WASHINGTON STATE

RAIL STATE SAFETY OVERSIGHT (SSO) PROGRAM

REFERENCE GUIDE

Washington State Department of Transportation
Public Transportation Division
State Safety Oversight Program
2901 3rd Ave.
Seattle, WA 98121

June 2022

Title VI Notice to Public, Americans with Disabilities Act information, and translation services

English
Title VI Notice to Public
It is the Washington State Department of Transportation's (WSDOT) policy to assure that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise discriminated against under any of its programs and activities. Any person who believes his/her Title VI protection has been violated, may file a complaint with WSDOT's Office of Equity and Civil Rights (OECR). For additional information regarding Title VI complaint procedures and/or information regarding our non-discrimination obligations, please contact OECR's Title VI Coordinator at (360) 705-7090.

Americans with Disabilities Act (ADA) Information
This material can be made available in an alternate format by emailing the Office of Equity and Civil Rights at wsdotada@wsdot.wa.gov or by calling toll free, 855-362-4ADA(4232). Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

Español
Notificación de Titulo VI al Público
La política del Departamento de Transporte del Estado de Washington (Washington State Department of Transportation, WSDOT) es garantizar que ninguna persona, por motivos de raza, color u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964, sea excluida de la participación, se le nieguen los beneficios o se le discrimine de otro modo en cualquiera de sus programas y actividades. Cualquier persona que considere que se ha violado su protección del Título VI puede presentar una queja ante la Oficina de Equidad y Derechos Civiles (Office of Equity and Civil Rights, OECR) del WSDOT. Para obtener más información sobre los procedimientos de queja del Título VI o información sobre nuestras obligaciones contra la discriminación, comuníquese con el coordinador del Título VI de la OECR al (360) 705-7090.

Información de la Ley sobre Estadounidenses con Discapacidades (ADA, por sus siglas en inglés)
Este material puede estar disponible en un formato alternativo al enviar un correo electrónico a la Oficina de Equidad y Derechos Civiles a wsdotada@wsdot.wa.gov o llamando a la línea sin cargo 855-362-4ADA(4232). Personas sordas o con discapacidad auditiva pueden solicitar la misma información llamando al Washington State Relay al 711.

한국어-Korean

제6조 관련 공지사항

워싱턴 주 교통부(WSDOT)는 1964년 민권법 타이틀 VI 규정에 따라, 누구도 인종, 피부색 또는 출신 국가를 근거로 본 부서의 모든 프로그램 및 활동에 대한 참여가 배제되거나 혜택이 거부되거나, 또는 달리 차별받지 않도록 하는 것을 정책으로 하고 있습니다. 타이틀 VI에 따른 그/그녀에 대한 보호 조항이 위반되었다고 생각된다면 누구든지 WSDOT의 평등 및 민권 사무국(OECR)에 민원을 제기할 수 있습니다. 타이틀 VI에 따른 민원 처리 절차에 관한 보다 자세한 정보 및/또는 본 부서의 차별금지 의무에 관한 정보를 원하신다면, (360) 705-7090으로 OECR의 타이틀 VI 담당자에게 연락해주십시오.

미국 장애인법(ADA) 정보

본 자료는 또한 평등 및 민권 사무국에 이메일 wsdotada@wsdot.wa.gov 을 보내시거나 무료 전화 855-362-4ADA(4232)로 연락하셔서 대체 형식으로 받아보실 수 있습니다. 청각장애인은 워싱턴주 중계 711로 전화하여 요청하실 수 있습니다.

русский-Russian
Раздел VI Общественное заявление

Политика Департамента транспорта штата Вашингтон (WSDOT) заключается в том, чтобы исключить любые случаи дискриминации по признаку расы, цвета кожи, или национального происхождения, как это предусмотрено Разделом VI Закона о Гражданских Правах 1964 года, а также случаи недопущения участия, лишения льгот, или другие формы дискриминации в рамках любой из своих программ и мероприятий. Любое лицо, которое считает, что его средства защиты в рамках раздела VI были нарушены, может подать жалобу в Ведомство по Вопросам Равенства и Гражданских Прав WSDOT (OECR). Для дополнительной информации о процедуре подачи жалобы на несоблюдение требований раздела VI, а также получения информации о наших обязательствах по борьбе с дискриминацией, пожалуйста свяжитесь с координатором OECR по разделу VI по телефону (360) 705-7090.

Закон США о защите прав граждан с ограниченными возможностями (ADA)

Эту информацию можно получить в альтернативном формате, отправив электронное письмо в Ведомство по вопросам равенства и гражданских прав по адресу wsdotada@wsdot.wa.gov или позвонив по бесплатному телефону 855-362-4ADA(4232). Глухие и слабослышащие лица могут сделать запрос, позвонив в специальную диспетчерскую службу штата Вашингтон по номеру 711.

tiếng Việt-Vietnamese
Thông báo Khoản VI dành cho công chúng

Chính sách của Sở Giao Thông Vận Tải Tiểu Bang Washington (WSDOT) là bảo đảm không để cho ai bị loại khỏi sự tham gia, bị từ khước quyền lợi, hoặc bị kỳ thị trong bất cứ chương trình hay hoạt động nào vì lý do chủng tộc, màu da, hoặc nguồn gốc quốc gia, theo như quy định trong Mục VI của Đạo Luật Dân Quyền năm 1964. Bất cứ ai tin rằng quyền bảo vệ trong Mục VI của họ bị vi phạm, đều có thể nộp đơn khiếu nại cho Văn Phòng Bảo Vệ Dân Quyền và Bình Đẳng (OECR) của WSDOT. Muốn biết thêm chi tiết liên quan đến thủ tục khiếu nại Mục VI và/hoặc chi tiết liên quan đến trách nhiệm không kỳ thị của chúng tôi, xin liên lạc với Phối Trí Viên Mục VI của OECR số (360) 705-7090.

Thông tin về Đạo luật Người Mỹ tàn tật (Americans with Disabilities Act, ADA)

Tài liệu này có thể thực hiện bằng một hình thức khác bằng cách email cho Văn Phòng Bảo Vệ Dân Quyền và Bình Đẳng wsdotada@wsdot.wa.gov hoặc gọi điện thoại miễn phí số, 855-362-4ADA(4232). Người điếc hoặc khiếm thính có thể yêu cầu bằng cách gọi cho Dịch vụ Tiếp âm Tiểu bang Washington theo số 711.

Arabic - عَرَبِيّة

فيضمان عدم استبعاد أي شخص، على أساس العرق (WSDOT) إشعار للجمهور بتتمثل سياسة وزارة النقل في الولاية ونشرطن العنوان أو اللون أوالأصل اللقومي من المشاركة في أي من برامجها وأنشطتها أوالحرمان من المفوائد المتاحة بموجبها أوالتعرض للتمييز في مخالف ولمن لأي شخص يعتقد أنه تم انتهاك حقوقها الحقيفيلها 1964 ذلك، كما هو منصوص عليه في الباب السادس من قانون الحقوق المدنية لعام للحصول على معلومات. التبلغ لوزارة النقل في الواي تواشنطن (OECR) الباب السادس يقديم شكوى إلى مكتب المساواة والحقوق المدنية أوبش أن التزامنا ببعدم التمييز بموجب الباب السادس، يرجى التصال بمنسق الباب/ضافي بشأن إجراءات الشكاوى و السادس في مكتب المساواة والحقوق المدنية على الرقم 7090-705 (360).

中文 – Chinese

《权利法案》Title VI公告

<華盛頓州交通部(WSDOT)政策規定，按照《1964 年民權法案》第六篇規定，確保無人因種族、膚色或國籍而被排除在WSDOT任何計畫和活動之外，被剝奪相關權益或以其他方式遭到歧視。如任何人認為其第六篇保護權益遭到侵犯，則可向WSDOT的公平和民權辦公室(OECR)提交投訴。如需關於第六篇投訴程式的更多資訊和/或關於我們非歧視義務的資訊，請聯絡OECR的第六篇協調員，電話(360) 705-7090。

《美国残疾人法案》(ADA)信息

可向公平和民權辦公室發送電子郵件wsdotada@wsdot.wa.gov或撥打免費電話

855-362-4ADA(4232)，以其他格式獲取此資料。听力丧失或听觉障碍人士可拨打711联系Washington州转接站。

Af-soomaaliga – Somali
Ciwaanka VI Ogeysiiska Dadweynaha

Waa siyaasada Waaxda Gaadiidka Gobolka Washington (WSDOT) in la xaqiijiyo in aan qofna, ayadoo la cuskanaayo sababo la xariira isir, midab, ama wadanku kasoo jeedo, sida ku qoran Title VI (Qodobka VI) ee Sharciga Xaquuqda Madaniga ah ah oo soo baxay 1964, laga saarin ka qaybgalka, loo diidin faa'iidooyinka, ama si kale loogu takoorin barnaamijyadeeda iyo shaqooyinkeeda. Qof kasta oo aaminsan in difaaciisa Title VI la jebiyay, ayaa cabasho u gudbin kara Xafiiska Sinaanta iyo Xaquuqda Madaniga ah (OECR) ee WSDOT. Si aad u hesho xog dheeraad ah oo ku saabsan hanaannada cabashada Title VI iyo/ama xogta la xariirta waajibaadkeena ka caagan takoorka, fadlan la xariir Iskuduwaha Title VI ee OECR oo aad ka wacayso (360) 705-7090.

Macluumaadka Xeerka Naafada Marykanka (ADA)

Agabkaan ayaad ku heli kartaa qaab kale adoo iimeel u diraaya Xafiiska Sinaanta iyo Xaquuqda Madaniga ah oo aad ka helayso wsdotada@wsdot.wa.gov ama adoo wacaaya laynka bilaashka ah, 855-362-4ADA(4232). Dadka naafada maqalka ama maqalku ku adag yahay waxay ku codsan karaan wicitaanka Adeega Gudbinta Gobolka Washington 711.

Translation Services

If you have difficulty understanding English, you may, free of charge, request language assistance services by calling 360-705-7921 or email us at: PubTrans@wsdot.wa.gov

Español - Spanish
Servicios de traducción

Aviso a personas con dominio limitado del idioma inglés: Si usted tiene alguna dificultad en entender el idioma inglés, puede, sin costo alguno, solicitar asistencia lingüística con respecto a esta información llamando al 360-705-7921, o envíe un mensaje de correo electrónico a: PubTrans@wsdot.wa.gov

tiếng Việt-Vietnamese
các dịch vụ dịch thuật

Nếu quý vị không hiểu tiếng Anh, quý vị có thể yêu cầu dịch vụ trợ giúp ngôn ngữ, miễn phí, bằng cách gọi số 360-705-7921 hoặc email cho chúng tôi tại: PubTrans@wsdot.wa.gov

한국어-Korean

번역 서비스

영어로 소통하는 것이 불편하시다면, 360-705-7921 으로 전화하시거나 다음 이메일로 연락하셔서

무료 언어 지원 서비스를 요청하실 수 있습니다: PubTrans@wsdot.wa.gov

русский-Russian
Услуги перевода

Если вам трудно понимать английский язык, вы можете запросить бесплатные языковые услуги, позвонив по телефону 360-705-7921 или написав нам на электронную почту: PubTrans@wsdot.wa.gov

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لُغَة - Arabic
خدمات الترجمة

إذا كنت تجد صعوبة في فهم اللغة الإنجليزية، فإنك تستطيع أن تطلب خدمات المساعدة اللغوية مجاناً، وذلك عن طريق الاتصال بالرقم 360-705-7921 أو مراسلتنا عبر البريد الإلكتروني: PubTrans@wsdot.wa.gov

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Af-soomaaliga - Somali
Adeegyada Turjumaada

Haddii ay kugu adag tahay inaad fahamtid Ingiriisida, waxaad, bilaash, ku codsan kartaa adeegyada caawimada luuqada adoo wacaaya 360-705-7921 ama iimayl noogu soo dir: PubTrans@wsdot.wa.gov

中文 – Chinese
翻译服务

如果您难以理解英文，则请致电：360-705-7921，或给我们发送电子邮件：

PubTrans@wsdot.wa.gov，请求获取免费语言援助服务。

01 Introduction to the Reference Guide

This Reference Guide is a companion document to the Washington State Department of Transportation (WSDOT) Rail State Safety Oversight (SSO) Program Standard. The Program Standard provides the regulatory requirements and expectations for the SSO program and the rail properties. This documents acts as a guide for executing SSO program processes and activities, and completing the expected interactions with rail properties. The documents that make up the Program Standard and the Reference Guide are available on the WSDOT Public Transportation Division website: Washington State Rail Safety Oversight Program Standard M 3138.

The following list provides an overview of the sections/topics described as part of this Reference Guide. The sections, documents, and forms in this guide can be downloaded separately from the website and can be tracked in the version tracking table on page 4.

Reference Guide Content Overview

- 01 Introduction and Version Tracking Table
- 02 SSO Program Standard Updates
- 03 Annual SSO Program Status Report
- 04 Rail Property Agency Safety Plans
- 05 Conflict of Interest (COI)
- 06 FTA SSOR System
- 07 Use of Enforcement Authority
- 08 SSO Program Data Management
- 09 Quarterly Program Status Report
- 10 Rail Property Data Analyses
- 11 Internal SSO Program Meetings
- 12 Triennial FTA Headquarters Audit of the SSO Program
- 13 Notifications and Investigations Processes
- 14 Internal Safety Program Audits
- 15 Corrective Action Plans (CAPs)
- 16 Tracking and Participating in Rail Property Committee Meetings
- 17 Risk Monitoring Process and Activities
- 18 Management of Change Requirements and Tracking
- 19 Triennial Safety Program Audit

Version Tracking for the Reference Guide

Section/Procedure/Form	Current Version
01 Introduction and Version Tracking Table	June 2022
02 SSO Program Standard Updates	June 2022
02a System Security Plan (SSP)/Security and Emergency Preparedness Plan (SEPP) Description	June 2022
03 Annual SSO Program Status Report	June 2022
04 Rail Property Agency Safety Plans	June 2022
04a ASP Review Checklist from FTA with Added Guidance	June 2022
04b Checklist to Account for Safety Program Description	June 2022
04c ASP Review Checklist from FTA Template	June 2022
05 Conflict of Interest (COI)	June 2022
05a Conflict of Interest (COI) Form	June 2022
06 FTA State Safety Oversight Reporting (SSOR) System	June 2022
06a Annual Rail Property Submission Checklist	June 2022
07 Use of Enforcement Authority	June 2022
08 SSO Program Data Management	June 2022
09 Quarterly Program Status Report	June 2022
10 Rail Property Data Analyses	June 2022
11 Internal WSDOT SSO Program Meetings	June 2022
12 Triennial FTA Headquarters Audit of the SSO Program	June 2022
13 Notifications and Investigations Processes	June 2022
13a Unacceptable Hazardous Condition Initial Report	June 2022
13b Accident Notification Form	June 2022
13c Investigation Checklist	June 2022
14 Internal Safety Audits	June 2022
15 Corrective Action Plans (CAPs)	June 2022
15a Sample CAPs Log	June 2022
15b Change of Required CAP Information	June 2022
15c Review of CAP Closure Evidence	June 2022
15d CAP Development and Approval Form	June 2022
16 Tracking Rail Property Committee Meetings	June 2022
17 Safety Risk Monitoring Process and Activities	June 2022
17a Meeting Sign-In Sheet	June 2022
17b Example CAPs Analysis for Quarterly	June 2022
17c CAP Status Summary Example Presentation	June 2022
17d Risk Monitoring Topics Template	June 2022

Section/Procedure/Form	Current Version
17e Ride Log Example Template	June 2022
17f Risk Monitoring Facilities Visits	June 2022
18 Management of Change	June 2022
18a Project Assessment Tool	June 2022
18b SSO Procedure for Safety Certification Plans of Major Projects	June 2022
18c Checklist for Review of a Safety Certification Plan	June 2022
18d Listing of Sound Transit Capital Projects	June 2022
19 Triennial Safety Program Audit	June 2022

02 SSO Program Standard Updates

Version: June 2022

It is the primary responsibility of the WSDOT SSO program to develop and administer a Program Standard that establishes processes and procedures governing the conduct of the oversight program at the state level. The Program Standard also provides guidance to regulated rail properties concerning the processes and procedures that must be implemented by the rail properties to assure compliance with the WSDOT SSO program. The Program Standard, appendices, and Reference Guide are required to be reviewed at least annually and any changes/revisions are required to be a part of the WSDOT SSO program's annual submission to the FTA SSO program, as described in Program Standard Section 9. Annual Reporting to FTA.

The WSDOT SSO Program Standard is also required to address minimum standards for safety at the Washington rail properties. These standards are intended to include rail safety-related practices and procedures such as the rail property's Agency Safety Plan (ASP), and other related rail property documents and procedures associated with their safety program documentation. The minimum safety standards required by the WSDOT SSO program are industry-based, but additional rail property-developed safety standards are used by the properties and documented in their policies, program documents, plans, and procedures. The WSDOT SSO program tracks the current versions of the rail property safety program related control documents where the minimum standards for safety are recorded.

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49 CFR §674.25(a) – Role of the State safety oversight agency
An SSOA must establish minimum standards for the safety of all rail fixed guideway public transportation systems within its oversight. These minimum standards must be consistent with the National Public Transportation Safety Plan, the Public Transportation Safety Certification Training Program, the rules for Public Transportation Agency Safety Plans and all applicable Federal and State law.

49 CFR §674.27(a)(2) – State safety oversight Program Standards
Program Standard development. The SSO Program Standard must explain the SSOA's process for developing, reviewing, adopting, and revising its minimum standards for safety, and distributing those standards to the rail fixed guideway public transportation systems.

Guidance from the FTA on the Program Standard is available at:
https://www.transit.dot.gov/regulations-and-guidance/safety/program-standard-technical-assistance-guide.

Procedure SSO-001. Program Standard Updates

The WSDOT SSO Program Manager is responsible for changes to the Program Standard. These changes might be the result of internal or external audits, policy changes, requirement changes from FTA or the state, and/or organizational changes. In addition, per regulation and FTA guidance, the Program Standard must be reviewed at least annually to check for any needed revisions or additions. This annual review of the Program Standard also includes an annual review for any updates to the rail property minimum standards for safety/safety program related control documents. All participants involved in the WSDOT SSO program are welcome to offer changes or additions to the Program Standard. Each comment or recommendation received will be reviewed by the WSDOT SSO program in a timely manner.

Program Standard Body Update – Significant Change: A significant change to the Program Standard body would include any changes to policy or requirements of the WSDOT SSO program or the Washington rail properties. Updates of actual policy in the body of the Program Standard will require approval and sign-offs from all program participants. This type of change will cause a full version number change in the first digit, e.g., Version 3.1 would change to Version 4.0. A row will be added on the Program Standard Version Tracking page to explain the update.

Proposed significant changes to the Program Standard will be circulated for review in draft form to applicable WSDOT SSO program management and staff and the Washington rail properties. Following review and comment, draft changes must be approved by the WSDOT Public Transportation Division Director and incorporated into the final revision of the Program Standard.

Once the final/updated Program Standard has been approved within WSDOT, each of the Washington rail properties will receive a copy for review and will be required to acknowledge the updated Program Standard by filling in the signature page for the accountable executive and chief safety officer at the rail property. The signed page(s) should be sent back to the WSDOT SSO program. Any corrections or issues at this point in the process will be reviewed and appropriate changes will be made as needed and approved by the WSDOT Public Transportation Division Director.

The finalized Program Standard will then be notified to the WSDOT SSO program staff and Washington rail properties. The program standard will also be available electronically in PDF format and placed on WSDOT's website at https://wsdot.wa.gov/engineering-standards/all-manuals-and-standards/manuals/rail-safety-oversight-program-standard. Once the updated Program Standard has been finalized, it is the responsibility of the Washington rail properties to pass these requirements on to any appropriate staff or contractors.

Program Standard Body Update – Administrative Change: An administrative change to the Program Standard body are minor in nature without any substantial policy change or expectations of the WSDOT SSO program or the Washington rail properties. Administrative changes will follow an abbreviated update process that will include review by appropriate staff at the Washington rail properties and approval by the WSDOT SSO Program Manager and will not require the formal signatures or acknowledgement of the changes by the Washington rail properties. This type of change will cause the Program Standard version number to change in the second digit, e.g., Version 3.0 to Version 3.1. A row will be added on the Version Tracking page to explain the update.

This Administrative Change will be notified to the WSDOT SSO program staff and the Washington rail properties and then available electronically in PDF format and placed on

WSDOT's website: [Rail Safety Oversight Program Standard | Manuals | WSDOT (wa.gov)](#). Once the updated Program Standard has been finalized, it is the responsibility of the Washington rail properties to pass these requirements on to any appropriate staff or contractors.

Program Standard Appendices or Reference Guide Updates: The WSDOT Rail Transit Program Standard includes an appendices and Reference Guide separate from the body of the Program Standard. Updates to the appendices and Reference Guide will follow an abbreviated update process that will include review by appropriate staff at the Washington rail properties and approval by the WSDOT SSO Program Manager, and will not require the formal signatures or acknowledgement of the changes by the Washington rail properties. When an appendix or any part of the Reference Guide are updated, the version date in the version tracking table with the appendices and the version tracking table in the Reference Guide will reflect any updates.

Updates to the appendices or Reference Guide will be notified to the WSDOT SSO program staff and Washington rail properties and available electronically in PDF format on WSDOT's website: [Rail Safety Oversight Program Standard | Manuals | WSDOT (wa.gov)](#).

A list of the appendices, Reference Guide, and current version date is available at the front of the appendices, in Reference Guide Section 01, and online so all WSDOT SSO program participants have access to the current version of each appendix or procedure.

Program Standard Updates Submission to FTA: Any changes to the WSDOT Rail Transit Program Standard, appendices, or Reference Guide since the last annual submission to FTA must be provided to FTA via the next annual submission, typically March 31. If the Program Standard, appendices, or Reference Guide have not been changed in the previous year, documentation of the annual check will be provided to FTA as part of the annual submission. This annual review/check is typically a summary of any noted changes needed. This provides an indication of whether or not an update to the program standard, appendices, or reference guide were needed. Finally, if an update were needed, the review provides the potential timing of when the update would occur. This summary then becomes a program record as part of the annual review.

Minimum Standards for Safety/Safety Program Related Control Documents
FTA provided guidance to SSO programs that the State is required to have the authority to develop, review, adopt, and revise minimum standards for safety at their rail properties, and this authority exists by incorporation of the requirements from 49 U.S.C. Section 5329(e) and 49 CFR Part 674. However, FTA also published in 49 CFR Part 673 that minimum standards for safety are reserved for standards documents that FTA provides industry notification and comment via the Federal Register.

Minimum standards for safety have been envisioned within the WSDOT SSO program to be safety-related standards adopted and documented by the Washington rail properties that govern the safe operations, command and control, and inspection and maintenance of the rail systems, including facilities, infrastructure, and rail-related vehicles. These safety-related standards generally already exist at the rail properties; however, experience from accident investigations, audits, and updates of procedures may indicate a need to update or develop new safety standards for the rail property. The WSDOT SSO program requires that the safety program related control documents from each rail property will need to be tracked, reviewed, and approved when changes are made. **The WSDOT SSO program and the rail properties must check annually for any new or updated minimum standards for safety/safety program related control documents.**

All of the safety-related standards should be based on existing transit industry standards (such as standards from the American Public Transportation Association (APTA), National Fire Protection Association, American Railway Engineering and Maintenance of Way Association (AREMA), etc.) that have been customized for the rail property equipment, infrastructure, and operations. The existing transit industry related standards will also need to be checked for updates and then those updates will need to be integrated into the existing minimum safety standards documents. These documents may also be those provided by vehicles, facilities, infrastructure, or equipment suppliers to the rail property.

The FAST Act added a requirement for FTA (in Section 5329) to include minimum standards for safety into their National Safety Plan as well as to develop a compendium of transit industry related safety standards. FTA has also convened a working group of transit industry experts to consider development and enforcement of minimum standards for safety that are not currently requirements by other federal agencies. This activity and related documents are available at Federal Transit Administration | US Department of Transportation.

The general list of minimum standards for safety or safety program related control documents that are tracked by the WSDOT SSO program are listed below with a description of each type of document and a specific document and version list is provided in the Program Standard appendices for each Washington rail properties (Appendix E through H). Note that the WSDOT SSO program requires direct access to minimum safety standard documents, any changes to these documents, and to similar/related documents developed by the rail properties. Each of these documents has its own update process based on requirements or experience.

Safety Program Related Control Documents Updates: During the annual review of the Program Standard for update, WSDOT SSO program staff should review the safety program related control documents with each rail property to ensure the WSDOT SSO program has current versions, receives any changed documents, and updates each rail property appendix tracking table.

- **Washington State Rail SSO Program Standard** – This document provides a description of the processes used by the WSDOT SSO program and requirements of the Washington rail properties, including minimum safety standards, distributing the Program Standard, and related minimum safety standards.

- **Agency Safety Plan (ASP)** – The ASP contains requirements for the safety program and SMS-related activities at the rail properties. This document and its requirements are discussed further in Program Standard Section 4. Reference Guide Section 04 details ASP requirements, provides an outline of the ASP, and gives a checklist for the review and approval process of an ASP by the SSO program.

- **System Security Plan (SSP)/Security and Emergency Preparedness Plan (SEPP)** – This security program document describes the requirements for system security and emergency preparedness at the rail property. Note that the new SSO Rule no longer defines the content of the SSP/SEPP, its processes, or procedures. However, the WSDOT SSO program now considers these security program documents as minimum safety standards in terms of the overlap with the safety program at the rail property (risk assessment and management, and emergency preparedness). The WSDOT SSO program requires that the rail property develop an appropriate security program document and the WSDOT SSO program will provide oversight of that document and the processes that it represents, but only from the safety program (all-hazards) perspective. The current description of the content of an SSP/SEPP is provided in Reference Guide Section 02a.

- **Emergency Operations Plan (EOP) –** This document provides the coordination and preparedness activities inside and outside of the rail property.

- **Rail Operating Rule Book –** These are the rules that operators and others working around the rail system must follow.

- **Right-of-Way (ROW) or Roadway Worker Protection (RWP) Plan** – This document is related to the Rail Operating Rule Book from the perspective of the protections and procedures for workers on the rail ROW.

- **Command and Control/Train Control Standard Operating Procedures (SOPs)** – These SOPs are used by command and control staff/supervision to manage operations on the rail system for both usual and unusual operations, as well as managing maintenance and workers on the ROW. These SOPs should include troubleshooting information for frequent problems and managing emergencies on the rail system. These SOPs include the function of load/power control/management.

- **Safety Event Investigation Procedures at the Rail Property** – This procedure includes a description of the types of events that need notification and investigation, who will perform those requirements, causal and contributing factor analysis, hazard analysis, and development of recommendations and corrective actions. This procedure is also required to be adopted and approved by the WSDOT SSO program in order to authorize the rail property to be the lead investigator for the WSDOT SSO program. These procedures are also mentioned in this Program Standard Sections 6 and 7 and described in Reference Guide Section 13.

- **Procedure requiring review of SOPs related to Safety** – This procedure requires that the minimum safety standards/safety program related control documents at the rail property are also required to be reviewed, agreed to, and approved by the Chief Safety Officer.

- **Preliminary Hazard Analysis (PHA), Operational Hazard Assessment (OHA), Safety Risk Management Plan (SRMP), and Safety Risk Register –** These documents are

used to track existing and potential hazards in the operations and maintenance of transit service, assessment of those hazards, consideration of mitigations, and actual selection of mitigations. These documents are kept up to date based on risk monitoring from safety assurance activities at the rail property.

- **Safety Certification Plan (SCP) –** This plan provides the required activities from the rail property safety program for assuring that safety certification is completed for capital projects, new equipment/infrastructure, or system refurbishment and modification that impact safety and are deemed necessary by the WSDOT SSO program. The main topics for safety certification are related design criteria, participation of the Chief Safety Officer, and a process of the rail property assuring that all safety design criteria exist, were comprehensive, and were properly addressed, including integrated testing, configuration management, and exceptions formally accepted by the rail property.

- **Configuration Management Plan (CMP) –** Configuration Management is a required element/function within the rail property safety program, along with safety certification and system modifications, as well as safety-related requirements for procurement. This is the focus of Safety Assurance Management of Change.

- **Transit Asset Management (TAM) Plan –** This is a plan required for rail properties and is related to the CMP, but with a focus on the state of good repair of transit assets and prioritization of planned projects and replacements.

- **Field Supervision SOPs** – These SOPs are for supervision out on the rail system for support of service delivery, responsiveness to passengers, and safety. The field supervisors will often be the first supervision to arrive at the scene of a safety event on the rail system and provide at least initial investigation of safety events on the rail system.

- **Inspection and Maintenance Manuals, SOPs, and Standards** – These documents provide the requirements for inspection and maintenance of the rail system, including facilities, infrastructure, and related vehicles. These documents should have the customized requirements/standards for preventive and corrective maintenance, inspection, and troubleshooting for equipment problems.

02a System Security Plan (SSP)/Security and Emergency Preparedness Plan (SEPP) Description

Version: June 2022

The new State Safety Oversight (SSO) Rule (Part 674) no longer specifically requires the system security plan (SSP) or the security and emergency preparedness plan (SEPP). However, the SSP is now included as part of the SSO program as a minimum standard for safety or safety program related control document as part of the WSDOT SSO program all-hazards approach to the system safety program. The WSDOT SSO program continues to require the SSP documentation, but no longer has jurisdiction over the content of the SSP. The following SSP standard is provided as an example of the content of an SSP for the Washington rail properties.

Objective

The SSP should identify the legislative authority that created the rail property, (or an organization contracted by a duly authorized transit authority or other governmental agency), and a policy statement, endorsed by upper management, that embraces security. The plan should describe the controls that are used to coordinate, communicate, and maintain liaison with the WSDOT SSO Program on security matters.

System Security Plan Example Contents

Example contents of an SSP developed for a rail property operating under the WSDOT SSO Program is identified as follows:

At a minimum, the System Security Plan and/or Security and Emergency Preparedness Plan developed by the rail property should:

(a) Identify the policies, goals, and objectives for the security program endorsed by the agency's accountable executive;

(b) Document the rail property's process for managing threats and vulnerabilities during operations, and for major projects, extensions, new vehicles and equipment, including the integration with the safety certification process;

(c) Identify controls in place that address the personal security of passengers and employees;

(d) Document the rail property's process for conducting internal security reviews to evaluate compliance and measure the effectiveness of the SSP; and

(e) Documents the rail property's process for making its SSP and accompanying procedures available to the oversight agency for review and approval.

Sample Format for System Security Plans

<u>System Security Plan Introduction</u>

Rail properties are primarily vulnerable to certain types of crimes, including vandalism, graffiti, pick pocketing and purse snatching, fare avoidance, trespassing, and other security-related problems; however, transit systems have become potential targets for more significant public safety events. It is, therefore, necessary to identify these security threats and reduce the system's vulnerability to them to a practicable level. To emphasize the importance of security in

all aspects of a rail property, a set of comprehensive security activities should be established and documented in the System Security Plan. The overall goal of the security program is to maximize the level of security afforded to passengers, employees, and property.

To be effective, the security aspects of the SSP/SEPP are oriented toward identifying potential security problems and implementing remedial and/or mitigating measures before security problems arise. It is also important to recognize the sensitivity of security-related plans and procedures, as they are tactical in nature, and treated with a reasonable degree of confidentiality. For this reason, the security elements of the SSP/SEPP identify items, which need to be considered, but does not provide specific tactical related information.

Security Policy Statement
The highest levels of rail property management set forth its policy embracing security. The appropriate management approval is denoted by signature on the policy statement and circulation of the statement to all departments. As part of this section, top management provides direction to the agency for the development of an SSP/SEPP that encompasses the rail property's security policy statement in all facets of its operations.

Purpose of Security Program
The SSP/SEPP identifies the purpose of the security program endorsed by the rail property's accountable executive. The purpose of the SSP/SEPP should ensure a planned, documented, organized response to actual and potential security threats to the system, and to address these threats with proactive measures and response techniques that manage and minimize the outcome of security breaches or related events.

Goals and Objectives
This SSP/SEPP should identify the goals of the security and emergency preparedness programs endorsed by the rail property's accountable executive. Goals should be realistic and presented in qualitative terms.

Scope of Security Program
Provide the scope of the Security Program to cover all agency personnel and be applicable to all agency operations:

- Each department/function that supports the rail property's SSP/SEPP and cooperates in achievement of the SSP/SEPP security objectives; each rail property employee cooperates with the system safety and security/police functions and provides security with any information requested to aid in any threat or vulnerability identification, assessment or resolution, and/or security investigation; and
- Accountability for security and emergency preparedness of the rail transit system rests with each employee, supervisor, manager, and director

The scope includes the coordination and integration of emergency response plans with the rail property and jurisdictions in the system's service area.

Security and Law Enforcement
This section of the SSP/SEPP describes the approach used by the rail property for security and law enforcement functions including management and support for the implementation of the SSP/SEPP. An overview of the rail property security authority should be provided, along with an overview of activities.

When the rail property employs its own security (non-sworn) force or purchases security services from a private company, the plan should provide an overview of these security services and identify the cooperation with local law enforcement agencies in the transit system's service area.

Where a Memorandum of Understanding (MOU) exists, the SSP/SEPP should discuss what arrangements are in place. The rail property should indicate how information regarding response to incidents, planning and deployment, joint operations, special events, and threat and crime information is shared.

Management Authority and Legal Aspects

This section of the SSP/SEPP describes the authority which oversees the operation and management of the rail property, including its police/security function.

The section identifies the charter or legislation which created the rail transit system and addresses the roles of the executive leadership and the manager of the security function in executing the SSP/SEPP. The roles and responsibilities of middle management and line personnel may be briefly introduced and described (i.e., management within the transit security/police function, as well as the roles of supervisors and operations and maintenance personnel).

The section briefly discusses the ordinances, codes, rules and other laws enforced on the rail transit system, for example, felonies and misdemeanors applicable to the rail property's service area, fare evasion, vandalism, unlawful entry (trespass) upon transit property or vehicles, interference with movement of or access to transit vehicles, disorderly conduct on transit property or in transit vehicles, and offensive physical contact with a transit passenger, employee, agent, security or police agency.

Government Involvement

This section of the SSP/SEPP describes how the SSP/SEPP interfaces with local, state, and federal authorities to ensure security and emergency preparedness for the rail property.

This section of the SSP/SEPP introduces and briefly describes the local, state, and federal agencies with whom the rail property coordinates for security and emergency preparedness. For example, at the federal level, the rail property may coordinate with government agencies for funding support and to ensure compliance with security regulations and grant requirements. Federal partners may include: Federal Transit Administration (FTA), Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), Department of Homeland Security (DHS), and its subsidiary bureaus, including the Federal Emergency Management Agency (FEMA) and Transportation Security Administration (TSA).

Security Acronyms and Definitions

Identify all of the acronyms and definitions used in the SSP/SEPP.

System Description

Background & History of System
Briefly describe the system's characteristics. Include a description of when and how the transit system was established, history of service delivery, major milestones in the transit system's history, and the modes of service provided. A system map and reference to the rail property's website should also be provided.

Organizational Structure
This section of the SSP/SEPP should provide organizational charts showing the lines of authority and responsibility as they relate to security and emergency preparedness.

Include the following information as part of the SSP/SEPP:

- Detailed organizational diagrams for the rail property showing the title of each position.
- Detailed diagram of the structure of the security/police function identifying the key positions at all levels.
- Diagrams showing the relationship and lines of communications between the security/police function and other units of the organization.
- The relationship of the transit system to local political jurisdictions, including law enforcement and emergency management agencies.

Human Resources
This section of the SSP/SEPP provides a categorization and break-down of all employees and contractors who work for/on the rail property.

(This information may be referenced to the responsible rail property Department for review)

Passengers
This section of the SSP/SEPP provides a description of the ridership. Annual ridership statistics for the most recent year should be provided. Ridership may be broken down by mode of service and day of the week. Weekly and annual totals should be provided.

(This information may be referenced to the responsible rail property Department for review)

Service and Operations
This section of the SSP/SEPP describes the rail property operations and services. Information should be provided on the size, location, and function of the agency's physical assets, including maintenance facilities, offices, stations, vehicles, signals, and structures for all modes.

Operating Environment
This section of the SSP/SEPP describes the rail property operating environment, including traffic conditions, rail alignment, weather, issues associated with special events or other activities, safety issues associated with the rail property, and levels of crime in the communities served by the rail property.

Integration with Other Plans and Programs
This section of the SSP/SEPP describes how the SSP/SEPP integrates with other plans and programs maintained by the rail property, including the Agency Safety Plan (ASP), Safety

Certification Plan, Emergency Operations Plan, and other documents and programs that affect security and emergency preparedness.

Describe the interface of the Security Department in its role for the safety certification and sign-off process, used to verify the operational readiness of a new fixed guideway transit systems, major system modifications, system expansions, new equipment, and facilities, enabling the rail property to consider the system safe and secure for operations, prior to entering revenue service. The process illustrates the use of checklists to record compliance to criteria, standards, specifications, codes, and recommended guidelines and practices.

Current Security Conditions

Provide a description of the current security conditions at the rail property and the types of security incidents experienced by the rail property and their frequency of occurrence. This section should describe current security conditions and issues at the rail property including incidents of crime experienced on the system and relevant information on passenger perceptions of security. Crime data should be provided, documenting the most recent year for which it is available. The types of security incidents (including Part I and Part II offenses and ordinance violations) and their frequency of occurrence on the rail property should be included. Additionally, this section should provide context for this information, including a comparison of crime rates at the rail property over time and/or a comparison of crime rates from the rail property with crime rates in the municipalities of the rail property service areas.

Capabilities and Practices

This section of the SSP/SEPP should summarize the methods and procedures, devices, and systems utilized to prevent or minimize security breaches, including passenger education, campaigns, delay, detection, and assessment devices used to minimize security incidents throughout the rail property. In preparing this section, the rail property may consider theft and vandalism at stations, parking lots, and terminal locations; drug dealing at stations/facilities; fare evasion; disruptive behavior, etc.

SSP Management Activities

Responsibility for Mission Statement and System Security Policy

This section of the SSP/SEPP should define the authority and responsibility for the rail property's Security Organization, including but not limited to, designating and listing the individual(s) responsible for determining security policy on behalf of the rail property, and for carrying out the activities of the SSP/SEPP, and defining the Security/Police functions' mission and role in the organization.

