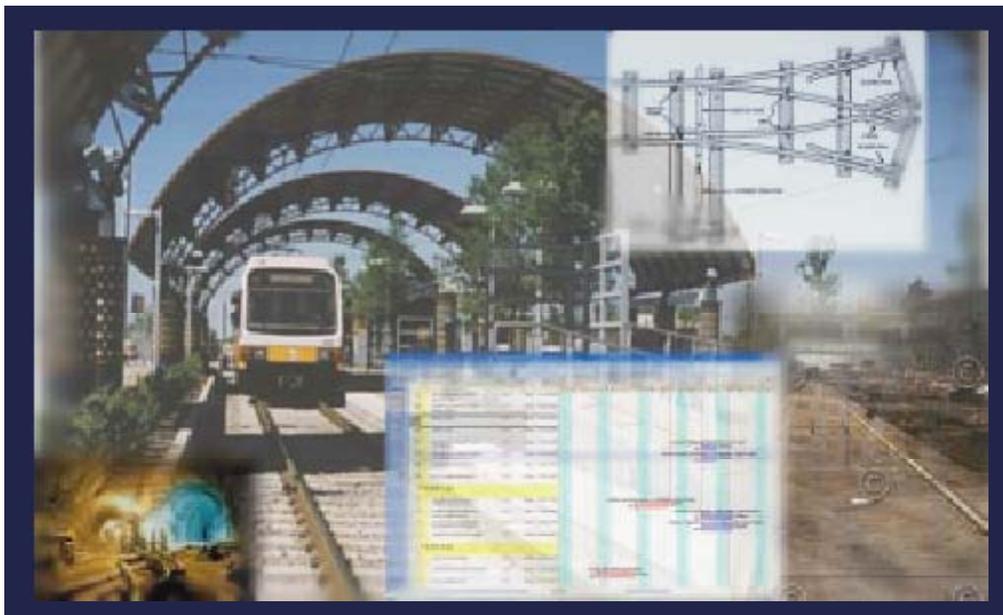U.S. Department
of Transportation
**Federal Transit
Administration**

Recommended Best Practices for States Conducting Three-Year Safety Reviews

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Introduction

On April 29, 2005, the Federal Transit Administration (FTA) published its revised 49 CFR Part 659, *Rail Fixed Guideway Systems; State Safety Oversight* final rule in the *Federal Register*. The revised rule, which went into effect on May 1, 2006, contains provisions that direct each State Safety Oversight (SSO) agency to conduct an on-site review, at least once every three (3) years, at each rail transit agency (RTA) in its jurisdiction. The purpose of this review is to assess the RTA's implementation of its System Safety Program Plan (SSPP) and to determine whether it is effective and whether it should be updated.

FTA developed this recommended best practice to help SSO agencies perform more thorough reviews of the RTAs in their jurisdictions. This resource provides verification activities to assess the RTA's effective implementation of each required SSPP element. This document also offers recommendations for making findings and requiring corrective action.

In using this document, SSO agencies select the activities that will be most beneficial to effective implementation of their programs, and are encouraged to look beyond the typical document review and interview formats that have historically been employed to conduct Three-Year Safety Reviews. FTA believes that through the verification activities and processes provided in this document, SSO agencies can greatly strengthen the effectiveness of their oversight programs.

This document also serves to demonstrate FTA's ongoing commitment to providing SSO agencies and RTAs with the technical assistance and resources required to fully implement and administer effective SSO programs and the requirements of Part 659.

Authority Conferred to SSO Agencies to Conduct Three-Year Safety Reviews

In the enabling authority for FTA's SSO rule, 49 U.S.C. Section 5330, Congress directs FTA to convey to the States the authority to "require, review, approve and monitor" the RTA's implementation of its SSPP. As such, in conducting Three-Year Safety Reviews, States are authorized to make findings on whether the rail transit agency is implementing its SSPP effectively and whether the SSPP needs to be updated.

§ 659.15(b)(4) of FTA's SSO rule requires the oversight agency, in its Program Standard, to describe "the process and criteria to be used at least every three (3) years in conducting a complete review of each affected RTA's implementation of its SSPP." This section of the Program Standard must also include "the process to be used by the affected RTA and the oversight agency to manage findings and recommendations from this review."

§ 659.29 states that the SSO agency "must review the RTA's implementation of its SSPP" and "must prepare and issue a report containing findings and recommendations resulting from that review, which, at a minimum, must include an analysis of the effectiveness of the SSPP and a determination of whether it should be updated."

