

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

Procedure SSO-011: Tracking, Closure, and Verification of Corrective Action Plans (CAPs)

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

Scope: This procedure provides the details of how the ODOT SSO program tracks CAPs from the RTA and ODOT SSO program monthly reports. When the RTA is ready to close a CAP, evidence must be provided by the RTA Safety Department to the ODOT SSO program for concurrence. The ODOT SSO program is required to determine if the evidence is consistent with the intent of the CAP. In addition, for those CAPs that can and should be verified at the RTA via inspections or interviews that needs to be completed and documented.

Regulatory and SSO Program Standard (SSOPS) Requirements: 49 CFR Part 674.37(a) includes the following requirement – The RTA must periodically report to the SSOA on its progress in carrying out the CAP. The SSOA [state safety oversight agency] may monitor the RTA's progress in carrying out the CAP through unannounced, on-site inspections, or any other means the SSOA deems necessary or appropriate.

49 CFR Part 674.27(a)(8) includes the additional requirements to be in the SSOPS – Also, the program standard must explain the SSOA's policy and practice for tracking and verifying an RTA's compliance with the CAP, and managing any conflicts between the SSOA and RTA relating either to the development or execution of the CAP or the findings of an investigation.

SSOPS Section 8 includes the following comments/requirements regarding CAPs disputes – If there is a dispute regarding a CAP between the ODOT SSO program and an RTA, the ODOT SSO program is the authority in this process; however, the RTA is always encouraged to explain their position and the ODOT SSO program intends to be reasonable. At the end of these discussions, the ODOT SSO program has the final approval and authority.

CAPs Status Tracking: The ODOT SSOPS Section 1 describes the requirement for the Ohio RTAs to provide monthly status updates in a CAPs table or log. SSOPS Section 8 describes the required process for developing, tracking, and closing CAPs. The monthly status tracking reports are required by the 15th of the month, unless that date falls on the weekend and then it is required by the following business day. These monthly status tracking reports from the RTAs include the status report of CAPs, hazard log, and daily safety event tracking, as well as safety committee meeting minutes for review by the ODOT SSO program. Once the monthly status tracking reports are received, the ODOT SSO program reviews all of the updates and compares that information to the ODOT SSO Program Tracking Database as well as email received during the previous month. Any discrepancies between the ODOT SSO Program records and the monthly status tracking reporting are communicated and resolved with the RTA. The ODOT SSO program status tracking report is typically completed by the 20th of the month. The open and recently closed CAPs at each RTA are reviewed at Quarterly meetings.

CAPs Closure: When the owner of a CAP at the RTA has completed the required actions, then evidence of that completion must be submitted to the RTA Safety Department for concurrence. Once the RTA Safety Department has concurred with the CAP closure, the evidence is provided to the ODOT SSO program via email (or other electronic methods for large electronic files) with any attached evidence required for closure. The evidence received and closure are recorded in the ODOT SSO program database and the evidence is saved with the source of the CAP (investigation, internal audit, external audit, triennial audit, or any other source). If there are any questions or issues with the evidence provided, the ODOT SSO program will coordinate with the RTA Safety Department to determine the course of action needed to resolve those questions or issues.

CAPs Closure Verification: Verification of CAP closure can be completed via receipt and review of the evidence provided such as records of training or pictures. In other cases, an SOP or training material may have been modified, and then the ODOT SSO program requires a copy of that updated material to review and concur with the completion of the CAP. In some cases, such as maintenance or modifications at a facility or in the field, the CAP may need to be verified in the field by inspection or via interviews with appropriate RTA or contractor staff. Any field inspection and/or interviews at the RTAs are scheduled as part of the Risk Monitoring activities as described in Procedure SSO-008. The results of these CAP closure verification activities must be recorded in the ODOT SSO program database in the ODOT Comments field, including any notes of what was reviewed and who provided input for that verification. The Risk Monitoring visits to the RTAs are also recorded in notes recorded by the ODOT SSO program staff in attendance of the meetings and/or field inspections.

Updates:

- January 28, 2019 – initial release.