SMS and Small Transit Providers:
Safety Assessment of Petersburg Area Transit
TRA and Virginia Department of Rail and Public Transportation

APTA Mobility Conference

May 21, 2019

New Federal Requirements for Bus Transit

- 49 Code of Federal Regulations (CFR) Part 673; becomes effective July 20, 2019

- Agencies will have one (1) year from effective date to have a Public Transportation Agency Safety Plan (PTASP) by July 20, 2020

- For Small Transit Providers, states write plan for them

Small Transit Providers

- Have 100 or fewer vehicles in peak revenue operation

- Receive Urbanized Area Formula Grant (Chapter 5307) funding

- Does not include agencies relying solely on Enhanced Mobility for Seniors and People with Disabilities funds (Chapter 5310) or Rural Area funds (Chapter 5311)

- States required to write PTASP for Small Transit Providers, unless they opt to write their own

Safety Review at Petersburg Area Transit (PAT)

Virginia Department of Rail and Public Transportation

- DRPT will write PTASP for PAT and other Small Transit Providers in VA

- States writing PTASPs for Small Transit Providers should closely tailor to each agency's physical, operational, organizational characteristics

- DRPT got a "head start" in conducting the assessment at PAT

Safety Review at PAT

- Review process began in February 2018
- Several months prior to 49 CFR 673
- No PTASP templates at that time
- Nonetheless, review organized around SMS framework

High-Level Safety Assessment Methodology

- Document and Records Reviews

- Interviews

- Field Observations

- Organized around SMS:
  - Safety Policy
  - Safety Risk Management
  - Safety Assurance
  - Safety Promotion

Safety Policy

SMS Requirements:

- *Establish authorities, accountabilities, and responsibilities*

- *Develop process for reporting safety issues to senior management*

- *Communicate the Safety Management Policy throughout the entire organization*

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Safety Policy – Practical Application

- Document reviews
  - Safety plans, policies, procedures
- Interviews
  - Senior management
  - Organizational structure
  - Processes
  - Roles and responsibilities
  - Accountabilities
  - Implementation of written plans, policies, procedures

Safety Risk Management

SMS Requirements:
- *Hazard Identification*
- *Safety Risk Assessment*
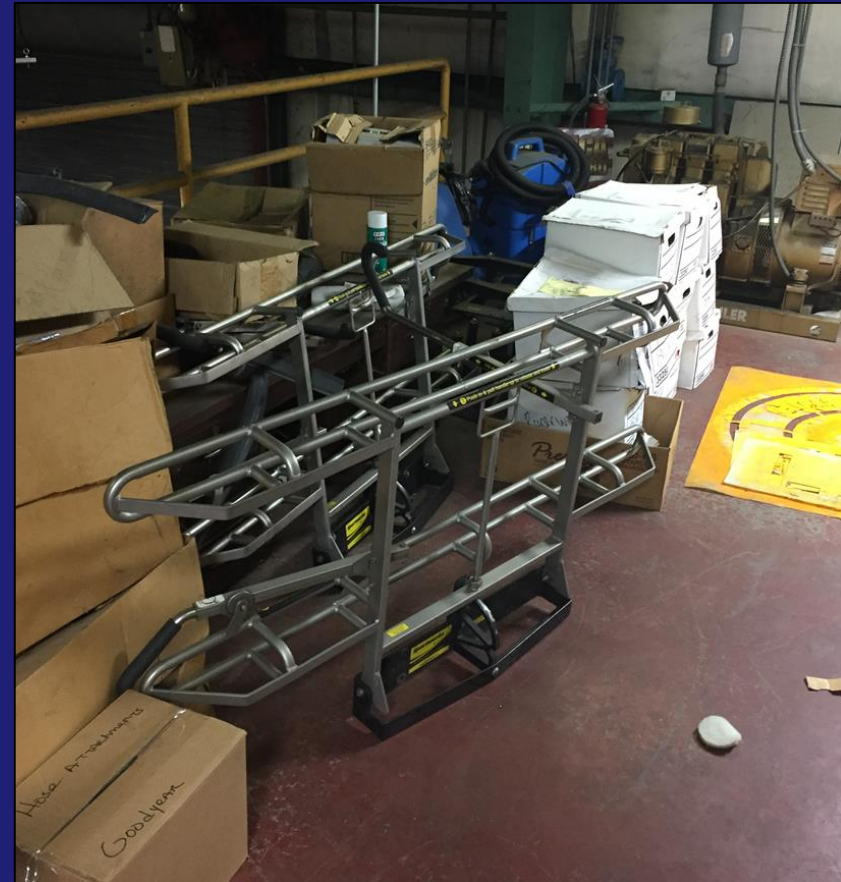- *Safety Risk Mitigation (or Elimination)*

