

#### Draft responses from webinar number 4

107. We believe certification of TAM plans should be handled in the same fashion as others, through the annual certs and assurances exercise.

108. We do not believe an FTA-furnished self-assessment tool would be helpful. Since agencies will differ substantially in their plans and practices, such a tool would necessarily be over simplistic or overly complex and, in either case, not of great value.

109. The triennial review process is the optimal point for TAM plan sampling and review. Adding yet another review to the grant process would unnecessarily delay grants.

110. The concept of sampling in addition to triennial reviews is redundant. FTA should limit itself to assessing TAM plans in the triennial review process.

111. FTA should not dictate particular methods for states and other designated recipients to review or approve TAM plans of subrecipients. Simply rolling the TAM program into the triennial review process is the most cost effective means of monitoring compliance.

112. There should be no extraordinary procedures imposed on states as they develop or certify safety plans for subrecipients. Doing so would interfere with the concept of allowing states to determine how best to implement safety plans for subrecipients and push states toward a 'one-size-fits-all' solution which would be, at some level, inefficient and unworkable.

113. Progress is likely to be slow and incremental. Annual updates would, in many cases, simply require a 'paper drill' that would not render useful information to the grantees involved or FTA. As such, updates should be in line with local agency processes, with a maximum time between updates only.

114. Designating a particular position for certification presents difficulties for states and larger agencies. FTA should simply require a responsible official to certify TAM plans.

115. Board of director approval of TAM plans likewise are problematic. This is a technical document, not a policy decision for a board. Certification by a responsible official is sufficient.

116. MPOs receive input to their processes via TAM plans and other documents. The MPO then develops the TIP which may or may not include each transit or highway requirement. There is no realistic, effective means of dictating inclusion.

117. Individual agencies must set their own targets. Attempting to consolidate these targets at the MPO level would add nothing to the process, would effectively tie the MPO's hands on funding allocations, and would not be a reliable measure of effectiveness for any purpose. Different agencies operate within different dynamic envelopes and cannot be compared in any simplistic way.

118. Much like MPOs. This should be a 'flow-up' exercise. Also like MPOs, there is no realistic, effective means of dictating inclusion.

119. Again, this cannot be dictated in any effective way. Simply directing MPOs to effectively integrate goals, measures, and targets into their products is the best FTA will be able to do, short of completely taking over the planning process in each and every community.

120 & 121. FTA should not interpret the STIP as a funding document. Targets should be compiled, with no attempt to consolidate them into a 'one-size-fits-all' target. Doing a consolidated target would, in most cases, direct all potential funding to highways, the most dangerous mode of all. Rolling up agency targets is the best means of ensuring equitable treatment.

NOTE: Questions 48-55 shall be addressed anew in webinar 5, due to the unavailability of many safety professionals during webinar 4. Preliminary answers follow

48. We have not yet identified any additional competencies or training outcomes necessary. We remain concerned that even the existing requirements will result in an immediate dearth of qualified safety professionals, straining agency budgets and the training opportunities available to the breaking point.

49. We have asked our members to identify any unnecessary competencies but, as a preliminary matter, caution that the competencies required in a small, rural, bus-only agency are far different from those required in a large, urban, multi-modal agency. Agencies with lesser risk factors should be allowed to work within standards appropriate to their risk profile.

50. Requiring certification prior to employment would exacerbate an already tight market for trained professionals. Training once hired, and even apprentice-like situations should be acceptable. The TRACS committee is already engaged on this and FTA should defer to their guidance.

51. We have asked our members to comment on this specific question. We do caution that it is the quality, not the quantity or frequency of training, that should be the primary concern. Moreover, overlaying refresher training requirements on an already strained system would further slow training of new safety professionals.

52 through 55. We have asked our members to answer for their specific agencies.