Describe the role of the General Manager/CEO/Accountable Executive in preparing, revising, reviewing, and signing the policy statement and the role of the head of Security/Police function and staff in preparing, revising, and reviewing the SSP/SEPP.

Management of the SSP Program

The SSP/SEPP should identify the person(s) with overall responsibility for transit security and emergency preparedness, including day-to-day operations, SSP/SEPP-related internal communications, liaison with external organizations, and identifying and resolving SSP/SEPP-related concerns.

The SSP/SEPP should be reviewed at least once each calendar year to determine if changes are required. In this section, the rail property should address when during the calendar the SSP/SEPP will be reviewed.

Specifically, this section should address who is responsible for the following critical SSP/SEPP management activities, as a minimum:

(1) Defining ultimate responsibility for secure rail transit system operations.
(2) Communicating that security is a priority for all rail transit employees.
(3) Advocating for and allocating security program resources; directing day-to-day security operational activities (including tactics, intelligence, and analysis); and assessing security performance.
(4) Developing and explaining relations with outside organizations that contributes to the rail property's security and emergency preparedness program.
(5) Developing relations with local, state and federal security-related agencies, including security oversight roles of FTA's State Safety Oversight and Project Management Oversight (PMO) programs, security oversight role of DHS TSA, and emergency preparedness roles of DHS, the state Agency of Homeland Security, the region's emergency management group or committee, and Urban Area Security Initiative, Point-of-Contact Working Group.
(6) Explaining the mechanism for bringing security concerns to the attention of the appropriate rail property official or group.
(7) Identifying potential security concerns in any part of the rail property's operations, through internal or external audits.
(8) Actively soliciting the security concerns of employees.
(9) Explaining the liaison between transit system employees and other security and emergency preparedness groups, committees and functions at the rail property, for the purpose of addressing employees' security concerns.
(10) Ensuring the rail property's security and emergency preparedness program is carried out on a daily basis.

Division of Security Responsibilities

Provide a listing of the system security related responsibilities of the personnel who work within the rail property's Security/Police Department should be provided. This section should present a detailed description of the security/police function, including staff, the qualifications of the personnel, any planned short or long-term additions to the security organization's mission, and any additional staff which may be required. Specific roles and responsibilities should also be identified.

As part of the security organization, the rail property should consider forming two committees: a Proactive Security Committee and a Security Breach Review Committee; the former responsible for identifying and neutralizing security risks; and the latter responsible for identifying security issues, investigation of incidents and development of corrective action (countermeasures). Both committees reside within the rail property's security authority.

The Proactive Security Committee conducts system-wide security assessments and ensures that new procedures and facilities incorporate security in their design. The committee reviews training curriculum geared to security. Additionally, this committee determines:

- Compliance with management policies, rules, procedures and assigned security responsibilities
- Identifies organizational issues that may contribute to security incidents, or less effective response to incidents
- Actively promotes security awareness campaigns and award programs

Staffing of this committee should be a combination of rail property and local community representatives.

The Security Breach Review Committee identifies security breaches and investigates these breaches to understand the deficiencies in the security program. Unlike the Proactive Security Committee, this committee focuses on incidents that have already happened. It is acknowledged that the breaches and incidents investigated by this committee are controversial and sensitive. Such incidents may involve violence, criminal activity, or wrong doing by rail property staff.

The Security Breach Review Committee reviews security incidents to determine whether the breach occurred because of:

- Incorrect policies or procedures
- Staff not following procedures
- An accepted risk, unforeseen technology, or action against the rail property

SSP Program Description

Planning
This section of the SSP/SEPP identifies the activities and programs in place at the rail property to support planning for system security and emergency preparedness. Planning for the SSP/SEPP includes developing internal agency plans to address SSP/SEPP issues during operations, budgeting for system security and emergency preparedness functions, addressing security requirements in system design and safety/security certification for extensions and major projects, renovations and rehabilitations; and coordinating with local emergency management agencies and public safety agencies to ensure integration of the rail transit system into the response community plans for major incidents.

Organization
This section of the SSP/SEPP identifies the SSP/SEPP-related activities and programs and the ability to coordinate with external agencies. The rail property should identify its Incident Command System (ICS) based on the National Incident Management System (NIMS) and the capabilities of the agency to respond to major crimes, terrorism and natural disaster emergencies. Capabilities should be coordinated and integrated with external jurisdictions and regional emergency preparedness plans.

Equipment
Provide a description of the equipment used to support implementation of the system security program. Equipment required to support its capabilities to detect, prevent, respond to and recover from security and terrorism events and to manage natural disasters should also be required.

Training and Procedures

Describe the system security program related training and procedures to ensure employee proficiency. Training typically addresses rules, polices, and procedures as well as many hazards in the rail property's operating environment. An overview of the training applicable to the rail property include, but not limited to; SOPs, EOPs, Safety Rules, Security Awareness, Security Systems (Facilities and Vehicles), Emergency First Responder Training, Introduction to ICS/NIMS, Incident Command Training, Interagency Training, Weapons of Mass Destruction/Chemical, Biological, Radiation, Nuclear, and Explosive (CBRNE), CPR, Blood-Borne Pathogens, First Aid, and Hazardous Material Awareness. The rail property must also identify the specific procedures for advisory level changes.

Emergency Exercises and Evaluation

Describe the system security-related activities to ensure the conduct of emergency exercises and evaluation. These exercises should address the rail property's response to incidents which may be intentional (bomb threats, fire/arson, security breaches, etc.), unintentional (hazmat spills, accidental property/vehicle damage, etc.), or naturally occurring (high winds, floods, snowstorms, etc.).

Threat and Vulnerability Identification, Assessment, and Resolution

Threat and Vulnerability Identification

This section of the SSP/SEPP describes the rail property's methods and activities to identify security-related threats and vulnerabilities. Include the identification and prioritize the rail property's assets based on security data collection and analysis in addition to:

- The value of the asset, including current and replacement value;
- The value of the asset to a potential adversary;
- Where the asset is located;
- How, when, and by whom an asset is accessed and used; and
- The impact, if there assets are lost, on passenger, employees, public safety organizations, the general public and the public transportation operation.

Threat and Vulnerability Assessment

Provide a description of the rail property's methods and activities to assess the likely impacts of identified threats and vulnerabilities on the system and to identify particular vulnerabilities which require resolution. Once threats and vulnerabilities are identified, their impact on the total system must be assessed to determine whether to accept the risk of a particular danger, and the extent to which corrective measures can eliminate or reduce its severity.

Responsibility for assessment of these threats and vulnerabilities is assigned to personnel qualified in security deployment practices. Threat and vulnerability assessment considers:

- Experienced personnel (with knowledge of the rail property) to be responsible for security assessment
- Analysis of the rail property, familiarity with the communities, and knowledge of statistical methods
- Dissemination of security information to interested organizations (Management, Local Police, etc.)

Threat and Vulnerability Resolution

This section of the SSP/SEPP describes the rail property's development of response strategies, both short and long term, to prioritized vulnerabilities, including the decision process used to determine whether to eliminate, mitigate, or accept security problems. Based on the results of the assessment, the rail property can identify effective countermeasures to reduce vulnerabilities identified as unacceptable to management. Countermeasures include physical security, planning, coordination with local law enforcement agencies, and training and security exercises.

Threat and vulnerability resolution as a minimum includes:

- The mechanisms for activating certain types of emergency response including those authorized to respond, what levels of response are possible, and the duration the emergency response is capable of being maintained
- The methods employed to investigate security breaches including the circumstances that led to the breach
- The in-depth research of threats and vulnerabilities to determine if the risk(s) can be managed, and to provide criteria for long-term improvements in identified security risk areas
- The considerations of alternatives associated with security problems including eliminating the problem through design, retraining or procedural changes; minimizing the problem by increasing surveillance, changing procedures; increasing the presence of security forces; or accepting the security risk in those instances where the incident likelihood is remote, or impact to the system is so minor that it does not warrant action.

Internal Security Audit Process

The Internal Security Audit Process, a formal process of managing a security program, ensures that all elements of the security program are in place and performing as required. The Internal Security Audit Process is the method used to determine if all organizational elements, equipment, procedures, and functions are performing as intended from a security perspective. Security management and good overall management are inseparable concepts. The audit process is be part of the program and includes an approved implementation plan using checklists. The plan contains, as a minimum, the following:

Audit Responsibility

The rail property should identify the unit or divisions of responsibility for oversight of the

Internal Security Audit Process. The unit responsible for the conduct of the audit should not be the unit in charge of implementation of the items being audited.

Employee and Contractor Security Program

The rail property should identify the program in place to ensure employee and contractor compliance with the security requirements applicable to rail property and contractor on-site work activities at the rail property or on its operating property.

Related to the Contractor Security Program, the rail property issues written security procedures, conducts security orientation meetings, and monitors contractor employees on or near the rail property.

The internal security audit includes the verification of employee and contractor security or security awareness training, certification, and retraining programs as appropriate. A periodic review of the programs verifies that instructions and course contents meet the expectations of the training and certification requirements.

Audit Reporting

The audit report, an official document, provides a working level status of system elements to all levels of management. As part of the formal reporting, the chief executive officer receives a departmental summary report.

The rail property conducts internal audits in a cooperative manner and includes an administrative process for resolving problems or disagreements.

Audit Completeness

Audits should be done on a coordinated basis with full management support, on an ongoing basis rather than an annual basis. The rail property includes the following elements, as part of the audit procedure:

- **Cycle/Schedule**. A three-year audit schedule must be developed, reviewed, maintained and updated to ensure that all SSP/SEPP elements are reviewed during the audit cycle. The audited departments know when to expect audits. Audits are scheduled to be unobtrusive. Unannounced inspections or spot audits are approved as part of the overall audit process with concurrence of general management.
- **Checklists**. A unit conducting an audit prepares a list of security items to be audited in advance and issues the checklist to the department, under review. Each department, subject to review, produces the necessary documentation. This does not preclude spot check of individual records such as maintenance records or personnel qualification records. A cooperative nature is maintained throughout the audit process.
- **Documentation**. A unit conducting an audit maintains the formal documentation of all aspects of the internal audit process. As part of the formal documentation, general management and respective departments receive all necessary reports.
- **Follow-up/Corrective Action**. Each audit report process includes a list of recommended corrective actions, as appropriate. Management approves the corrective actions to be tracked by the Safety and/or Security Department for compliance. Each corrective action item receives an implementation schedule and monitored to completion.

Three Year Security Review

The WSDOT SSO program conducts an onsite review of the rail property to determine the extent to which the rail property is meeting the requirements of its Agency Safety Plan, the effectiveness of the Agency Safety Plan, and whether the document should be updated. This includes the overlap of the safety and security programs from the safety program perspective.

The rail property should verify that:

- The SSP/SEPP is an integral part of the rail property's overall management, engineering, operating and maintenance practice;
- The SSP/SEPP is reviewed, at a minimum, on an annual basis;

- the rail property regularly monitors compliance with the SSP/SEPP through ongoing internal security audit/review processes;
- The rail property identifies potential security issues, threats and vulnerabilities and that measures to control them are implemented;
- Investigations are conducted following established procedures adopted by the rail property;
- The rail property's emergency preparedness and security programs are being implemented in accordance with the SSP/SEPP and associated procedures; and
- Specific activities and tasks identified in the SSP/SEPP are being carried out as specified in these plans and/or identification of deficiencies or areas requiring improvement

Modification of System Security Plan and Emergency Procedures

Initiation
This section of the SSP/SEPP provides a description of the process used to initiate revisions to the security plan and emergency procedures, gather input for the revisions, procedures for updating the security plan and associated procedures, and the identification of responsible person(s).

System Security Plan and/or System Emergency Preparedness Plan Review Process
Describe the process used to review and revise the security plan as necessary, including frequency of reviews, and responsible person(s). This section of the SSP/SEPP should identify the rail property's process for making the SSP/SEPP and procedures available to the WSDOT SSO program as a safety program related control document.

Implementation Modifications
This section of the SSP/SEPP describes the process for communicating, disseminating, and implementing new and revised procedures of the security plan to appropriate rail property staff.

SSP and/or SEPP Submittals from New Starts Projects

An rail property New Starts project is required to submit to the WSDOT SSO program, an SSP/SEPP and associated procedures/referenced materials at least 180 calendar days before beginning passenger service operations. The initial SSP/SEPP will be reviewed and approved by the WSDOT SSO program, as part of the project's safety certification process.

SSP and/or SEPP Readiness for Service Review

Specific to New Starts Projects, Major Projects or extensions, the WSDOT SSO program may conduct onsite Readiness for Service review to assess the capabilities of the rail property to implement its SSP/SEPP during passenger operations with respect to the safety program and public safety. This assessment may be conducted in conjunction with the WSDOT SSO program's review and approval of the initial SSP/SEPP submission.

Version: June 2022

Procedure SSO-005: Annual Program Safety Report Development Procedure
The WSDOT SSO program develops an annual data analysis (trends) report to be reviewed/shared with each of the rail property. In addition, a programmatic-level annual report is developed for the WSDOT SSO program that is made available for review by the rail properties and ultimately released to the public (Governor, FTA, and rail property's Boards or equivalent). These reports are expected to be available for review in draft by April 30 of each year, with publication by June 30 of each year.

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49 CFR §674.13 Designation of oversight agency
(a) Every State that must establish a State Safety Oversight program in accordance with 49 U.S.C. 5329(e) must also establish a SSOA for the purpose of overseeing the safety of rail fixed guideway public transportation systems within that State. Further, the State must ensure that:
  (7) At least once a year, the SSOA reports the status of the safety of each rail fixed guideway public transportation system to the Governor, the FTA, and the board of directors, or equivalent entity, of the rail fixed guideway public transportation system.

Scope: This procedure provides a process for developing and completing the annual program status report. The procedure includes a scope and outline for this annual report as well as the review and approval process to be followed. Ultimately, this report is required to be delivered annually to the FTA, Governor of the State of Washington, and the boards of directors (or equivalent) of each of the Washington rail property.

Requirement: This Annual Program Status Report is required based on 49 CFR Part 674.13(a)(7) – The State must ensure that at least once a year, the SSOA reports the status of the safety of each rail fixed guideway public transportation system to the Governor, the FTA, and the board of directors, or equivalent entity, of the rail fixed guideway public transportation system.

Scope of Annual Program Status Report: The scope of this report will include accomplishments of the WSDOT SSO program, interactions, and status of the rail safety program at each of the Washington rail properties. Status of the Washington rail property rail safety programs will include total number of reportable investigations and numbers of corrective actions being tracked as part of the WSDOT SSO program for the reporting year. This status report will cover activities for the previous calendar year and the final status report will be distributed to the required parties no later than June 30th of the following year.

Outline – Annual Program Status Report: The following is a general outline for this status report:

- Title page
- Executive Summary
- Introduction
- Accomplishments of the WSDOT SSO Program

- Each rail property
- Highlights for the next calendar year

<u>Review Process for Draft Status Report</u>: The draft report will be completed by April 30th for the previous calendar year. Reviews of the draft status report are requested from WSDOT and each of the Washington rail properties. These reviewers should include any additional reviews needed by others at each rail property and within WSDOT. After the review process, all comments and changes will be made to the draft status report. WSDOT management will be responsible for taking the updated draft report up the WSDOT chain of command for review and comment. Once the draft status report is finalized, WSDOT management will coordinate delivery of the final report to the Governor's Office. Each of the Washington rail properties will coordinate delivery of the final report to their boards of directors (or equivalent) and provide evidence back to the WSDOT SSO program of that delivery. The WSDOT SSO program will coordinate delivery of the final report to the FTA Associate Administrator of the Office of Safety and Oversight.

Version: 5/29/2020

For more than twenty years, the transit industry has used a System Safety Program Plan (SSPP) to describe the intended Safety Program at a transit agency. Originally, this document was defined only as part of an American Public Transportation Association (APTA) industry standards and then in regulation from the Federal Transit Administration (FTA) for rail transit agencies (RTAs) in 49 CFR Part 659 (in effect from 1996 to April 2019). As part of FTA's enhanced transit safety program, a new regulation for all transit modes (except those transit modes already regulated for safety from another federal agency – Federal Railroad Administration or United State Coast Guard) has been completed, 49 CFR Part 673, and provides requirements for a Public Transportation Agency Safety Plan (PTASP or ASP). The ASP is intended to describe the transit agency's implementation of a Safety Management System (SMS) to assure authority, resourcing, safety performance improvement, and full compliance with the transit agency's safety program.

It is critical to understand that the rail properties must have both a complete description of their safety program AND an ASP/SMS. The Safety Program Description is the scope of safety oversight and the ASP/SMS is an added function to assure that the transit agency safety program is properly resourced and managed for safety risk to a level as low as reasonably practicable (ALARP).

At the beginning of this transition to the ASP, most transit agencies have the most complete description of their safety program in only their SSPP. As the ASP is being developed to both replace the SSPP and to implement the SMS, it is currently necessary to also account for the full Safety Program Description (currently described in the SSPP) in order to account for the scope of what the SMS is intended to manage and the oversight of the Safety Program. For the references to the SSPP Elements that follow, the intent is that over time, the Safety Program Description will be developed into documents and accounted for separate from the ASP with only references in the ASP, in appendices would suffice. This will then allow the ASP to focus more on the SMS, its implementation, and progress towards assuring and improving safety performance.

ASP/SMS Description
The following information is taken directly from the PTASP regulation and FTA guidance. In addition, a few documents are included in this Reference Guide Section 04:

- 04a – This document includes FTA's extended guidance information provided as part of the FTA checklist for development and safety oversight review and approval of ASPs. This document includes the checklist and FTA's extended guidance by Checklist Item.
- 04b – This document is an additional checklist to track the safety program description that was previously in the SSPP. This Safety Program Description content may be contained in the ASP, its appendices, or in referenced documents. The review of the completeness and appropriateness of the ASP is focused on tracking where and how the safety program description is accounted for and referenced/related to the ASP and SMS organization.
- 04c – This document is a blank template for use reviewing a rail property's ASP submitted to the WSDOT SSO program.

FTA has provided a website and a technical assistance center to answer questions about developing and approving the ASPs – https://www.transit.dot.gov/PTASP-TAC. The following documents are currently available from FTA on this website:

- Comparison of Definitions Part 673 versus Part 659
- Transition Roadmap Guidance on Using SSPPs to Develop PTASPs
- FTA Certification and Assurances
- RTA and SSOA PTASP Review Checklist
- Sample Agency Safety Plan Development, Review and Approval Timeline for RTAs and SSOAs
- Key Points for Development Agency Safety Plans for Recipients with Contractors and Other External Service Providers Fact Sheet
- National Safety Plan
- Introduction to Safety Performance Indicators and Targets
- Safety Performance Targets Guide
- CSO SMS Executive Fact Sheet
- Guide to Developing the Safety Management Policy Component of a PTASP
- The Role of the CSO in PTASP Implementation
- Development the Safety Management Policy Statement
- Guide to Developing the Safety Risk Management Component of a PTASP
- Sample Hazard Classification System
- Safety Risk Mitigations and Corrective Actions Guide
- Hazard Management vs. Safety Risk Management Guide
- Guide to Developing the Safety Promotion Component of a PTASP
- Safety Training Resources for Bus Transit Agencies
- Public Transportation Safety Certification Training Program and Agency Safety Plan Training Requirements

A summary of the over-arching requirements for the ASP are the following:

- The ASP and subsequent updates must be signed by the Accountable Executive and approved by the Board of Directors, or an Equivalent Authority.
- The ASP must document the processes and activities related to the SMS implementation.
- The ASP must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.
- The ASP must address all applicable requirements and standards set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.
- The transit agency must establish a process and timeline for conducting an annual review and update of the ASP.
- Rail properties must include or incorporate by reference in its ASP an emergency preparedness and response plan or procedures that addresses, at a minimum:
  - The assignment of employee responsibilities during an emergency
  - Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the transit agency's service area.

Additional requirements of the rail property ASP are the following:

- The ASP may be developed for all transit modes or separately for transit modes.
- The rail property must follow the recordkeeping requirements provided in Part 673.31.
- A State must draft and certify ASPs for small public transportation providers.
- Rail properties may continue to use their System Safety Program Plan compliant with 49 CFR Part 659 until July 20, 2020.
- Transit agencies under the jurisdiction of the United States Coast Guard (USCG) or the Federal Railroad Administration (FRA) are not required to develop ASPs for those transit modes of service.

The rail property must certify that an ASP meeting the requirements of Part 673 has been completed by the deadline, July 20, 2020, and approved by the SSO program. On an annual basis, the rail property must certify its compliance with Part 673. In addition, to the maximum extent practicable, the rail property must coordinate with States and Metropolitan Planning Organizations (MPOs) in the selection of State and MPO safety performance targets.

Each transit agency must establish and implement an SMS that is appropriately scaled to the size, scope, and complexity of the transit agency. The following descriptions of the overall SMS Implementation requirements and the four SMS Components also include a summary of additional information and documentation related to each topic/component that are currently required to be included in the ASP.

Additional information and documentation related to the *SMS General Requirements*.

- Safety Plan Review and Modification: this requirement from the SSPP is also a part of the ASP/SMS general requirements.
- National Public Transportation Safety Plan – the current version of this document provides a description of the FTA's transit-specific SMS.
- Safety Data: this data is the basis of the Safety Performance Measures and then Targets set for improvement.
- System Security Program (SSP)/System Emergency Preparedness Plan (SEPP) – this document is now a minimum standard for safety and the focus here is the overlap with the safety program.
- EOP/EMP – this documentation is required to be at least referenced in the ASP.
- Emergency Management: related to the SSP/SEPP and EOP/EMP, required to be at least referenced in the ASP.

Safety Management Policy (Part 673.23)

- The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals:
    - Accountable Executive
    - Chief Safety Officer or Safety Management System (SMS) Executive
    - Agency leadership and executive management
    - Key Staff
- Establish organizational accountabilities and responsibilities.

- Written statement of safety management policy that includes the agency's safety objectives.
- Establish and implement a process that allows employees to
  - Report safety conditions to senior management,
  - Protections for employees who report safety conditions, and
  - A description of employee behaviors that may result in disciplinary action.
- The safety management policy must be communicated throughout the agency.

Additional information and documentation related to *Safety Management Policy*.

- Policy Statement: the Safety Management Policy is a replacement for the SSPP Policy Statement.
- Purpose, Goals, and Objectives: safety program and SMS purpose, goals, and objectives continue to be required in the ASP/SMS Safety Management Policy.
- Management Structure: this is focused on the organization chart and flow down of authorities. This excludes the rail systems/physical plant description that will be accounted for in Safety Risk Management and Safety Assurance.
- Plan Implementation: SMS and Safety Program implementation are now addressed in the ASP/SMS, so long as all the content of the Safety Program Description is accounted for.

Safety Risk Management (Part 673.25)

- Safety Risk Management process
- Safety hazard identification
- Safety risk assessment
- Safety risk mitigation

Additional information and documentation related to *Safety Risk Management*.

- Hazard Management Process: this section from the SSPP is now the focus of the Safety Risk Management process described in this SMS component.
- Control documents for Operational Hazard Assessment, Safety Risk Management Plan, and Safety Risk Register – these documents are a part of and support Safety Risk Management.
- Safety Certification Process: focuses on the formal hazard analyses and risk assessments used in this process.
- System Modification: focuses on the formal hazard analyses and risk assessments used in this process.
- Procurement: focuses on establishing safety-related controls on procurements based on risk assessments and safety-related requirements.
- Coordination with other Risk Assessments and prioritization for public safety and threat and vulnerability assessments (TVAs) – this is focused on all-hazards and the overlap with the Safety Program.

Safety Assurance (Part 673.27)

- Safety Assurance process
- Safety performance monitoring and measurement
- Management of change
- Continuous improvement

Additional information and documentation related to *Safety Assurance*.

- Safety Performance Monitoring and Measurement – the results of these topics and processes may include corrective actions that flow into Continuous Improvement. Any unresolved safety risk or issues with risk mitigations may need to feedback to Safety Risk Management for reconsideration of proper risk mitigations.
  - o Safety Data Acquisition
  - o Incident Notification, Investigation, and Reporting
  - o Emergency Management Program
  - o Internal Safety Audit Program
  - o Rules Compliance
  - o Facilities and Equipment Inspections
  - o Maintenance Audit and Inspection Program
  - o Training and Certification Program: assuring training and competency.
  - o Compliance with Local, State, and Federal Safety Requirements
  - o Hazardous Materials Program
  - o Drug and Alcohol Program
  - o Hours of Service/Fatigue Management
  - o Roadway Worker Protection
  - o Control documents Rail Operating Rule Book, Roadway Worker Protection, Command and Control/Train Control Standard Operating Procedures (SOPs), Investigation Procedures, Procedure requiring review of SOPs related to Safety, Field Supervision SOPs, Inspection and Maintenance Manuals, SOPs, and Standards
- Management of Change
  - o Safety Certification Process
  - o System Modification
  - o Procurement
  - o Configuration Management
  - o Control documents Safety Certification Plan, Transit Asset Management Plan, and Configuration Management Plan.

- Continuous Improvement
  - o Safety Data Acquisition: includes tracking and analysis of corrective action plans.
  - o Incident Notification, Investigation, and Reporting
  - o Emergency Management Program: includes results of drills and exercises.
  - o Internal Safety Audit Program
  - o Plan Review and Modification

Safety Promotion (Part 673.29)

- Competencies and Training
- Safety Communication

Additional information and documentation related to ***Safety Promotion***.

- Competencies and Training – from a safety perspective, it is critical that staff and those working around or on the rail systems are competent and receive periodic awareness or refresher training to support safety performance.
    - Training and Certification Program
    - Roadway Worker Protection
    - Emergency Management Program: specifically training and drills and exercises.
    - Training requirements for designated staff under Part 672, Safety Certification Training Program
- Safety Communication – communication of hazards, safety risks, safety performance, and responses from executives and management are critical. In addition, it is also critical that Safety Communication make it up the chain of command.
    - Hazard Management Process
    - Safety Data Acquisition
    - Compliance with Local, State and Federal Safety Requirements
    - Hazardous Materials Program
    - Drug and Alcohol Program
    - Hours of Service/Fatigue Management
    - Roadway Worker Protection
    - Any public safety communications

Safety Plan Documentation (Part 673.31)

This topic addresses all records generated as part of the SMS-related tasks and activities.

Responsibilities of the SSO Program

Based on the requirements of the WSDOT Rail Transit Program Standard and 49 CFR Part 674, the rail property is required to submit:

- An initial ASP
- Any significant updates/modifications to a previously approved ASP
- Annual reviews and updates (if needed) to the WSDOT SSO program for review and approval.

Per the SSO and ASP regulations, the rail property is required to:

- Review its ASP at least annually.
- Make any modifications, as needed to assure that the ASP is current and accurate, as well as progressing in maintaining or improving safety performance.

The rail property completes the annual review for the previous calendar year and submits an updated draft ASP to the WSDOT SSO program for review and approval.

Each updated draft ASP submitted to the WSDOT SSO program by a rail property should include a summary that identifies and explains the changes. If there are no changes required for the ASP, it should be indicated at this point in the review and approval process. The WSDOT SSO program staff reviews the draft ASP update to determine if there are any issues or if the draft ASP is ready for approval. The WSDOT SSO program uses a conformance checklist for the review of the ASP and determines if the ASP meets the federal and state program requirements based on this program standard.

If there are any issues with the draft ASP, the WSDOT SSO program staff will provide the rail property with comments via the checklist and negotiate appropriate modifications to the ASP. The WSDOT SSO program or the rail property may request a meeting to review and discuss ASP issues to assure an understanding of the needed changes and negotiate the timing of any needed modifications to the draft ASP.

Once the draft ASP has been determined to be ready for approval, the WSDOT SSO program staff will indicate that status to the appropriate rail property staff, and provide the checklist used for the review. At this point in the update process, the rail property can finalize their updated ASP with appropriate signatures and transmittal letter, including approval by the Board of Directors (or equivalent) and submit the final ASP to the WSDOT SSO program for final approval. This submittal is required to be completed by March 1st each year to coincide with the rail property's annual report to the WSDOT SSO program as discussed in the next subsection on internal safety audits.

Upon receipt of the final rail property ASP, the WSDOT SSO program will issue written approval of the ASP to the rail property within thirty (30) calendar days.

The WSDOT SSO program may require changes to an ASP based on:

- Revisions to the Washington State Rail SSO Program Standard
- 49 CFR Part 674 or 673
- Audit results
- Investigations
- Changing trends in safety data and information analysis.

Upon receipt of a written notification from the WSDOT SSO program for ASP modifications, the rail property and the WSDOT SSO program will negotiate a timeframe and set a deadline for completing the revision.

In the event the rail property significantly modifies its ASP for its own purposes and needs, the rail property will submit the modified ASP to the WSDOT SSO program for review and approval within thirty (30) calendar days of the effective date of the change.

Note that all operating rules, procedures, and materials referenced in the rail property ASP should also be submitted to the WSDOT SSO program with the ASP to ensure an efficient and complete review of the rail property's safety program, as documented in the ASP.

Initial submittals. A rail property new (or extension) rail system capital project (including a New Starts project) is required to make an initial submittal of an ASP (or appropriate modification to

an existing ASP) to the WSDOT SSO program at least one-hundred eighty (180) calendar days before beginning revenue service operations.

The initial ASP will be reviewed and approved by the WSDOT SSO program in writing as part of the new rail system capital project safety certification process. The review and approval process for initial submittals generally follows the ASP update review and approval process discussed above and is generally a more thorough review and may take several revision cycles to complete. This is the reason for the long-lead time for the initial submittal.

Specific to New Starts projects, the WSDOT SSO program may conduct onsite Readiness Reviews to assess the capabilities of the rail property to implement its ASP during passenger operations. This assessment may be conducted in conjunction with the WSDOT SSO program's review and approval of the initial ASP submission.

This is discussed further in Reference Guide Section 18.

State:
Rail Property:

Section A. Transit Agency Information

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	A-1. The RTA specifies transit agency name and address		
	A-2. The RTA specifies mode(s) of transit service covered by the ASP (673.11(b))		
	A-3. The RTA specifies SSOA and authority for State Safety Oversight (SSO) program.		
	A-4. The RTA identifies an Accountable executive that is:		
	A-4-a. Accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's transit system (673.23(d)(1)).		
	A-4-b. Accountable for ensuring action is taken to address substandard performance in the agency's SMS (673.23(d)(1)).		
	A-5. The RTA identifies a Chief Safety Officer (or SMS Executive) who:		
	A-5-a. Is designated by the Accountable Executive (673.23(d)(2)).		
	A-5-b. Holds a direct line of reporting to the Accountable Executive (673.23(d)(2) and 674.29(b)).		
	A-5-c. Is adequately trained (673.5 and 674.29(b)).		
	A-5-d. Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS (673.23(d)(2)).		
	A-5-e. Does not serve in other operational or maintenance capacities (673.5)).		

FTA Guidance – Requirements and Considerations:

A-1. The RTA specifies transit agency name and address
A transit agency must, within one calendar year after July 19, 2019, establish an Agency Safety Plan that meets the requirements of this part. Any rail fixed guideway public transportation system that had a System Safety Program Plan (SSPP) compliant with 49 CFR part 659 as of October 1, 2012, may keep that plan in effect until one year after July 19, 2019.

The RTA may want to consider revising available text from its SSPP to explain that its ASP responds to both FTA's requirements at 49 C.F.R. Part 673 and the State Safety Oversight (SSO) program established by the State with jurisdiction over the RTA.

A-2. The RTA specifies mode(s) of transit service covered by the ASP
A transit agency may develop one Public Transportation Agency Safety Plan for all modes of service, or may develop a Public Transportation Agency Safety Plan for each mode of service not subject to safety regulation by another Federal entity.

Just as with the SSPP, unless otherwise specified by the SSOA, an RTA with multiple modes of public transportation service may develop one ASP for all modes of its service, or it may develop an ASP for each mode of service that is not subject to safety regulation by another Federal entity. The RTA should review the SSOA's Program Standard to identify any requirements regarding the scope of the ASP, and then, accordingly, should determine whether the ASP will address multiple (if applicable) or single modes.

A-3. The RTA specifies SSOA and authority for State Safety Oversight (SSO) program
A State Safety Oversight Agency must review and approve an Agency Safety Plan developed by a rail transit agency, as authorized in 49 U.SC. 5329(e) and its implementing regulations at 49 C.F.R. Part 674.

SSPPs also identify the SSOA and the authority for the State's oversight program.

A-4. The RTA identifies an Accountable executive that is:
The transit agency must identify an Accountable Executive. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive.

A-4-a. Accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's transit system
The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented, throughout the agency's public transportation system.

A-4-b. Accountable for ensuring action is taken to address substandard performance in the agency's SMS

The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS.

Each RTA must identify an Accountable Executive within its organization who ultimately is responsible for carrying out and implementing its safety plan and asset management plan. An Accountable Executive should be a transit operator's chief executive; this person is often the president, chief executive officer, or general manager. As a preliminary matter, FTA distinguishes the role of the Accountable Executive from the role of a Board of Directors, or an Equivalent Authority. Pursuant to 49 C.F.R. 673.11(a)(1), the Accountable Executive must sign the safety plan; the Board of Directors or an Equivalent Authority must approve the safety plan in accordance with 49 U.S.C. 5329(d)(1)(A). Given the varying sizes and natures of transit systems, FTA defers to those systems in their designation of an Accountable Executive, so long as that single individual has the ultimate responsibility and accountability for the implementation and maintenance of the SMS of a public transportation agency; responsibility for carrying out the agency's transit asset management plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's public transportation agency safety plan and the agency's transit asset management plan.

For municipal government agencies, that individual could be a county executive or a mayor, or it could be the head of a city's department of transportation, the head of a city's department of public works, or a city manager. FTA has offered this non-exhaustive list of examples of Accountable Executives for illustrative purposes only. And while many individuals within a transit agency may be responsible for "implementing" SMS, the Accountable Executive is the individual with the ultimately responsibility for SMS implementation at the agency. FTA understands that at many smaller transit operators, roles and responsibilities are more fluid. However, FTA believes that, even in circumstances where responsibilities are either shared or delegated, there must be one primary decision-maker who is ultimately responsible for both safety and transit asset management. It is a basic management tenet that accountabilities flow top-down. Therefore, as a management system, safety and transit asset management require that accountability reside with an operator's top executive.

A-5. The RTA identifies a Chief Safety Officer (or SMS Executive) who:

A-5-a. Is designated by the Accountable Executive

The Accountable Executive must designate a Chief Safety Officer or SMS Executive.

A-5-b. Holds a direct line of reporting to the Accountable Executive

The Chief Safety Officer (SMS Executive) must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer (SMS Executive).

A-5-c. Is adequately trained

The Safety Plan identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA.

A-5-d. Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS

...who has the authority and responsibility for day-to- day implementation and operation of an agency's SMS.

A-5-e. Does not serve in other operational or maintenance capacities

A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Given the different sizes of transit operators, and given the varying operating environments of transit systems across the nation, FTA is deferring to each RTA and SSOA to determine the appropriate direct reporting relationship with the Accountable Executive. FTA also defers to the RTA and SSOA to determine the level of training that is adequate for the Chief Safety Officer. Given the more complex operating environments of rail transit systems and the increased safety risks in these environments, FTA will not allow the Chief Safety Officers for rail transit agencies to have additional operational and maintenance responsibilities; it is necessary to have a single individual wholly dedicated to ensuring safety. FTA believes that this role should be a full-time responsibility at rail transit agencies, unless a rail transit agency petitions FTA to allow its Chief Safety Officer to serve multiple roles given administrative and financial hardships with having a single, dedicated, and full-time Chief Safety Officer.

Section B. Plan Development, Approval and Updates

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	B-1. The RTA provides the Accountable Executive's signature of the ASP (673.23(a)(1)) and date of signature.		
	B-2. The RTA provides the Board of Directors' or Equivalent Authority's approval of the ASP (673.23(a)(1) and 674.29(b)) and date of approval.		
	B-3. The RTA provides the Certification of compliance with Part 673 (673.11(a)(4), 673.13, 674.29(a)), including the name of the individual or entity that certifies the ASP and date of certification.		
	B-4. The RTA provides the Certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification (674.29(a)).		
	B-5. The RTA provides a process and timeline for conducting an annual review and update of the ASP (673.11(a)(5) and 674.29(b)), including the ASP version number and other relevant information.		

FTA Guidance – Requirements and Considerations

B-1. The RTA provides the Accountable Executive's signature of the ASP and date of signature.
The Plan, and subsequent updates, must be signed by the Accountable Executive…

The RTA may amend or prepare signature blocks and any formal adoption memorandum or other documents that may need to be attached to the ASP to demonstrate the required signature from the Accountable Executive.

B-2. The RTA provides the Board of Directors' or Equivalent Authority's approval of the ASP and date of approval.
... and approved by the agency's Board of Directors or an equivalent entity.

The RTA may amend or prepare signature blocks and any formal adoption memorandum or other documents that may need to be attached to the ASP to demonstrate the required approval from the Board of Directors or an Equivalent Entity.

B-3. The RTA provides the Certification of compliance with Part 673, including the name of the individual or entity that certifies the ASP and date of certification.
The Safety Plan must address all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan. Compliance with the minimum safety performance standards authorized under 49 U.S.C. 5329(b)(2)(C) is not required until standards have been established through the public notice and comment process.

B-4. The RTA provides the Certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification.
In determining whether to approve a Public Transportation Agency Safety Plan for a rail fixed guideway public transportation system, an SSOA must evaluate whether the Public Transportation Agency Safety Plan is in compliance with the program standard set by the SSOA.

Since the SSPP requirement pre-dates the National Public Transportation Safety Plan and the FTA's Public Transportation Safety Program, there is no already developed section in the SSPP where the RTA explains its compliance with Federal safety regulations. If the RTA chooses to address this requirement explicitly in the ASP, the RTA may consider briefly describing the FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan and clarifying its intention to comply with any minimum safety performance standards authorized under 49 U.S.C.. 5329(b)(2)(C). This section can also explain that FTA has not yet issued any such standards, and that any future FTA standards will be established through the public notice and comment process. This section can also identify any reviews or assessments the RTA may conduct, independently or jointly with the SSOA to ensure compliance with FTA's regulations and the SSOA program standard.

B-5. The RTA provides a process and timeline for conducting an annual review and update of the ASP, including the ASP version number and other relevant information.
Each transit agency must establish a process and timeline for conducting an annual review and update of its Safety Plan.