§ 659.37 of FTA's SSO rule specifies that the SSO agency must require corrective action plans (CAPs) from the RTA for findings from Three-Year Safety Reviews. § 659.37 also requires that each CAP should identify the action to be taken by the RTA,

an implementation schedule, and the individual or department responsible for the implementation. Further, the CAP must be reviewed and formally approved by the SSO agency. Finally, the SSO agency must monitor and track the implementation of each approved CAP by the RTA, and the RTA must provide verification to the SSO agency that the CAPs have been closed.

Developing the Recommended Best Practice

To begin the process of developing its recommended best practices, FTA focused on activities that could be performed, within FTA's existing enabling authority, to verify the effective implementation of the SSPP by the RTA. Based on concerns raised by the National Transportation Safety Board (NTSB), FTA conducted an examination of how Three-Year Safety Reviews are currently performed by SSO agencies.

FTA collected and evaluated Three-Year Safety Review Reports from 20 different SSO agencies to assess scope, methodologies, types of findings made, and corrective action plans required. FTA determined that there is a wide variance among the SSO agencies regarding the scope of these reviews, the level of on-site verification performed to assess SSPP implementation, and the types of findings made requiring corrective action.

Based on this examination, FTA determined that the Three-Year Safety Review process could be improved to achieve greater consistency and effectiveness through the application of additional on-site verification activities, as well as through the provision of additional recommended best practices and clarification from FTA. FTA also determined that SSO agencies had the authority to make findings requiring CAPs for any instances where:

- The RTA was not implementing its SSPP,
- The SSO agency, based on analysis, did not find that the SSPP was effective, and
- The SSO agency determined that the SSPP needed to be updated.

Recommended Best Practices for States Conducting Three-Year Safety Reviews, was developed to document FTA's findings and recommendations regarding activities that should be performed by SSO agencies during their Three-Year Safety Review to assess SSPP implementation at the RTA's in their jurisdictions. This document identifies the on-site verification methods currently used by SSO agencies. It also recommends the use of specific verification methods for each of the 21 SSPP elements identified in § 659.19. In this resource, FTA also recommends that SSO agencies, during their Three-Year Safety Reviews, make findings requiring corrective action to address any specific instances, identified during these reviews, where the RTA is not implementing its SSPP and referenced or supporting procedures.

This document is not a regulation. The verification items specified in its checklists are recommended best practices. Implementation of the recommended practices contained in this resource will greatly enhance the capabilities of SSO agencies to assess the RTA's effective implementation of its SSPP and to determine whether it should be updated.

This document identifies the eight (8) types of verification methods that can be used by SSO agencies to perform their Three-Year Safety Reviews. It also provides detailed

checklists containing recommended verification activities for each of the 21 SSPP elements required by FTA in § 659.19, and suggested practices for making recommendations to RTAs based on the increased information and data that will be obtained by SSO agencies that use the verification methods.

Types of Verification Methods

FTA has identified eight (8) distinct verification methods that are currently used by SSO agencies during their Three-Year Safety Reviews:

- **Document Review**: Sampling the RTA's SSPP and referenced and/or supporting procedures to ensure that each required element of the State's Program Standard and 49 CFR Part 659 is addressed.

- **Rules Review**: Sampling the RTA'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 RTA personnel as specified in the SSPP, if training has been offered, and if this process has been tracked.

- **Records Review**: Sampling of the RTA's records for evidence of implementation of the SSPP 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 RTA Senior Management**: Discussions held with senior RTA management, including the RTA's Chief Executive Officer (CEO), to assess their knowledge of the RTA's safety program, as specified in the SSPP and referenced or supporting procedures, and to gauge their commitment to the safety program.

- **Interviews with RTA Safety Personnel**: Discussions held with RTA safety personnel, including the Chief Safety Officer, to assess implementation of the RTA's safety program, to identify issues in its implementation, and to highlight areas of compliance and non-compliance with Part 659 requirements.

- **Interviews with Other RTA Personnel:** Discussions held with other RTA personnel (including a representative sample of rank and file operations and maintenance personnel) to verify their understanding of requirements specified in SSPP and referenced or supporting procedures.

- **Field Observations:** Observations and sampling conducted on-site at the RTA to observe implementation of the processes and procedures described in the SSPP and supporting or referenced documents, procedures and materials related to the RTA's safety program.

- **Inspections and Measurements:** Inspections and measurements conducted on-site at the RTA to ensure that the RTA's infrastructure and equipment is maintained to the specifications identified in the RTA's standards, procedures, and manuals.