Safety Risk Management – Practical Application

- Document and records review
  - Log or record of safety hazards
  - Meeting minutes, agendas – at all levels
- Interviews
  - Senior managers, operations, maintenance
  - Understanding of safety hazards and safety risk
  - Understanding of roles and responsibilities
  - How processes actually work

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Safety Risk Management, Continued

- Field observations
  - Facilities
  - Vehicles
  - Equipment
  - Transit Centers
- Not intended to be full OSHA-style inspection

Safety Assurance

SMS Requirement:

- Safety Performance Monitoring and Measurement
- Note: Small Transit Providers are NOT required to implement Management of Change or Continuous Improvement at this time
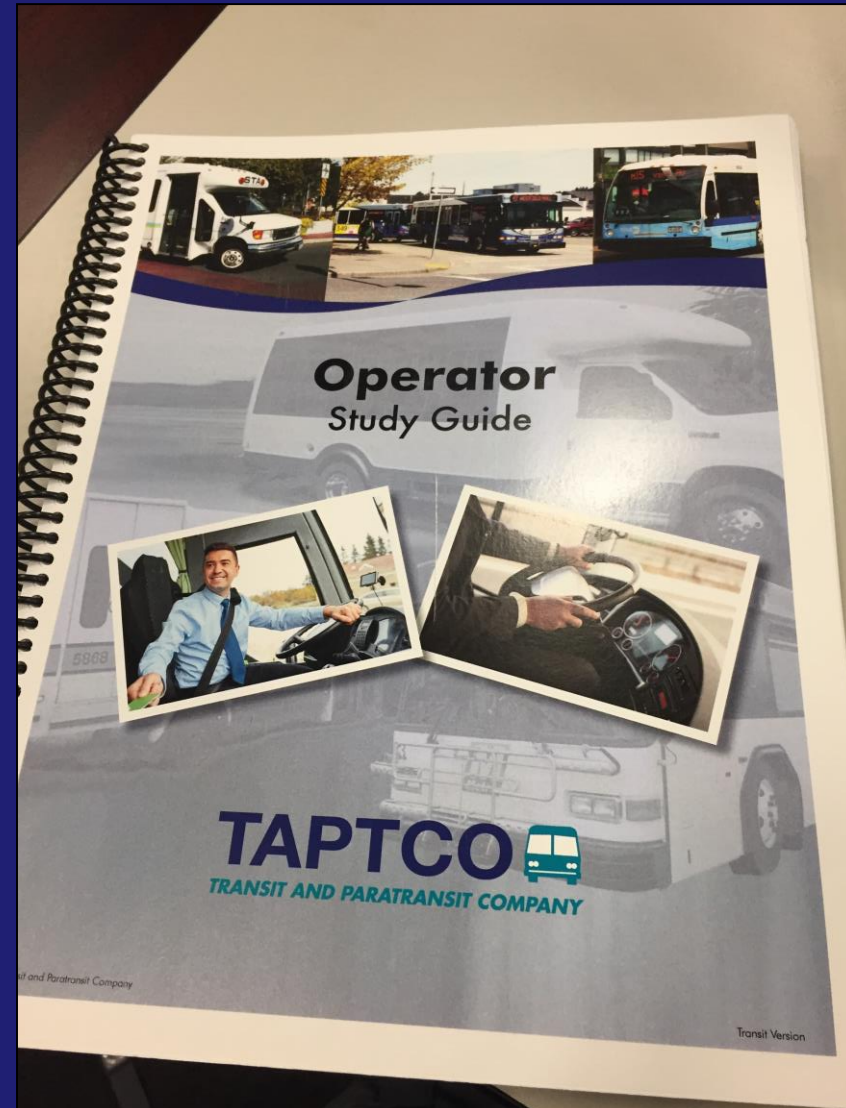
Safety Assurance - Practical

- Document and records review
  - Maintenance procedures and standards, including from vehicle manufacturer
  - Work orders and recordkeeping
  - PM inspections
  - Paper or electronic MMIS
  - Operating rules
  - SOPs and EOPs

- Interviews – managers and front-line

- Field Observations – maintenance activities, bus operations

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Safety Promotion

SMS Requirement:

- *Competencies and Training*
- *Safety Communication*

Safety Promotion – Practical Application

- Document and records reviews
  - Training and certification materials – syllabi, training requirements across positions
  - May be standard training materials produced externally
  - Training records
  - Safety meeting materials – agendas, minutes
- Interviews
  - Senior and department managers
  - Extent of on-the-job training (OJT) particularly for maintenance
  - Front-line employees – understanding of safety roles and responsibilities, adequacy of training

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Takeaways and Considerations

- Possible first encounter with safety process scrutiny (beyond occupational)
- Limited personnel resources
- Organize interviews and field observations by department
- Cover multiple SMS topic areas, lessen administrative burden
- SMS implementation a multi-year process
- Small transit providers should scale their SMS to their available resources
- Many good processes may not be documented
- PTASP – how things work vs how things should work in the future

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