There may be many similarities between the process documented in the SSPP and the new process for the ASP. The RTA may consider modifying its current SSPP text (or developing new text) to:

- Reflect that the plan is now called a ASP instead of an SSPP;
- Update the content of existing processes and procedures that will now guide the annual review and update of the ASP;
- Ensure coordination with the requirement to have the Board of Directors or Equivalent Entity review and approve the updated ASP and the Accountable Executive sign the updated ASP; and
- Ensure compliance with the annual review and update requirements specified by the SSOA in its program standard.

Section C. Emergency Preparedness and Response Plan

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	C-1. The RTA provides or references an emergency preparedness and response plan or procedure that addresses, at a minimum addresses:		
	C-1-a. The assignment of employee responsibilities during an emergency (673.11(a)(6))		
	C-1-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area (673.11(a)(6)).		

FTA Guidance – Requirements and Considerations

C-1. The RTA provides or references an emergency preparedness and response plan or procedure that addresses, at a minimum:
An RTA must include or incorporate by reference in its Safety Plan an emergency preparedness and response plan or procedures that addresses, at a minimum,

C-1-a. The assignment of employee responsibilities during an emergency
the assignment of employee responsibilities during an emergency,

C-1-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area.
coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the transit agency's service area.

Historically, FTA's SSO program has required RTAs to have emergency preparedness plans through 49 C.F.R. 659.19(k). Further, FTA understands that the RTA may have developed an emergency preparedness and response plan that addresses these minimum requirements in accordance with regulations from other Federal and State agencies. To address this section, the RTA may consider including as an appendix, or incorporating by reference, its emergency preparedness and response plan, which, at a minimum, defines employee roles and responsibilities during emergencies and documents coordination with Federal, State, regional and local officials. The RTA also should review the SSOA's Program Standard to identify any other requirements regarding how the ASP should address the emergency preparedness and response plan or procedures, and also review its internal policies to identify any

specific considerations that should be in place to manage Sensitive Security Information (SSI), as defined by Federal Regulation 49 C.F.R. Part 1520.

Section D. Safety Performance Targets

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	D-1. The RTA specifies performance targets for fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-2. The RTA specifies performance targets for injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-3. The RTA specifies performance targets for safety events: Total number of reportable events and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-4. The RTA specifies performance targets for system reliability: Mean (or average) distance between major mechanical failures, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-5. The RTA specifies or references documentation that specifies performance targets are made available to the State to aid in the planning process (673.15(a)).		
	D-6. The RTA specifies, or references documentation that specifies, performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process (673.15(a)).		
	D-7. The RTA specifies, or references documentation that specifies, that the RTA coordinates with the State and MPOs in the selection of State and MPO safety performance targets, to the maximum extent practicable (673.15(b)).		

FTA Guidance – Requirements and Considerations

D-1. The RTA specifies performance targets for fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by rail transit mode.
D-2. The RTA specifies performance targets for injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode.
D-3. The RTA specifies performance targets for safety events: Total number of reportable events and rate per total vehicle revenue miles, by rail transit mode.
D-4. The RTA specifies performance targets for system reliability: Mean (or average) distance between major mechanical failures, by rail transit mode.
The Safety Plan must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan [Version 1.0, dated January 18, 2017, Page 32).

Pursuant to 49 U.S.C. § 5329(d), a Public Transportation Agency Safety Plan must include safety performance targets based on the safety performance measures in the National Safety Plan. The safety performance measures (fatalities, injuries, safety events and system reliability) selected by FTA are intended to provide "state of the industry" high-level measures and help focus individual agencies on the development of specific performance indicators and measurable targets relevant to their operations. These measures should also inform agencies as they identify actions they each would take to improve their own safety outcomes. Agencies should select performance targets that are appropriate to their operations and environment. Successful performance targets are specific, measurable, attainable, relevant, and time-bound (SMART). As part of the annual review of a Public Transportation Agency Safety Plan, each transit agency should reevaluate its safety performance measures and determine how the measures should be refined, sub-measures developed, and performance targets selected. FTA recognizes that each transit agency has its own operating policies that impact how performance is reported to the NTD. However, bringing greater attention to safety and reliability metrics will encourage more robust, consistent data reporting in the future.

D-5. The RTA specifies or references documentation that specifies performance targets are made available to the State to aid in the planning process.
D-6. The RTA specifies, or references documentation that specifies, performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process.
A State or transit agency must make its safety performance targets available to States and Metropolitan Planning Organizations to aid in the planning process.

D-7. The RTA specifies, or references documentation that specifies, that the RTA coordinates with the State and MPOs in the selection of State and MPO safety performance targets, to the maximum extent practicable.
To the maximum extent practicable, a State or transit agency must coordinate with States and Metropolitan Planning Organizations in the selection of State and Metropolitan Planning Organization safety performance targets.

While many transit agencies may have voluntarily shared safety performance and state of good repair targets with local and State planning agencies, the requirement to do so is new. In addressing this new activity, in the ASP, the RTA may wish to document the process through which the transit agency shares its safety performance and state of good repair targets with its State and Metropolitan Planning Organizations. In addition, the RTA should consider indicating if it has representation on the Metropolitan Planning Organization Board, either directly or indirectly (i.e., elected officials serving on both the Metropolitan Planning Organization board and the transit agency board), and briefly describing how this representation can support the agency's process for making safety performance target available to the Metropolitan Planning Organization and State. The RTA also could reference relevant transportation planning documentation or legislation.

Section E. Development and Implementation of Safety Management System (SMS)

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	E-1. The RTA specifies, or references documentation that specifies, its establishment and implementation of a Safety Management (SMS) (673.11(a)(2) and 673.21).		
	E-2. The RTA specifies, or references documentation that specifies, that the SMS is appropriately scaled to the size, scope, and complexity of the RTA and includes Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion (673.21).		

FTA Guidance – Requirements and Considerations

E-1. The RTA specifies, or references documentation that specifies, its establishment and implementation of a Safety Management (SMS).
Each transit agency must establish and implement a Safety Management System under this part. A transit agency Safety Management System must be appropriately scaled to the size, scope and complexity of the transit agency...

E-2. The RTA specifies, or references documentation that specifies, that the SMS is appropriately scaled to the size, scope, and complexity of the RTA and includes Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.
...and include the following elements:

(a) Safety Management Policy as described in § 673.23;
(b) Safety Risk Management as described in § 673.25;
(c) Safety Assurance as described in § 673.27; and
(d) Safety Promotion as described in § 673.29.

This requirement will be assessed through evaluation of the Safety Management Policy, Safety Risk Management, Safety Assurance and Safety Promotion sections below.

Section F. Safety Management Policy

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	F-1. The RTA specifies, or references documentation that specifies, a written statement of safety management policy, including the agency's safety objectives (673.5, 673.21(a), and 673.23(a)).		
	F-2. The RTA specifies, or references documentation that specifies, an employee safety reporting program, that includes:		
	F-2-a. A process that allows employees to report safety conditions to senior management (673.23(b)).		
	F-2-b. Protections for employees who report safety conditions to senior management (673.23(b)).		
	F-2-c. A description of employee behaviors that may result in disciplinary action (673.23(b)).		
	F-3. The RTA specifies, or references documentation that specifies, communication of the safety management policy throughout the agency's organization (673.23(c)).		
	F-4. The RTA specifies, or references documentation that specifies, necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA's SMS among the key safety roles within the organization:		
	F-4-a. Accountable Executive (673.5, 673.23(d)(1), and 674.7).		
	F-4-b. Chief Safety Officer (or SMS Executive) (673.5, 673.23(d)(2), and 674.29(b)).		
	F-4-c. Agency Leadership and Executive Management (673.23(d)(3)).		
	F-4-d. Key Staff (673.23(d)(4)).		
	F-5. The RTA specifies, or references documentation that specifies, adequate methods to ensure implementation of ASP by all employees, agents and contractors (674.29(b)).		

FTA Guidance – Requirements and Considerations

F-1. The RTA specifies, or references documentation that specifies, a written statement of safety management policy, including the agency's safety objectives.
...and have a written statement of safety management policy that includes the agency's safety objectives.

Safety Management Policy is the foundation of the organization's SMS. The safety management policy statement clearly states the organization's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. It clearly delineates management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the organization's safety performance by requiring regular review of the safety policy by a designated Accountable Executive (general manager, president, or other person with similar authority). Within the context of the Public Transportation Agency Safety Plan, an organization's safety objectives will be articulated through the setting of performance targets based on, at a minimum, the safety performance measures established in the National Public Transportation Safety Plan. See 49 U.S.C. 5329(d)(1)(E).

F-2. The RTA specifies, or references documentation that specifies, an employee safety reporting program, that includes:
   F-2-a. A process that allows employees to report safety conditions to senior management.
A transit agency must establish and implement a process that allows employees to report safety conditions to senior management...

   F-2-b. Protections for employees who report safety conditions to senior management.
...protections for employees who report safety conditions to senior management, and…

   F-2-c. A description of employee behaviors that may result in disciplinary action.
... a description of employee behaviors that may result in disciplinary action.

Each RTA will need to review its current employee reporting systems and ensure that they meet FTA's employee safety reporting expectations, including comprehensiveness and accessibility, and address protections for employees who report safety conditions as well as identify behaviors that would result in disciplinary action. In addition, the RTA will need to address any gaps related to the documentation and storage of the data, its retrieval and analysis, and any practices for communicating back to reporting employee. In addressing any identified gaps, the RTA will want to establish and communicate criteria and procedures for employee safety reporting across the organization. Each RTA will need to specify in documentation the new or modified employee reporting program as a fundamental source for safety concerns and hazard identification.

F-3. The RTA specifies, or references documentation that specifies, communication of the safety management policy throughout the agency's organization.
The safety management policy must be communicated throughout the agency's organization.

Each RTA will need to implement the necessary provisions for ensuring that the Safety Management Policy Statement is communicated to all employees, with explicit support from senior management, including the means as well as the criteria establishing when the statement should be updated or revised.

F-4. The RTA specifies, or references documentation that specifies, necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA's SMS among the key safety roles within the organization:
A transit agency must establish its organizational accountabilities and responsibilities.

As a general action, each RTA will need to review and discuss authorities, accountabilities, and responsibilities as they relate to the development and management (or operation) of the SMS, in addition to established safety responsibilities. Each RTA will need to revise current SSPP text based on those meetings for inclusion in the ASP. The Accountable Executive is ultimately responsible for ensuring these authorities, accountabilities and responsibilities are established.

F-4-a. Accountable Executive.
The transit agency must identify an Accountable Executive. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented, throughout the agency's public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS.

F-4-b. Chief Safety Officer (or SMS Executive).
The Accountable Executive must designate a Chief Safety Officer (SMS Executive). The Chief Safety Officer (SMS Executive) must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer (SMS Executive). The Chief Safety Officer who has the authority and responsibility for day-to- day implementation and operation of an agency's SMS...The Safety Plan identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA.

Given the different sizes of transit operators, and given the varying operating environments of transit systems across the nation, FTA is deferring to each RTA and SSOA to determine the appropriate direct reporting relationship with the Accountable Executive. FTA also defers to the RTA and SSOA to determine the level of training that is adequate for the Chief Safety Officer. Given the more complex operating environments of rail transit systems and the increased safety risks in these environments, FTA will not allow the Chief Safety Officers for rail transit agencies to have additional operational and maintenance responsibilities; it is necessary to have a single individual wholly dedicated to ensuring safety. FTA believes that this role should be a full-time responsibility at rail transit

agencies, unless a rail transit agency petitions FTA to allow its Chief Safety Officer to serve multiple roles given administrative and financial hardships with having a single, dedicated, and full-time Chief Safety Officer.

F-4-c. Agency Leadership and Executive Management.

Agency leadership and executive management. A transit agency must identify those members of its leadership or executive management, other than an Accountable Executive or Chief Safety Officer (SMS Executive), who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

Each RTA must identify agency leadership and executive management who would be responsible for the implementation of a transit agency's safety plan.

F-4-d. Key Staff.

A transit agency may designate key staff, groups of staff, or committees to support the Accountable Executive or Chief Safety Officer (SMS Executive) in developing, implementing, and operating the agency's SMS.

Each RTA must identify key staff, groups of staff, or committees who would support development, implementation, and operation of the RTA's SMS.

F-5. The RTA specifies, or references documentation that specifies, adequate methods to ensure implementation of ASP by all employees, agents, and contractors.

The Agency Safety Plan includes adequate methods to support the execution of the Plan by all employees, agents, and contractors for the rail fixed guideway public transportation system.

The SSOA must ensure that the RTA's ASP is sufficiently detailed and provides adequate methods to be carried out by employees, agents, and contractors.

Section G. Safety Risk Management

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	G-1. The RTA specifies, or references documentation that specifies, a Safety Risk Management process for all system elements (673.21(b), 672.25, and 674.29(b)).		
	G-2. The RTA specifies, or references documentation that specifies, a process for hazard identification, including identifying consequences of hazards (673.25(a), 673.25(b)(1), and 674.7).		
	G-3. The RTA specifies, or references documentation that specifies, a process to include FTA, the SSOA, and other oversight authorities as sources for hazard information (673.25(b)(2)).		
	G-4. The RTA specifies, or references documentation that specifies, a process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations (673.7, 673.25(c), and 674.7).		
	G-5. The RTA specifies, or references documentation that specifies, a process to prioritize hazards based on the safety risk (673.25(c)(2)).		
	G-6. The RTA specifies, or references documentation that specifies, a process to identify mitigations or strategies necessary as a result of safety risk assessments to reduce the likelihood and severity of the consequences of hazards (673.25(a) and 673.25(d)).		
	G-7. The RTA specifies, or references documentation that specifies, a process for safety risk management, with adequate means of risk mitigation (673.25 and 674.29(b)).		

FTA Guidance – Requirements and Considerations

G-1. The RTA specifies, or references documentation that specifies, a Safety Risk Management process for all system elements.
A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process must be comprised of the following activities: Safety hazard identification, safety risk assessment, and safety risk mitigation.

49 C.F.R. Part 673 proposes a more comprehensive process for identifying and managing safety risks through the life cycle of a rail transit system. It encourages the use of new safety analysis tools by adequately staffed and trained safety personnel and RTA departments, groups and committees, and subject matter experts. Also, safety risk management feeds into the SMS safety assurance process, to ensure that safety risk mitigations are evaluated for effectiveness over time. In addressing these new requirements, the RTA can update its SSPP language describing its hazard management process to reflect the new approach to safety risk management, including definitions and criteria related to safety risk management terms and activities (to be consistent with SMS concepts and terms under Part 673.5). The SSPP section also can be revised to include the new organizational and reporting structure developed for safety risk management, the new tools used to support safety risk analysis and evaluation, the new roles of the adequately trained and staffed safety or SMS department in supporting and conducting safety risk analysis, and any new requirements for coordinating with and reporting to the SSOA regarding the implementation and results of the safety risk management process.

G-2. The RTA specifies, or references documentation that specifies, a process for hazard identification, including identifying consequences of hazards.
A transit agency must establish methods or processes to identify hazards and consequences of the hazards.

Pursuant to § 673.25(b)(1), each transit agency must establish a process for safety hazard identification, including the identification of the sources, both proactive and reactive, for identifying hazards and their associated consequences. Activities for hazard identification could include formalized processes where a transit agency identifies hazards throughout its entire system, logs them into a database, performs risk analyses, and identifies mitigation measures. These activities also could include safety focus groups, reviews of safety reporting trends, meetings with employees, scenario-based assessments, and What If? Analysis. A transit agency must apply its process for safety hazard identification to all elements of its system, including but not limited to its operational activities, system expansions, and state of good repair activities. FTA encourages transit agencies to take into account bicycle and pedestrian safety concerns, along with other factors, as agencies are conducting Safety Risk Management. A transit agency also should consider the results of its asset condition assessments when performing safety hazard identification activities within its SMS. The results of the condition assessments, and subsequent SMS analysis, will inform a transit agency's determination as to whether an asset meets the state of good repair standards under 49 C.F.R. part 625.

G-3. The RTA specifies, or references documentation that specifies, a process to include FTA, the SSOA, and other oversight authorities as sources for hazard information.
A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA.

G-4. The RTA specifies, or references documentation that specifies, a process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations.
A transit agency must establish methods or processes to assess the safety risks associated with identified safety hazards. A safety risk assessment includes an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations.

G-5. The RTA specifies, or references documentation that specifies, a process to prioritize hazards based on the safety risk.
A safety risk assessment includes...prioritization of the hazards based on the safety risk.

49 C.F.R. Part 659, and by extension the RTA SSPP, is more narrowly focused on hazards as opposed to safety risk management. Therefore, to address the 49 C.F.R. Part 673 provisions, the RTA can review the SSPP sections devoted to § 659.19(f)(2) and § 659.19(f)(3), and update, as appropriate, to describe the methods or processes, including the activities, roles, and participation of different agency departments, used in the assessment and prioritization of safety risks. This includes the identification of when SMEs will be involved in the safety risk assessment process. Also, this section may reference or explain the levels of management that have authority to make decisions as a function of the level of safety risk(s) evaluated, including when decisions should be elevated. In § 673.25(c)(2), each transit agency must assess safety risks in terms of probability (the likelihood of the hazard producing the potential consequences) and severity (the damage, or the potential consequences of a hazard, that may be caused if the hazard is not eliminated or its consequences are not successfully mitigated), and must assess existing mitigations, to support the prioritization of hazards based on safety risks. The RTA can use existing SSPP text to address many of the requirements of this section. When reviewing and potentially updating this text, the RTA should consider how well the existing SSPP text ensures:

- Potential consequences for hazards are identified;
- Existing mitigations – or defenses – are identified and assessed for the current effectiveness in addressing the potential consequences (note: it is possible that existing mitigations may not be working as intended); and
- Both the likelihood and severity of the potential consequences of the hazard are established (with current mitigations included).

G-6. The RTA specifies, or references documentation that specifies, a process to identify mitigations or strategies necessary as a result of safety risk assessments to reduce the likelihood and severity of the consequences of hazards.
A transit agency must establish methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences.

In § 673.25(d), each transit agency must establish criteria for the development of safety risk mitigations that are necessary based on the results of the agency's safety risk assessments. 49 C.F.R. Part 659 is more narrowly focused on the control and elimination of individual hazards that may be identified as opposed to establishment of "methods or processes" to manage safety risk agency wide. The RTA should consider reviewing its existing SSPP language and potentially updating or expanding it to describe how it identifies when mitigations or strategies may be necessary to reduce the likelihood of severity of consequence. For example, the RTA may decide that the criteria for developing safety risk mitigations could be the identification of a safety risk, benefit-cost analysis, a system level change (such as the addition of new technology on a vehicle), a change to operational procedures, or the expansion of service. To further illustrate these examples, the RTA may color code different levels of safety risk ("red" as high, "yellow" as medium, and "green" as minor) and develop different types of safety risk mitigations to correspond to those levels.

Also, the RTA should review how the existing SSPP text describes its activities for evaluating existing versus proposed mitigations to ensure the agency is not unknowingly assuming increased safety risk or misallocating safety resources in the case that similar mitigations exist. The RTA also may wish to consider reviewing and/or revising, as appropriate, current text to ensure it defines participation by SMEs during mitigation development. This review should include descriptions of how the agency makes decisions to prioritize and assign resources to address safety risks.

In addition, the RTA should ensures that the ASP documents how mitigations will be implemented and monitored, including:

- Mitigation to be implemented;
- Responsible party (individual and/or department);
- Timeframe for implementation;
- Safety performance indicator; and
- Safety performance target.

This information will directly support mitigation monitoring for effectiveness under 49 C.F.R. 673.27(b)(2).

G-7. The RTA specifies, or references documentation that specifies, a process for safety risk management, with adequate means of risk mitigation.
In determining whether a Public Transportation Agency Safety Plan is compliant with 49 C.F.R. part 673, an SSOA must determine, specifically, whether the Public Transportation Agency Safety Plan sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail fixed guideway public transportation system.

The SSOA must ensure that the safety risk management process laid out in the RTA's ASP is sufficiently detailed and provides adequate methods to identify, assess and mitigate safety risks.

Section H. Safety Assurance

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-1. The RTA specifies, or references documentation that specifies, its methods or processes to develop and implement a Safety Assurance process covering Safety Performance Monitoring and Measurement Management of Change, and Continuous Improvement (673.27).		

FTA Guidance – Requirements and Considerations

H-1. The RTA specifies, or references documentation that specifies, its methods or processes to develop and implement a Safety Assurance process covering Safety Performance Monitoring and Measurement Management of Change, and Continuous Improvement.

A transit agency must develop and implement a safety assurance process, consistent with this subpart. A rail fixed guideway public transportation system, and a recipient or subrecipient of Federal financial assistance under 49 U.S.C. Chapter 53 that operates more than one hundred vehicles in peak revenue service, must include in its safety assurance process each of the requirements in paragraphs (b), (c), and (d) of this section. A small public transportation provider only must include in its safety assurance process the requirements in paragraph (b) of this section.

Each RTA must develop and implement processes for Safety Assurance, including (1) safety performance monitoring and measurement, (2) management of change, and (3) continuous improvement. Each RTA's safety assurance activities should be scaled to the size and complexity of its operations. Through these activities, each transit agency should accurately determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing its SMS. Each RTA will need to establish its process for developing safety performance indicators and safety performance targets that are aligned with RTA safety objectives and represent the milestones that allow to track progress towards achievement of safety objectives. To accomplish this, each RTA will also need to revise its approach to the identification of the sources of safety data from service delivery-related functions, necessary to support safety performance monitoring. This will include the development of safety performance indicators and targets related not only to operational situations, but also related to effectiveness of mitigation strategies resulting from safety risk evaluation activities. Finally, each RTA will need to establish activities and criteria for analyzing data regarding remedial action for shortcomings in meeting safety performance targets, such that safety performance indicators and targets can be revised, as necessary.

The SSPP does not discuss the nexus between safety performance and the condition of transit assets or compliance with operating rules. Instead, inspection and monitoring activities are documented as separate programs managed by different departments (i.e., track inspections by the track department, rules compliance reviews by the operations department). Results of these programs are

only considered from a safety perspective when they are "entered into the hazard management process." In opening this section of its ASP, the RTA should consider developing text to address the role of safety assurance in ensuring ongoing, integrated assessment of the agency's safety performance across departments and functions.

Safety Performance Monitoring and Measurement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-2. The RTA specifies, or references documentation that specifies, its methods or processes to monitor system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance (673.27(b)(1)).		
	H-3. The RTA specifies, or references documentation that specifies, its methods or processes to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended (673.27(b)(2)).		
	H-4. The RTA specifies, or references documentation that specifies, its methods or processes to conduct investigations of safety events to identify causal factors (673.27(b)(3)) and that address:		
	H-4-a. SSOA requirements for notifying the SSOA of accidents including time limits for and methods of notification and what information the RTA must submit to the SSOA (674.27(a)(6) and 674.33(a)).		
	H-4-b. FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system (674.33(a)). Accident is defined as any instance involving a fatality occurring at the scene or within 30 days following the accident, one or more persons suffering serious injury (673.5 and 674.7), property damage resulting from a collision involving a rail transit vehicle or any derailment of a rail transit vehicle (674 Appendix).		
	H-4-c. What must be included in any investigation report developed on behalf of the SSOA, including at a minimum, identification of factors that caused		

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	or contributed to the accident and setting forth a Corrective Action Plan as appropriate (674.35(b)).		
	H-4-d. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event (674.35(a)).		
	H-4-e. The process through which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate (674.35(b)).		
	H-4-f. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Program (674.35(c)).		
	H-5. The RTA specifies, or references documentation that specifies, its methods or processes to monitor information reported through any internal safety reporting programs (673.27(b)(4)).		

FTA Guidance – Requirements and Considerations

H-2. The RTA specifies, or references documentation that specifies, its methods or processes to monitor system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance.
A transit agency must establish activities to monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance.

Each RTA will need to review and revise its current SSPP text to ensure that its ASP addresses the following items related to monitoring compliance with and sufficiency of established procedures for operations and maintenance:

- Identification of all safety standards and requirements, both internal to the agency as well as in recognition of any SSOA or FTA safety standards and requirements that must be complied with and assessed for sufficiency. Related to Part 674 (SSO Rule), each RTA should draft/revise text to address:
  - Activities for reviewing safety standards and requirements to ensure they are current
  - Activities the RTA will implement to monitor compliance with documented safety standards and requirements
  - Activities to monitor compliance with its safety policies, procedures and protocols related to service delivery
  - Methods for collecting and compiling information regarding compliance monitoring activities

o   Criteria for documenting and reporting non-compliance
o   Criteria for when non-compliance findings would be evaluated through the Safety Risk Management process

H-3. The RTA specifies, or references documentation that specifies, its methods or processes to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.
A transit agency must establish activities to monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

In § 673.27(b), each RTA must identify the data and information that it will collect from its operations, maintenance, and public transportation services so that it may monitor the agency's safety performance as well as the effectiveness of its SMS and safety risk mitigations. Each transit agency must monitor its operations and maintenance protocols and procedures, and any safety risk mitigations, to ensure that it is implementing them as planned and that mitigations are performing as intended.

H-4. The RTA specifies, or references documentation that specifies, its methods or processes to conduct investigations of safety events to identify causal factors (673.27(b)(3)) and that address:
A transit agency must establish activities to conduct investigations of safety events to identify causal factors.

H-4-a. SSOA requirements for notifying the SSOA of accidents including time limits for and methods of notification and what information the RTA must submit to the SSOA.
The SSO program standard must establish requirements for an RTA to notify the SSOA of accidents on the RTA's rail fixed guideway public transportation system. These requirements must address, specifically, the time limits for notification, methods of notification, and the nature of the information the RTA must submit to the SSOA... In addition to the requirements for accident notification set forth in an SSO program standard, an RTA must notify both the SSOA and the FTA within two hours of any accident occurring on a rail fixed guideway public transportation system. The criteria and thresholds for accident notification and reporting are defined in a reporting manual developed for the electronic reporting system specified by FTA as required in § 674.39(b), and in appendix A.

H-4-b. FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system (674.33(a)). Accident is defined as any instance involving a fatality occurring at the scene or within 30 days following the accident, one or more persons suffering serious injury, property damage resulting from a collision involving a rail transit vehicle or any derailment of a rail transit vehicle.
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.

H-4-c. What must be included in any investigation report developed on behalf of the SSOA, including at a minimum, identification of factors that caused or contributed to the accident and setting forth a Corrective Action Plan as appropriate.
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.

H-4-d. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event.
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.

H-4-e. The process through which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate.
All personnel and contractors that conduct investigations on behalf of an SSOA must be trained to perform their functions in accordance with the Public Transportation Safety Certification Training Program.

H-4-f. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Program.
The Administrator may conduct an independent investigation of any accident or an independent review of an SSOA's or an RTA's findings of causation of an accident.

Each RTA must investigate safety events (as defined in Part 673 and Part 674) and any reports of non-compliance with applicable regulations, standards, and legal authority. FTA expects each RTA to establish procedures for conducting investigations and to ensure that these procedures address the requirements in the SSO program standard, including requirements for the RTA to notify the SSOA of accidents on the RTA's rail fixed guideway public transportation system; the time limits for notification, methods of notification, and the nature of the information the RTA must submit to the SSOA; thresholds for accidents that require the RTA to conduct an investigation; how the SSOA will oversee an RTA's internal investigation; the role of the SSOA in supporting any investigation conducted or findings and recommendations made by the NTSB or FTA; and procedures for protecting the confidentiality of the investigation reports (as appropriate). FTA may conduct and independent investigation of any accident or an independent review of an SSOA's or an RTA's findings of causation of an accident. Based on the SSOA program standard, RTA's may choose to address these requirements in their ASP or in separate procedures referenced in the ASP.

H-5. The RTA specifies, or references documentation that specifies, its methods or processes to monitor information reported through any internal safety reporting programs.
A transit agency must establish activities to monitor information reported through any internal safety reporting programs.

Internal safety reporting programs and activities provide each RTA with additional information for identifying safety concerns. Internal safety reporting programs include the Employee Safety Reporting Program and other internal reporting programs that may provide safety data or information to support the SMS. The number and types of internal safety reporting systems will vary based on the size and complexity of the agency. Most agencies likely have several relevant programs, although they may not currently term these programs as "safety reporting" programs. These programs could include drug and alcohol testing programs, fitness for duty programs, hours of service programs, customer complaints, or operations or maintenance compliance or inspection programs.

Management of Change

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-6. The RTA specifies, or references documentation that specifies, its methods or processes to identify and assess changes that may introduce new hazards or impact the RTA's safety performance (673.27(c)(1)).		
	H-7. The RTA specifies, or references documentation that specifies, its methods or processes to evaluate any changes that may introduce new hazards or impact the agency's safety performance through the RTA's Safety Risk Management Process (673.27(c)(2)).		

FTA Guidance – Requirements and Considerations

H-6. The RTA specifies, or references documentation that specifies, its methods or processes to identify and assess changes that may introduce new hazards or impact the RTA's safety performance.
A transit agency must establish a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance.

H-7. The RTA specifies, or references documentation that specifies, its methods or processes to evaluate any changes that may introduce new hazards or impact the agency's safety performance through the RTA's Safety Risk Management Process.
If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process.

RTAs must develop processes for identifying and assessing changes that may introduce new hazards or impact safety performance. If an RTA determines that a change might impact safety, then the transit agency would need to evaluate the change using Safety Risk Management activities established under § 673.25. These changes would include changes to operations or maintenance

procedures, changes to service, the design and construction of major capital projects (such as New Starts and Small Starts projects and associated certifications), organizational changes, and any other changes to a transit agency's system that may impact safety performance. Each rail transit agency should include a description of the safety certification process that it uses to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for News Starts and other major capital projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment. To document this process, Each RTA will need to review, and revise as necessary, text that addresses a comprehensive approach to change identification. Revisions will typically include:

- Identification of internal and external sources of change
- Documentation of communication and coordination activities to ensure appropriate departments/individuals receive notifications of change
- Use of documented field activities to help identify changes in the operational environment that may not have been planned
- Development and use of criteria to identify and determine the extent of changes in the operational environment that would trigger the initiation of management of change activities
- Use of documented criteria to ensure that information regarding management of change activity is distributed to all relevant service delivery functions.

Each RTA will need to review, and revise as necessary, language to address the use of documented criteria for determining when changes must be assessed through the Safety Risk Management process, prior to implementation, to ensure that accepted levels of safety performance are not jeopardized or diminished. This includes the development of criteria such that in principle, no operations under changed conditions that may pose a safety impact may continue until a safety risk evaluation is conducted. In addition, each RTA will need to identify and document how monitoring activities will be updated, as necessary, to address changes that do not go through the Safety Risk Management process, thus ensuring the change and related mitigations perform as intended so as not to negatively impact safety performance.

Continuous Improvement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-8. The RTA specifies, or references documentation that specifies, its methods or processes to assess the RTA's safety performance (673.27(d)(1)), including:		
	H-8-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA Program Standard (674.27(a)(4)).		
	H-8-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature (674.27(a)(4)).		
	H-9. The RTA specifies, or references documentation that specifies, its methods or processes to develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment (673.27(d)(2)).		

FTA Guidance – Requirements and Considerations

H-8. The RTA specifies, or references documentation that specifies, its methods or processes to assess the RTA's safety performance, including:
A transit agency must establish a process to assess its safety performance.

H-8-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA Program Standard.

H-8-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature.
The SSO program standard must explain the role of the SSOA in overseeing an RTA's execution of its Public Transportation Agency Safety Plan and any related safety reviews of the RTA's fixed guideway public transportation system. The program standard must describe the process whereby the SSOA will receive and evaluate all material submitted under the signature of an RTA's accountable executive. Also, the program standard must establish a procedure whereby an RTA will notify the SSOA before the RTA conducts an internal review of any aspect of the safety of its rail fixed guideway public transportation system.

H-9. The RTA specifies, or references documentation that specifies, its methods or processes to develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment.

If a transit agency identifies any deficiencies as part of its safety performance assessment, then the transit agency must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies.

Each RTA must conduct a safety performance assessment annually. The safety performance assessment can be completed in conjunction with the annual review and update to its overall safety plan as required by 49 U.S.C. 5329(d)(1)(D) and 49 C.F.R. 673.11(a)(5). FTA does not prescribe the format or content of the annual assessment and leaves it up to the RTA to design an approach that is appropriate for its size and complexity. The RTA can assess the performance of an SMS through audits, reviews, assessments, and other verification and follow-up actions. To document activities to address this requirement in the ASP, the RTA will need to update its internal safety review process and associated procedures and criteria to ensure consistency with PTASP SMS requirements and the comprehensive review of safety management processes and activities, as well as those safety programs established to deliver on outputs of SMS activities. The RTA will also need to lay out is approach to addressing any safety deficiencies under the direction of the Accountable Executive. Finally, the RTA should consider updating its text to document how it will communicate with SSOA regarding safety performance reviews, activities, and results.

Section I. Safety Promotion

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	I-1. The RTA specifies, or references documentation that specifies, its methods or processes to establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety (673.29(a)) that:		
	I-1-a. Includes employees and contractors (673.29(a)).		
	I-1-b. Includes refresher training, as necessary (673.29(a)).		
	I-2. The RTA specifies, or references documentation that specifies, its methods or processes to communicate safety and safety performance information throughout the agency's organization (673.29(b)).		
	I-3. The RTA specifies, or references documentation that specifies, its methods or processes to convey information on hazards and safety risks relevant to employees' roles and responsibilities (673.29(b)).		
	I-4. The RTA specifies, or references documentation that specifies, its methods or processes to inform employees of safety actions taken in response to reports submitted through an employee safety reporting program (673.29(b)).		

FTA Guidance – Requirements and Considerations

I-1. The RTA specifies, or references documentation that specifies, its methods or processes to establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety that:
A transit agency must establish and implement a comprehensive safety training program for all agency employees and contractors directly responsible for safety in the agency's public transportation system. The training program must include refresher training, as necessary.

    I-1-a. Includes employees and contractors.
    I-1-b. Includes refresher training, as necessary.

FTA's requirements for a comprehensive safety training program address a statutory requirement under 49 U.S.C. 5329(d)(1)(G), which requires each operator of a public transportation system to establish "a comprehensive staff training program for the operations personnel and personnel directly responsible for safety" and includes "completion of a safety training program" and "continuing safety education and training." Given the unique operating environments and operating systems of each transit agency, FTA is providing great latitude and flexibility in complying with these provisions. Each transit agency should determine for themselves the classes of employees who are directly responsible for safety in that unique system. These employees could include vehicle operators, maintenance staff, dispatchers, the Chief Safety Officer, the Accountable Executive, and other agency staff and management who have direct responsibility for safety. The training program should cover all levels of employees and contractors.

Through the safety training program, each transit agency must require each employee and contractor, as applicable, to complete training to enable the individual to meet his or her role and responsibilities for safety, and to complete refresher training, as necessary, to stay current with the agency's safety practices and procedures. To address this requirement, each RTA will need to review PTASP requirements, including its development of SMS processes and activities to identify where it needs new training developed or where current training must be revised and updated. Each RTA will need to develop a plan for updating job descriptions and training requirements appropriate for each employee, for example, front line employees, managers and supervisors and senior managers.

For each, the RTA will need to establish a plan to deliver the training as well as identify and deliver on refresher training requirements. Each RTA will also need to address training requirements, including updates to current training, for contractors. In addition, each RTA will need to ensure compliance with FTA safety training provisions. Finally, as necessary, the RTA will need to integrate SMS responsibilities training into skills-based training for appropriate operational personnel.

I-2. The RTA specifies, or references documentation that specifies, its methods or processes to communicate safety and safety performance information throughout the agency's organization.
A transit agency must communicate safety and safety performance information throughout the agency's organization.

I-3. The RTA specifies, or references documentation that specifies, its methods or processes to convey information on hazards and safety risks relevant to employees' roles and responsibilities.
A transit agency must convey information on hazards and safety risks relevant to employees' roles and responsibilities.

I-4. The RTA specifies, or references documentation that specifies, its methods or processes to inform employees of safety actions taken in response to reports submitted through an employee safety reporting program (673.29(b)).
A transit agency must inform employees of safety actions taken in response to reports submitted through an employee safety reporting program.
To address § 673.29(b), each RTA must ensure that all employees are aware of any policies, activities, and procedures that are related to their safety-related roles and responsibilities. Safety communications may include information on hazards and safety risks

that are relevant to the employee's role and responsibilities; explain reasons that a transit agency introduces or changes policies, activities, or procedures; and explain to an employee when actions are taken in response to reports submitted by the employee through the employee safety reporting program. FTA expects that each transit agency would define the means and mechanisms for effective safety communication based on its organization, structure, and size of operations. Therefore, to address this requirement in the ASP, each RTA will need to document its approach to safety communication. Each RTA may consider the following as it documents its safety communication policies and activities:

- Documentation of how safety and safety performance information will be communicated throughout the organization.
- Documented criteria to trigger the communication of safety and safety performance information throughout the organization.
- Documented policies and/or procedures to communicate information related to SMS activities to appropriate personnel throughout the agency.
- Employees are made aware of safety management priorities and safety concerns at the organizational level and as they relate to their own duties and responsibilities.
- Communication of safety concerns and hazards to appropriate groups and individuals as it relates to their responsibilities.
- Communication of actions taken by the RTA to address safety concerns and hazards reported by employees through the employee safety reporting program.
- Communication of safety concerns, safety risks and safety performance to executive management.
- Documented policies and/or procedures for communicating safety performance and SMS information to FTA and the SSOA.
- How to ensure communication, and the means, are effective.

Section J. Corrective Action Plans

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	J-1. The RTA specifies, or references documentation that specifies, when the RTA must develop and carry out a CAP (674.37(a)).		
	J-2. The RTA specifies, or references documentation that specifies, how the RTA will submit CAPs to the SSOA for review and approval (674.37(a)).		
	J-3. The RTA specifies, or references documentation that specifies, how the RTA will manage immediate or emergency corrective actions (674.37(a)).		
	J-4. The RTA specifies, or references documentation that specifies, the required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions (674.37(a)).		
	J-5. The RTA specifies, or references documentation that specifies, how the RTA must periodically report to the SSOA on its progress in carrying out CAPs (674.37(a)).		