Each of these verification methods has specific strengths and limitations. To adequately assess implementation of each of the 21 SSPP elements required in § 659.19, FTA believes that more than one verification method should be used.

How to Use this Recommended Best Practice

While each RTA is ultimately accountable for implementing its safety program, SSO agencies provide an added degree of confidence that the requirements of 49 CFR Part 659 are effectively implemented. The Three-Year Safety Review is a critical tool for assessing RTA compliance with its own SSPP and supporting procedures.

To enhance the conduct of these reviews, FTA has developed a series of checklists for each of the 21 SSPP elements included in 49 CFR Part 659. These checklists include the element to be assessed, the eight (8) on-site verification methods, and recommendations for how these methods can be applied to each of the specific SSPP elements.

FTA believes use of these checklists will help SSO agencies by:

- Clarifying the scope of the Three-Year Safety Review,

- Supporting increased consistency in the quality of the Three-Year Safety Reviews conducted by SSO agencies around the country,

- Recommending verification activities to be performed by SSO agencies, and

- Enabling SSO agencies to gather more information and data related to RTA safety program performance that can be used to support targeted findings requiring CAPs.

It should be noted that, given the range of RTAs and SSO agencies in the SSO program, not every checklist item applies to every RTA. To address this concern, FTA recommends that SSO agencies review each topic for its relevance and the applicability of the recommended verification methods to the particular SSPP element implemented by the RTA. However, the checklists also call out specific verification activities that can be conducted in some manner regardless of the RTA's size or operating environment.

FTA's recommended best practice begins with a summary table that includes each of the 21 SSPP elements required in § 659.19 and highlights the verification methods that FTA recommends be performed by the SSO agencies during their Three-Year Safety Reviews. The approach recommended by FTA maintains the program's existing focus on interviews, the review of the SSPP and referenced or supporting procedures, the review of rulebooks and maintenance procedures, and the review of records to verify implementation of specific activities by the RTA. FTA's recommended approach also calls out other verification activities, including field observations and inspections and measurements, to support assessments of the effectiveness of the RTA's implementation of specific SSPP elements that cannot be evaluated based on records alone.

FTA's recommended best practice then presents detailed checklists for each of the 21 SSPP elements. These checklists are organized by verification type, and provide recommendations regarding the specific activities that should be performed by SSO agencies to assess the RTA's effective implementation of each SSPP element. Since many SSO agencies typically conduct only one interview with the assembled RTA Executive Leadership Team, key topics to be covered during this interview are included in the checklist for Element #1: Policy Statement and Authority for SSPP. The results of these interviews are then referenced in the other checklists for the remaining 20 SSPP elements. Some SSO agencies may wish to conduct additional interviews with the RTA Executive Leadership Team, and, if so, these interviews can easily be integrated into FTA's checklist format.

Finally, the recommended best practice concludes with suggested practices for making recommendations based on the findings generated as a result of the verification activities contained in the checklists as applied during the Three-Year Safety Review.

Summary Table

FTA's recommendations for which verification methods are applicable to each of the 21 SSPP elements assessed during the SSO agency Three-Year Safety Review appear below in Table 1.

Table 1: RECOMMENDED VERIFICATION METHODS FOR THREE-YEAR SAFETY REVIEW

	Document Review	Rules Review	Records Review	Interviews – Senior Management	Interviews – RTA Safety Personnel	Interviews – Other RTA Personnel	Field Observations	Inspections & Measurements
Element #1: Policy Statement and Authority for SSPP	✓			✓	✓			
Element #2: Goals and Objectives	✓		✓	✓	✓			
Element #3: Overview of Management Structure	✓	✓	✓	✓	✓	✓		
Element #4: SSPP Control and Update	✓		✓	✓	✓			
Element #5: Implementation Activities and Responsibilities	✓		✓	✓	✓	✓	✓	
Element #6: Hazard Management Process	✓	✓	✓	✓	✓	✓		
Element #7: System Modification	✓	✓	✓	✓	✓	✓		
Element #8: Safety Certification	✓		✓	✓	✓	✓	✓	
Element #9: Safety Data Collection and Analysis	✓	✓	✓	✓	✓	✓	✓	
Element #10: Accident Investigation	✓	✓	✓	✓	✓	✓	✓	
Element #11: Emergency Management Program	✓	✓	✓	✓	✓	✓	✓	
Element #12: Internal Safety Audits	✓	✓	✓	✓	✓	✓	✓	
Element #13: Rules Compliance	✓	✓	✓	✓	✓	✓	✓	✓
Element #14: Facilities and Equipment Inspections	✓	✓	✓	✓	✓	✓	✓	✓
Element #15: Maintenance Audits and Inspections	✓	✓	✓	✓	✓	✓	✓	✓
Element #16: Training and Certification for Employees and Contractors	✓	✓	✓	✓	✓	✓	✓	
Element #17: Configuration Management and Control	✓	✓	✓	✓	✓	✓		
Element #18: Compliance with Local, State and Federal Requirements	✓	✓	✓	✓	✓	✓	✓	
Element #19: Hazardous Materials Program	✓	✓	✓	✓	✓	✓	✓	✓
Element #20: Drug and Alcohol Program	✓	✓	✓	✓	✓	✓		
Element #21: Procurement Process	✓	✓	✓	✓	✓	✓		

