigation procedures and reporting requirements in Section 7 of the program standard.

As an investigation proceeds from notification (Initial Notification Form), start of investigation, and completion of the investigation, the ODOT SSO program requires progress and final reports as follows:

- An initial facts report within one working day, which includes all key information regarding the event compiled at the scene by the RTA.

- A status report identifying the preliminary cause of the event, once this preliminary cause is established, and updates of progress every 30 days until the draft final investigation report is submitted, including corrective action plans (CAPs) with assignments and due dates

The ODOT SSO program requires that an RTA investigation report be standardized, and include at least the following topics (or as needed based on the event and investigation):

Investigation Report General Outline

- Event description
- Notification, Incident Response, and Incident Command
- Initiating Event
- Immediate Corrective Actions
- Operator Information – Fatigue Evaluation and Training
- Investigation:
 - Operator event report
 - Field supervision report
 - Employee record/history
 - Post-accident safety inspection
 - Video analysis
 - Communications analysis
- Findings, Potential Causal Factors, and Recommendations (including CAPs)
- Investigator
- Date of Report
- Distribution

If the ODOT SSO program staff is the lead investigator, progress and investigation reports will follow the same process and content. The RTA can provide input and comments based on the progress and investigation reports before the investigation report is finalized. This may require a meeting between the ODOT SSO program and RTA staff to resolve any discrepancies and comments.

If the RTA completed the draft final investigation report, the ODOT SSO program is required to independently review and agree to the content and conclusions of the investigation report, including primary cause and contributing factors of the safety event being investigated. The ODOT SSO program also independently reviews and approves any CAPs developed and requires additional evaluation if it is determined that additional or different CAPs are needed.

Once the RTA (or the ODOT SSO program) indicates that the investigation report is ready for final review, the ODOT SSO program is required to complete any independent review, discussions with the RTA about content and any changes with the investigation or CAPs, and provide the adoption and approval letter and documentation within 90 days of completion/receipt of the draft final report. The final adopted and approved investigation report and CAPs are the source of required data reporting to FTA on an annual basis, usually by March 15th of the following year. De-identification of that information for the annual report to FTA follows Procedure SSO-006 and is applied prior to the final report being submitted in the annual report to FTA.

Updates:

- August 7, 2017 – initial release
- January 29, 2019 – minor wording changes.