FTA Guidance – Requirements and Considerations

J-1. The RTA specifies, or references documentation that specifies, when the RTA must develop and carry out a CAP.
J-2. The RTA specifies, or references documentation that specifies, how the RTA will submit CAPs to the SSOA for review and approval.
J-3. The RTA specifies, or references documentation that specifies, how the RTA will manage immediate or emergency corrective actions.
In any instance in which an RTA must develop and carry out a CAP, the SSOA must review and approve the CAP before the RTA carries out the plan, however, an exception may be made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that the SSOA has been given timely notification, and the SSOA provides subsequent review and approval.

J-4. The RTA specifies, or references documentation that specifies, the required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.
A CAP must describe, specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.

J-5. The RTA specifies, or references documentation that specifies, how the RTA must periodically report to the SSOA on its progress in carrying out CAPs.
The RTA must periodically report to the SSOA on its progress in carrying out the CAP.

As specified in FTA's SSO rule, a CAP is "a plan developed by an RTA that describes the actions the RTA will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either an SSOA, FTA or an RTA may require that RTA to develop and carry out a CAP." FTA considers CAPs the result of a joint effort between RTAs and SSOAs, to be developed in a collaborative manner, particularly since both an SSOA and RTA have a shared and critical interest in safety. FTA expects that the RTA should be given the opportunity to present a CAP to an SSOA for its review and approval, particularly since the RTA is most familiar with the risks and hazards within its system. While FTA does not believe it is the responsibility of the SSOA to develop CAPs for an RTA, ultimately it is the responsibility of the SSOA, as the oversight agency, to ensure that RTAs are developing and implementing appropriate CAPs. This process must be documented and implemented by the RTA and overseen by the SSOA. It includes:

- Establishing when the RTA must develop and carry out a CAP reviewed and approved by the SSOA.
- Establishing that the SSOA must review and approve each CAP before the RTA carries it out, unless it is an immediate or emergency CAP, which must be subsequently reviewed and approved by the SSOA following the process outlined in the SSOA's program standard.
- Establishing that each CAP to be reviewed and approved by the SSOA must describe, specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.
- Establishing that the RTA must periodically report to the SSOA on its progress in carrying out CAPs as specified in the SSOA program standard.
- Establishing that SSOA 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.

Section K. Documentation, Definitions and Acronyms

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	K-1. The RTA specifies, or references documentation that specifies, how the RTA will document key processes and procedures required to carry out the SMS that are not included or referenced elsewhere in the (ASP)(673.31).		
	K-2. The RTA specifies, or references documentation that specifies, how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created (673.31).		
	K-3. The RTA specifies, or references documentation that specifies, how the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to any SMS documentation maintained by the RTA upon request (673.31).		
	K-4. The RTA specifies, or references documentation that specifies, applicable definitions from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		
	K-5. The RTA specifies, or references documentation that specifies, applicable acronyms from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		

FTA Guidance – Requirements and Considerations

K-1. The RTA specifies, or references documentation that specifies, how the RTA will document key processes and procedures required to carry out the SMS that are not included or referenced elsewhere in the ASP.
At all times, a transit agency must maintain documents that set forth its Public Transportation Agency Safety Plan, including those related to the implementation of its SMS, and results from SMS processes and activities.

K-2. The RTA specifies, or references documentation that specifies, how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created.
A transit agency must maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that the agency uses to carry out its Public Transportation Agency Safety Plan...A transit agency must maintain these documents for a minimum of three years after they are created.

K-3. The RTA specifies, or references documentation that specifies, how the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to any SMS documentation maintained by the RTA upon request.
These documents must be made available upon request by the Federal Transit Administration or other Federal entity, or a State Safety Oversight Agency having jurisdiction.

K-4. The RTA specifies, or references documentation that specifies, applicable definitions from Part 673, Part 674, and the SSOA Program Standard.
See definitions in § 673.5 and §674.7.

K-5. The RTA specifies, or references documentation that specifies, applicable acronyms from Part 673, Part 674, and the SSOA Program Standard.
See definitions in § 673.5 and §674.7.

Part 673 requires each transit agency to keep records of its documents that are developed in accordance with this part. FTA expects a transit agency to maintain documents that set forth its ASP, including those related to the implementation of its SMS such as the results from SMS processes and activities. For the purpose of reviews, investigations, audits, or other purposes, this section requires each transit agency to make these documents available to FTA, SSOAs, and other Federal agencies as appropriate. A transit agency must maintain these documents for a minimum of three years. In addressing this new requirement, the RTA could identify the gaps between current safety program documentation and the PTASP rule requirements. The RTA could also review and revise (or develop new), as appropriate, policies and/or procedures that pertain to the documentation of PTASP and the results of its SMS processes and activities, as well as the control of these documents. Finally, the RTA could include information explaining how it ensures that documents are maintained, as required, and providing documents requested by the FTA or its SSOA.

Section L. SSOA Compliance Assessment

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	L-1. The ASP is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan (674.29(a)).		
	L-2. The ASP is in compliance with the SSOA's Program Standard (674.29(a)).		
	L-3. The ASP is approved by the RTA's board of directors or equivalent entity (674.29(b)).		
	L-4. The ASP sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system (674.29(b)).		
	L-5. The ASP includes a process and timeline for annually reviewing and updating the ASP (674.29(b)).		
	L-6. The ASP includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA (674.29(b)).		
	L-7. The ASP identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA (674.29(b)).		
	L-8. The ASP includes adequate methods to support the execution of the ASP by all employees, agents, and contractors for the rail transit system (674.29(b)).		
	L-9. The ASP sufficiently addresses other requirements under the regulations at 49 CFR Part 673 (674.29(b)).		

FTA Guidance – Requirements and Considerations

L-1. The ASP is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan.
L-2. The ASP is in compliance with the SSOA's Program Standard.
L-3. The ASP is approved by the RTA's board of directors or equivalent entity.
L-4. The ASP sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system.
L-5. The ASP includes a process and timeline for annually reviewing and updating the ASP.

L-6. The ASP includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA.
L-7. The ASP identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA.
L-8. The ASP includes adequate methods to support the execution of the ASP by all employees, agents, and contractors for the rail transit system.
L-9. The ASP sufficiently addresses other requirements under the regulations at 49 CFR Part 673.

In determining whether to approve the RTA's Agency Safety Plan, an SSOA must evaluate whether the Agency Safety Plan is consistent with the FTA's regulations implementing such Plans; is consistent with the National Public Transportation Safety Plan; and is in compliance with the program standard set by the SSOA. In determining whether the Agency Safety Plan is compliant with 49 CFR part 673, an SSOA must determine, specifically, whether the Agency Safety Plan is approved by the RTA's board of directors or equivalent entity; sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system; includes a process and timeline for annually reviewing and updating the safety plan; includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA; identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA; includes adequate methods to support the execution of the Agency Safety Plan by all employees, agents, and contractors for the rail transit system; and sufficiently addresses other requirements under the regulations at 49 CFR part 673.

One of the most significant changes in the SSO program for SSOAs and RTAs is the transition from the simple review and-approval of an RTA's SSPP under 49 C.F.R. Part 659 to the more hands-on, proactive role required for SSOAs in evaluating the effectiveness of an RTA's safety program and SMS. This means that SSOAs will need to make determinations based on their own expertise and authority. Rather than working from a set of prescriptive Federal standards, SSOAs must develop their own locally-developed state safety program standards and hold RTAs accountable to those standards. Above all, SSOAs must ensure that the Agency Safety Plan -- and the SMS it documents -- is appropriate for the size and complexity of the RTA.

Section M. Bipartisan Infrastructure Law (BIL)
Per 49 U.S.C. § 5329 / IIJA § 30012, the ASP:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	M-1. Provides State Safety oversight agencies authority to collect and analyze data and conduct risk-based inspections of rail fixed guideway transportation systems.		
	M-2. Requires agency safety plans to be consistent with Center for Disease Control and Prevention and State		

	health authority guidelines to minimize exposure to infectious disease.		
	M-3. Requires recipients serving an urbanized area with a population of fewer than 200,000 to develop their agency safety plan in cooperation with frontline employees.		
	M-4. Requires recipients of section 5307 funds that serve urbanized areas with populations of 200,000 or more to undertake the following activities: • Establish a Safety Committee, composed of representatives of frontlines employees and management that is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the agencies' safety risk assessment. • Develop, add to their agency safety plan, a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the national transit database. • Set risk reduction performance targets by using a three-year rolling average of the data submitted by the recipient to the National Transit Database and allocate not less than 0.75 percent of their section 5307 funds to safety related projects. • Required maintenance personnel to meet the existing safety training requirements and safety, operations, and maintenance personnel to complete de-escalations training.		

Additional Information about the BIL can be found at: Bipartisan Infrastructure Law | FTA (dot.gov)

Mapping of Agency Safety Plan Checklist and Sections from the System Safety Program Plan (SSPP)

For each section of the FTA's Agency Safety Plan Development and Review Checklist, the following are FTA guidance documents and sections of the System Safety Program Plan (SSPP) or Safety Program Description that should be accounted for under each of these checklist sections and related to the Agency Safety Plan. The intent is that the Agency Safety Plan will be focused on the Safety Management System (SMS) and Safety Performance, and at the same time, the Transit Agency must also account for its Safety Program Description that contains the content of the Safety Program that the SMS manages and assures.

The documentation in this checklist may be included directly in the Agency Safety Plan (indicate in the ASP Page Number(s)) or in documents referenced by the Agency Safety Plan that incorporate the transit agency's customization and integration of industry safety standards and requirements (indicate by adding to the Comments column). These are Safety Program Related Control Documents and will be related to the FTA's Minimum Standards for Safety in the future.

Section A. Transit Agency Information
None

Section B. Plan Development, Approval and Updates

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Plan Review and Modification (SSPP Element 4)		
	• 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.		Review and update, update process timeline, required approvals all covered in ASP. Interactions with SSO program covered in ASP B-4. SSPP Element 4 already addressed. Roles and Responsibilities addressed in Safety Management Policy Certification of Compliance is covered in the Internal Safety Audits in Safety Assurance

Section C. Emergency Preparedness and Response Plan

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Emergency Preparedness and Response Plan		Provide reference document
	Security and Emergency Preparedness Plan		Provide reference document, if separate
	Emergency Operations Plan/Emergency Management Plan		Provide reference document, if separate
	Emergency Management Program (SSPP Element 11)		
	- 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 are providing employee training are identified. - The agency's responsibilities for providing familiarization training to local public safety organizations are identified.		Review the above referenced documents or documentation and assure this content is addressed. This includes the need for after-action results from real emergencies and drills and exercises.

Section D. Safety Performance Targets

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	National Public Transportation Safety Plan (NSP)		Assure that the ASP addresses the current safety performance criteria, measures, and targets required. ASP should reference the need to address the NSP requirements.
	FTA's Guidance on Safety Performance Measures and Targets		Assure that the ASP addresses the FTA guidance adequately
	Safety Data Acquisition (SSPP Element 9)		
	• 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.		Review the safety performance targets discussion from the perspective of Safety Data Acquisition.

Section E. Development and Implementation of Safety Management System (SMS)
None

Section F. Safety Management Policy

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	FTA's Guidance on Safety Management Policy requirements and examples		Assure that the ASP addresses the FTA guidance adequately
	Policy Statement (SSPP Element 1)		
	• A policy statement is developed for the SSPP • The policy statement describes the authority that establishes the SSPP. • The policy statement is signed and endorsed by the RTA's chief executive		SSPP Element 1 is superseded by the Safety Management Policy requirements and the FTA's guidance documentation.
	Purpose, Goals and Objectives (SSPP Element 2)		
	• The purpose of the SSPP is defined. • Goals are identified to ensure that the SSPP fulfills its purpose.		Assure that the Safety Management Policy statement and section addresses the purpose, goals, and objectives for the ASP, SMS, and the Safety Program.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• 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.		
	Management Structure (SSPP Element 3)		
	• An overview of the management structure of the RTA is provided including an organization chart. • Organizational structure is clearly defined and includes: o History and scope of services 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 RTA to manage safety issues is provided		Supports F-4 above for roles and responsibilities. The organization charts (overall management and connection to Safety and Safety responsibilities) should continue to be provided in the Safety Management Policy section. The history, scope of services, physical characteristics, operations, and maintenance should be a part of Safety Risk Management and Safety Assurance (most likely referenced as a separate document or appendix). This information is a part of the system description to be used in risk assessments.
	Plan Implementation (SSPP Element 5)		
	• A description of the specific activities required to implement the SSPP 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 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.		Supports F-4 for roles and responsibilities. Assure a focus on the distribution of responsibilities, specifically that Safety is not just the responsibility of the Safety Department. Assure a description of the Safety Department as a resource to the overall organization, not the owner of all things Safety.

Section G. Safety Risk Management

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	FTA's Guidance on SRM and SA process elements		Assure that the ASP addresses the FTA guidance adequately. The boundary of what is in SRM versus SA is not clear at this point.
	FTA's Guidance on Sample Hazard Classification System		Assure that the ASP addresses the FTA guidance adequately
	FTA's Guidance on Sample Safety Risk Assessment Matrices		Assure that the ASP addresses the FTA guidance adequately
	FTA's Guidance on Safety Risk Registers and Examples		Assure that the ASP addresses the FTA guidance adequately. Note that the Safety Risk Register appears to essentially be the same as an Operational Hazard Analysis (OHA).
	FTA's Guidance on Mitigations and Corrective Actions		Assure that the ASP addresses the FTA guidance adequately.
	Hazard Management Plan		If this plan has been developed or required, this document needs to be converted to work together with the SRM and SA processes.
	Coordination with other Risk Assessments such as Threat and Vulnerability Assessments (TVAs) from an all-hazards and public safety perspective.		Assure that the ASP addresses that priorities are made from an all-hazards perspective.
	Hazard Management Process (SSPP Element 6)		
	• The process used by the RTA to implement its hazard management program, including the role of the oversight agency in providing on-going communication, 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.		This information should be accounted for in the SRM description. The SSO program may include a requirement for a Hazard Management Plan that should be modified to account for the new terminology presented in the ASP. Also, need to assure the difference between mitigations and corrective actions, every hazard does not require a corrective action, but may require a mitigation plan.
	Safety Certification Process (SSPP Element 7), System Modifications (SSPP Element 8), and Procurement (SSPP Element 21)		

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• The use and requirement to complete hazard analyses, risk assessment, and prioritization for each of these SSPP Elements		Assure that each of these processes are accounted for in the ASP SRM section.

Section H. Safety Assurance

Safety Performance Monitoring and Measurement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	FTA's Guidance on SRM and SA process elements		Assure that the ASP addresses the FTA guidance adequately. The boundary of what is in SRM versus SA is not clear at this point.
	FTA's Guidance on Safety Performance Measures and Targets		Assure that the ASP addresses the FTA guidance adequately
	FTA's Guidance on Sample Hazard Classification System		Assure that the ASP addresses the FTA guidance adequately
	FTA's Guidance on Mitigations and Corrective Actions		Assure that the ASP addresses the FTA guidance adequately.
	Hazard Management Plan		If this plan has been developed or required, this document needs to be modified to work together with the SRM and SA processes.
	Rail Operating Rule Book		Monitor for compliance with these rules or procedures.
	Roadway Worker Protection Plan		Monitor for compliance with these rules or procedures.
	Command and Control/Train Control SOPs		Monitor for compliance with these rules or procedures.
	Investigation Procedures		Monitor for compliance with these rules or procedures.
	Procedure requiring review of SOPs related to Safety		Monitor for compliance with these rules or procedures.
	Field Supervision SOPs		Monitor for compliance with these rules or procedures.
	Operations, Inspection, and Maintenance Manuals		Monitor for compliance with these rules or procedures.
	SOPs and Standards		Monitor for compliance with these standards, rules or procedures.
	Safety Data Acquisition (SSPP Element 9)		
	• 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		Monitor results of data collection, analysis, and results of safety performance measures.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	receives the necessary information to support implementation of the system safety program is clarified.		
	Incident Notification, Investigation, and Reporting (SSPP Element 10)		
	• A description is provided regarding the process used by the RTA to perform accident 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 safety 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.		Monitor results of investigations causal and contributing factors, along with patterns of potential safety issues and loss of control/mitigations not working as intended. Assure that the organization accident approach is included in the investigation process.
	Emergency Management Program (SSPP Element 11)		
	• The agency's emergency planning responsibilities and requirements are identified.		Monitor results of emergency responses, with a review of potential safety issues and processes/procedures not working as intended (after action reports). This

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• 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 are providing employee training are identified. • The agency's responsibilities for providing familiarization training to local public safety organizations are identified.		includes after-action results from real emergencies and drills and exercises.
	Internal Safety Audit Program (SSPP Element 12)		
	• A description of the process used by the RTA to ensure that planned and scheduled internal safety audits are performed to evaluate compliance with the SSPP is included. • Identification of departments and functions subject to audit is performed. • Auditors must be independent form 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 audits, including the development of checklists, and procedures for		Assure that the internal safety audits approach is risk-based, data-driven and comprehensive for the SMS and the entire Safety Program, including the safety program related control documents/minimum standards for safety.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	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 ISAP process and reporting must be coordinated with the state oversight agency. • The ISAP process should be comprehensive.		
	Rules Compliance (SSPP Element 13)		
	• 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.		Assure that the Rules Compliance process is being accomplished. Monitor results for indications of problems with adherence with rules and procedures, any need for changes to those rules and procedures, and any need for changes in the training program. This includes workers and supervision.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• Process for documenting results and incorporating them into the hazard management program.		
	Facilities and Equipment Inspections (SSPP Element 14)		
	• 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.		Assure that the Facilities and Equipment Inspections process is being accomplished. Monitor results for indications of problems with adherence with these inspections, any need for changes to those inspections, and any need for changes in the training program. This includes workers and supervision.
	Maintenance Audit and Inspection Program (SSPP Element 15)		
	• 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.		Assure that the Maintenance Audit and Inspection Program process is being accomplished. Monitor results for indications of problems with adherence with these inspections and maintenance, any need for changes to those inspections and maintenance, and any need for changes in the training program. This includes workers and supervision.
	Training and Certification Program (SSPP Element 16)		
	• 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.		Training and competencies are specifically a part of Safety Promotion. This topic is included in Safety Assurance for the aspect of monitoring and assuring that the required training is being accomplished for intended staff (operators, maintenance, supervision, management, etc.) and timeframe for training and refresher training. These are required mitigations for managing multiple safety-related hazards and safety performance.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• Description of the training and certification program for contractors 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.		
	Compliance with Local, State and Federal Safety Requirements (SSPP Element 18)		
	• 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, RTA controlled property are identified. • Processes for ensuring the employees and contractors know and follow the requirements are described.		Assure that Compliance with Local, State and Federal Safety Requirements processes are being accomplished. Monitor results for indications of problems with adherence with these requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision.
	Hazardous Materials Program (SSPP Element 19)		
	• A description of the hazardous materials program, including the process used to ensure knowledge of and compliance with program requirements is provided.		Assure that the Hazardous Materials Program process is being accomplished. Monitor results for indications of problems with adherence with these requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision.
	Drug and Alcohol Program (SSPP Element 20)		
	• A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements is provided.		Assure that the Drug and Alcohol Program process is being accomplished. Monitor results for indications of problems with adherence with these requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision.

Management of Change

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Safety Certification Plan		Monitor for compliance with these rules or procedures.
	Transit Asset Management Plan		Monitor for compliance with these rules or procedures.
	Configuration Management Plan		Monitor for compliance with these rules or procedures.
	Safety Certification Process (SSPP Element 7)		
	• A description of the safety certification process required by the RTA 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 or systems.		Assure that the Safety Certification process is being accomplished. Monitor results for indications of problems with adherence with these requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision, as well as management approval of risk, as appropriate. These changes are required to go through the Configuration Management process.
	System Modifications (SSPP Element 8)		
	• The process used by the RTA 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.		Assure that the System Modifications process is being accomplished. Monitor results for indications of problems with adherence with these requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision, as well as management approval of risk, as appropriate. These changes are required to go through the Configuration Management process.
	Procurement (SSPP Element 21)		
	• A description of the measures, controls, and assurances in place to ensure that safety principles, requirements, and representatives are included in the RTA procurement process.		Assure that the Procurement process is being accomplished. Monitor results for indications of problems with adherence with the safety-related requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision, as well as management approval of risk, as appropriate. Any changes to the safety-related controls are required to go through the Configuration Management process.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Configuration Management Process (SSPP Element 17)		
	• A description of the configuration management control process is provided and appropriate reference are made to other RTA 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.		Assure that the Configuration Management process is being accomplished. Monitor results for indications of problems with adherence with these requirements, any need for changes to those procedures, and any need for changes in the training program. This includes workers and supervision, as well as management approval of risk, as appropriate. Assure communication/notification of the configuration changes are made to affected departments, along with any needed changes to documents, procedures, and training.

Continuous Improvement

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Safety Data Acquisition (SSPP Element 9)		
	• 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.		Monitor results of data collection, analysis, and results of safety performance measures. Results are used for Continuous Improvement.
	Incident Notification, Investigation, and Reporting (SSPP Element 10)		
	• A description is provided regarding the process used by the RTA to perform accident 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,		Monitor results of investigations causal and contributing factors, along with patterns of potential safety issues and loss of control/mitigations not working as intended. Assure that the organization accident approach is included in the investigation process. Results are used for Continuous Improvement.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	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 safety 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.		
	Emergency Management Program (SSPP Element 11)		
	• 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 are providing employee training are identified.		Monitor results of emergency responses, with a review of potential safety issues and processes/procedures not working as intended (after action reports). Results are used for Continuous Improvement. This includes after-action results from real emergencies and drills and exercises.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• The agency's responsibilities for providing familiarization training to local public safety organizations are identified.		
	Internal Safety Audit Program (SSPP Element 12)		
	• A description of the process used by the RTA to ensure that planned and scheduled internal safety audits are performed to evaluate compliance with the SSPP is included. • Identification of departments and functions subject to audit is performed. • Auditors must be independent form 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 audits, 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 ISAP process and reporting must be coordinated with the state oversight agency. • The ISAP process should be comprehensive.		Assure that the internal safety audits approach is risk-based, data-driven and comprehensive for the SMS and the entire Safety Program, including the safety program related control documents/minimum standards for safety. Results are used for Continuous Improvement.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Plan Review and Modification (SSPP Element 4)		
	• 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.		The update of the ASP and Safety Program Description documents is a part of the Continuous Improvement process.

Section I. Safety Promotion

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Training and Competencies		
	Training requirements for designated staff under Part 672, Safety Certification Training Program		Monitor for compliance with these requirements.
	Training and Certification Program (SSPP Element 16)		
	• 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. • Description of the training and certification program for contractors is provided. • The process used to maintain and access employee and contractor training records is described.		Monitor for compliance with these requirements. Monitor for needs in defining staff competencies and changes needed for the training.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• The process used to assess compliance with training and certification requirements is described.		
	Emergency Management Program (SSPP Element 11)		
	• 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 are providing employee training are identified. • The agency's responsibilities for providing familiarization training to local public safety organizations are identified.		Monitor for needs in defining staff competencies and changes needed for training, based on after-action results from real emergencies, as well as drills and exercises.
	Safety Communication		
	National Public Transportation Safety Plan (NSP)		Focus is on assuring that the Safety Communication addresses requirements provided in the NSP.
	FTA's Guidance on Safety Performance Measures and Targets		Assure that the ASP addresses the FTA guidance for Safety Communication adequately
	Safety Management Policy		Assure that the ASP addresses the requirement for the Safety Management Policy to be communicated across the agency.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Hazard Management Process (SSPP Element 6)		
	• The process used by the RTA to implement its hazard management program, including the role of the oversight agency in providing on-going communication, 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.		Focus is on the Hazard Management communications of hazard identification and hazard mitigations and resolutions.
	Safety Data Acquisition (SSPP Element 9)		
	• 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.		Focus is on the results of safety data analyses, safety performance measures and progress towards targets for improvement. This also includes the communication of safety and hazard identification issues and resolutions.
	Compliance with Local, State and Federal Safety Requirements (SSPP Element 18)		
	• 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, RTA controlled property are identified. • Processes for ensuring the employees and contractors know and follow the requirements are described.		Focus is on communication of issues and resolutions for safety performance, hazard identification, and resolutions.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Hazardous Materials Program (SSPP Element 19)		
	• A description of the hazardous materials program, including the process used to ensure knowledge of and compliance with program requirements is provided.		Focus is on communication of issues and resolutions for safety performance, hazard identification, and resolutions.
	Drug and Alcohol Program (SSPP Element 20)		
	• A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements is provided.		Focus is on communication of issues and resolutions for safety performance, hazard identification, and resolutions.

Section J. Corrective Action Plans

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	FTA's Guidance on Mitigations and Corrective Actions		Assure that the ASP addresses the FTA guidance adequately.
	SSO Program Standard Section and Procedures on CAPs		Monitor for compliance with these requirements.
	Hazard Management Plan		If this plan has been developed or required, this document needs to work together with the SRM and SA processes. Investigations of hazards may be completed and CAPs developed.
	Hazard Management Process (SSPP Element 6)		
	• The process used by the RTA to implement its hazard management program, including the role of the oversight agency in providing on-going communication, 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.		Focus is on the Hazard Management activities that result in CAPs development.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	Incident Notification, Investigation, and Reporting (SSPP Element 10)		
	• A description is provided regarding the process used by the RTA to perform accident 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 safety 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.		Focus is on resulting CAPs development.
	Emergency Management Program (SSPP Element 11)		
	• 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.		Focus is on resulting CAPs development.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	• 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 are providing employee training are identified. • The agency's responsibilities for providing familiarization training to local public safety organizations are identified.		
	Internal Safety Audit Program (SSPP Element 12)		
	• A description of the process used by the RTA to ensure that planned and scheduled internal safety audits are performed to evaluate compliance with the SSPP is included. • Identification of departments and functions subject to audit is performed. • Auditors must be independent form 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 audits, 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		Focus is on resulting CAPs development.

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	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 ISAP process and reporting must be coordinated with the state oversight agency. • The ISAP process should be comprehensive.		

Section K. Documentation, Definitions and Acronyms
None

Section L. SSOA Compliance Assessment

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	All aspects of the Safety Program Description, including the safety program related control documents/minimum standards for safety are accounted for and sufficiently addressed/described?		

Section M. Bipartisan Infrastructure Law

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	M-1. Provides State Safety oversight agencies authority to collect and analyze data and conduct risk-based inspections of rail fixed guideway transportation systems.		
	M-2. Requires agency safety plans to be consistent with Center for Disease Control and Prevention and State health authority guidelines to minimize exposure to infectious disease.		
	M-3. Requires recipients serving an urbanized area with a population of fewer than 200,000 to develop their agency safety plan in cooperation with frontline employees.		

	M-4. Requires recipients of section 5307 funds that serve urbanized areas with populations of 200,000 or more to undertake the following activities: • Establish a Safety Committee, composed of representatives of frontlines employees and management that is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the agencies' safety risk assessment. • Develop, add to their agency safety plan, a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the national transit database. • Set risk reduction performance targets by using a three-year rolling average of the data submitted by the recipient to the National Transit Database and allocate not less than 0.75 percent of their section 5307 funds to safety related projects. • Required maintenance personnel to meet the existing safety training requirements and safety, operations, and maintenance personnel to complete de-escalations training.		

State: Washington State Department of Transportation
RTA/RTS:

Public Transportation Agency Safety Plan (PTASP)
Review Checklist for Rail Transit Agencies (RTAs) and State Safety Oversight Agencies (SSOAs)
Version 2, 2023

The Federal Transit Administration (FTA) is providing the Public Transportation Agency Safety Plan Checklist for Rail Transit Agencies (RTAs) and State Safety Oversight Agencies (SSOAs) to assist with the development of the Public Transportation Agency Safety Plan (ASP) for rail transit modes.

Overview
Section A. Transit Agency Information
Section B. Plan Development, Approval, and Updates
Section C. Emergency Preparedness and Response Plan
Section D. Safety Performance Targets
Section E. Development and Implementation of Safety Management System (SMS)
Section F. Safety Management Policy
Section G. Safety Risk Management
Section H. Safety Assurance
Section I. Safety Promotion
Section J. Corrective Action Plans
Section K. Documentation, Definition and Acronyms
Section L. SSOA Compliance Assessment
Section M. Bipartisan Infrastructure Law

FTA Guidance and Safety Program Description Additions are focused on emerging guidance documents from FTA on the ASP and accounting for the entire Safety Program Description in addition to the SMS and assuring that it is complete and continues to address all of the previous system safety requirements. This includes safety program related control documents/minimum standards for safety.

The RTA specifies:

Compliant?	Checklist Item	ASP Page Number(s)	SSOA Comments
	A-1. Transit agency name and address		
	A-2. Mode(s) of transit service covered by the ASP (673.11(b))		
	A-3. SSOA and authority for State Safety Oversight (SSO) program.		
	A-4. An Accountable executive who is:		
	A-4-a. Accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's transit system (673.23(d)(1)).		
	A-4-b. Accountable for ensuring action is taken to address substandard performance in the agency's SMS (673.23(d)(1)).		
	A-5. A Chief Safety Officer (or SMS Executive) who:		
	A-5-a. Is designated by the Accountable Executive (673.23(d)(2)).		
	A-5-b. Holds a direct line of reporting to the Accountable Executive (673.23(d)(2) and 674.29(b)).		
	A-5-c. Is adequately trained (673.5 and 674.29(b)).		
	A-5-d. Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS (673.23(d)(2)).		
	A-5-e. Does not serve in other operational or maintenance capacities (673.5)).		

Section B. Plan Development, Approval and Updates

The RTA provides:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	B-1. The Accountable Executive's signature of the ASP (673.23(a)(1)) and date of signature.		
	B-2. The Board of Directors' or Equivalent Authority's approval of the ASP (673.23(a)(1) and 674.29(b)) and date of approval.		
	B-3. Certification of compliance with Part 673 (673.11(a)(4), 673.13, 674.29(a)), including the name of the individual or entity that certifies the ASP and date of certification.		
	B-4. Certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification (674.29(a)).		
	B-5. Process and timeline for conducting an annual review and update of the ASP (673.11(a)(5) and 674.29(b)), including the ASP version number and other relevant information.		

Section C. Emergency Preparedness and Response Plan

The RTA provides or references:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	C-1. An emergency preparedness and response plan or procedure that addresses, at a minimum:		
	C-1-a. The assignment of employee responsibilities during an emergency (673.11(a)(6))		
	C-1-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area (673.11(a)(6)).		

Section D. Safety Performance Targets

The RTA specifies or references documentation that specifies:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	D-1. Fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-2. Injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-3. Safety Events: Total number of reportable events and rate per total vehicle revenue miles, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-4. System Reliability: Mean (or average) distance between major mechanical failures, by rail transit mode (National Safety Plan and 673.11(a)(3)).		
	D-5. Performance targets are made available to the State to aid in the planning process (673.15(a)).		
	D-6. Performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process (673.15(a)).		
	D-7. Coordination with the State and MPOs in the selection of State and MPO safety performance targets, to the maximum extent practicable (673.15(b)).		

Section E. Development and Implementation of Safety Management System (SMS)

The RTA specifies or references documentation specifies:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	E-1. Its establishment and implementation of a Safety Management (SMS) (673.11(a)(2) and 673.21).		
	E-2. The SMS is appropriately scaled to the size, scope, and complexity of the RTA and includes Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion (673.21).		

Section F. Safety Management Policy

The RTA specifies or references documentation that specifies:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	F-1. Written statement of safety management policy, including the agency's safety objectives (673.5, 673.21(a), and 673.23(a)).		
	F-2. Employee safety reporting program, that includes:		
	F-2-a. A process that allows employees to report safety conditions to senior management (673.23(b)).		
	F-2-b. Protections for employees who report safety conditions to senior management (673.23(b)).		
	F-2-c. A description of employee behaviors that may result in disciplinary action (673.23(b)).		
	F-3. Communication of the safety management policy throughout the agency's organization (673.23(c)).		
	F-4. Necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA's SMS among the key safety roles within the organization:		
	F-4-a. Accountable Executive (673.5, 673.23(d)(1), and 674.7).		
	F-4-b. Chief Safety Officer (or SMS Executive) (673.5, 673.23(d)(2), and 674.29(b)).		
	F-4-c. Agency Leadership and Executive Management (673.23(d)(3)).		
	F-4-d. Key Staff (673.23(d)(4)).		
	F-5. Adequate methods to ensure implementation of ASP by all employees, agents and contractors (674.29(b)).		

Section G. Safety Risk Management

The RTA specifies or references documentation that specifies:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	G-1. Safety Risk Management process for all system elements (673.21(b), 672.25, and 674.29(b)).		
	G-2. Process for hazard identification, including identifying consequences of hazards (673.25(a), 673.25(b)(1), and 674.7).		
	G-3. Process to include FTA, the SSOA, and other oversight authorities as sources for hazard information (673.25(b)(2)).		
	G-4. Process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations (673.7, 673.25(c), and 674.7).		
	G-5. Process to prioritize hazards based on the safety risk (673.25(c)(2)).		
	G-6. Process to identify mitigations or strategies necessary as a result of safety risk assessments to reduce the likelihood and severity of the consequences of hazards (673.25(a) and 673.25(d)).		
	G-7. Process for safety risk management, with adequate means of risk mitigation (673.25 and 674.29(b)).		

Section H. Safety Assurance

The RTA specifies, or references documentation that specifies, its methods or processes to:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-1. Develop and implement a Safety Assurance process covering Safety Performance Monitoring and Measurement Management of Change, and Continuous Improvement (673.27).		

Safety Performance Monitoring and Measurement

The RTA specifies, or references documentation that specifies, its methods or processes to:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-2. Monitor system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance (673.27(b)(1)).		
	H-3. Monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended (673.27(b)(2)).		
	H-4. Conduct investigations of safety events to identify causal factors (673.27(b)(3)) and that address:		
	H-4-a. SSOA requirements for notifying the SSOA of accidents including time limits for and methods of notification and what information the RTA must submit to the SSOA (674.27(a)(6) and 674.33(a)).		
	H-4-b. FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system (674.33(a)). Accident is defined as any instance involving a fatality occurring at the scene or within 30 days following the accident, one or more persons suffering serious injury (673.5 and 674.7), property damage resulting from a collision involving a rail transit vehicle or any derailment of a rail transit vehicle (674 Appendix).		
	H-4-c. What must be included in any investigation report developed on behalf of the SSOA, including at a minimum, identification of factors that caused or contributed to the accident and setting forth a Corrective Action Plan as appropriate (674.35(b)).		
	H-4-d. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event (674.35(a)).		
	H-4-e. The process through which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate (674.35(b)).		
	H-4-f. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Program (674.35(c)).		
	H-5. Monitor information reported through any internal safety reporting programs (673.27(b)(4)).		

Management of Change

The RTA specifies or references documentation that specifies its methods or processes to:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-6. Identify and assess changes that may introduce new hazards or impact the RTA's safety performance (673.27(c)(1)).		
	H-7. Evaluate any changes that may introduce new hazards or impact the agency's safety performance through the RTA's Safety Risk Management Process (673.27(c)(2)).		

Continuous Improvement

The RTA specifies or references documentation that specifies its methods or processes to:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	H-8. Assess the RTA's safety performance (673.27(d)(1)), including:		
	H-8-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA Program Standard (674.27(a)(4)).		
	H-8-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature (674.27(a)(4)).		
	H-9. Develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment (673.27(d)(2)).		

Section I. Safety Promotion

The RTA specifies, or references documentation that specifies, its methods or processes to:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	I-1. Establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety (673.29(a)) that:		
	I-1-a. Includes employees and contractors (673.29(a)).		
	I-1-b. Includes refresher training, as necessary (673.29(a)).		
	I-2. Communicate safety and safety performance information throughout the agency's organization (673.29(b)).		
	I-3. Convey information on hazards and safety risks relevant to employees' roles and responsibilities (673.29(b)).		
	I-4. Inform employees of safety actions taken in response to reports submitted through an employee safety reporting program (673.29(b)).		

Section J. Corrective Action Plans

The RTA specifies or references documentation that specifies:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	J-1. When the RTA must develop and carry out a CAP (674.37(a)).		
	J-2. How the RTA will submit CAPs to the SSOA for review and approval (674.37(a)).		
	J-3. How the RTA will manage immediate or emergency corrective actions (674.37(a)).		
	J-4. The required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions (674.37(a)).		
	J-5. How the RTA must periodically report to the SSOA on its progress in carrying out CAPs (674.37(a)).		

Section K. Documentation, Definitions and Acronyms

The RTA specifies or references documentation that specifies:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	K-1. How the RTA will document key processes and procedures required to carry out the SMS that not included or referenced elsewhere in the (ASP)(673.31).		
	K-2. How the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created (673.31).		
	K-3. How the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to any SMS documentation maintained by the RTA upon request (673.31).		
	K-4. Applicable definitions from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		
	K-5. Applicable acronyms from Part 673, Part 674, and the SSOA Program Standard (673.5 and 674.7).		

Section L. SSOA Compliance Assessment

Per 674.29(b), the ASP:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	L-1. Is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan (674.29(a)).		
	L-2. In compliance with the SSOA's Program Standard (674.29(a)).		
	L-3. Is approved by the RTA's board of directors or equivalent entity (674.29(b)).		
	L-4. Sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system (674.29(b)).		
	L-5. Includes a process and timeline for annually reviewing and updating the ASP (674.29(b)).		
	L-6. Includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA (674.29(b)).		

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	L-7. Identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA (674.29(b)).		
	L-8. Includes adequate methods to support the execution of the ASP by all employees, agents, and contractors for the rail transit system (674.29(b)).		
	L-9. Sufficiently addresses other requirements under the regulations at 49 CFR Part 673 (674.29(b)).		

Section M. Bipartisan Infrastructure Law
Per 49 U.S.C. § 5329 / IIJA § 30012, the ASP:

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	M-1. Provides State Safety oversight agencies authority to collect and analyze data and conduct risk-based inspections of rail fixed guideway transportation systems.		
	M-2. Requires agency safety plans to be consistent with Center for Disease Control and Prevention and State health authority guidelines to minimize exposure to infectious disease.		
	M-3. Requires recipients serving an urbanized area with a population of fewer than 200,000 to develop their agency safety plan in cooperation with frontline employees.		
	M-4. Requires recipients of section 5307 funds that serve urbanized areas with populations of 200,000 or more to undertake the following activities: • Establish a Safety Committee, composed of representatives of frontlines employees and management that is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the agencies' safety risk assessment. • Develop, add to their agency safety plan, a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the national transit database. • Set risk reduction performance targets by using a three-year rolling average of the data submitted by the		

	recipient to the National Transit Database and allocate not less than 0.75 percent of their section 5307 funds to safety related projects. • Required maintenance personnel to meet the existing safety training requirements and safety, operations, and maintenance personnel to complete de-escalations training.		