Checklists

To clarify its recommendations for verification activities to be performed during the SSO agency Three-Year Safety Reviews, FTA has prepared a checklist for each of the 21 SSPP elements. Each checklist contains four items:

- ✓ **SSPP Element Number** – Unique indicator for which SSPP element is being addressed.

- ✓ **Text of 49 Part 659 regarding the SSPP Element Number** – Reference to the specific Part 659 requirement that must be implemented by the RTA in its SSPP and assessed by the SSO agency during the Three-Year Safety Review.

- ✓ **Verification Methods** – A listing of the eight (8) verification methods typically used by the SSO agencies during the Three-Year Safety Review.

- ✓ **Recommended Activities** – Specific activities that FTA recommends be performed to support verification that the RTA is effectively implementing the SSPP element as required in the SSO agency Program Standard and in 49 CFR Part 659.

Checklists are provided for the following:

- SSPP Element #1: Policy Statement and Authority for SSPP
- SSPP Element #2: Goals and Objectives
- SSPP Element #3: Overview of Management Structure
- SSPP Element #4: SSPP Control and Update Procedure
- SSPP Element #5: SSPP Implementation Activities and Responsibilities
- SSPP Element #6: Hazard Management Process
- SSPP Element #7: System Modification
- SSPP Element #8: Safety Certification
- SSPP Element #9: Safety Data Collection and Analysis
- SSPP Element #10: Accident/ Incident Investigations
- SSPP Element #11: Emergency Management Program
- SSPP Element #12: Internal Safety Audits
- SSPP Element #13: Rules Compliance
- SSPP Element #14: Facilities and Equipment Inspections
- SSPP Element #15: Maintenance Audits and Inspections
- SSPP Element #16: Training and Certification Program for Employees and Contractors
- SSPP Element #17: Configuration Management and Control
- SSPP Element #18: Local, State, and Federal Requirements
- SSPP Element #19: Hazardous Materials Program
- SSPP Element #20: Drug and Alcohol Program
- SSPP Element #21: Procurement Process

SSPP Element # 1: Policy Statement and Authority for SSPP

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ A policy statement signed by the agency's chief executive that endorses the safety program and describes the authority that establishes the SSPP.	
Document Review	Review SSPP Policy Statement, ensuring: ✓ That it endorses the RTA's safety program; that it has the signature of the RTA General Manager (GM), Executive Director (ED), or Chief Executive Officer (CEO); that it describes the authority that establishes the SSPP; and that it is dated.
Rules Review	n.a.
Records Review	n.a.
Interviews with RTA Senior Management	Conduct a meeting with RTA GM/ED/CEO, Chief Safety Officer, and Senior Management in Operations, Maintenance, Engineering, Human Resources/Training, Procurement, and Legal to discuss: ✓ How the authority conferred in RTA's policy statement to the Safety Department is reinforced with RTA personnel during meetings, bulletins or other methods. ✓ How the RTA's safety policy is consistent with the commitment to safety expressed by the RTA GM/ED/CEO and RTA Senior Management. ✓ Whether safety is included as a regular topic at RTA Board Meetings, and whether the RTA Chief Safety Officer gives reports. ✓ Formal meetings that are held and attended by RTA Executive Leadership to discuss safety performance (such as ongoing evaluation of goals and targets). ✓ RTA GM/ED/CEO and RTA Senior Management awareness of high priority safety issues and the status of corrective actions. ✓ The RTA Safety Department's reporting relationship to the RTA GM/ED/CEO, the RTA's Safety Committee Structure, and the participation of the RTA's Senior Management in this structure. ✓ Where in the organization safety decisions are made and the involvement of RTA Senior Management in making them. ✓ The process for the periodic review of the resources devoted to safety by the RTA GM/ED/CEO and RTA Senior Management. ✓ The inclusion of safety activities and requirements in employee job descriptions and training programs at the RTA. ✓ The inclusion of safety responsibilities in job evaluations for managers, supervisors, and employees. ✓ The implementation of RTA's internal safety audit process, to include a clearly defined scope, checklists, procedures, an effective findings resolution process, and annual certification of SSPP compliance from the RTA GM/ED/CEO. ✓ Use of risk assessment and hazard management as part of the overall safety program. ✓ Efficiency and proficiency testing programs for operations and maintenance employees, and how these programs ensure compliance with safety-critical rules. ✓ The RTA's accident investigation program and its focus on cause finding and correction.
Interviews with RTA Safety Personnel	Interview the Chief Safety Officer and representatives from the Safety Department to see if they feel empowered, authorized, and supported by