FTA Guidance and Safety Program Description Additions

Compliant?	Checklist Item	ASP Page Number(s)	Comments
	All aspects of the Safety Program Description, including the safety program related control documents/minimum standards for safety are accounted for and sufficiently addressed/described?		

05 Conflict of Interest (COI)

Version: 5/29/2020

Procedure SSO-002: Conflict of Interest (COI) Management is addressed in Part 674.41.

> **49 CFR §674.41 Conflicts of interest**
> (a) An SSOA must be financially and legally independent from any rail fixed guideway public transportation system under the oversight of the SSOA, unless the Administrator has issued a waiver of this requirement in accordance with § 674.13(b).
> (b) An SSOA may not employ any individual who provides services to a rail fixed guideway public transportation system under the oversight of the SSOA, unless the Administrator has issued a waiver of this requirement in accordance with § 674.13(b).
> (c) A contractor may not provide services to both an SSOA and a rail fixed guideway public transportation system under the oversight of that SSOA, unless the Administrator has issued a waiver of this prohibition.

Scope: This procedure explains the identification of potential WSDOT SSO program conflicts of interest (COI), review of these potential COIs, and the determination and documentation of decision-making based on the review of the potential COIs. An example of the use of this potential COI process will be when WSDOT is involved in providing grant funding to any of the Washington rail properties related to the rail systems. This procedure also includes a template form to capture the potential COI and any decisions and notes from the review of that potential COI. Completed template forms will become formal records to be tracked as part of the WSDOT SSO program.

Conflict of Interest Requirements: No individual or entity may provide services to both the WSDOT SSO program and a rail property when there is a conflict of interest (COI) or an appearance of a conflict. A potential COI situation occurs when an individual or entity performing work for a Washington rail property or the WSDOT SSO program is unable, or potentially unable to render impartial assistance or advice on the development or implementation of the standards and provisions of the WSDOT SSO program, or to objectively perform such work without bias. Each contractor is subject to full disclosure on all present and potential conflicts of interest in its activities or relationships prior to being awarded or during a contract with WSDOT or rail property within the state.

FTA's safety program authorization in 49 U.S.C. Section 5329 (from MAP-21) and 49 CFR Part 674 further describes financial independence that prohibits funding from the rail property to the WSDOT SSO program, and requires management of potential COI situations when the WSDOT Public Transportation Division participates in funding projects at an rail property. The WSDOT SSO program does not receive funding from any of the Washington rail properties and is hereby prohibited from doing so.

COI Identification, Assessment, and Resolution: Potential COI situations are required to be actively identified, disclosed, assessed, and resolved for the WSDOT SSO program. For any situation that might arise that could be a potential COI situation as described in the requirements above, a staff member of the WSDOT SSO program must assess and determine if the COI situation poses an actual conflict or violation of the SSO regulation (49 CFR Part 674).

This assessment and determination may require discussions with other staff, WSDOT Legal, and/or WSDOT management. Ultimately, for each COI assessment occurrence, the following form must be filled in to describe the potential COI situation, the assessment and resolution determined as part of this procedure, and what the next steps might be, if any. If there are next steps, when those steps are taken, another COI Review and Assessment form should be used to continue the assessment and resolution process.

As a part of this COI assessment procedure, each filled in COI Review and Assessment form becomes a record to be kept on file as part of the WSDOT SSO program.

05a WSDOT SSO Program Conflict of Interest (COI) Form

Version: 12/29/2019

WSDOT SSO Program
Conflict of Interest (COI) Review and Assessment

Date: _____

Potential COI Description: _____

_____

_____

Staff Reviewer: _____

Assessment and Resolution: _____

_____

_____

_____

_____

Next Steps: _____

_____

_____

_____

06 FTA SSOR System

Version: 5/12/2022

The State Safety Oversight Reporting system (SSOR) is the web-based tool for entering, tracking, submitting transit safety data to the Federal Transit Administration (FTA). Representatives of State Safety Oversight Agencies (SSOA) are the primary users of SSOR. This system replaced the Excel-based method that was used for the submission of safety data since 2007 up to reporting year 2018. The SSOR system ensures compliance with 49 CFR Part 674.39, which states that safety data "must be submitted electronically through a reporting system specified by FTA."

It is important to note that the Annual Report is still due to FTA by March 15th of each year or as allowed by FTA. All SSO programs are required to submit the annual reports to FTA using the SSOR system. The SSOR reports consist of event and transit safety data from the previous calendar year. It is important to note that SSOR uses the term "event" to describe accidents that meet the thresholds that are defined under 49 CFR Part 674.

In addition to the Annual Report, SSOR provides several capabilities for the SSOAs, including analytical reports, event discrepancy tracking, and an in-app communication feature – all of which allow SSOAs greater data control, and visibility into the reporting process. Below is a list of the basic features SSOR provides:

- **Annual Safety Data Entry:** *The primary function of SSOR.* Allows SSOA users to enter all data required as part of their annual safety report. A validation tool is provided to ensure data quality and completeness.
- **Annual Safety Report Submission:** Allows SSOA users to review, enter and submit data and required documents to FTA for approval. This feature also allows FTA to open 'issues' within the site and communicate these back to the States. The system provides tools to the SSOA to assist in resolving any identified issues.

- **Data Analytics*:** Users have access to a set of tables and graphs depicting SSOR's main data categories, which is provided to visualize data and identify trends. All data queried within SSOR is exportable to Excel.

- **Event Discrepancy Tracker*:** SSOR enables users to record discrepancies that occur between what an RTA-submitted to the NTD, and an SSOA's investigation report. This tool allows SSOAs to record and monitor the discrepancies between State and RTA event data, which reduces the need to rely on back-and-forth email.

- **Communication*:** Each page of the SSOR system includes a 'comments' or validation section. The system provides this section to allow SSOA users to ask questions and share thoughts amongst themselves as well as their contacts at FTA. When posting a comment, users can 'tag' another user in the system. Tagged users are notified of the comment, calling their attention to the portion of the report under discussion. This feature is intended to help the SSOA staff collaborate within their agency when entering data, as well as provide a method of quickly contacting FTA when questions arise.

This feature is provided as a convenience and not required as part of annual safety reporting.

FTA has provided a State Safety Oversight Reporting – SSOA User Manual, Version 1.0

Web Address is: https://faces.fta.dot.gov/suite/. The SSOR system and the User Manual are only available via the FTA website with access control verification.

Reference Guide Section 06a includes an internal Safety Program Annual Report template and guidance for the SSO to track each rail property's required reporting submissions. This information is then used for the WSDOT SSO Program Annual Submission to FTA.

Procedure SSO-006: De-identification Procedure.

Scope: This procedure explains the process and requirements for the rail property safety event investigations, internal audits, and corrective action plans (CAPs) data and information to be de-identified, coded, and delivered to the FTA on an annual or as needed/periodic basis, now using the SSOR system. 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.

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. Individual's names in the report should be redacted to only their title (e.g., Operator, Supervisor, Maintainer, Contractor, Passenger/Patron, Pedestrian, Bicycle Operator, or other), as appropriate. The shortened description of the investigation should not include names.
2. **Corrective actions** – the SSO is required to provide the name of the responsible person and his/her department when submitting CAPs to the FTA Annual Report.
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.
4. **Sensitive Security Information (SSI)** – all transmittals shall follow the established practices in "Sensitive Security Information (SSI): Designation, Markings and Control" published by the FTA in March 2009, as needed.

06a Annual SSO Program Internal Status Report Checklist

Version: 5/12/2022

Safety Program Annual Report

Name of Rail Transit Agency and System: _____

Calendar Year Completed and Reported: _____

Document purpose: The SSO will use the checklist to benchmark RTA-submitted data in SSOR before submitting annual report to the FTA.

Reportable Incidents
Number of reportable incidents: _____
For **each reportable incident,** provide:
1. Date and Time
2. Location
3. Number and Type of Fatalities and Injuries (Passenger, Patron, Public, or Employee/Contractor)
4. Damages ($)
5. Probable Cause (Equipment failure, poor maintenance, operating rules violation/human factor, slips and falls, imprudent action of customer, non-transit auto driver at fault, medically related, pedestrian actions, trespasser, suicide, other)
6. Initial Notification form submitted to WSDOT (Include as attachment)

Reportable Unacceptable Hazardous Conditions (UHC)
Number of unacceptable hazardous conditions: _____
For **each unacceptable hazardous condition,** provide:
1. Initial Notification form submitted to WSDOT (include as attachment)
2. Date identified
3. Location
4. Corrective Action Plan(s) developed/Implemented to address hazard. (include as attachment)

Internal Safety Audits for Recently Completed Year
For **all ASP internal safety audits in the recently completed calendar year** provide:
1. List of dates audits were conducted.
2. Completed audit checklists and final reports for the recently completed calendar year.
3. Current status of any corrective action plans relating to audit findings.

Internal Safety Audits for Current Year
For **all ASP internal safety audits in the current calendar year** provide:
1. List of dates audits conducted or scheduled.
2. Completed audit checklists and final reports for any completed in current year.
3. Current status of any corrective action plans relating to audit findings.

Annual CEO Certification Letter (Include as attachment)
Attach a letter from the agency's executive officer stating that the agency remained in compliance with its Agency Safety Plan and the Washington State Rail Safety Program

Standard or a letter that identifies areas of non-compliance and actions being taken to address them.

Version: 5/29/2020

Procedure SSO-004: Enforcement escalation procedure.

Scope: This procedure explains the process that the WSDOT SSO program uses to track potential unmitigated safety (or security) risk at the Washington rail properties and interactions with the rail properties to assure that these potential unmitigated safety risks are appropriately addressed. The focus for this procedure is on how the WSDOT SSO program may escalate this type of situation if there are disagreements or a lack of responsiveness from the Washington rail properties. This escalation of enforcement may include up to applying financial penalties – Washington Administrative Code (WAC) 468-550-080 or suspension of service, modification of service, or the removal of equipment due to failure to mitigate to hazardous conditions – WAC 468-550-090.

Background – Safety Risk Management and Safety Risk Monitoring: With limited budgets and resources, the WSDOT SSO program focuses on issues that have been identified already through National Transit Database (NTD) reporting, event investigations, audit results, and risk monitoring of various safety related activities and issues. For each of the Washington rail properties, there is a list of risk monitoring topics that are tracked and monitored to assure that mitigations are working and no new risks have been introduced by that mitigation.

Prioritization of hazard/risk issues is based on a concept of if you see or become aware of one issue/concern that might become a safety risk, it is noted and tracked. If the potential hazardous condition is observed (or reported) a second time, then it is tracked as a potential unmitigated risk that needs more attention. If observed (or reported) a third time, the response is escalated to an onsite visit to conduct interviews and collect relevant data, such as through inspections. This approach is used by the WSDOT SSO program to manage the limited resources for tracking potentially unmitigated risk. If at any time, the potential situation becomes a significant hazardous condition, the WSDOT SSO program will work with the rail property safety contact and/or Chief Safety Officer to respond right away.

This is an ongoing or continuous process of tracking, analysis, observing, and communicating with each of the Washington rail properties to be aware of the risk environment. One extremely important and related issue is that the Washington rail property should always own their own risk, not the WSDOT SSO Program, so care is required in this process to assure responsibility of the Washington rail property for managing and mitigating its own risk.

Enforcement Escalation: The WSDOT SSO program has a set of scheduled and ongoing activities that enable the program staff to monitor the risk environment at the Washington rail properties, as follows:

- On-going notification and investigation of safety-related events and communication and cooperation for internal and external audits (such as the WSDOT SSO program Triennial Safety Program Audit) at the Washington rail properties.
- Collection and analysis of monthly reporting of investigation, audit, and corrective action status and progress for each Washington rail property and for the performance of the overall WSDOT SSO program.

- Quarterly meetings onsite at the Washington rail properties to go over current safety-related activities and status of all corrective actions – open and recently closed. These onsite quarterly meetings often include additional days of meetings with various rail property staff to monitor and explore performance of the rail systems and activities.
- Additional visits to the Washington rail properties may also be planned between onsite quarterly meetings to follow-up on issues being tracked and to perform inspections and interviews at the Washington rail properties. Topics for these visits are set based on priorities from the ongoing safety risk monitoring process, see Reference Guide Section 17.

First level of escalation. Once the WSDOT SSO program staff identify something that appears to be a potentially significant hazardous condition, this situation is discussed directly with rail property staff and management. Often, there are several issues at the same time that are discovered and considered important for rail property attention and resolution. These risk-related issues are typically and almost always resolved at this level of discussion and interaction. The WSDOT SSO program documents these observations, inspections, interviews, planned resolutions, and continues to monitor for resolution and whether or not the risk issues are properly resolved over time.

Second level of escalation. If after some appropriate period of time, the WSDOT SSO program staff continue to observe a pattern of potentially significant risk issues already communicated to the Washington rail property, further communication will be made. This is typically performed through a formal letter from the WSDOT SSO program to the Accountable Executive of the Washington rail property. This letter provides the risk issues that were of concern to the WSDOT SSO program staff with a formal request to respond to the letter including an explanation of how the Washington rail property plans to address the identified concerns from the WSDOT SSO program. If the explanations from the Washington rail property are reasonable/acceptable, the issues and responses are documented, and risk monitoring continues. If the Washington rail property determines that the identified risk issues need more attention, then the WSDOT SSO program requires the Washington rail property to develop appropriate corrective actions that are agreed to and then tracked to completion. The response to a letter from the WSDOT SSO program might require a response from one to four weeks depending on the complexity of the identified risks. Experience has shown that the initial response from the Washington rail property is typically within one week.

Third level of escalation. WAC 568-550-080 provides a process for considering a financial penalty for a lack of response to noncompliance with the program standard or identified issues from the WSDOT SSO program. The WSDOT SSO program would follow the process described in that section if it ever became necessary.

Imminent Threat to Public Safety. Any time the WSDOT SSO Program becomes aware of an imminent threat to public safety at a Washington rail property, immediate communications with the rail property safety contact and/or Chief Safety Officer (and other appropriate rail property departments, as needed) and WSDOT SSO program management will be completed to determine if the threat is truly imminent and what the next steps might be. If the WSDOT SSO program manager concurs that it is necessary, immediate actions to address the imminent threat to public safety up to and including shutting down the rail system at the Washington rail property will be ordered per WAC 568-550-090 Suspension of service, modification of service, or the removal of equipment due to failure to mitigate to hazardous conditions.

468-550-080   Notifying of and applying financial penalties.

(1) If any RFGPTS fails to comply with any of the requirements or due dates specified in the Washington state rail safety oversight program standard, the department shall notify the RFGPTS in writing of such a violation. These violations will be designated by the department to be one or more findings of noncompliance.

(2) The RFGPTS will have fifteen calendar days to respond to this notification with:

(a) Documentation and records of corrective actions taken, for department review, that fully address the violations and findings of noncompliance; or

(b) Justification for its failure to comply or to provide the required records. The justification must include records of all supporting documentation, corrective actions taken, and all other mitigation plans proposed, planned or implemented with intent to address the violation.

(3) Within thirty days of receipt of the RFGPTS response, the department will review and issue one of the following determinations:

(a) Determination of compliance - Where the department determines that violations have been fully addressed and noncompliance findings can be closed.

(b) Determination of noncompliance with exception - Where the department determines that the RFGPTS has taken action to address violations and has a corrective action plan, acceptable in scope and schedule, in place to come into compliance.

(c) The department may establish a new deadline by which the corrective action plan addressing violations must be fully implemented. Failure by the RFGPTS to meet this new deadline may result in the issuance of a determination of noncompliance.

(d) Determination of noncompliance - Where the department determines that violations have not been adequately addressed by the RFGPTS and there is an absence of acceptable corrective actions taken and/or of acceptable scope and schedule of corrective actions to be taken.

(4) Where, the department issues a determination of noncompliance, the department may issue a second and final notification in writing that states a new deadline by which a financial penalty will be imposed if noncompliance findings cannot be addressed. The amount of the financial penalty will be stated in the written notification. If more than one finding of noncompliance exists, more than one financial penalty may be imposed. Financial penalties will be as follows:

(a) The department may issue a financial penalty of ten thousand dollars for each determination of noncompliance.

(b) Thirty days following the issuance of a financial penalty, the department will determine if the status of the violation remains in noncompliance status. This determination will be based on a review of all additional submittals and actions taken by the RFGPTS. If the status has not been changed to determination of compliance or determination of noncompliance with exception, the department may impose an additional financial penalty of ten thousand dollars per finding of noncompliance.

(c) Following each subsequent thirty-day period, the department will review all additional submittals and actions and impose an additional financial penalty of ten thousand dollars until the determination is reduced to either a finding of noncompliance with exception or a finding of compliance.

(d) If a RFGPTS fails to remit the full amount of the imposed financial penalty within sixty days of when due, the department may seek judicial enforcement to recover full payment. Venue for any action hereunder shall be Thurston County.

(5) Additionally, following any issuance by the department of a determination of noncompliance or of inadequate progress in addressing it, the department may require a meeting with the director responsible for the RFGPTS's operations and maintenance, or with the

agency's chief executive, to discuss the RFGPTS's progress in completing the documentation and the potential consequences of delay.

[Statutory Authority: RCW 81.104.115, 49 U.S.C. § 5329 and 49 C.F.R. Part 674. WSR 18-13-031, § 468-550-080, filed 6/11/18, effective 6/11/18. Statutory Authority: RCW 81.104.115. WSR 08-15-078, § 468-550-080, filed 7/15/08, effective 8/15/08. Statutory Authority: RCW 81.104.115(5). WSR 02-13-004, § 468-550-080, filed 6/6/02, effective 7/7/02. Statutory Authority: 1999 c 202 § 7. WSR 99-18-059 (Order 193), § 468-550-080, filed 8/30/99, effective 9/30/99.]

468-550-090   Suspension of service, modification of service, or the removal of equipment due to failure to mitigate to hazardous conditions.

When a known unacceptable hazardous condition is not mitigated to an acceptable level by RFGPTS owners or operators, the department may require the suspension or modification of service or the suspended use or removal of equipment. The department may impose sanctions per WAC 468-550-080 upon owners or operators of RFGPTS for failure to meet deadlines of submissions of required reports and audits.

[Statutory Authority: RCW 81.104.115, 49 U.S.C. § 5329 and 49 C.F.R. Part 674. WSR 18-13-031, § 468-550-090, filed 6/11/18, effective 6/11/18. Statutory Authority: RCW 81.104.115. WSR 08-15-078, § 468-550-090, filed 7/15/08, effective 8/15/08.]

08 SSO Program Data Management

Version: 5/12/2022

The WSDOT SSO program currently uses Excel spreadsheets to collect, review, and manage safety information for each rail property. The SSO currently manages all program data within the WSDOT PTD file system and is researching database software programs (i.e., Origami) to easily access RTA safety data. This capability will support several other critical SSO program activities, such as annual reporting, capital projects safety data review, and investigations.

The SSO will do the following with RTA data:

- Collect and maintain documents from RTAs related to hazard assessments, monthly CAP and hazard log reporting, capital improvement data required for project concurrence, and meeting minutes.
- Monitor data as uploaded to the SSOR tool (See reference guide 6a).
- Perform quarterly and annual safety data reviews for quality assurance, coordinated with the FTA SSOR system and data prior to annual FTA submission.
- Record keeping also includes shared file space design and upkeep for records of investigations, internal safety program audits, hazards, and formal corrective action plans.

The SSO will archive all data, i.e., safety data, hazard assessments, safety certification documentation and triennial audit files after 10 years.

09 Quarterly Program Status Report

Version: 5/30/2020

The Quarterly Program Status Report is intended to document all of the WSDOT SSO program accomplishments since the last quarterly report. These reports are intended as a record and a trigger to assure that all data collection, data sets, recordkeeping, and tracking are checked and up-to-date. Typical timing may be receipt of monthly status reporting from each rail property for investigations, internal safety program audits, hazards, and CAPs tracking by the 15th of the month. Then, the SSO program quarterly status report can be completed by the end of the quarter, this would mean due on April 30th, July 31st, October 31st, and January 31st.

This procedure/process is being developed and not yet required. When ready, this procedure will be accomplished by the WSDOT SSO program.

Start of Quarterly Program Status Report
1. Create a new folder for the new quarterly status report (ex. 2020-01) in SSO Program/Quarterly Status Report. Follow the convention of Year/Year-Month.
2. Copy over the files from the previous quarter, change previous quarter to current quarter, or change filename with current date at the end, as needed.
3. Open the Quarterly summary Events CAPs file, change the quarter at the top.
4. For all rows that were shaded as closed from the previous quarter, these should be deleted before starting the update.
5. All additions since the last report update should be bolded, remove bolding from the previous quarter. Bold indicates new progress this quarter.
6. Review the new investigations, investigations updates, and CAPs updates from email and update the table with new rows and date updates, as needed.
    a. Tracking number assigned by rail property with the addition of R-reportable, SR-state reportable, NR-non-reportable
    b. Description generally provided by rail property in the Fact Report form
    c. Date of Event
    d. Time to Contacting SSO Program – from the Notification Form or Investigation Report
    e. Draft Event Report Date – this is the date of the notification form, fact report form, and any status reports required every 30 days until the report is a draft final.
    f. Final Draft Event Report Date – when this date is available, the investigation report is ready for review, adoption, and approval process.
    g. Acceptance of Corrective Action Plan – first date is when the initial/immediate CAPs are approved via email; second date is the date of adoption and approval of the investigation along with review and approval of the CAPs
    h. CAP Status – once adopted and approved, one or more CAPs still open or all CAPs closed
    i. #CAPs Closed/Total
7. Continue updates as described next.

Corrective Action Plan (CAP) Process

Investigation Adopted and Approved
1. Update Quarterly Summary Events CAPs row with Adoption and Approval date
2. Add investigation information into a new record in the Reportable Events table

3. Are there CAPs in the investigation? No
    a. Add/update row in Quarterly Summary Events CAPs with required information, date of adoption and approval, Closed, and CAPs 0/0
    b. Shade row at 15%
4. Are there CAPs in the investigation? Yes
    a. Add CAPs in the investigation to the CAPs table
    b. Add/update row in Quarterly Summary Events CAPs with required information, date of adoption and approval, Open, and CAPs Closed/Total.

CAPs Change of Date Form
1. Find the CAP in the CAPs table
2. Update the Proposed Implementation field by adding a date to the current one in the field (ex, 11/30/2019; Revised 1/31/2020)
3. Use the Change of Date Form to populate a new entry in the CAP Progress field with the date of the request for change of date along with the status of the CAP and reason for the change of date (ex., 10/7/2019: Training is underway. More time is needed to completing training for staff on second and third shifts.)
4. Copy the Change of Date Form into the appropriate folder in the Investigations, Internal Audits, or Triennial Audits.

Request for CAP Closure
1. Receipt of email with a request for CAP closure
2. Review the evidence for CAP closure provided in the email request. Determine if the CAP closure evidence addresses the entire scope of the CAP and is otherwise consistent for closeout.
    a. If CAP closure is not agreed to, complete an email to rail property requesting clarification or additional information. No additional action is needed until rail property provides a response, and then this Request for CAP Closure process starts over.
    b. If CAP closure is agreed to, then continue this process.
3. Find the CAP in the CAPs table
4. Enter the date of request for CAP closure from the original requestor or the date provided in the evidence, such as the newest date of retraining on the training record.
5. Copy the CAPs closure evidence into the appropriate folder in the Investigations, Internal Audits, or Triennial Audits. The CAP number should be associated with the evidence saved on the share drive.
6. A new data record should be created in the CAP Closure table.
7. The number of CAPs closed on the appropriate row in the Quarterly summary Events CAPs file should be updated.
    a. If the CAPs closed change completes all CAPs, mark the record as Closed and shade the row at 15%.

All Other Sources of CAPs (Internal Audits, Triennial Audits, etc.)
1. When CAPs have been developed and reviewed and approved by the SSO program, the CAPs need to be added to the CAPs data table.
2. Updates to these CAPs should be completed as described above.

Completion of the Quarterly Status Report and Delivery
1. Once completed above, need to update additional files in the folder
    a. Reportable Event Tracking
    b. Internal Audits Tracking
    c. Triennial Audit Tracking
    d. SSO Quarterly Status presentation for the current month.
2. Complete the above information for each rail property and record as part of the report.
3. Update the calendar of events document with updates for dates of completion of planned or added activities for the SSO program.
4. Build an email to the SSO Program Manager with all of these files attached. Send.

10 Rail Property Data Analyses

Version: 5/30/2020

This Section is in development, along with databases, data sets, and reporting. This section is also envisioned to include the WSDOT data analysis staff.

This section should provide the following descriptions:

- Determine how often this type of analysis should be completed based on the data being received by the rail property.
- A data period should be chosen – current three-year internal safety program audit period underway, previous three-year period. Data should include all investigations, internal safety audits, CAPs, and the last Triennial. Hazards may also be included.
- Determine how often this analysis report for each rail property should be updated, at least once a year. In addition, an analysis report should be completed at the beginning of preparation for any Triennial Audit of the rail property.
- Update from the last analysis report for the rail property.
- Use the results, observations for ongoing Safety Risk Monitoring.
- The WSDOT SSO program staff should also collect and review data analysis completed by each of the rail properties, as that information becomes available.

The following might be a typical analysis report outline:

Introduction

Summary Results

Safety Oversight and Safety Risk Monitoring of the rail property
      Rail Property Rail System Description
      Notifying and Reporting Safety-Related Events
      Internal and Triennial Audits
      FTA Safety Advisories and Inquiries
      Hazard Management and Risk Monitoring

Data Analysis Results
      Rail System Passenger Operations
      Reportable Events
      Fatalities and Injuries
      Oversight Risk Monitoring and Inspections
      Corrective Actions Resolution Analysis

11 Internal WSDOT SSO Program Meetings

Version: 05/27/2022

The SSOA conducts formal and informal internal meetings while following these actions:

- Establish and attend bi-weekly meetings to discuss these core items: program standard updates, safety certification, RTA internal safety audit topics and schedule, annual reports, and FTA and RTA quarterly meetings.
- Coordinate with SSO program staff and management on an ad hoc or scheduled basis.
- Formal meetings should have an agenda to track topics, action items, and future meeting needs.
- Meeting minutes should include a high-level summary of each topic and action item. Following meetings should recap prior action items and request an update on open action items.
- Meeting agendas, minutes and presentation materials will be kept in the WSDOT PTD SSO file drive and archived after 10 years.

12 Triennial FTA Headquarters Audit of the SSO Program

Version: 5/29/2020

The FTA SSO program is required in Section 5329(e)(10)(B) to complete an audit of each state's SSO program at least every three years to assure compliance to Part 674 and Section 5329(e). During these triennial audits of the WSDOT SSO program, the FTA-TSO/SSO program staff request a tremendous number of documents and amount of information ahead of the onsite activities, which typically includes a visit to one or more of the rail properties. The WSDOT SSO program staff will work directly with the rail properties and the FTA SSO program staff to schedule and coordinate the onsite portion(s) of the FTA audit and the interviews and inspections that might be completed with rail property staff and on rail property. The WSDOT SSO program intends to negotiate on behalf of the state and the rail properties (with consultation) for all findings and recommendations documented in FTA's draft audit report, and work with the rail properties to develop and approve corrective actions to be tracked to completion, as needed, once the FTA audit report is final.

- The last FTA HQ Triennial Audit was in 2019, so the next audit should be 2022
- A copy of the last document request from FTA is provided for reference
- Preparation for the next FTA HQ Triennial Audit should start in mid-2021
    - Review the previous findings and assure appropriate attention and/or closure of any corrective actions defined
    - Review the SSO program documentation, processes, and records and consider any updates or changes that are needed in order for the SSO program documents to be up-to-date prior to the audit document request.

The process usually works in this order:

- On-going communications with FTA will be used to watch for scheduling of the next audit
- Negotiate with FTA and the rail properties to determine an appropriate timeframe and week for the onsite.
- Receive FTA's notification letter and document request.
- Determine with FTA the location(s) and topics to be reviewed during the audit.
- Work with the rail properties and SSO program management to complete planning and develop the schedule/itinerary – at the SSO Program office and one or more rail properties.
- Watch for the Document Request and respond within the requested timeframe. Include the rail properties, as needed, to assure as complete a response for FTA as possible.
- Participate and travel as needed for the onsite portion of the audit.
- Provide any follow up information or documentation.
- Watch for draft audit report, review and provide comments within the timeframe provided.
- Receive the final audit report. Respond to FTA's matrix of issues and respond with appropriate corrective actions, as needed.
- Complete the corrective actions as soon as reasonably possible. Provide required evidence to FTA for closure of those corrective actions.
- Receive corrective action completion letter from FTA, once all actions have been acceptably completed.

Version: 5/30/2020

Hazard Identification, Incidents, Occurrences, and Notifications

The rail property is required to develop and document in its Agency Safety Plan (ASP) a process to identify and resolve hazards on all aspects of its rail transit system and for all life cycle phases, including for all elements of existing systems as well as any modifications or major enhancements to them. The ASP must define the rail property's approach to safety risk management and the implementation of an integrated system-wide hazard resolution process. Procedures for the identification, notification, analysis, and evaluation of the probable cause and causal factors of incidents and occurrences are required along with identification and mitigation of hazards.

Hazard Identification
The rail property must specify the sources of, and the mechanisms to support, the ongoing identification of hazards; including from:
- Planning and design of new systems,
- Planning and design of system expansions;
- Construction or modification of system elements,
- Testing of new systems elements or components;
- Procurement of new systems elements or components;
- Preliminary hazard analysis;
- Inspections of critical system elements, including equipment, track and facilities;
- Incident and occurrence reports and accident investigations;
- Reports from employees and employee safety meetings;
- Review of unusual occurrences log;
- Review of compliance checks and evaluations;
- Analysis of maintenance logs and inspections;
- Findings from internal or external audits;
- Trend analysis of safety data;
- Comprehensive safety analysis;
- Root cause analysis;
- Close call reporting; and
- Job hazard analysis.

Hazard Notification
The ASP describes the rail property's procedures for ensuring that internal and external stakeholders are notified of hazards. These procedures should also identify the thresholds at which incidences and occurrences require notifications, analysis, and evaluation of potentially hazardous conditions. The ASP should include a list or worksheet of typical incidences and occurrences and their corresponding notification requirements to stakeholders. The purpose of this list is to prevent delay in notification, since items on this list will be known to result from undesirable or unacceptable hazards, and notification can occur prior to their analysis and evaluation.

Internal Hazard Notification

The ASP describes the process and procedures for the identification and recording of reasonably foreseeable hazards and the assessment and recording of risks once identified (on a prioritized basis) to ensure that the stakeholders within the rail property, including the safety department and management, are notified of hazards resulting from incidences, occurrences and accidents. The ASP must also describe how internal stakeholders are notified of hazards determined to be undesirable or unacceptable.

Unacceptable Hazardous Conditions

After an unacceptable hazard identification is made, the rail property determines what immediate measures should be in place to effectively eliminate or reduce the hazard risk to an acceptable level that will prevent or significantly reduce the potential harm from happening. The ASP describes the process for the notification, investigation, and mitigation of unacceptable hazardous conditions. This includes a description of the process for addressing the hazard in the immediate, short, and long term. The ASP describes the process for assuring and documenting that the hazard be mitigated to the point to allow for any affected service, equipment, facilities or other rail property-controlled resources to be returned to normal operations. The ASP requires documentation of measures taken and corrective action plans developed and being implemented by the rail property to address the hazardous conditions.

The rail property is required to notify the WSDOT SSO program within two hours when a hazard is determined to be unacceptable based on the analysis and evaluation process. A completed Safety Event or Unacceptable Hazardous Condition Initial Report is submitted to the WSDOT SSO program within 48 - hours.

An investigation is required for an unacceptable hazardous condition based on the existing investigation procedure. Hazards considered to be Unacceptable are automatically entered as CAP items in the CAP log. Hazards considered to be Undesirable are expected to be resolved within 6 months. Undesirable hazards not mitigated in this time frame will be elevated to the CAP log.

Significant Hazardous Condition Notifications

The WSDOT SSO program has established minimum requirements for the reporting of incidents and occurrences to its SSO program.

30-Day Notification of Safety Events via Logs

Rail Properties should track in a log all significant rail related safety events. Rail Properties must submit safety event logs to the SSO program at least monthly (email to TransitSafety@wsdot.wa.gov). Safety events that Rail Properties should track include however is not limited to the following:

1. Reportable Safety Events.
2. Significant Hazardous Conditions.
3. Close Calls:
    a. Rail vehicle to motor vehicle or object.
4. Safety Rule Violations:
    a. Red signal violation;
    b. Rail vehicle doors open on wrong side at platform;
    c. Berthing train at platform not at proper location;
    d. Wrong/unintended route (switch set in unexpected direction).

5. Rail system damage or problems that may disrupt service:
   a. Broken rail or track buckle;
   b. Railcar braking system failure;
   c. Rail vehicle door(s) open while vehicle is in motion;
   d. Signal system failure or problems;
   e. Flooding or ice on or near the right of way;
   f. Damage to the overhead catenary system;
   g. Mirror strikes;
   h. Hard couple (less than substantial damage) in a yard.
6. Emergency or hard braking of rail revenue vehicle.
7. Vehicles blocking the right of way that is not a close call.
8. Collision:
   a. With a motor vehicle, not at a grade crossing;
   b. With a person, non-serious injury;
   c. With an object, non-serious injuries and less than substantial damage.
9. Person(s) too close to rail dynamic envelope or trespassing on the right of way, not a close call.
10. Patron at station platform too close to rail dynamic envelope, not a close call.

Documents/Forms Related to Notifications:

13a WSDOT Unacceptable Hazardous Condition Notification Form
13b WSDOT Accident Notification Form

Documents/Forms Related to Investigations:

13c WSDOT Independent Investigation Review Checklist (Proposed version)

Investigation Reports

Reportable safety events, WSDOT SSO program additional reportable safety events, and significant hazardous conditions that will have investigations and reports developed for the WSDOT SSO program will have been notified and are described/listed in Program Standard Section 6. The reportable safety events are generally safety-related, but could also be security-related. In all cases, the rail property will be the lead investigator at least initially even if there is a need for the WSDOT SSO program, FTA, or the NTSB to lead the investigation. Since the rail property will be the lead investigator, it is required that the rail property has investigation procedures that follow industry practice for investigations and are reviewed, approved, and adopted by the WSDOT SSO program. These procedures have been designated a minimum safety standard and tracked for updates, as well as following the transit industry standard from the American Public Transportation Association (APTA).

- *Rail Transit Accident/Incident Notification and Investigation Requirements,* APTA RT-OP-S-002-02 Rev. 3, July 2018, https://www.apta.com/resources/standards/Documents/APTA%20RT-OP-S-002-02%20Rev%203.pdf.
- Guidelines for Performing Rail Transit Agency Accident Investigations (dot.gov)

The WSDOT SSO program staff may go to a rail property-led investigation as a resource or observer depending on the severity of the event that caused the investigation. In all cases, when the WSDOT SSO program staff intends to go to a rail property investigation, the rail property will be notified and the WSDOT SSO program staff will coordinate with the rail property staff. Only under unusual circumstances will the WSDOT SSO program staff take over and lead the investigation. An example might be if the rail property Safety Department is conflicted from leading the investigation.

In the cases where the WSDOT SSO program staff lead or participate in the investigation, the WSDOT SSO program staff will follow the rail property's investigation procedures as approved and adopted and reporting will follow the process described in this section. First and foremost, the WSDOT SSO staff going on-site for the investigation will follow all safety practices and procedures of the rail property. In addition, if the WSDOT SSO program staff takes over an investigation, the rail property will continue to be included in the investigation at least as a resource.

The WSDOT SSO program investigators are required to be trained according to the FTA Safety Certification Training Program and the rail property RWP plan and other applicable procedures and requirements. The rail property investigators are also required to have the appropriate training and experience for performing these investigations at the rail property. Also note that the expectation is that the investigation team will include the appropriate rail system expertise to successfully and thoroughly investigate the safety event that has occurred.

If the FTA or NTSB decides to go on-site at the rail property and take over or join an investigation, the rail property will support that investigation, as required. The WSDOT SSO program staff intends to also go on-site to support the rail property, FTA, and/or the NTSB as a resource or observer. Both the rail property and the WSDOT SSO program staff will follow the requirements and rules of the FTA or NTSB investigation. The WSDOT SSO program and the rail property will review (and comment on) the FTA or NTSB findings, draft and final reports, and the rail property will develop CAPs to implement any findings/recommendations, as appropriate,

agreed to, and approved by the WSDOT SSO program. This includes following the federal agency's investigation rules and procedures.

Independent Investigation Process and Procedure

If the WSDOT SSO program staff were required to perform an investigation at one of the Washington rail properties, the following procedure would be followed.

Procedure for WSDOT SSO Program Investigations

The WSDOT SSO program may choose to participate in or lead an investigation at a Washington rail property. In all cases, it is assumed that the rail property will be at least the initial investigator, even if the WSDOT SSO program joins or leads the investigation. If and when the WSDOT SSO program team participates or leads an investigation, the adopted and approved investigation procedures from the rail property will be used, as well as applicable rail property safety procedures, as documented in the minimum safety standards.
In establishing these procedures, the FTA expects that the SSO program will address the following:

- Options to observe rail property investigation activities. The SSO program may observe rail property staff during portions of the investigation, such as on-scene response or records reviews, attend and observe all meetings of the investigation team, and review all versions of reports and briefs resulting from investigation into safety events.
- Performing a checklist-based independent assessment of all reportable investigations to ensure all required elements are included in the report.
- Performing an assessment of accident investigations to examine: how evidence collected during the investigation is reflected in content of the final investigation report, strength of causal analysis determinations, and comprehensiveness of investigations.
- Performing an assessment of the investigation process, including adherence to notification protocols, submission of draft reports, status updates, and final reports within required timeframes, and record keeping of final reports among other items.

There are several technical rail system and vehicle topics for which the WSDOT SSO team (including contractors and/or Federal Railroad Administration Inspectors) might provide technical assistance and/or investigation services (as needed and resources allow), for topics such as the following:

- Track – rails, ties, roadbed, switches
- Structures, Tunnels, and supporting infrastructure (e.g., ventilation, end-of-line devices and braking strategies)
- Stations and access areas
- Substations/power – to include grounding issues and safety placarding
- Power/Load Control/SCADA
- Overhead catenary/contact system (OCS)
- Radio control and communications
- Signals and control systems (including wayside signal huts and rooms)
- Rail vehicles
- Rail vehicle maintenance facilities and special maintenance equipment – including Yard movement and control

- Rules and procedures for operations, maintenance, and command and control (including Right-of-Way Worker Protection – RWP)
- Capital projects and safety certification and auditing/inspections, including all management of change requirements

Notification

1. The WSDOT SSO program will inform the rail property of its decision to conduct or participate in an investigation, using investigation personnel distinct from the rail property staff.
2. The WSDOT SSO program will advise the rail property as to the personnel who will be participating or leading the investigation.
3. All WSDOT SSO program authorized investigation personnel are granted authority, under the WAC (468-550-070), to access records, materials, data, analysis, and other information which is pertinent to the investigation. The rail property is expected to provide the WSDOT SSO program investigation team with the resources and information necessary to conduct the investigation in an effective and efficient manner.
4. The WSDOT SSO program investigation team will arrive at the rail property as soon as practicable. The WSDOT SSO program investigation team will wait until the rail property and/or other emergency response personnel have secured the scene before commencing its participation in the investigation. The WSDOT SSO program reserves the right to request that the rail property preserve the scene to the maximum extent feasible until arrival and start of participation in the investigation.

Information Collection and Analysis

1. The WSDOT SSO program investigation team will observe or participate in field analysis, operational surveys, interviews, record checks, data analysis, and other onsite and off-site tasks that may be necessary for a comprehensive investigation.
2. The WSDOT SSO program investigation team will observe or participate in assessing physical evidence of the scene and document the environmental and physical factors of the scene through measurements, diagrams, and photographs.
3. As part of the investigation, the WSDOT SSO program investigation team will observe or participate in assessing compliance with operating rules and procedures; conducting follow-up interviews (if required); analyzing employee records and the results of post-accident drug and alcohol tests; and conducting vehicle and equipment inspections.
4. If the WSDOT SSO program investigation team requires information or analysis which is not readily available, or which may require additional resources by the rail property, it will request this information or analysis in a written request to the rail property.

Reporting and Recommendations

1. Upon completion of the onsite and off-site investigation requirements, the WSDOT SSO program investigation team will participate or lead in preparing a draft investigation report.
2. All information gathered from the investigation will be documented and included in the investigation report.
3. The WSDOT SSO program investigation team and the RTA/RTS will coordinate review and completion of the investigation report. The progress and final reports will follow the process described in Program Standard Section 7. Any disagreements between the WSDOT SSO program investigation team and the rail property will be either resolved through discussion or documented as part of the investigation report.

4. A final investigation report will be adopted and approved or issued by the WSDOT SSO program and shared with the rail property.

Follow Up

1. The final investigation report may contain findings and recommendations for addressing all deficiencies or unsafe conditions identified during the investigation process. The rail property will be responsible for developing appropriate corrective action plans (CAPs) for these issues from the investigation report, and the WSDOT SSO program will review and approve the agreed-to CAPs.

Investigation Progress and Final Reports

The APTA standard indicates that the purpose of accident/incident investigation is to gather and assess facts in order to determine cause(s); and to identify corrective measures to prevent recurrence. Accident/incident investigation is not intended to affix blame, or subject people to liability for their actions, or to recommend disciplinary action. This purpose statement is consistent with FTA's transit-specific SMS.

The accident/incident investigation outcomes or objectives and the data and information collection on-site and off-site the scene need to address organizational and procedural issues such as the following:

- **Safety Performance of the Rail Operator** – before, during, and after the event being investigated.
- **Safety Performance of the controller and Field Supervision (or others responding to the event)** – before, during, and after the event being investigated.
- **Securing the train/scene of the event and assuring there are no additional hazards** – need to assess the safety performance of those involved in this critical activity including the Rail Operator, Controller, Field Supervision, and any additional rail property personnel responding to the event. An example is the performance and following procedure and/or command to lower the pantograph or removing traction power. This also includes control of any train movement or single-tracking.
- **Safety Performance of any Passenger Evacuation** – this may be at a platform or on the right-of-way (ROW) to a platform; special attention should be given to control of an evacuation on the ROW (other rail property trains, freight rail traffic, if nearby), elevated track/guideway, and passengers with disabilities.
- **Consideration of future prevention of the event and/or any additional capabilities that would increase safety performance and emergency response.**

The above topics need to be evaluated from a safety performance perspective, including individuals and the organization, for:

- Staff recognizing the event or a potential event
- Following procedures
- Problem-solving
- Communication and coordination.

An analysis is required to develop the primary cause and contributing factors. Typical corrective actions are training/retraining, changing or adding procedures, awareness information (bulletins, orders, etc.) and activities, and/or adding/enhancing capabilities.

As an investigation proceeds from notification (Initial Notification), start of investigation, and completion of the investigation, the WSDOT SSO program follows the process shown in Procedure SSO-010, below.

Procedure SSO-010: Investigation Reporting Process.

Current Version: February 9, 2020

Scope: This procedure describes the WSDOT SSO Program process for safety event investigations at the Washington Rail Properties.

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 WSDOT SSO program requires notification and investigation for criteria from both SSO Rules and certain additional significant hazardous conditions as defined in Program Standard Section 6 of the program standard. Safety event investigations are covered in Program Standard Section 7.

Safety Event Investigation Procedure: Each Washington rail property has developed standard investigation procedures, and those procedures are adopted and approved by the WSDOT SSO program to allow the rail property to complete these investigations for the state. The WSDOT SSO program has the authority to join and/or lead any of these investigations and is required to follow the local rail property investigation procedures and reporting requirements in Program Standard Section 7.

As an investigation proceeds from notification, start of investigation, and through completion of the investigation, the WSDOT SSO program requires progress and final reports as follows:

- Submit to the SSO an initial accident report within two working days. This 48-hour report includes critical information gathered by the investigation team at the scene along with any immediate corrective actions taken by the rail property. SSO program staff will review the initial report and follow up with the Rail Property with any questions.

- Until it submits the final accident investigation report, the Rail Property must submit a status report every 30 days identifying the preliminary cause of the event and any circumstances that may delay the final investigation report.
- Within 45 calendar days of the accident, the Rail Property must submit a draft final investigation report. If circumstances do not allow the Rail Property to meet this deadline, it should communicate to the SSO through the status report described above.

The WSDOT SSO program requires that a rail property investigation report be standardized, and include at least the following topics (or as needed based on the complexity of the safety 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 WSDOT SSO program staff is the lead investigator, progress and investigation reports will follow the same process and content. The rail property 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 WSDOT SSO program and rail property staff to resolve any discrepancies and comments.

If the rail property completed the draft final investigation report, the WSDOT SSO program is required to independently review and agree to the sufficiency and thoroughness of the investigation report, including agreement with the primary cause and contributing factors of the safety event being investigated. The WSDOT 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 rail property (or the WSDOT SSO program) indicates that the investigation report is ready for final review, the WSDOT SSO program is required to complete an independent review, discussions with the rail property about content and any changes with the investigation or CAPs, and provide the adoption and approval letter and documentation. The final adopted and approved investigation report and CAPs are the source of required data reporting to FTA on an annual basis.

Procedure SSO-009: Investigation for Allegations of Rail Property Noncompliance with Agency Safety Plan (ASP) Procedure (including public input).

Current Version: February 9, 2020

Scope: This procedure addresses receipt of allegations of rail property noncompliance with their ASP.

Agency Safety Plan Investigation of Noncompliance Requirement:

§ 674.25(c). An SSOA has primary responsibility for the investigation of any allegation of noncompliance with a Public Transportation Agency Safety Plan.

Sources of Allegations of Rail Property ASP Noncompliance: The following are potential sources of allegations of rail property ASP noncompliance:

- Public
- Patrons
- Rail Property Employees
- Rail Property Safety Department
- SSO Program
- Federal Transit Administration (FTA)
- Others

The WSDOT SSO program requirements, processes and procedures are intended to be transparent. The program standard and contacts for the SSO program staff are publicly available on the WSDOT webpage describing the SSO program. This information is published with the acknowledgement that anyone can contact the WSDOT SSO program staff with any concerns, including allegations of rail property noncompliance with their ASP/safety program.

The WSDOT SSO program also uses this regulatory requirement to add investigations beyond those required by FTA for accidents as state/significant hazardous condition reportable events.

Investigation Procedure for Rail Property ASP Noncompliance: All allegations of rail property noncompliance with their ASP will be properly reviewed and investigated, as needed. If an allegation requires investigation, it will follow the procedures described in earlier in this Reference Guide Section and in the next procedure SSO-010 and/or the adopted and approved rail property investigation procedures. The WSDOT SSO program may require the rail property Safety Department to complete the investigation for the program under the same authority as any other safety event investigations. The investigation report and any issues or recommendations required will be communicated and coordinated between the WSDOT SSO program and the rail property Safety Department for resolution (and other rail property departments, as needed). The rail property will be required to develop a corrective action plan (CAP) or explanation of no need for a CAP. If CAP(s) are developed by the rail property, the WSDOT SSO program will review, approve and adopt the CAP(s) in the same manner as any other investigation report and CAP(s), including a formal review of the CAP(s). Any investigations for allegation of noncompliance with the rail property will be designated a significant hazardous condition investigation and follow standard record-keeping for that type of investigation.

UNACCEPTABLE HAZARDOUS CONDITION (UHC)
INITIAL REPORT

This form must be submitted to WSDOT within 2 business days of the identification of an unacceptable hazardous condition. WSDOT must be notified of unacceptable hazardous conditions within 2 hours of their discovery.

Rail Transit Agency and System:

Was WSDOT notified within 2hrs? ☐ Yes ☐ No

If yes, notified by: _____ Time/Date and method of notification: _____

Describe how this unacceptable hazardous condition was discovered?

Was the UHC discovered as a result of a **reportable accident investigation/analysis**? ☐ Yes ☐ No
If Yes, what is the date, accident location and tracking number ID: _____

Was the UHC discovered as a result of an **incident or occurrence investigation/analysis** ? ☐ Yes ☐ No
Please briefly describe the incident or occurrence, including date, time and location:

Did the UHC result from the **discovery of a trend** ☐ Yes ☐ No

Was the UHC discovered resulting from a **hazard analysis**? ☐ Yes ☐ No

UNACCEPTABLE HAZARDOUS CONDITION (UHC)

Describe the Unacceptable Hazardous Condition (UHC):

Date Identified:	Who Identified:	How Identified:
Location(s) of UHC:		

Initial Hazard Ranking:

1. Mitigations already taken by you or your contractors:

Residual Hazard Ranking:

Is the residual hazard ranking acceptable to your agency? ☐ Yes ☐ No
If Yes, no further actions required. If no, continue to #2

2. Mitigations that have been identified and will be implemented in the near term by you or your contractors:

Residual Hazard Ranking:

Is the residual hazard ranking acceptable to your agency? ☐ Yes ☐ No
If Yes, no further actions required. If no, continue to #3

3. Mitigations that have been identified and will be implemented in the long term by you or your contractors:

Residual Hazard Ranking:

Is the residual hazard ranking acceptable to your agency? ☐ Yes ☐ No
If no, what additional actions does your agency need to take?

Prepared By:

_____   _____   _____   _____
Name   **Signature**   **Title/Agency**   **Date**

SAFETY EVENT INITIAL REPORT

This form must be submitted to WSDOT within 48 hours of an incident WSDOT and FTA must be notified of reportable accidents within 2 hours.

Rail Transit Agency and System:
Reportable Event ☐
Was WSDOT notified within 2 hours? ☐Yes ☐No
If yes, notified by: _____Time/Date and method of notification: _____
Was FTA notified within 2 hours? ☐Yes ☐No
If yes, notified by: _____Time/Date and method of notification: _____
Was NTSB notified? ☐Yes ☐No
If yes, notified by: _____Time/Date and method of notification: _____
NTSB Case Number: _____

SAFETY EVENT

Reportable Event Notification Threshold Checklist WSDOT & FTA: (*Check all that apply. If none are checked, formal notification not required; See page 49 of WSDOT program standard*)
☐ Fatality at scene; OR where an individual is confirmed dead within 30 calendar days of transit-related incident, excludes natural causes;   ☐ One or more persons suffering serious **injury**(1);   ☐ Collision between a rail transit vehicle and another rail transit vehicle   ☐ Substantial **damage**(2) resulting from collision involving a rail transit vehicle;   ☐ An evacuation due to life safety reasons;   ☐ A derailment (mainline or yard);   ☐ A runaway train;   ☐ Fire resulting in a serious injury or fatality;

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1 Serious injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) causes severe hemorrhages, nerve, muscle, or tendon damage; (4) involves any internal organ; or (5) involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.)

2 Substantial damage EXCLUDES damage such as cracked windows, dented, bent or small punctured holes in the body, broken lights, mirrors, or removal from service for minor repair or maintenance, testing, or video and event recorder download.

Reportable WSDOT Event Notification Threshold Checklist: (*Check all that apply. See page 51 of WSDOT program standard*)

☐ Collision of a rail vehicle with a motor vehicle, bicycle, or person resulting in non-serious injuries and less than substantial damage.

☐ Evacuation of a rail vehicle for a non-life-safety reason into the right-of-way or street.

☐ Substantial damage to all rail related assets exceeding $25,000. Excludes collisions or derailments defined as accidents in Thresholds for two-hour accident notification to the Federal Transit Administration.

☐ Split switch of a rail revenue vehicle or work vehicle.

☐ Close calls that are not collisions between two rail vehicles. Includes collisions involving rail work equipment, or between a rail vehicle and a transit worker in the rail right-of-way

☐ Damage to the rail property's overhead catenary service that disrupts service. Includes significant damage, pull downs, and chipped or damaged pantographs.

☐ Two or more persons transported for a medical assessment with no obvious serious injury.

☐ An unacceptable hazardous condition determined by the Rail Property through its hazard management program as defined in its agency safety plan.

Fatalities(3):	Injuries:	Estimated Property Damage: $_____
Date and Time:	Location of Accident:	Type of Accident:

Describe what occurred:

Who responded to the accident scene, including rail transit and emergency response agency staff?	
Name	Title/Department/Agency

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3 Fatality refers to a death at the scene or where an individual is confirmed dead within 30 days.

When did normal operations resume?
What restrictions or special orders, if any?
OCS inspected prior to resuming operations: ☐Yes ☐No ☐NA
Track inspected prior to resuming operations: ☐Yes ☐No ☐NA
Signals inspected prior to resuming operations: ☐Yes ☐No ☐NA
Event Recorder Requested: ☐Yes ☐No ☐NA   By:
Digital Video Recording Requested: ☐Yes ☐No ☐NA By:
LRV Impounded: ☐Yes ☐No ☐NA , If yes, held by:
Impound Location:
Have/Are the police investigating the accident?   ☐Yes ☐No   If yes, what police agency?

Who is charged with leading your accident investigation?
Name: Title/Department/Agency:

Mitigations already taken by you or your contractors:

Have any short or long-term mitigations been identified by you or your contractors?

Prepared By:

Name	**Signature**	**Title/Agency**	**Date**

Investigation Review

Reference Guide 13C

Date

RTA Representative,
RTA Representative Job Title
RTA
RTA Street Address
RTA City, State, Zip

**Re: Adoption of Final Accident Investigation for INSERT SSO INVESTIGATION ID # &
RTA INVESTIGATION ID #**

RTA Rep,

Thank you for submitting the final accident investigation report detailing the INSERT HOW
EVENT IS REPORTABLE of SPECIFIC LOCATION on DATE. WSDOT has reviewed this
report and supporting documentation and agrees with its findings. OR WSDOT has reviewed and
will be requiring additional information. LIST ITEMS NEEDED.

WSDOT hereby adopts this accident investigation, which was conducted on its behalf, and the
resulting final report. By adopting this investigation and report, WSDOT satisfies the
requirement of 49 CPR Part 674.35 to conduct or cause to be investigated each reportable
accident. This report can now be considered final and closed out.

As required by 49 CFR Part 674.35 and the Washington State Rail Safety Oversight Program
Standard, please provide WSDOT with monthly status updates or preliminary reports for all open
accident investigations.

Sincerely,

_____
Ryan Sigurdson
Safety Oversight Specialist

Rail Transit Agency:

RTA Investigation Identification Number:

Investigator:

Investigators Qualifications:

Reportable due to (check all that apply)

☐ Fatality – One or more fatalities within 30 days of safety event

☐ Injuries- One or more serious injuries

☐ Collision between a rail transit vehicle and another rail transit vehicle- All, except normal coupling of rail cars in a yard

☐ Collision of a rail transit vehicle at a grade crossing- Only those resulting in substantial damage, serious injury, or fatality

☐ Collision of a rail transit vehicle with a person, motor vehicle, or object- Only those resulting in substantial damage, serious injury, or fatality

☐ A runaway train- all

☐ Evacuations- Due to life safety reasons

☐ Derailments- All, Mainline or Yard

☐ Property Damage- Substantial damage only for collisions with a person, object, or at a grade crossing

Short Description and Summary (Include what led up to the safety event):

Date and Time of Safety Event	Date: Time:
Weather Conditions (At the time of event)	☐ Sunny ☐Cloudy ☐Rainy ☐Windy ☐Snowy ☐ Overcast
Location of Safety Event- Include nearest station and location marker	(Provide here)
Train Identification	(Provide here)
Rail Line, Direction, Track Number	(Provide here)

NOTIFICATIONS

Who was Notification made to	☐ Internal RTA/RTS ☐SSO Program ☐FTA ☐NTSB ☐SSO Program Investigator ☐Other
How was Notification made, Date and Time	How Contacted: Date Contacted: Time Contacted: Reported in Two Hours: ☐Yes ☐No

Response Description /Immediate action Taken/ Casualties

TOPIC	YES/ NO/ N/A	SUPPORTING EVIDENCE

Response and Incident Command Description- Did someone respond to the scene? Was anyone relieved? Was the scene transitioned back to safety? Was scene released for repairs and back to operations?	☐ Yes ☐No ☐N/A	
Were Immediate Actions Taken? (Short term mitigation, anyone transported for medical attention, drug and alcohol testing)	☐ Yes ☐No ☐N/A	
Were there any Casualties? If yes, include location and follow up.	☐ Yes ☐No ☐N/A	

HUMAN FACTORS		
TOPIC	YES/ NO/ N/A	SUPPORTING EVIDENCE

Was there an Operator Involved?	☐ Yes ☐No ☐N/A	
Other Potential involved Employees? (Controller, Maintainer, field Supervision, Station Personnel, Management, etc.)	☐ Yes ☐No ☐N/A	
Drug & Alcohol Testing- Who, When, met required timeframe, if applicable.	☐ Yes ☐No ☐N/A	
Was Fatigue Management an issue? (Hours of Service, Previous rest cycle)	☐ Yes ☐No ☐N/A	
Were Training Records provided? (Is the Employee up-to-date, incident history and discipline)	☐ Yes ☐No ☐N/A	

INVESTIGATION DATA AND ANALYSIS		
TOPIC	YES/ NO/ N/A	SUPPORTING EVIDENCE

Operator Event report provided?	☐ Yes ☐No ☐N/A	
Field Supervisor report provided?	☐ Yes ☐No ☐N/A	
Employee History Reviewed?	☐ Yes ☐No ☐N/A	
Were Interviews conducted at the Scene?	☐ Yes ☐No ☐N/A	
Were there any Police activity or reports?	☐ Yes ☐No ☐N/A	
Was a post-accident inspection completed	☐ Yes ☐No ☐N/A	
Inspection, Maintenance, State of Good Repair Analysis- Vehicle, Infrastructure?	☐ Yes ☐No ☐N/A	
Video Analysis/ Review provide?	☐ Yes ☐No ☐N/A	
Event Recorder Analysis/ Review provided?	☐ Yes ☐No ☐N/A	
Communication Analysis provided?	☐ Yes ☐No ☐N/A	
Pictures, Drawings, measurements, and visual documentations provided?	☐ Yes ☐No ☐N/A	
Were any special Technical Services provided?(Metallurgy, Analytical services)	☐ Yes ☐No ☐N/A	
Any Reconstructions of the Safety Event?	☐ Yes ☐No ☐N/A	

DAMAGE / MAINTENANCE, RETURN TO SERVICE		
TOPIC	YES/ NO/ N/A	SUPPORTING EVIDENCE

Description of Damage Provide (Vehicle, Station, Infrastructures, Facilities, Signals, Crossing Gates, switches, Track)?	☐ Yes ☐No ☐N/A	
Labor and Material Cost Provided to bring system back to a State of Good Repair?	☐ Yes ☐No ☐N/A	
Vehicle status provided?	☐ Yes ☐No ☐N/A	
Status of infrastructure elements damaged, provided?	☐ Yes ☐No ☐N/A	

FINDINGS, CASUAL, AND CONTRIBUTING FACTORS

TOPIC	SUPPORTING EVIDENCE
What were the findings, casual or contributing factors?	

RECOMMENDATIONS AND CORRECTIVE ACTIONS

TOPIC	YES/NO/N/A	SUPPORTING EVIDENCE
List the recommendations and corrective actions	See Comment	
Do recommendations appear to address all of the findings and factors?	☐ Yes ☐No ☐N/A	
Are additional recommendations/corrective actions required to address issues reported in the investigation?	☐ Yes ☐No ☐N/A	
Were there any disputes between the investigation and the Rail Departments/Divisions?	☐ Yes ☐No ☐N/A	

REFERENCE REPORT/EXHIBITS, DISTRIBUTION AND INDEPENDENT INVESTIGATOR REVIEW

TOPIC	SUPPORTING EVIDENCE
List reports and exhibits related to the investigation report- For each document, list owner department or division, person if provided, and date completed.	
List request for information and request for additional information required to complete this investigation review (Case numbers, Drug and Alcohol testing information, missing information, other interactions with RTA to complete review.	
Report Distribution List- Was everyone that had a role in the investigation, approving management, or receiving recommendation included in the distribution?	☐ Yes ☐No ☐N/A
SSO completing the Independent Review	
Date Review completed	

[Electronic Signature]

I hereby approve the Affirmation of investigation sufficiency and thoroughness of this Investigation.

Version: June 2022

SSO Program Oversight of Rail Property Internal Safety Audits

49 CFR Part 674.27(a)(4) and 673.27(d) requires rail properties to conduct internal safety audits . Each rail property must develop a three-year cycle of internal safety audits that covers approximately one-third of its safety program topics each year. The purpose of the internal safety audits is to compare the content of the safety program documentation (baseline) to the activities that the rail property actually executes in order to assure that these activities are being sufficiently completed and safety performance is meeting or exceeding the established targets. Findings and changes might require the program documentation or minimum standards for safety be updated to reflect current activities or activities might need to be changed or added so that the documents and activities match.

To be in alignment with the Washington State Rail Safety Oversight Program Standard, rail properties must include the following topics in their three-year audit schedule:

- **Safety management system implementation**– Annually, internal safety audit staff should audit the rail property's implementation of its safety management system. This audit topic may include assessing progress towards achieving safety performance targets, safety management system training, and program recordkeeping.

- **Agency safety plan and safety management policy**–Annually, rail property internal safety audit staff should audit the rail property's compliance with its safety management policy and the requirement to annually review and update of its agency safety plan.

- **Safety Assurance—**Once throughout the three-year cycle, audit the rail property's compliance with its safety assurance processes as described in tis agency safety plan.

- **Safety Risk Management—**Once throughout the three-year cycle, audit the rail property's compliance with its safety risk management processes as described in tis agency safety plan.

- **Safety Promotion—**Once throughout the three-year cycle, audit the rail property's compliance with its safety promotion processes as described in tis agency safety plan.

Safety Program Topics Grouping

To help with internal safety audit planning, the SSO program established the following 12 safety program topic groupings. These groupings seek to align system safety topics from the old system safety program plan with the four safety management system components. Audit staff should base the selection of audit topics within each grouping on risk. The SSO program does not expect that the rail property will be able to audit all of safety program topics within a three-year cycle.

Grouping 1. Agency Safety Plan Program Management and Safety Management System Implementation
>Review records and recordkeeping for the safety management system and its implementation
>Annual agency safety plan review and update
>Minimum standards for safety Documentation and Tracking of
>Integration of safety management system with public safety and emergency Management
>Emergency Management Program
>Emergency operations plan(s) and related training for staff and emergency responders
>Drills and exercises program
>Integration of the safety department in policy and procedure development and changes

Grouping 2. Safety Management Policy
>Safety management policy documentation
>Agency's safety objectives
>Organizational accountabilities and responsibilities
>Employee safety reporting system
>Policy communication throughout transit agency

Grouping 3. Safety Risk Management
>Safety risk monitoring process that includes Management Process hazard identification, risk assessment and then prioritization, and selection and implementation of mitigations
>Safety Certification Process for the formal hazard analyses
>System Modifications for the formal hazard analyses
>Other sources of formal risk assessments that are related to safety and public safety

Grouping 4. Safety Assurance –Performance Measures and Safety Risk Monitoring
>Safety data acquisition
>Safety performance criteria, targets, and measures
>National Safety Plan
>FTA guidance on safety performance measures and targets
>Coordination with the State and MPO for safety performance measures and targets
>SSO Program Standard requirements and procedures for hazard identification, data collection, and risk assessments
>Hazard log, risk register, and corrective action plan tracking

Grouping 5. Safety Assurance – Notifications and Investigations of Safety Events
>Reportable Event Notification, Investigation, and Reporting
>Emergency Management Program
>Rail Property Investigation Procedure(s)

SSO Program Standard Requirements/Procedures for Safety Event notifications and investigations
Emergency Response/Operations Procedures
Rail Operating Rule Book and Required Training
Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
Field Supervision SOPs and Required Training

Grouping 6. Safety Assurance – Compliance with Operations Rules/Procedures
Rules Compliance
Rail Operating Rule Book and Required Training
Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
Field Supervision SOPs and Required Training
Inclement Weather Procedures and Refresher Training
Operator Certification/Refresher Training and Record-Keeping
Inspection and Maintenance Manuals, SOPs, and Standards, Supervision, Training, and Competency

Grouping 7. Safety Assurance – Compliance with Inspection and Maintenance (I&M) Requirements
Facilities and Equipment Inspections
Maintenance Audit and Inspection Program
Transit Asset Management (TAM) Plan
Inspection and Maintenance (I&M) Manuals, SOPs, Standards, Supervision, Training, and Competency
Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
Maintenance (equipment and rail infrastructure/systems) Job-based Certification/Refresher Training

Grouping 8. Safety Assurance – Compliance with Local, State, and Federal Safety Requirements
Compliance with Local, State, and Federal Safety Requirements, includes OSHA-Related Requirements at the state, local, and/or transit agency level
Hazardous Materials Program
Drug and Alcohol Program

Grouping 9. Safety Assurance – Management of Change
Safety Certification Process
System Modifications
Configuration Management
Procurement
Configuration Management Plan (CMP)
Safety Certification Plan (SCP)
Tracking of Significant Capital Projects
Safety-Related Procurement Specifications/Requirements

Grouping 10. Safety Assurance – Continuous Improvement
Internal Safety Audit Program
Tracking the Three-Year Cycle of ISAs

Safety Data Acquisition – includes results from investigations, internal audits, emergency management
Assuring Integration of the Safety Department in Policy and Procedure Development and Changes
Plan Review and Modification

Grouping 11. Safety Promotion – Training
Training and Certification Program
Rail Operating Rule Book and Required Training
Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
Field Supervision SOPs and Required Training
Inclement Weather Procedures and Refresher Training
Operator Certification/Refresher Training and Record-Keeping
Maintenance (equipment and rail infrastructure/systems) Job-based Certification/Refresher Training
Inspection and Maintenance Manuals, SOPs, and Standards, Supervision, Training, and Competency

Grouping 12. Safety Promotion – Communication
Policy Communication Throughout Transit Agency
Safety Data Acquisition – data analysis results for investigations, internal audits, hazard management, emergency response, rules/procedures compliance
Safety Performance Criteria, Targets, and Measures
Employee Safety Reporting System

Internal Audit Schedule and Plan
The WSDOT SSO program requires that each rail property provide a three-year schedule of internal safety audits at the beginning of that three-year cycle (required by March 31 of the year starting the three-year cycle) with a schedule of each of the three years of audits for the safety program. The audit schedule should include the SMS pillars and groupings that the RTA will audit for that cycle. This schedule of internal safety audits can change as needed so long as the overall three-year requirement of completing audits of all aspects of the ASP and safety program is met. The schedule and progress of internal safety audits each year is tracked as part of the monthly status tracking that includes CAPs, investigations, and internal safety audits.

The rail property develops any needed procedures and checklists for each planned audit and documents the results of completed internal safety audits. Each year, the rail properties are expected to schedule and prepare any needed documentation for their internal safety audits. Once the rail property is ready to schedule each of their internal safety audits, the WSDOT SSO program is required to be notified at least thirty (30) calendar days before the on-site internal safety audit activities. Staff from the WSDOT SSO program may participate in the rail property internal safety audits, as time and resources allow.

The rail property must ensure that the internal audit process allows for an objective review and assessment for all audit topics. This may require some audit topics to be audited by a different individual or audit team than for other audit topics. Auditors must not audit any topics that fall within the scope of their ongoing job responsibilities. The following general internal audit guidelines should be followed:

- The internal auditor should be free from any conflict of interest arising either from professional or personal relationships or other interests in an activity, which is subject to audit.
- The internal auditor should be free from undue influences which either restrict or modify the scope or conduct of their work or over-rule or significantly affect judgment as to the content of the internal audit report.
- The internal auditor should not allow their objectivity to be impaired when auditing an activity for which they have had authority or responsibility.
- An internal auditor should be consulted about significant proposed changes in the internal control system and the implementation of new systems and make recommendations on the standards of control to be applied.

Based on the results of each audit conducted, the rail property must prepare a written report documenting recommendations and any corrective actions identified as a result of the audit. The WSDOT SSO program requires that the internal audit reports produced for each audit be provided for review within thirty (30) calendar days of the closing conference, additional time requires communication and agreement with the WSDOT SSO program. This requirement is intended to help address any issues with the internal audit findings and CAPs developed and to streamline the approval of the rail property's annual report and certification letter. The Annual Report is further discussed in Section 9 of this program standard. Each rail property is required to provide the WSDOT SSO program with an annual internal safety audit report and certification letter of compliance along with the rail property's current ASP by March 1st of each year.

WSDOT SSO Program Participation in Internal Safety Audits
Once the rail property plan/procedure for the internal safety audit has been received and reviewed, the WSDOT SSO program staff may decide to participate with the on-site portion of

the audit. This intent for the WSDOT SSO program staff to participate in the internal safety audit should be communicated to the rail property Safety Department as soon as possible. WSDOT SSO program staff that intend to participate in the internal safety audit will need to have current track safety training and acceptable personal protective equipment (PPE) to be on the rail system or in the rail related facilities.

When the WSDOT SSO program staff observe the planned internal safety audit activities, they will need to follow and participate in any job safety briefings and follow all rail system procedures, as appropriate. Observations and field notes should be taken by the WSDOT SSO program staff, so that notes from the field visit can be recorded. Any documents or records collected during the internal safety audit may also be collected by the WSDOT SSO program staff. Permission for taking photographs should be covered ahead of the field visit or as part of the job safety briefing.

The SSO program will need to determine how much of this type of participation and observation in the internal safety audits can be completed within the WSDOT SSO program resources and balanced with other SSO program requirements and duties.

15 Corrective Action Plans (CAPs)

Version: June 2022

Corrective Action Plan (CAP) Process

Corrective action plan (CAP) means a plan developed by a Rail Transit Agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a corrective action plan.

Each CAP must identify:

- The hazard or programmatic deficiency
- The action to be taken by the rail property
- An implementation schedule/due date
- The individual(s) and department(s) responsible for the implementation
- Any other critical information, such as interim/short-term steps taken while awaiting longer-term mitigations to be implemented.

> **49 CFR §674.27(a)(8) – State safety oversight program standards**
> *Corrective Action Requirements.* The program standard must explain the process and criteria by which the SSOA may order an RTA to develop and carry out a Corrective Action Plan (CAP), and a procedure for the SSOA to review and approve a CAP. 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.
>
> **49 CFR §674.37 Corrective action plans**
> (a) In any instance in which an RTA must develop and carry out a CAP, the SSOA must review and approve the CAP before the RTA carries out the plan; however, an exception may be made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that the SSOA has been given timely notification, and the SSOA provides subsequent review and approval. A CAP must describe specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions. The RTA must periodically report to the SSOA on its progress in carrying out the CAP. The SSOA 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.
> (b) In any instance in which a safety event on the RTA's rail fixed guideway public transportation system is the subject of an investigation by the NTSB, the SSOA must evaluate whether the findings or recommendations by the NTSB require a CAP by the RTA, and if so, the SSOA must order the RTA to develop and carry out a CAP.

CAPs Sources and Approvals

Development of CAPs has differences depending on the safety program related source, and the state safety oversight (SSO) program or Federal Transit Administration (FTA) approvals are provided below. The 30-day deadline is a target and not currently in the program standard. See Section 8 of the program standard regarding CAPs.

Investigations, See Program Standard Section 6, Section 7 and Reference Guide Section 13.

- Safety Events, reportable to the FTA or State, may also include other federal agencies such as the National Transportation Safety Board (NTSB), Federal Railroad Administration (FRA), or Transportation Security Administration (TSA). These investigations may also be special external investigations or audits and include recommendations and corrective actions.
- Close Calls/Near Mishaps
- Significant Hazardous Conditions

- Immediate Actions Taken – Approval within 14 days calendar days
- Formal CAPs Developed in final investigation report – Review and Approval by the SSO program usually within 30 days

Internal Audits [includes Internal Audit department], See Program Standard Section 4 and Reference Guide Section 14.

- By report, recommendations/CAPs available when report final, this would include any Immediate Actions Taken if there are any
- Approve CAPs (and Immediate Actions Taken if there are any) within 30 days or with Annual Certification Approval, whichever comes first

Triennial Safety Program Audits, See Program Standard Section 5 and Reference Guide Section 19.

- With the final report, follow process in Program Standard, usually 45 days for the rail property to complete CAPs development, 30 days for the SSO program to approve

FTA Headquarters Audit of SSO Program, See Program Standard Section 1 and Reference Guide Section 12.

- Final Audit Report includes a Matrix from FTA to SSO Program, develop CAPs, within 30 days
- Coordinate with rail properties if CAPs focused on the rail properties
- FTA to approve the CAPs

Risk Monitoring and Hazard Identification Activities, See Program Standard Section 1 and Reference Guide Section 17.

- If CAPs needed based on these activities, rail property will be responsible to develop
- SSO Program to approve within 30 days

Procedure SSO-012: CAPs Process and Interactions with the SSO Program

Overview of CAPs Process, See also Program Standard Section 8.

Scope: This procedure provides a summary of CAPs development, SSO program review and approval, and how the SSO program tracks CAPs from the rail property and SSO program monthly reports. When the rail property is ready to close a CAP, evidence must be provided by the rail property Safety Department to the SSO program for concurrence. The 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 rail property via inspections or interviews, that verification needs to be completed and documented.

Regulatory and SSO Program Standard Requirements: 49 CFR Part 674.37(a) includes the following requirement –

The rail property must periodically report to the SSO program on its progress in carrying out the CAP. The SSO program may monitor the rail property's progress in carrying out the CAP through unannounced, onsite inspections, or any other means the SSO program deems necessary or appropriate.

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

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

1. **Rail Property Develops CAP(s)** – Rail property develops CAP(s), as appropriate, and submits to the SSO program
   - Immediate Actions Taken
   - All Other/Standard CAPs

2. **SSO Program Review and Approval** – Formal review and approval by the SSO program per the program standard [Record Required – letter, document, or email]
   - Immediate Actions Taken – within 14 calendar days for Investigations
   - Standard CAPs – within 30 calendar days of being final

3. **CAPs Tracking to Closure** – Tracking CAPs to completion, via periodic reports to the SSO program, see sample CAPs Tracking Log. SSO program required to track/monitor CAPs progress to closure up to and including unannounced inspections – our approach is to use Risk Monitoring to address tracking requirements. [Records are Reports, meeting notes, change of date/assignment/scope forms]
   - Monthly/Periodic Rail Property Status Reports, See Program Standard Section 1 and Reference Guide Section 9 for SSO Program Quarterly Status Reports.

- Other planned rail property meetings, such as safety and security review committee (SSRC) or equivalent committee, see Reference Guide Section 16 for committee tracking, Section 17 for risk monitoring and Section 9 for SSO Program Quarterly Status Report.
- Quarterly Meetings with rail properties – specifically to cover CAPs status, See Program Standard Section 1 and Reference Guide Section 17.
- Any changes to scope, assignment, or due date must be formally approved by the SSO program. Approval is automatic once the formal request has been made unless the SSO program takes exception through comments or questions, this is done for efficiency. These changes are completed through a record provided by the rail property Safety Department and/or through meetings with a record of the change. These changes are also checked as part of the SSO Program Quarterly Status Report process, Reference Guide Section 9.

CAPs Status Tracking: The Program Standard Section 1 describes the requirement for the rail properties to provide monthly status updates in a CAPs table or log. Program Standard 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 (see Reference Guide Section 9). These monthly status tracking reports from the rail properties include the status report of CAPs, hazard log, and daily safety event tracking, as well as safety committee meeting minutes for review by the SSO program. Once the monthly status tracking reports are received, the SSO program reviews all of the updates and compares that information to the SSO Program Tracking Data tracking (see Reference Guide Section 8) as well as email received during the previous month. Any discrepancies between the SSO Program records and the monthly status tracking reporting are communicated and resolved with the rail property. The open and recently closed CAPs at each rail property are reviewed at Quarterly meetings.

4. **CAPs Closure** – Once a CAP is complete, evidence of that closure is required by the rail property and provided to the SSO program. The CAP closure evidence is checked and filed as part of the SSO Program Quarterly Status Report process, Reference Guide Section 9. [Records are emails with communications and documentation as evidence of closure for each CAP]
   - Each CAP must have evidence of closure
   - Rail Property Safety Department should receive and concur
   - Then, provide to SSO program
   - SSO program formally review evidence and concur or ask questions or provide comments [Formal record is a document and/or email]

CAPs Closure: When the owner of a CAP at the rail property has completed the required actions, then evidence of that completion must be submitted to the rail property Safety Department for concurrence. Once the rail property Safety Department has concurred with the CAP closure, the evidence is provided to the 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 SSO program data collection system 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 SSO program will coordinate with the rail property Safety Department to determine the course of action needed to resolve those questions or issues.

5. **CAPs Closure Evidence Quality Assurance** – The SSO program is required to complete a quality assurance check of Closed CAPs based on the evidence provided and field visits (interviews, demonstrations, or inspections). See Program Standard Section 1 and Reference Guide Section 17.
   - Follow-up on CAP closure evidence completed through onsite interviews, field inspections, or field demonstrations, based on the evidence provided.
   - These are completed as part of Safety Risk Monitoring Visits
   - Safety Risk Monitoring Visits also address open CAPs requirements to check on progress, based on priority from experience with the Risk Environment at the rail property

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 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 rail property or contractor staff. Any field inspection and/or interviews at the rail properties are scheduled as part of the Safety Risk Monitoring activities as described in Reference Guide Section 17. The results of these CAP closure verification activities must be recorded in the SSO program data collection system in the Comments field, including any notes of what was reviewed and who provided input for that verification. The Risk Monitoring visits to the rail properties are also recorded in notes by the SSO program staff in attendance of the meetings and/or field inspections.

Documents included in Reference Guide Section 15:

15a Sample CAPs Tracking Log
15b Request for Change of Corrective Action Plan Due Date (Seattle Streetcar, Seattle Monorail)
15c Corrective Action Plan Initiation/Extension/Closure Request Form (Sound Transit)

SAMPLE CORRECTIVE ACTION PLAN TRACKING LOG
XYZ TRANSIT AGENCY: 321 RAIL TRANSIT SYSTEM
CAP Tracking Log: September 2013

WSDOT #	Source	Recommendation/Finding	Corrective Actions Planned	To Be Completed On or Before	Assigned To:	Comments / Issues Preventing Resolution	Status
201002-2	Accident Investigation 1/10/10 Collision	Media relations and signals superintendent did not receive notification.	Develop call out list and procedure.	Nov 2010	J. Doe	New call out list has been created and draft procedures are waiting for management approval.	OPEN
201007-1	August 2010 SSPP Internal Audit Report	Rules compliance activities are not consistent with the description the SSPP or in standard operating procedures.	Review rules compliance procedures and update SSPP and SOP 5.7 to reflect actual practices.	Dec 2010	T. Mainline	New CAP added Sept 2010.	New
201004-5	4/2/10 Employee Safety Meeting	Tripping hazard exists at Main St. Station.	Evaluate tripping hazard and determine appropriate mitigations.	Completed	M. Scada	Tile artwork on station floor becomes slippery when wet. A large section of platform floor has been replaced by contractor.	Completed

Seth Stark: How is this better than the current CAP Log? See attached below.
Ryan Sigurdson: Include a section for extension request, approval date, new due date and explanation for extension.
Having a WSDOT identifier as well as a RTA identifier.

Reporting Period: December 2019
Submission Date: Monday, December 31, 2018

							ComNIIR-Clf fffwnIlnO IUllon•	
							Months not listed were a "no response/update". See CAP Detail Sheet for complete record.	
	RCM Incident Report						0&3Q!S: a-M 'H"Q_.sor,1n,l 1g _,i m,n	I)3,'11: t-ie"•GAI' IICC Cf/'NUXIT :il:e,fffCHein- il:efflS)

Request for Change of Corrective Action Plan Due Date

Form Number: 2020 -

Year of Corrective Action Plan:	**Title of Requestor:**
Department Responsible:	**Name of Requestor:**
Hazard Ranking, If applicable:	**Corrective Action Plan Number, if applicable:**
Date of Request:	**Incident or Audit:**
Proposed Due Date Change:	
Description of Corrective Action Plan:	
Status of Corrective action Plan:	
Reason for Date Change:	
Cost Impact (approximate equipment costs and person-hours required for change):	
Alternative Solutions Considered:	
Description of Safety Impact:	
Description of Work-Around to reduce Safety Risk, if applicable:	

For WSDOT Use Only	**Approval** (Yes or No)
Approved for Change of Date:	☐ Yes
	☐ No
If no, state Reason:	

Date:	**Name:**	**Signature:**

SOUNDTRANSIT

Corrective Action Plan Initiation/Extension/Closure Request Form			
WSDOT ID No.	**CAP Tracking Number**	**CAP Source**	**Mode**
		Choose an item.	Choose an item.
Date Submitted	**Expected Completion Date**	**CAP WSDOT Adoption Date**	**CAP Closure Date**
		Click or tap to enter a date.	Click or tap to enter a date.

Stakeholder Contact Information		
Name	**Agency/Department**	**Title**
Email Address	**Office Number**	**Mobile Number**
Name	**Agency/Dept.**	**Stakeholder Title**
Email Address	**Office Number**	**Mobile Number**
Request for Change in Responsible Party If you wish to update the stakeholder(s) on the project, please provide a brief explanation for your request along with any updated contact information.		
Reason for Request		
Name	**Agency/Department**	**Title**

Description
Issue

Corrective Action Plan

Will the proposed corrective action plan consist of multiple mitigations and/or phases? ☐ **YES** ☐ **NO**

If you answered yes, please include a detailed list of proposed mitigation activities in the space below. Multiple mitigations should be labeled by their associated CAP number, followed by a distinguishing alphanumeric label. Each mitigation label consists of a letter (starting with the letter "A"), and each of its phases (if applicable) is identified numerically (Example: CAP 55-A1, CAP 55-A2, etc.).
Inspection records and photos will be provided upon completion.

Mitigation No.	Completion Date
A	

Mitigation Description

Mitigation No.	Completion Date
B	

Mitigation Description

Request for Project Extension			
Date of Extension Request		**CAP Tracking No.**	**Mitigation Letter(s)**
Click or tap to enter a date.			
Original Completion Date	Click or tap to enter a date.	**New Completion Date**	Click or tap to enter a date.
Has there been a previous extension request submitted for this mitigation? ☐ YES ☐ NO If you answered yes, please complete the fields below before submitting this request.			

Reason for Extension Request
Please provide a detailed explanation of why this extension request is being submitted.

Request for Closure	
Closure Request Date	**Mitigation No.**
Click or tap to enter a date.	

Closure Narrative
In the space below, provide a detailed description of how the mitigation(s) has been successfully accomplished.

Supporting Documentation
Please list any supporting documents that will accompany your closure request (commissioning paperwork, updated SMP/SOP, logs, reports, photos, etc.).
1.

FOR INTERNAL SOUND TRANSIT USE ONLY			
Related Location		**F&R Sub-location**	
		Choose an item.	
Classification	**Sub-Type**	**ST Document Control No.**	**File Path**
CAP	Event		

16 Tracking and Participating in Rail Property Committee Meetings

Version: 5/12/2022

The WSDOT SSO program tracks the rail property safety-related committee meetings and activities. These committees and activities may have different names and processes, and these should be recorded for each rail property.

The general names of committees and activities that should be considered:

- Executive safety committee (i.e., CSO, Accountable Executive)
- Configuration management committee
- Safety committees, usually by facility or mode
- Transit asset management committee
- Safety and security review committee
- Capital Projects meetings or committees (i.e., SSCRS, FLSSC, PMOC)
- Drills and exercises, determine how these activities are coordinated internally at the rail property

The SSO program should collect meeting minutes or other documentation, such as an After-Action Report for the drills and exercises. When possible, the SSO program should also consider attending these committee meetings occasionally, as appropriate or as resources allow. Results of these activities should be documented and then accounted for via a record in the shared file space (WSDOT PTD file system) and as part of the SSO program quarterly status report (See Reference Guide Section 9).

17 Safety Risk Monitoring Process and Activities

Version: 5/31/2020

Procedure SSO-008: Risk Monitoring Process

Scope: This document explains the process and requirements for the activities that make up the WSDOT SSO program safety risk monitoring of the Washington rail properties. **Safety Risk Monitoring** is a process used to address safety oversight and enforcement 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 (SA) means the processes within a transit agency's SMS that function to ensure the implementation and effectiveness of safety risk mitigation and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

The WSDOT SSO program completes safety risk monitoring in the same way as SMS SA monitors safety performance measures, data, and information such as those from the National Safety Plan. The list of data and information can also be used as a framework for transit-specific safety performance measures and assess:

- The effectiveness of risk controls in agencies' operations and safety programs
- Conformance to expectations and/or the objectives of agencies' safety programs or policies
- Causes and contributing factors of non-conformances and potential new hazards or threats
- Improvements for agencies' operations and safety programs.

The risk monitoring data, information and analyses are used to fully understand the state of the safety risk environment and provide a high-level understanding of safety culture at the rail properties. The SSO program needs to have a body of knowledge of each rail property that it provides safety oversight in order to fully understand the safety risk environment and as a part of the required Technical Training Plan (TTP). As part of ongoing safety risk monitoring, the WSDOT SSO program intends to conduct on-site meetings and inspections of issues that have been identified either by the rail property or from data/information tracking and analysis (risk-based, data-driven).

The SSO program will inform and schedule with the rail property any meetings and inspections which should include appropriate rail property staff such as for safely inspecting track or catenary locations. Other planned on-site interviews, discussions, or inspections will be coordinated by the SSO program. If during these on-site inspections, a concern arises that constitutes an immediate threat to safety on the rail system or property, this situation will be communicated immediately to the rail property staff and management for appropriate actions. A summary trip report of any on-site visit to a rail property will be provided for review and comment by the rail property safety representatives.

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

The following are the requirements related to conduct of rail property Safety 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 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 (Program Standard Section 6 and Reference Guide Section 13)
    b. Internal Audits (Program Standard Section 4 and Reference Guide Section 14)
    c. Triennial Audits (Program Standard Section 5 and Reference Guide Section 19)
    d. Daily Incident/Safety Event Log (Program Standard Rail Property Communication and Coordination and Section 9, Reference Guide Section 10 on data analysis)
    e. Hazard Log (Program Standard Rail Property Communication and Coordination and Section 9, Reference Guide Section 10 on data analysis)

2. Analyses of the tracking issues based on these and other sources of safety risk information from the rail property (Reference Guide Section 10 on data analysis)

3. The WSDOT SSO program staff also maintain a register of specific issues at each rail property that are being tracked as potential sources of risk (see the Safety Risk Monitoring Log template). This list typically contains topics that indicate an actual or perceived risk may require new or improved mitigation. If an identified topic progresses to a point at which an immediate threat emerges, it will be addressed by the rail property 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 rail property.
    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 WSDOT SSO program staff actively start monitoring that potential risk through data collection and discussions with the appropriate rail property staff.

c. If the specific or related potential safety issue is experienced a third time, this will require a visit by the WSDOT 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 SSO program staff.

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

Scope of On-site Activities for Risk Monitoring: The WSDOT SSO program staff visit the Washington rail properties for quarterly meetings and often in between quarterly meetings. The content of these visits is defined by an agenda that focuses the information collection 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 rail property 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 examinations** – these are usually targeted based on existing investigations or high-priority CAPs (open or closed), see Reference Guide Section 15 on CAPs. This activity might also include participation in internal audit activities or follow-up of those activities, see Reference Guide Section 14 on Internal Safety Audits.

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 a work assignment 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, see also Reference Guide Section 15 on CAPs.

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 WSDOT SSO program staff over a certain period of time or a particular review topic may be selected. Some new issues may become apparent through news or social media sources. The FTA often asks the SSO program questions based on current notifications or news releases.

6. **Current state of the rail system** – it is critical that the WSDOT SSO program staff have experience with the current state of the rail systems and related infrastructure, including operations, maintenance, command and control, and projects. Monitoring the TAM Plan and the status of maintaining the rail system are an important part of this process.

Internal Audits, SSO Program Audits and Inspections, and the Triennial Audit: The rail property internal audits and the SSO program Safety Risk Monitoring audits and examinations

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 Audit (described in Program Standard Section 5 and Reference Guide Section 19) integrates with all of these audit and inspection activities, and is used to assure that safety oversight and enforcement are applied to the entire safety program (including the safety program related control documents/minimum standards for safety).

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

- Review ongoing safety risk issues being monitored
- Select some number of CAPs, for example 5 CAP closures, for review on-site, record of these on-site reviews will then be recorded in the tracking database; the CAPs selected should be topics that can be reviewed by examination, 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 program staff

Safety Risk Monitoring Related Activities for Each Site Visit
I. Site Visit Planning/Preparation

Initial Planning
- Designate lead staff member for the Site Visit
- Date of Visit
- Visit Type – Select
    - Safety Risk Monitoring
    - Quarterly Meeting
    - Other (such as training, drill/exercise, audit/inspection, etc.)
- Determine Staff to Attend Site Visit – 2 to 4 staff depending on rail property and activities to be accomplished. Note that at least 2 SSO program staff should attend each meeting.
- Establish shared documents for this Site Visit in the appropriate shared folder location

Safety Risk Monitoring Preparation
- Review Safety Risk Monitoring Topics for follow-up, select based on current events and risk priority
- Determine if Corrective Actions need follow-up, select based on current events and risk priority
- Select Safety Risk Monitoring Topics and Corrective Actions (open or closed with evidence) to follow-up
- Develop handouts for each Safety Risk Monitoring and Corrective Actions activity
- Review selections and handouts with staff and send out for input and scheduling by the rail property

Quarterly Meeting Preparation, if needed for this Site Visit
- Develop Quarterly Meeting Agenda
    - CAPs analysis spreadsheet and presentation

- o Presentations by rail property, request, based on the Safety Risk Monitoring Preparation
- o Special topics – internal audits, triennial audit, FTA HQ audit, training, etc.
- o Complete draft agenda, provide to rail property contact (and others attending this Site Visit)
- Develop CAPs analysis spreadsheet and presentation
- Complete Agenda with any changes and send Quarterly Meeting materials out to rail property contact and planned Site Visit staff
- May need an update to the CAPs analysis spreadsheet and presentation prior to copies being made and Site Visit on-site, electronic updates to be sent out

Travel Arrangements, if visit is longer than one day – complete this step as soon as the Site Visit date, duration, and participating staff are confirmed
- Hotel
- Airfare/Train/Rental Car
- Share with the site visit lead and team going on the visit

Complete Site Visit Planning
- Once scheduling has been received back from rail property, complete development of the Site Visit Agenda/Itinerary including all Safety Risk Monitoring and Quarterly Meeting activities – send out to SSO program manager and Site Visit participants at least 2 weeks ahead of time
- Once review and update of handouts and Site Visit Agenda/Itinerary are complete, make appropriate number of copies for the field, send any electronic copies, as needed
- Bring sign-in sheets for each meeting planned, plus a few additional blank forms
- Communicate with staff participating in Site Visit the personal protective equipment (PPE) requirements for this Site Visit.

II. Completion of On-site Visit Activities

- Site Visit Staff arrive on-site, PPE is typically required for the visit, but not necessarily every day of the visit
- Complete each planned visit, meeting, and inspection – sign-in forms and notes by meeting from each staff member.
- Document any rides on the rail system and visits to facilities at the rail property.
- Coordinate any additional meetings or changes to the schedule and activities for the on-site.
- Agree to assignments for collecting documents, records, and draft notes from each meeting – provide to lead staff member for Site Visit. Determine the intended collaboration on notes – individual and then integrate or one staff member develops the first draft and the other participating staff add to those notes.
- Site Visit Staff depart

III. Reporting/Post Site Visit

- Each participating staff member is to complete notes for each meeting attended, scan any documents received or copy over electronic versions, and scan any sign-in sheets. Place in designated shared folder. This should be accomplished, even in draft in the designated shared folder, as soon as possible after the Site Visit
- Collect all materials from the Site Visit, place in the designated Site Visit folder

- Lead staff member to coordinate with the participating staff to complete an integrated set of notes and finished materials.
- Complete the Ride Log and Rail Facilities Log, with coordination between the lead and the participating staff.
- When notes and materials from the Site Visit are complete, send out for appropriate review and update as needed.
- When Reporting is complete, update the Safety Risk Monitoring Topics Log with appropriate material. Follow the rules for adding to the Safety Risk Monitoring Topics Log. Notify appropriate staff when this step has been completed.
- Lead to assure all records and documentation are present in the designated shared folder.
- Any open actions or CAPs should be received from the rail property, reviewed, approved, and tracked on the CAPs log. If there are new hazards identified, these should be tracked on the rail property's Hazard Log, as needed.

Summary of Safety Risk Monitoring through Experience with the Rail Property Safety Risk Environment

Ongoing Activities and Issues – Safety Risk Environment at the Rail Property
- Tracked through topics identified and updates of status after meetings and any documentation provided, includes Safety Program Related Control Documents and Updates, See Program Standard Section 2.
- Field follow up, as needed

Investigations of Safety Events or Hazards Experience
- Track experience for these events and hazards through notifications and investigations results, See Program Standard Sections 6 and 7.
- Field follow up, as needed [Review one investigation onsite per quarter per rail property]

CAPs Status
- Track Status through rail property monthly and quarterly status reporting, and meetings
- Field follow up, as needed

CAPs Closure Evidence Provided to the SSO Program
- Collection of Evidence, Results of Review and Approval
- Field follow up, as needed/appropriate

Internal Audits
- Tracking Status, Reports/Results, including Recommendations, Immediate Actions Taken, and CAPs
- Field Participation and Follow up, as needed [Possibly participate on-site with one internal audit per year per rail property]

Monitoring Safety Related Data and Information
- Data and Information Tracking and Analysis – Daily/Monthly Dispatch Logs, Occurrences and Incidents, Rules Violations, near mishaps, etc.
- Quarterly Status Reports – Investigations, Audits, and CAPs, as well as SSO Program activities being completed
- Quarterly Meetings – review of CAPs analysis and presentation

- Rail Property Safety Related Committee Meetings, Minutes, presentations – in-person when deemed appropriate or possible – these are safety and security review committee, configuration management committee, executive safety committee, other safety committee meetings, transit asset management, etc.
- Tracking of Capital Projects – System Modifications, Safety Certification, Configuration Management; Managing Procurements for Safety-Related purchases
- Drills and Exercises [participate on site; receive after-action report (AAR) and review, track any CAPs]
- Rail Property Trends/Analysis Reports or Presentations – either as part of committee meetings or as published periodically, performance measures and targets from the Agency Safety Plan
- Notes from Safety Risk Monitoring Visits to review CAPs closure evidence, field interviews, field inspections, and field demonstrations

All above information is used to update the Safety Risk Environment Topics.

Additional documents in this Reference Guide Section

- Meeting Sign-in Sheet
- Quarterly CAPs analysis example template
- Quarterly CAPs analysis example presentation slides
- Safety Risk Monitoring Topics Log Template
- Ride Log Template
- Rail Facilities Visited Template

MEETING SIGN-IN SHEET

Project:		Meeting Date:	
Facilitator:		Place/Room:	

Name	Company	Phone	E-Mail

Page 1 of 1

Event Number	CAP Number	Event/Audit Date	Corrective Action	Individual Responsible	Proposed Implementation	Actual Implementation	Overdue Date	Open >1 Year
Engineering								
					Engineering: 8 CAPs		0 Closed	0 Overdue	3 Old
Rail District								
					Rail District: 22 CAPs		7 Closed	1 Overdue	2 Old
Asset Management								
					Asset Management: 1 CAPs		0 Closed	0 Overdue	0 Old
Training								
					Training: 12 CAPs		3 Closed	1 Overdue	3 Old

Event Number	CAP Number	Event/Audit Date	Corrective Action	Individual Responsible	Proposed Implementation	Actual Implementation	Overdue Date	Open >1 Year
Safety								
				Safety: 3 CAPs		2 Closed	0 Overdue	0 Old
Control Center/Field Supervision								
				Service Quality: 8 CAPs		5 Closed	0 Overdue	0 Old
				Total CAPs: 54 CAPs		17 Closed	2 Overdue	8 Old
						37 Open		

RAIL PROPERTY CAP STATUS SUMMARY

QUARTERLY DATE

AGENDA

- CAP Summary by Owner/Lead

- CAPs Completed Since the Last Quarterly (Last Quarterly Date)

- Overdue Dates

- CAPs Open More Than One Year

CAP STATUS SUMMARY

- Handout shows 54 CAPs organized by a general lead or owner of the CAP, even if there is more than one responsible party.

- Timeframe for these CAPs is intended to be since the last quarterly (Date).

- Training CAPs have been separated out based on previous discussion.

- Note that a CAP can both have an Overdue date and be Old. Old calculated from DATE.

CAPS BY LEAD OR OWNER

- **Engineering**: 8 CAPs, 0 Closed, 8 Open, 0 Overdue, 3 Old

- **Rail District**: 22 CAPs, 7 Closed, 15 Open, 1 Overdue, 2 Old

- **Asset Management:** 1 CAP, 0 Closed, 1 Open, 0 Overdue, 0 Old

- **Training:** 12 CAPs, 3 Closed, 9 Open, 1 Overdue, 3 Old

- **Safety**: 3 CAPs, 2 Closed, 1 Open, 0 Overdue, 0 Old

- **Control Center/Field Supervision**: 8 CAPs, 5 Closed, 3 Open, 0 Overdue, 0 Old

- **Total**: 54 CAPs, 17 Closed, 37 Open, 2 Overdue, 8 Old

SIGNIFICANT CAPS CLOSED

OVERDUE DATES

- **2 CAPs with dates overdue**, as listed in handout.

    - 1 CAP regarding

    - 1 CAP

- **The CAPs progress is excellent.** Total number of CAPs in the last quarterly presentation was 42, and this time is 54 CAPs with 37 CAPs Open.

- For overdue dates, please provide a new estimate for completion including an explanation (change of date form) to Safety.

- Our tracking of progress and completion of CAPs is a required/regulated activity.

CAPS OPEN FOR MORE THAN A YEAR

- The CAPs open for a long time are not necessarily a problem, so long as it's explainable.

QUESTIONS

Washington State Department of Transportation (WSDOT)
Rail Transit State Safety Oversight (SSO) Program

Rail Property:
Risk Monitoring Topics
Updated:

Category	Risk Topic	Last Update	Risk Priority	Next Check In	Notes
Injuries (customers, employees, and the public)					
Reportable accidents/events					
Probable causes and contributing factors					
Status of existing corrective action plans (CAPs)					
Maintenance defects					
On-time performance of maintenance					
Rule compliance results provided by HRT					
Hazard logs					

Category	Risk Topic	Last Update	Risk Priority	Next Check In	Notes
Crime statistics					
Reports/complaints from patrons or employees					
Changes to management, operations, or maintenance					

Risk Monitoring Topic Status Tracking

State: WSDOT SSO Program
Rail Property:

Risk Topic Title:

Risk Description (what is the issue being tracked):
How is it a risk to the rail system safety program?

Related Investigations:
Related Internal Audits:
Related CAPs:

These three are tracked in the table above
Last Updated:
Current Risk Rating:
Next Check-In Time Frame:

Follow-Up Status Information

Washington State Department of Transportation (WSDOT)
Rail Transit State Safety Oversight (SSO) Program

Rail Property – Rail Lines Ridden Log

[picture/graphic of rail system]

Rail Property Rail Lines Ridden Log

Date	Rail Line	Station to Station	Staff Riding	Observations
				Ride comfort, any issues on the train, any issues with riders, performance of the rail operator, etc.

Washington State Department of Transportation (WSDOT)
Rail Transit State Safety Oversight (SSO) Program
Rail Property

Facility Listing and Function

Name	District/Rail System	Function	Date Visited	Next Check in	Risk Priority	Comments
Facility Type	Yard					
Facility Type	Rail Control Center					
Facility Type	Station					
Facility Type	Shop					
Facility Type	Training Facility					

Facility Type	**Work Unit Facility**					
Facility Type	**Bridge/Structure**					

Risk Monitoring Topic and Facilities Visit Tracking

State: WSDOT SSO Program
Rail Property:

Facility Topic Title:

Facility Description (what is the issue being tracked):

The following information is tracked in the table above
Last Updated:
Current Risk Rating:
Next Check-In Time Frame:

Follow-Up Status Information

18 Management of Change

Version: 3/17/2022

Management of change for transit safety programs is made up of projects for new or refurbished rail systems, vehicles, and infrastructure. It is critical that when these projects are planned and executed those assessments of these changes are studied for the introduction of new hazards or impacts that the changes might have on the agency's safety performance. The formal hazard analyses conducted may include Preliminary Hazard Analysis (PHA), Failure Modes and Effects Analysis (FMEA), and Operational Hazard Assessment (OHA). In addition, the impact of planned changes on public safety should also be considered through threat and vulnerability assessment (TVA) and consideration of transit security design considerations.

These activities are accomplished through the following Safety Program topics:

- **System Modification** – a process used by the rail property 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.
- **Safety Certification** – a process required by the rail property 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.
- **Procurement** – the measures, controls, and assurances in place to ensure that safety principles, requirements and representatives are included in the rail property's procurement process and controls.
- **Configuration Management** – a control process that includes the authority to make configuration changes, process for making changes, and assurances necessary for formally notifying all involved departments. Significant changes that are made through System Modification, Safety Certification, or the safety-related Procurement controls should be documented as part of a Configuration Management process, which records the baseline and changes to systems, subsystems, and components, including assurance of requirements for changes to rules, procedures, and training.

Related documents from FTA or developed by the rail property:

- Transit Asset Management (TAM) Plan
- Configuration Management Plan (CMP)
- Safety Certification Plan (SCP) based on the FTA Safety and Security Certification Handbook
- FTA Circular C5800.1 and a Safety and Security Management Plan (SSMP) for significant capital projects
- FTA Research, Construction Management Handbook
- Oversight Procedure 54, Readiness for Service
- Oversight Procedure 22

Role of the SSO Program

The SSO program has multiple responsibilities for capital projects that come down to the following:

- Assure that the rail property processes for Management of Change follow industry standard practice and are adequately documented either in the Agency Safety Plan or in document(s) referenced by the Agency Safety Plan.
- Monitor the rail property's planning for capital projects and the status of those projects to determine the appropriate timeframe to start or increase monitoring of those projects. Also see Reference Guide Section 17 on Risk Monitoring.
- Assure that the rail property and project team follow their documented processes from a safety oversight perspective only. This is completed through receiving copies of documents, meeting minutes, attending meetings, and occasionally completing on-site walk throughs or inspections, as deemed appropriate. Others such as the FTA Project Management Oversight (PMO) and their Contractor (PMOC) along with the FTA Regional Office are responsible for the grants and following the federal requirements.
- As the project, modification, or procurement activities near completion, the SSO program needs to have participated and collected enough evidence records to concur that the previous three bullets are true and have been completed successfully, as documented in the rail property process documents.

Activities that the SSO Program Should Monitor – this is to be aware of, not attendance at all activities. The SSO program should set up monitoring of the Safety and Security Review Committee (SSRC) or other appropriate committee meetings, FTA PMO meetings, and documentation being developed for the project (new or system modification). Generally, the SSO program should follow the project's safety certification process.

- Safety-Related Design Criteria
- Rail Activation
- Safety and Security Review Committee
- Development of Safety and Security documentation, especially those documents that will exist into revenue operations or affect the transition
- Hazard analysis for project (PHA, TVA, and OHA)
- Pre-Revenue Operations Planning and Activities
- Integrated Testing Plans and Completion
- Safety and Security Certification Verification Report (SSCVR) with a focus on assurances from the rail property and project team, and exceptions to design criteria

What does the SSO program need in order for the project to enter revenue service?
- SSCVR – review and concur, which includes enough experience and knowledge of the process followed and documentation to do so
- ASP – review and approve content
- EOP/SSEPP – review as a safety program related control document
- Accident/incident investigation procedure – approve and adopt, need before rail vehicles moving on rail system
- SOPs, EOP, RORB, RWP, Maintenance Manuals, I&M Manuals (safety program related control documents/minimum standards for safety – O&M)
- Training and Competencies

- Threat and Vulnerabilities Assessment (TVA) as applicable to safety and security hazards under SSO responsibilities.
- Interactions and data/information sharing process with SSO program
- SSO program should provide awareness training to the project team going into revenue service to make requirements and processes clear – CAPs management, data/information sharing, investigations, internal audits, etc. This training should be a requirement of start-up.
- Update/complete Configuration Management Plan and TAM Plan – this may or may not be required to be completed before revenue service.
- The SSO must concur with the final certification activities and documentation such as the SSCVR and certification forms. The SSO Program must be assured that the rail property and project team followed their process and that all exceptions are properly documented. Revenue service may not begin until the SSO Program concurs with the safety certification.

Handbook for Transit Safety and Security Certification Steps
A project assessment tool is included in this section that has the Safety Certification steps and tasks that can be used to record the project's (significant capital project or system modification) progress to completing each activity and a description of the evidence collected for safety oversight monitoring.

How Much Should the SSO Program be Involved?
The SSO Rule (Part 674) requirement for this activity is in the definition of a rail fixed guideway public transportation system. This definition indicates that the SSO program oversight includes those rail systems (not under the jurisdiction of the Federal Railroad Administration) that are engineering or construction. To begin with, the SSO program should be aware of the rail property's planned capital projects. As the capital project progresses into and beyond the design phase, the SSO program should be aware of the capital project and meetings and be on the distribution for a few of the significant planning documents; however, no significant input is necessary at this point. Once the capital project is ready to complete design and start construction, this is the point that the SSO program should start being more attentive and prepare to ramp up effort to track and follow the meetings and activities. The objective of all of these activities is to be capable/have the needed experience to concur with readiness for service when the project reaches that milestone.

State Safety Oversight (SSO) Program
Responsibilities for New Projects, Major Purchases, and Significant System Modifications
February 20, 2018

Assessment Tool – this table provides a listing of tasks for safety and security certification according to the Federal Transit Administration (FTA) handbook, and includes input from the Project Management Oversight Contractor (PMOC) Oversight Procedure (OP) 54 Readiness for Revenue Service, as well as added information from experience with these types of projects.

Project Safety and Security Related Tasks	Documents, Evidence, and Notes
Establish the Safety and Security Certification Process • **Step 1: Identify Certifiable Elements** • **Step 2: Develop Safety and Security Design Criteria**	
Develop Safety and Security Policy (SSCP)	
Assign SSC Responsibilities (SSCP) – this might include and require contractor support for SSC and contractor support for Design and then Construction; Designated Function for Safety and Security	
Establish Safety and Security Committees (SSCP) – Safety and Security Review Committee (SSRC); Fire/Life Safety Committee (FLSC); Change Review Committee	
Identify Safety and Security Requirements for Acquisition Process (SSCP)	
Develop Safety and Security Certification Plan (SSCP)	
Identify Safety and Security Certifiable Elements and Items (SSCP)	
Initiate Project Documentation Systems (SSCP)	
Perform Preliminary Hazard and Vulnerability Analyses (PHA, TVA)	
Prepare Safety and Security Design Criteria, following required minimum and recognized industry safety standards (Design Criteria, contracts)	
Integrate Operations and Maintenance Requirements into Design (Design Criteria, contracts)	
Design Conformance (Infrastructure elements, facilities, and vehicles) • **Step 3: Develop and Complete Design Criteria Conformance Checklist**	
Develop Design Criteria Conformance Checklists (Defined in SSCP)	
Perform Safety and Security Design Reviews (Process Defined in SSCP)	
Perform Additional Hazard and Vulnerability Analyses (as applicable) (PHA, TVA updates)	
Implement Hazard and Vulnerability Resolution and Tracking (Action/Open Items and Hazard Log Tracking and Resolution, Keep in a Risk Register)	

Project Safety and Security Related Tasks	Documents, Evidence, and Notes
Verify Design Criteria Conformance Checklists (Process Defined in SSCP), includes exceptions, need to track	
Construction Conformance (Infrastructure elements, facilities, and vehicles) • **Step 4: Perform Construction Specification Conformance**	
Develop Specification Conformance Checklists (Construction) (Defined in SSCP, contracts)	
Monitor construction safety during construction (Contractor Construction Safety Handbook), including safety audits of construction sites	
Develop public communications plan including safety for construction, integrated testing and pre-revenue operations (Public communications/engagement plan)	
Complete Specification Conformance Checklists (Process Defined in SSCP), includes exceptions, need to track	
Perform Additional Hazard and Vulnerability Analyses (as applicable) (PHA, TVA updates)	
Update Hazard and Vulnerability Resolution and Tracking (Action/Open Items and Hazard Log Tracking and Resolution, Keep in a Risk Register)	
Issue Permits and Certificates for construction (as applicable) (Defined in SSCP, contracts)	
Identify Safety and Security Requirements for Test Program Plans, Integrated Testing and Operational Readiness – System Integration Testing (SIT), Rail Activation Plan (RAP), Pre-Revenue Operations (PRO)	
Integrated Testing and Verification (Infrastructure elements, facilities, and vehicles) • **Step 5: Identify Additional Safety and Security Test Requirements** • **Step 6: Perform Testing and Validation in Support of the SSC Program** • **Step 7: Manage Integrated Tests for the SSC Program** • **Note that Steps 7, 8, and 9 occur at the same time**	
Identify Additional Safety and Security Requirements for Test Program Plans, Integrated Testing and Operational Readiness (SITP, RAP, PRO) – Prior to any trains operating on the alignment for PRO, all system safety and security elements or an effective work-around should be in place	
Develop safety event notification, investigation, and reporting process and procedure (Notification and Investigations Procedure)	
Complete Integrated Tests (SITP and schedule)	
Update public communications plan including safety for integrated testing and pre-revenue operations (Public communications/engagement plan)	

Project Safety and Security Related Tasks	Documents, Evidence, and Notes
Hazard Identification and Resolutions/Mitigations • **Step 8: Manage "Open Items" in the SSC Program**	
Perform Updates to Hazard and Vulnerability Analyses (as applicable) (PHA, TVA updates, and OHA)	
Update Hazard and Vulnerability Resolution and Tracking, Results of SIT (Action/Open Items and Hazard Log Tracking and Resolution, Keep in a Risk Register)	
Operational Readiness Verification • **Step 9: Verify Operational Readiness**	
Identify Additional Safety and Security Requirements for Operational Readiness (RAP, PRO)	

Develop safety and security program documentation based on FTA and SSO program standard requirements
  • SSPP/ASP
  • SEPP
  • EMP/EOP, address Top 17/BASE
  • Coordination with TSA
  • Event notification, investigation, and reporting process and procedure
  • Configuration Management Plan and TAM Plan	

Update public communications plan including safety for integrated testing, and pre-revenue operations (Public communications/engagement plan)	
Safety and Security Review of Engineering Change Orders and Waivers (goes into SSCVR, open items into tracking and risk register)	

Complete Operations and Maintenance Plans, Procedures, and Training
  • Operations, command and control, and field supervision SOPs
  • Rail Operators Rule Book (RORB)
  • Right-of-Way or Roadway Worker Protection (RWP), Track Access
  • Inspection and Maintenance (I&M) Manuals
  • Training Plans, schedule, and evidence of completion	

Complete and Initiate Operations and Maintenance (O&M) Contracts	
Complete emergency training, drills, and exercises – according to EMP/EOP, Continuity of Operations Plan (COOP)	
Complete Operational Readiness Review (including work-arounds) – review/audit for completion of safety and security certification and readiness for revenue service	

Project Safety and Security Related Tasks	Documents, Evidence, and Notes
Complete any verification with others, such as FTA TSO Safety and Security Readiness Review (SSRR), SSOA Pre-Revenue Service Review (PRSR) processes and audits	
Establish monthly/quarterly meetings and data/analysis submissions with SSO program, including CAPs management, Open Items, and Hazard Log	
Safety and Security Certification Verification • **Step 10: Conduct Final Determination of Project Readiness and Issue Safety and Security Certification**	
Issue Final Safety and Security Certification (Process and forms from SSCP), includes all exceptions	
Issue Final Safety and Security Certification Verification Report (SSCVR)	

SSO PROCEDURE FOR SAFETY CERTIFICATION PLANS OF MAJOR PROJECTS

SCOPE

This section describes the State Safety Oversight (SSO) procedures for reviewing, approving, and filing Safety Certification Plan (SC Plan) of major projects that initiate preliminary engineering.

Note: <u>Major capital project</u> means, as defined in 49 CFR 633.5, a project that: (1) involves the construction of a new fixed guideway or extension of an existing fixed guideway; (2) involves the rehabilitation or modernization of an existing fixed guideway with a total project cost in excess of $100 million; or (3) the Administrator determines is a major capital project because the project management oversight program will benefit specifically the agency or the recipient. Typically, this means a project that: (i) generally is expected to have a total project cost in excess of $100 million or more to construct; (ii) is not exclusively for the routine acquisition, maintenance, or rehabilitation of vehicles or other rolling stock; (iii) involves new technology; (iv) is of a unique nature for the recipient; or (v) involves a recipient whose past experience indicates to the agency the appropriateness of the extension of this program[1].

PURPOSE

The purposes of this procedure are:

a. Establish a standard set of instructions for SSO staff to follow when reviewing, concurring, and filing of a rail property SC Plan submittals;

b. Establish a set of guidelines for the rail property to use when it is preparing or revising a SC Plan for a proposed project;

c. Establish the Safety Certification Oversight using the Certifiable Elements List and other elements of the SC Plan; and

d. Issuing a letter of concurrence for the System Safety Certification Verification Report (SSCVR) and notifying (through concurrence) the rail property the project may be placed in revenue service.

GENERAL REQUIREMENTS

• The SSO Program Manager has overall responsibility for the application and use of this procedure, including concurrence of the *SSO Review Activities for RTA Safety Certification Plans* (i.e., see 18c).

• The rail property will prepare a project specific SC Plan for each of its major projects exceeding $100 million in total project costs.

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[1] Source: FTA Circular C5800.1 August 1, 2007, pages I-3 and I-4

- The RTA will provide a SC Plan for every major capital project. The SSO will review each new SC Plan, including any subsequent revisions, for conformance.

- The SSO will perform the review of each SC Plan in consultation with the Rail Property to resolve any questions regarding the content, and to assure checklist requirements not adequately covered in the SC Plan are fully addressed in a revision.

- The SSO will review and concur any subsequent revisions to the SC Plan, and document changes by attaching revision requests and approvals to the original record approving the SC Plan.

- The rail property will provide a final draft SSCVR to the SSO **60 days** prior to revenue service. The SSCVR should at a minimum meet the requirements of FTA Circular C 5800.1 and follow the current practice of the FTA Safety and Security Certification Handbook[2].

PROCEDURES FOR REVIEWING REVISED SAFETY CERTIFICATION PLAN

- The rail property shall revise and expand the SC Plan as the project progresses, as necessary. The SSO will review and approve the revisions.

- The rail property shall file any revision of the SC Plan with the SSO.

- Within **30 calendar days**, the SSO will review the revised SC Plan (see Checklist 18c for *SSO Review Activities for RTA Safety Certification Plans*) and either approve or reject the proposed revisions or request additional justification.

- The SSO program manager will send an approval/rejection letter to the rail property.

- If the proposed revision is rejected or requires additional justification, the rail property must respond within **30 calendar days**.

MAJOR PROJECTS AND SAFETY CERTIFICATION OVERSIGHT

- The rail property will notify the SSO of its SC activities, including testing (integration testing) and other activities related to rail operations. SSO may observe certification activities, including tests, contingent upon rail property staffing and availability. Examples of tests and other activities that may be observed are, but not limited to:

    a.   Tests of newly installed automatic train control, block signaling and interlocking equipment;

    b.   Initial testing of grade crossing warning devices;

    c.   Simulation testing of automatic train control software and hardware elements;

    d.   Brake rate testing and commissioning of new or refurbished transit vehicles;

    e.   Emergency response drills and exercises;

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[2] FTA Safety and Security Certification Handbook – November 2002

      f.   Safety training classes for certification/recertification;

      g.   Internal safety audits; and

      h.   Start-up testing and pre revenue operations prior to opening a new extension or major system modification.

- Staff will become familiar with the requirements contained in the governing specifications and procedures before observing any testing activities.

- Following the completion of each test, if there are any safety concerns, the SSO will discuss them in the field or virtually with the rail property. Any safety concerns will be documented with the appropriate hazard analysis. The RTA staff will notify the SSO program manager of all safety concerns.

- The SSO will issue a letter of concurrence for major capital projects, pending receipt of and review of the respective submitted documentation to the RTA prior to any project entering the next phase of work, i.e., preliminary engineering to final design, final design to construction, to operations, etc.

REQUIREMENTS FOR SAFETY CERTIFICATION VERIFICATION REPORT

- Each rail property shall submit a System Safety Certification Verification Report (SSCVR) to the SSO prior to revenue service and to verify compliance with the SC Plan. Rail properties may share early drafts of the SSCVR with the SSO to address early concerns and requested information that could delay issuing letters of concurrence.

- Each RTA/rail property shall submit the SSCVR to the SSO at least **60 calendar days** prior to the start of service, unless otherwise approved by the SSO. RTAs may elect to work with the SSO during preliminary drafting of the SSCVR; this option may expedite the final review and concurrence of the SSCVR.

- The SSCVR shall certify that:
  a. All requirements of the SC Plan have been completed except for listed open items, if any;
  b. All unacceptable safety hazards have been adequately mitigated, and
  c. Adequate restrictions/workarounds are in place to ensure the safety of operations until open items are closed.

- The SSCVR shall include:
  a. Letter of Intent to Operate from the RTA/rail property Accountable Executive;
  b. Final Project Verification of Safety Report; and
  c. Remaining Open Items List, if any, with appropriate mitigations and completion timelines.

- The SSO shall respond to the SSCVR within **30 calendar days** of filing by indicating that it concurs with the SSCVR contents or will identify areas that are not acceptable for SSO concurrence. The SSO shall give issue its concurrence of the SSCVR by issuing a formal letter of concurrence to the rail property's Accountable Executive or designated person.

- The project shall not be placed into operational revenue service **until** the SSO issues its letter of concurrence.

This document is for WSDOT SSO internal purposes only during SC plan review and is available upon request.

SSO REVIEW ACTIVITIES FOR RTA SAFETY CERTIFICATION PLANS					

Transit Agency:		**Submittal Date:**	
Plan Title:		**Plan Date:**	

No.	SC Plan Requirements Does the plan contain or provide for the following:	Included		Page Ref.	Comments
		Y	N		
1	SC Plan Submittal • A Project specific SC Plan is submitted to Staff for review and approval during the preliminary engineering phase. • Any significant revisions to the SC Plan have been made since initial submission. • A revised SC Plan has been submitted.				

2	Safety Certification Management and Responsibilities
	
	Does the SC Plan identify the safety certification management and responsibilities including:
	
	  - Organizational authority and responsibilities
	
	  - Safety certification activities
	
	  - Processes
	
	  - Procedures
	
	  - Documentation requirements and responsibilities
	
	  - Reporting requirements				

3	Communication Control with SSO Staff • Controls and procedures used to maintain effective communications and liaison with Staff throughout the life of the project • Procedures to obtain and adequately address Staff's written comments on safety design reviews conducted throughout the project development cycle				
4	Process for Verification and Documentation • The process used to verify conformance with safety and security requirements during design, construction, testing and operational readiness • The process used to document conformance with safety and security requirements during design, construction, testing and operational readiness				

Washington State Rail Safety Oversight Program 18c

This document is for WSDOT SSO internal purposes only during SC plan review and is available upon request.

SSO REVIEW ACTIVITIES FOR RTA SAFETY CERTIFICATION PLANS

Transit Agency: _____ **Submittal Date:** _____

Plan Title: _____ **Plan Date:** _____

No.	SC Plan Requirements Does the plan contain or provide for the following:	Included Y	N	Page Ref.	Comments
	• A hazard management process to conduct safety hazard analyses and safety hazard resolution, which includes: o List of hazard analyses to be performed o Hazard Descriptions o Hazard Category o RTA Responsible Individual Assigned o Hazard Tracking o Date Closed o Language indicating the RTA will submit the hazard analyses to Staff upon request				
	• A list of all safety design criteria that will be used in the planning, design, and construction of projects				
	• A list of certifiable elements and sub-elements				
	• The process for conducting safety certification audits to verify compliance and judge the effectiveness of the SC Plan				
	- The written checklists used for the safety certification audits				
	• A format of conformance checklists				
	- A list of the conformance checklist used				
	- The final checklists will be submitted upon Staff's request				
	• Safety Certification milestones				
	• A procedure for updating the SC Plan				

The Safety Certification Plan is:

☐ **Acceptable**

☐ **Revisions needed (see comments above)**

Reviewed by: _____ **Date:** _____
                     Signature
                     Name and Title

This document is for WSDOT SSO internal purposes only during SC plan review and is available upon request.

SSO REVIEW ACTIVITIES FOR RTA SAFETY CERTIFICATION PLANS					
Transit Agency:			**Submittal Date:**		
Plan Title:			**Plan Date:**		
No.	**SC Plan Requirements** Does the plan contain or provide for the following:	**Included** Y / N	**Page Ref.**	**Comments**	
Concurrence provided by:	*Signature* *Name and Title*		**Date:**		

Project phases

Voter approval — Planning — Design — Construction — Start of Service

Planning: 4 - 5 years
Alternatives development: 1 - 1 1/2 years

- Starting with the representative project from the **voter-approved system plan**, Sound Transit develops alternatives for study and review, including route and station locations.
- Community members, stakeholders, commuters, elected officials and partner agency staff provide comments on alternatives, helping to screen for reasonable alternatives to carry forward.
- Based on input and analysis, the Sound Transit Board identifies a preferred alternative in addition to other alternative(s) to be studied during environmental review.

Environmental review and preliminary design: 3 - 3 1/2 years

As required by state and federal law, Sound Transit then studies potential environmental impacts of the alternatives. This results in the publishing of an Environmental Impact Statement (EIS).

- Sound Transit obtains data through field work that may include observing and counting traffic, studying natural resources and land use, and monitoring noise.
- Sound Transit publishes a Draft EIS, followed by a public comment period. The agency responds to those comments in the Final EIS.
- Sound Transit completes preliminary design work.
- Based on environmental studies, public input and other data, the Sound Transit Board selects the project to be built, including route and station locations.
- For projects with federal involvement that require an EIS such as funding or certain approvals, the lead federal agency issues an environmental decision document called a Record of Decision (ROD).

Less complex projects, such as construction of a parking garage, are more streamlined and follow a shortened environmental process that does not require the identification of alternatives.

Final design: 2 - 3 years

- With public input, architects and engineers define what the facilities will look like and how they will operate as well as technical specifications for the stations and tracks.
- Field work includes testing soil conditions and ground water levels, surveying, and locating utilities.
- Project teams gather public input at design milestones, typically at 30 percent, 60 percent and 90 percent design completion.
- Through a public process, Sound Transit selects artists for permanent art installations.
- Sound Transit obtains private property and easements. This may include relocating businesses and/or residents.
- Sound Transit acquired permits from local jurisdictions, including land use approvals, noise variances, storm water discharge and wetland impacts. A light rail project requires separate permits from each jurisdiction through which it travels.

Some contracts are issued as "design-build," which means that a single contractor is responsible for both final design and construction. Under these contracts, design and construction often overlaps rather than being sequential.

Construction: 5-plus years
Construction schedules vary widely from project to project depending on complexity. Some of the factors that can influence schedule and budget:

- Highly technical project elements, such as tunneling or water crossings.
- Type of development surrounding project. Noise, time and other constraints to build in dense residential and business settings exceed those for building close to interstate highways.
- External factors such as labor disputes, material shortages, unforeseen site conditions and weather.
- Property acquisitions and relocations.

Testing and pre-operations: 6 months to a year prior to service
Before the project opens for riders, the testing phase includes a safety certification process including:

- Simulations to assure that communications, safety, emergency and other systems are operational. The agency checks intersection signals, crossing gates and pedestrian signals.
- Trains begin running without passengers to help pedestrians, bikers and drivers learn how to travel safely with trains.

Existing Sound Transit Major Capital Projects

Did not include the transit center or parking/access projects.

Note that capital projects marked with an asterisk should currently be a part of Safety Risk Monitoring. This includes tracking of appropriate project meetings and development of a tracking summary for the project.

Northgate Link Extension*
Status: Complete, 2021

East Link Extension*
Status: Construction Phase, 2025

Hilltop Tacoma Link Extension*
Status: Construction phase, 2023

Operations and Maintenance Facility East*
Status: Complete, 2023

Downtown Redmond Link Extension*
Status: Construction Phase, 2025

Federal Way Link Extension*
Status: Construction Phase, 2025

Lynnwood Link Extension*
Status: Construction phase, 2024

Operations and Maintenance Facility South
Status: Planning phase, 2026

Tacoma Dome Link Extension
Status: Planning phase, 2032

West Seattle and Ballard Link Extensions
Status: Planning phase, 2030/2035

NE 130th St Infill Station
Status: Voter approval phase, 2031

South Boeing Access Road Infill Station
Status: Voter approval phase, 2031

South Graham St. Infill Station
Status: Voter approval phase, 2031

Everett Link Extension
Status: Voter approval phase, 2039

Tacoma Community College (TCC) Tacoma Link Extension
Status: Voter approval phase, 2039

South Kirkland-Issaquah Link
Status: Voter approval phase, 2042

Commuter Rail – SSO program should be aware of these projects, although not explicitly a part of the SSO program.

Sounder Maintenance Base
Status: Planning phase, 2024

Sounder South Capacity Expansion
Status: Planning phase, 2036

Dupont Sounder Extension
Status: Voter approval phase, 2036

Version: 5/31/2020

Procedure: SSO Program Triennial Audit of Rail Property Safety Programs

The Part 674 approach to the Rail Property Triennial Safety Program Audit is essentially the same as the intended full Triennial Review described in the Federal Transit Administration's (FTA) best practices document – Recommended Best Practice (RBP) for States Conducting Three-Year Safety Reviews (March 2009), https://www.transit.dot.gov/oversight-policy-areas/sso-three-year-review-recommended-best-practices-march-26-2009-final.

FTA's RBP (pages 4 and 5) identifies eight (8) distinct verification methods that are currently used by SSO programs during their Three-Year Safety Reviews:

- **Document Review**: Sampling the Rail Property's Safety Program Description and referenced and/or supporting procedures to ensure that each required element of the State's Program Standard and 49 CFR Part 674 is addressed.
- **Rules Review**: Sampling the rail property's operating rules and bulletins and maintenance rules and procedures to determine if they have been reviewed and updated on a regular basis, if they have been distributed to appropriate rail property personnel as specified in the Safety Program Description, if training has been offered, and if this process has been tracked.
- **Records Review**: Sampling of the rail property's records for evidence of implementation of the Safety Program Description and referenced or supporting procedures. Records reviewed and/or sampled may include, but are not limited to, training records, records of employee rules compliance checks, internal safety audit reports, maintenance inspection reports, minutes of safety committee meetings, etc.
- **Interviews with Rail Property Senior Management**: Discussions held with senior rail property management, including the rail property's Chief Executive Officer (CEO), to assess their knowledge of the rail property's safety program, as specified in the Safety Program Description and referenced or supporting procedures, and to gauge their commitment to the safety program.
- **Interviews with Rail Property Safety Personnel**: Discussions held with rail property safety personnel, including the Chief Safety Officer, to assess implementation of the rail property's safety program, to identify issues in its implementation, and to highlight areas of compliance and non-compliance with Part 674 requirements.
- **Interviews with Other Rail Property Personnel:** Discussions held with other rail property personnel (including a representative sample of rank and file operations and maintenance personnel) to verify their understanding of requirements specified in the Safety Program Description and referenced or supporting procedures.
- **Field Observations:** Observations and sampling conducted onsite at the rail property to observe implementation of the processes and procedures described in the Safety Program Description and supporting or referenced documents, procedures and materials related to the rail property's safety program.
- **Inspections and Measurements:** Inspections and measurements conducted onsite at the rail property to ensure that the rail property's infrastructure and equipment is

maintained to the specifications identified in the rail property's standards, procedures, and manuals.

Each of these verification methods has specific strengths and limitations. To adequately assess implementation of each of the Safety Program Description topics, FTA believes that more than one verification method should be used.

Sampling Rate

The RBP indicates that a sampling approach should be developed, but it does not indicate what that sampling rate should be. The audit process is not expected to be 100% of the rail system, and generally, the higher the sampling rate, the higher the cost will be for the Triennial Safety Program Audit. The Triennial Safety Program Audit approach described here addresses all of FTA's verification methods described in the RBP focused on the Agency Safety Plan (ASP), including the entire Safety Program Description. The ASP is focused on implementation of a transit-specific safety management system (SMS). The rail property implementation of the SMS and the ASP (specifically the progress towards improved safety performance) should also be included in this Triennial Safety Program Audit.

The Triennial Safety Program Audit addresses compliance, and then builds on that experience to make future Triennial Audit cycles more sophisticated and effective at measuring the safety risk environment and identifying potentially unmitigated safety risk at the rail property. As a focus in developing this Triennial Safety Program Audit process, there is a need to build "corporate knowledge" of the rail transit systems' safety performance and safety risk environment through experience, data collection, and analysis of risk-related information. This information includes experience with investigations, internal audits, close calls/hazards, and completion of corrective action plans (CAPs). At first, these analyses will be used to corroborate lagging indicators and then can be developed into leading indicators to be used in preventing future safety events at the rail properties. Further, the results of this data and information analyses will be used in targeting/developing the audit sample sets, focused on safety events that have occurred (rather than based on a random sample principle) and explore the effectiveness of CAPs implementing mitigations to control safety risk experienced within the rail transit system.

This sampling approach allows the Triennial Safety Program Audit process to be systematic and provide a programmatic feedback loop to address any remaining unmitigated safety risk or address mitigations that are not fully successful in managing risk to a level as low as reasonably practicable (ALARP). This approach also enables the SSO program to develop the Part 674 compliant safety risk monitoring data and information analysis tools and activities, including verification of CAPs implementation evidence and effectiveness (safety risk monitoring also discussed in Reference Guide Section 17).

Triennial Safety Program Audit Approach

The Triennial Safety Program Audit of the rail transit system requires the successful completion of the following tasks, which are summarized in the following subsections:

1. Building Knowledge and Tools
2. Planning and Preparation
3. Completing On-site Activities
4. Reporting and Corrective Actions.

This Triennial safety program audit approach is intended to be transparent as well as efficient, effective, and sustainable, allowing the required activities to be completed within current grant funding levels now and for future Triennial Safety Program Audits and ongoing Safety Risk Monitoring activities (as required in Part 674) at each rail property.

Building Knowledge and Tools

1. **Triennial Audit Plan**. The SSO program audit team should be selected and meet to go over the preparation and analysis activities and develop the Triennial Audit Plan. Once the Triennial Audit activities commence, the Triennial Audit Plan will be used to manage schedule and resources, tracking progress of all planned activities to completion.

   - Select the planning team for the Triennial, and all staff planned to participate (Due: xx)
   - Meeting of planning team to prepare and complete analysis activities (Due: xx)
   - Develop the Triennial Audit Plan – select an administrative owner for tracking the plan, schedule, and resources, periodic updates of progress and schedule. Treat the plan as a project plan. (Due: xx)

2. **Audit Scope**. The SSO program defines the triennial time period to match the rail property three-year cycle of internal safety program audits. The SSO program triennial audit will include the rail property current and possibly previous three-year internal safety audit cycle, so that all audits, investigations, and resolution of CAPs can be reviewed and physically checked for appropriate resolution. This audit scope is intended to be synergistic with ongoing safety risk monitoring activities at the rail property.

   - Define the audit time period for the Triennial Safety Program Audit (Due:xx)

3. **Rail Property Notification.** In the year that the triennial audit is due, the SSO program will communicate with the rail property to determine an appropriate timeframe for the triennial audit. The SSO program will notify and schedule with the rail property for the planned on-site portion of the triennial audit, at least 60 days in advance of the on-site activities. This is typically done as part of existing quarterly meetings.

   - Complete a phone call or in person meeting with the rail property and SSO Program to discuss the timing of the on-site Triennial Audit activities. (Due: xx)
   - Initiate the Rail Property Notification, draft the letter and coordinate with the SSO Program Manager to send the Letter. (Due: xx)

4. **Documentation Collection**. A list of documents will be collected to be reviewed and analyzed for the Triennial Audit. Primary documents of interest include rail property programmatic and process level documents related to operations, maintenance, infrastructure and vehicle issues, and safety (and security), with a focus on the rail property's minimum standards for safety. Note that investigations, internal audits, and CAPs should already be collected and analyzed by the SSO program as an ongoing process, which is why there is no need to request that information here, unless some information is missing.

Documentation List

    a. Agency Safety Plan (ASP)
    b. System Security Plan (SSP)
    c. Organizational Chart
    d. Safety Policy Statements
    e. Operating Rulebooks
    f. Emergency Response Procedures
    g. System safety and security statistics for the most recent three-year period prior to the review.
    h. Inspection and Maintenance Manuals, including standards (this request would be targeted to the rail systems and infrastructure being audited)
    i. SOPs related to the rail systems and infrastructure being audited, including command and control
    j. Other relevant documentation, as determined by the analysis activities and discussions.

- Assemble the general and/or specific documentation to be requested from the rail property for the Triennial Audit. (Due: xx)
- Develop the formal request for documentation for the SSO program manager following any timeline requirements from the Program Standard. This request needs to make it clear that the documentation is expected prior to the on-site activities and give a due date to the rail property for all (or most) of the documentation. (Due: xx)

5. **Complete Document Review Verification for Triennial Audit**. Once the documentation is collected, it is reviewed and analyzed to address the requirements of the RBP for the Document Review verification method across the Safety Program Document and the ASP/SMS implementation.

- Someone on the audit team needs to be assigned to track all documentation received and coordinate any issues with electronic transfer of the documentation. (Due: xx)
- Someone on the audit team needs to be assigned to organize the documentation received to the Audit Plan. (Due: xx)
- Someone on the audit team needs to be assigned to review the documentation received with a focus on the content of the documentation, whether or not it addresses the document request, and any highlights that the Audit Team might need to know. This documentation should be in an easy to use format for the team. (Due: xx)

6. **Collect Safety Risk Data and Analysis.** The SSO program collects significant safety information from the rail systems. The following data and information will be collected, reviewed, and analyzed to support the sampling used in the Triennial Audit.

    a. All rail property investigations, including reports and related CAPs for the previous three years, as well as the current year.
    b. All safety program related internal audits for the current and previous three-year cycle, including all Audit Reports and CAPs. This includes the related findings and recommendations.

c. The previous Triennial Audit report and CAPs.
d. All Investigation and Audit CAP closure data and evidence for the previous three years.
e. Close Call/Safety Event/Hazard data and information for the previous three years.
f. The rail property's safety data and information analyses from the previous three years, such as from the executive safety committee meetings.
g. FTA Audits of the SSO program – the previous two FTA Audits. This activity will focus on the findings and recommendations directed towards the rail property, and SSO program progress towards completing the corrective actions (what was determined to be an appropriate response and what was actually accomplished to close the CAPs).

- This process area might be different based on experience that the Audit Team has with the rail property and how much, if any, Safety Risk Monitoring has already been completed with the rail property and the SSO Program. The less experience, the earlier in the Triennial planning this process area needs to be completed. Make this determination and schedule these activities. (Due: xx)
- Based on the audit period, collect up all of the related investigations, audit reports (internal, triennial, and FTA, others from outside), Safety/Close Call Log, Hazard Log, Safety Related Meeting Minutes, any previous and related safety or hazard analyses, responses to FTA Safety Advisories or requests for information, results of drills and exercises, and CAPs, including tracking information. This collection might be a part of the documentation request. (Due: xx)

7. **Complete Data Analysis to Identify High-Priority Topics for Triennial Audit**. The audit team will complete an analysis of these compiled data sets to determine the Triennial Audit sampling of topics within each of the safety program elements/topics, including the minimum standards for safety. This analysis is documented in a separate report. The use of this analysis will maximize audit effectiveness and efficiency by placing priority on previously identified areas of risk, including a check for implementation and effectiveness of related open and closed CAPs. The close call or safety event data that was used for the FTA's Safety Advisories and for Hazard data reporting will be used to focus on potential emerging risk and an opportunity to be predictive. This analysis activity will be further enhanced over time through experience and developing the Part 674 Safety Risk Monitoring capabilities. Previous safety-related events and internal audit findings will be reviewed and assessed for effectiveness of resulting changes and mitigations.

- Complete a data and information analysis report to be used in conjunction with the preparation for the Triennial Audit and the reporting. (Due: xx)

8. **Complete Rules and Records Verification for Triennial Audit**. In addition, based on the FTA RBP for the Rules and Records verification categories, the audit team will analyze the rail property rules and records across all elements and topics of the safety program documents and minimum safety standards, as appropriate. Results of this part of the audit will be used to advise the rest of the Verification methods for the audit. The amount of records reviewed will be expanded in Triennial Audits over time based on lessons learned through this audit and ongoing Safety Risk Monitoring.

- Qualified Audit Team staff should be selected to identify and review the rules, procedures, and records provided in the Documentation Request. Qualified staff are those who have experience with rail systems operations, command and control, and maintenance. Any results or thoughts from these qualified staff should be written and shared with the rest of the planned Audit Team. (Due: xx)

Planning and Preparation

9. **Progress Meeting**. The audit team will meet to review the analyses and progress through the first three Verification Categories (Documents, Rules, and Records Reviews) and preparation for the onsite portion of the Triennial Audit.

   - Audit Team meeting to go over all progress to date and to discuss assignments and issues up to this point in the planning process. (Due: xx)
   - Assign the Audit Team with preparation activities that must be completed prior to the on-site activities, so everyone is ready for the on-site visit. (Due: xx)

10. **Audit Template Development and Schedule**. For each of the program documentation topics or groups of topics, a template is used to document details to be checked, interviews of rail property staff (and other related staff), and inspections of locations, equipment, and/or documents. The completed audit templates should be shared with the rail property at least 30 calendar days in advance of the on-site visit. The draft templates are provided ahead of time to facilitate the scheduling of interviews, inspections, and documentation review. Invitations to FTA headquarters and regional offices and the Transportation Security Administration (TSA) should be made with sufficient time for them to schedule the time to attend. All of this information is a part of the Audit Plan. The SSO program audit team typically coordinates with the rail property Safety Department staff for all scheduling.

    - This analysis and audit plan development for the groupings of Safety Program Documentation topics must be completed and available for review in order to provide materials 30 calendar days prior to the on-site activities (or as specified in the program standard). (Due: xx)
    - As part of the audit plan development, a general schedule of needed meetings, inspections, and tours needs to be provided to the rail property coordinator in order to start and complete the scheduling of all activities for the on-site. Typically, the Audit Team is planned to be capable of splitting into two (or more) groups to complete all of the activities. (Due: xx)
    - Someone needs to be assigned to work with the rail property coordinator to assure that all of the activities are scheduled, as needed. (Due: xx)
    - An Audit Manual is developed for the on-site activities and includes at least: the Audit Plan, analysis results completed for the Audit, the templates along with questions/issues that will need to be addressed for each of the Topics Grouping/Tour/Inspection. An appropriate number of copies will be developed and shipped to the on-location hotel, if needed. (Due: xx)

11. **Coordination with the Rail Property.** The SSO program audit team continues to communicate with the rail property as the triennial audit on-site week approaches to share information about any changes, to provide the list of team members that will attend, and to update the interview times and personnel schedule for each

interview/inspection. The on-site activities will be planned ahead of time, but will need to be flexible because of conflicting schedules and activities at the rail property during the on-site visit.

- Someone (same person as for process area 10) needs to be assigned to work with the rail property coordinator to assure that all of the activities are scheduled, as needed. (Due: xx)

12. **Complete Update of Triennial Audit Plan**. The Triennial Audit Plan will be a living document, providing flexibility as some activities are completed and other activities are scheduled/re-scheduled until all required Triennial Audit reviews, interviews, and inspections are completed.

- Complete an update of the Triennial Audit Plan prior to going on-site and based on all of the development and scheduling completed up to this point. (Due: xx)

Completing On-site Activities

13. **Track Access Training**. All members of the SSO program audit team will need to have current track access training from the rail property. Typically, the rail property will need to be available on the first day to provide track safety training to all of the team members prior to the start of the data collection on-site inspections and interview events that require access to the rail property Facilities and Right-of-Way locations. This may also be completed prior to the on-site visit.

- The entire on-site Triennial Audit Team needs to follow all rules of the rail systems. This includes completing track safety training either ahead of the on-site Triennial Audit week or as the first activity on-site at the rail property. This timing should be determined as part of the planning completed in the previous process areas and completion of the training assured at this point. (Due: xx)

14. **On-site Briefings**. The SSO program on-site audit team will provide opening and closing briefings for the rail property staff during the on-site visit. These briefings will be focused on sharing activities to be completed and any observations from the preparation and completion of the on-site interviews and inspections. The entire Triennial Audit is intended to be transparent, with all aspects shared with the rail property management and staff.

- The in-brief is planned early in the on-site visit with the appropriate rail property management to go over the plans for the week and to provide background for the Triennial Audit scope, objectives, and outcomes. (Due: xx)
- An out-brief presentation is planned for later in the on-site time to provide rail property Executives some results from the on-site and in preparation for the out-brief presentation with all rail property participants, which is typically the last activity on-site. This out-brief presentation is developed while on-site. (Due: xx)

15. **Complete Interviews (Senior, Safety, and Other Staff); Field Observations; and Inspections and Measurements Verification for Triennial Audit**. The Triennial Audit Team will complete all on-site activities based on an approved schedule and audit plan. This will often include a team of 3 to 5 people (SSO and contractor staff). The audit team

typically covers all of the interviews and inspections in two groups to assure that all topics and issues can be covered. Each audit team member is responsible for taking notes, collecting documentation, and taking photos of all activities completed. This documentation is then added to the templates each evening of the on-site activities. At least one person on the audit team will be responsible for consolidating all of the notes and documentation for each topic of the on-site audit activities. An additional trip may be required to follow up on questions or rescheduled activities.

- Someone (same person as for process area 10) needs to be assigned to work with the rail property coordinator to assure that all of the activities are scheduled, as needed. Changes to the on-site schedule are common and need to be tracked. (Due: xx)
- As these interviews, tours, and inspections are completed, each meeting must have a sign-in sheet of all participants and all Audit Team participants must take notes on all aspects of the discussions. In addition, documentation received while on-site must be provided back to the Audit Team. Photos should be taken as allowed by the rail property, please refrain from including people in the photos. These notes should be discussed each evening after the day of activities. If possible, write the notes up and provide back to the Audit Team, as those notes are completed. (Due: xx)
- One or two persons should be assigned to collect the Audit Team notes and assure that they are all accounted for by some due date after the on-site activities and while onsite. (Due: xx)

Reporting and Corrective Actions

16. **Complete Triennial Audit Draft Report**. The draft triennial audit report will be completed and shared internally with SSO program management and with the rail property for review, input, and edit. The report will include both findings and recommendations. The effort to draft this report typically takes 30-45 calendar days after the on-site visit and is done at the offices of the SSO program team.

    - The notes and information collected from the on-site activities needs to be collected and organized for the Audit Team to use in preparation for completing the Draft Triennial Audit Report. In addition, someone needs to be tracking that all expected notes, photos, and documentation have been received and coordinate the completion of this activity. (Due: xx)
    - One or two persons should be assigned to collect up and organize all of the documentation received prior to and during the Triennial Audit onsite. Some summary information (synthesizing the notes from the Audit Team and the existing documentation) describing this material should be developed for use in the report. (Due: xx)
    - A few persons that participated in the Triennial Audit should be assigned to develop the draft report. This should be coordinated with the entire Triennial Audit Team and completed within the timeframe required by the program standard. (Due: xx)

17. **Draft Triennial Audit Report for Rail Property Review**. The rail property will typically have two weeks to review the draft Triennial Audit Report. If there is a need to meet to discuss issues or questions from the draft report, this will be completed either via

teleconference or in person as scheduled by the rail property and the SSO program team. Any disputes of specific findings or recommendations will either be resolved via communications between the parties or will be documented in the report if not resolved. Any changes or corrections from the rail property will be incorporated into the Triennial Audit Report at this point.

- The Draft Triennial Audit Report must first be reviewed by the SSO program and management in time to make any changes. This timing must be agreed to prior to the completion of the Triennial on-site activities. (Due: xx)
- The Draft Triennial Audit Report must be provided to the rail property for their review and input. The rail property should be encouraged to make corrections to the report and communicate any issues, especially with the findings and recommendations. (Due: xx)
- Once all comments are received, the Draft Triennial Audit Report must be edited and finalized. (Due: xx)

18. **Final Triennial Audit Report and CAPs**. Once the triennial review and audit report is finalized (including internal approval by management), it is delivered to all parties –SSO program team, rail property staff, and any other participants (such as FTA staff). With the delivery of the final triennial report, the rail property will be requested to develop appropriate CAPs to address all findings and recommendations. This is usually accomplished within 30 calendar days after delivery of the final triennial report.

- The Finalized Triennial Report must be provided to the rail property within the timeframe in the program standard. At this point, the rail property must complete corrective action plans (CAPs) for findings and as needed for recommendations. The SSO program requests that all recommendations have a response, even if it is to indicate that the issue is already managed. The due date for the CAPs development is 45 calendar days as provided in the program standard. (Due: xx)

19. **CAPs Approval**. The rail property will submit the CAPs developed from the final triennial report for the SSO program team to review and approve. If there are any issues or questions with these CAPs, the SSO program team will contact the rail property staff to share specific comments and issues. A CAPs tracking table will be developed and include the recommendation/finding, CAP developed by the rail property, any comments from the SSO program, rail property person assigned responsibility, and date CAP is due to be resolved. Once the CAPs are agreed to, the SSO program will formally approve the rail property CAPs via letter. At that point, the CAPs will be added to the rail property monthly CAP status document and tracked until completion and evidence of completion collected.

- Once the CAPs are received from the rail property, the Triennial Audit Team must review the CAPs compared to the issues in the Triennial Audit Report that caused the findings or recommendations. There may be some questions or coordination at this point to adjust or comment on the CAPs at this point. Once the SSO Program is satisfied with the CAPs, an approval letter is sent to the rail property, as required from the program standard. (Due: xx)
- These CAPs need to then move to the CAPs tracking log for ongoing status tracking monthly, or as agreed to with the rail property and the SSO program. (Due: xx)

Grouping of Safety Program Topics

In development of the Triennial planning, the elements/topics of the Safety program related documents can be grouped for efficiency in completion of the audit activities. These groupings also match the safety management system (SMS) required for the ASP development. The general list of the safety program related control documents/minimum standards for safety documents have also been added to the groupings. Note that there is no expectation that the triennial audit will include the entire safety program and implementation of the SMS, only some aspects of each topic, with respect to risk priority. Note that the 21 elements/topics from the previous safety program document, System Safety Program Plan (SSPP), are included and organized into these 12 groupings.

Grouping 1. ASP/SMS Implementation

    Review records and recordkeeping for the SMS and its implementation
    Also use the results of the remaining audit groups to assess the SMS implementation
    Annual ASP Review and Update
        Certification of Compliance
        SSPP Element 4. Plan Review and Modification
    Documentation and Tracking of Minimum Standards for Safety
    Integration with Public Safety and Emergency Management
        SSPP Element 11. Emergency Management Program
        SEPP All Elements/Topics
        Emergency Operations/Management Plan(s) and Related Training for RTA staff and Emergency Responders
        Drills and Exercises Program
        Most Recent TSA BASE Review
    Assuring Integration of the Safety Department in Policy and Procedure Development and Changes

Grouping 2. Safety Management Policy

    Safety Management Policy documentation, signed/endorsed by the Accountable Executive
    Agency's safety objectives
    Organizational Accountabilities and Responsibilities
    Employee Safety Reporting System
    Policy Communication Throughout Transit Agency
    Safety Program Definition and Administration
        SSPP Element 1. Policy Statement
        SSPP Element 2. Purpose, Goals, and Objectives
        SSPP Element 3. Management Structure
        SSPP Element 4. Plan Review and Modification
        SSPP Element 5. Plan Implementation

Grouping 3. Safety Risk Management

    Hazard Identification
    Risk Assessment and then Prioritization
    Selection and Implementation of Mitigations
    SSPP Element 6. Hazard Management Process
    SSPP Element 7. Safety Certification Process – for the formal hazard analyses
    SSPP Element 8. System Modifications – for the formal hazard analyses
    Other sources of formal risk assessment, safety and public safety related

Grouping 4. Safety Assurance – Safety Performance Measures and Targets for Improvement
 SSPP Element 9. Safety Data Acquisition
 Safety Performance Criteria, Targets, and Measures
 National Safety Plan
 FTA Guidance on Safety Performance Measures and Targets
 Coordination with the State and MPO for Safety Performance Measures and Targets
 SSO Program Standard Requirements/Procedures for Hazard/Risk Identification, Data Collection, and Analyses/Assessments
 Hazard Log, Risk Register, and Corrective Actions/Mitigations Tracking and Status
 CAPs definition, tracking, closure process

Grouping 5. Safety Assurance – Notifications and Investigations of Safety Events
 SSPP Element 10. Reportable Event Notification, Investigation, and Reporting
 SSPP Element 11. Emergency Management Program
 Rail Property Investigation Procedure(s)
 SSO Program Standard Requirements/Procedures for Safety Event notifications and investigations
 Emergency Response/Operations Procedures
 Rail Operating Rule Book and Required Training
 Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
 Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
 Field Supervision SOPs and Required Training

Grouping 6. Safety Assurance – Compliance with Operations Rules/Procedures
 SSPP Element 13. Rules Compliance
 Rail Operating Rule Book and Required Training
 Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
 Field Supervision SOPs and Required Training
 Inclement Weather Procedures and Refresher Training
 Operator Certification/Refresher Training and Record-Keeping
 Inspection and Maintenance Manuals, SOPs, and Standards, Supervision, Training, and Competency

Grouping 7. Safety Assurance – Compliance with Inspection and Maintenance (I&M) Requirements
 SSPP Element 14. Facilities and Equipment Inspections
 SSPP Element 15. Maintenance Audit and Inspection Program
 Transit Asset Management (TAM) Plan
 Inspection and Maintenance (I&M) Manuals, SOPs, Standards, Supervision, Training, and Competency
 Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
 Maintenance (equipment and rail infrastructure/systems) Job-based Certification/Refresher Training

Grouping 8. Safety Assurance – Compliance with Local, State, and Federal Safety Requirements
 SSPP Element 18. Compliance with Local, State, and Federal Safety Requirements, includes OSHA-Related Requirements at the state, local, and/or transit agency level

SSPP Element 19. Hazardous Materials Program
SSPP Element 20. Drug and Alcohol Program

Grouping 9. Safety Assurance – Management of Change
SSPP Element 7. Safety Certification Process
SSPP Element 8. System Modifications
SSPP Element 17. Configuration Management
SSPP Element 21. Procurement
Configuration Management Plan (CMP)
Safety Certification Plan (SCP)
Tracking of Significant Capital Projects
Safety-Related Procurement Specifications/Requirements

Grouping 10. Safety Assurance – Continuous Improvement
SSPP Element 12. Internal Safety Audit Program
Tracking the Three-Year Cycle of ISAs
SSPP Element 9. Safety Data Acquisition – includes results from investigations, internal audits, emergency management
Assuring Integration of the Safety Department in Policy and Procedure Development and Changes
SSPP Element 4. Plan Review and Modification

Grouping 11. Safety Promotion – Training
SSPP Element 16. Training and Certification Program
Rail Operating Rule Book and Required Training
Right-of-Way or Roadway Worker Protection (RWP) Plan and Required Training
Command and Control/Train Control Standard Operating Procedures (SOPs) and Required Training
Field Supervision SOPs and Required Training
Inclement Weather Procedures and Refresher Training
Operator Certification/Refresher Training and Record-Keeping
Maintenance (equipment and rail infrastructure/systems) Job-based Certification/Refresher Training
Inspection and Maintenance Manuals, SOPs, and Standards, Supervision, Training, and Competency

Grouping 12. Safety Promotion – Communication
Policy Communication Throughout Transit Agency
SSPP Element 9. Safety Data Acquisition – data analysis results for investigations, internal audits, hazard management, emergency response, rules/procedures compliance
Safety Performance Criteria, Targets, and Measures
Employee Safety Reporting System

SSO Program Triennial Safety Program Audit Report Outline

Summary of Triennial Audit Results
Introduction
        Objectives
        Approach
Rail System Description
Triennial Process and Schedule
Analysis for Triennial Safety Program Audit
Review of Safety Program Documents and Activities
Appendix – Schedule On-Site Triennial Activities
Appendix – Triennial Review and Audit Forms

Corrective Actions Table Headings

Number
Recommendation
Corrective Action
SSO Comments
Responsibility
Due Date