SSPP Element # 1: Policy Statement and Authority for SSPP

✓ A policy statement signed by the agency's chief executive that endorses the safety program and describes the authority that establishes the SSPP.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Interviews with RTA Safety Personnel *continued*	Executive Management in carrying out the SSPP, as specified in the Policy Statement. ✓ Ask for three (3) examples of where management support has made the difference in getting a specific safety concern addressed.
Interviews with Other RTA Personnel	Conduct interviews with a representative sample of rank and file RTA operations and maintenance personnel to verify their familiarity with the SSPP, the RTA's safety programs and authorities, and their obligation to perform work safely and to report safety issues and potential hazards.
Field Observations	n.a.
Inspections and Measurements	n.a.

SSPP Element # 2: Goal and Objectives

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ A clear definition of the goals and objectives for the rail transit agency safety program and stated management responsibilities to ensure that they are achieved.	
Document Review	Review the SSPP to: ✓ Ensure that it clearly defines the goals for the RTA safety program. ✓ Ensure that it clearly identifies the objectives necessary for achieving the stated goals. ✓ Ensure that it identifies management responsibilities necessary to achieve all goals and objectives. ✓ Ensure that it includes a process for determining whether the RTA met its safety goals and objectives.
Rules Review	RTA goals should be reflected in the rule book. Usually there is a cover page with high level safety goals.

Records Review	✓ Review documentation used to measure and track RTA activity to meet the goals and objectives specified in the SSPP:
	  o For example, if the RTA set a goal of reducing grade crossing collisions by 10%, has this been accomplished? Is it tracked and reported on?
	✓ Review documentation used to report to the RTA GM/ED/CEO or other RTA Senior Managers regarding the safety performance of the agency (i.e., monthly or annual safety reports, quarterly viewgraph presentations, etc.).
	✓ Make a determination regarding the adequacy of the safety information provided to the RTA's Executive Leadership.
	  o Is the RTA's Executive Leadership receiving sufficient information to ensure that the RTA is meeting its safety goals and objectives?
	  o Are rules violations and other key safety measurements being tracked and reported to the RTA's Executive Leadership?

Interviews with RTA Senior Management	Addressed in the meeting conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Meet with RTA Chief of Safety and Safety Department representatives to: ✓ Review the goals and objectives and determine if those goals have been achieved. ✓ Obtain examples of how goals are evaluated (metrics/measures). ✓ Determine whether the stated goals and objectives should be revised. ✓ Determine whether management responsibilities are adequately identified for the goals and objectives.
Interviews with Other RTA Personnel	Covered in the interviews conducted for SSPP Element #1.
Field Observations	n.a.
Inspections and Measurements	n.a.

SSPP Element # 3: Overview of Management Structure

✓ An overview of the management structure of the rail transit agency, including: (i) an organization chart; (ii) a description of how the safety function is integrated into the rest of the rail transit organization; and (iii) clear identification of the lines of authority used by the rail transit agency to manage safety issues.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	Review the SSPP and referenced/supporting procedures to: ✓ Ensure that an organization chart is included that depicts the RTA's structure and the Safety Department's position within that structure. ✓ Ensure that an organization chart is provided specifically for the Safety Department. ✓ Ensure that a clear description is provided regarding how the Safety Department interfaces with the other RTA departments, including the RTA's Safety Committee Structure, Executive Management Teams, Employee Safety Committees, Rules Committees, Hazard Committees, and other organizations and methods. o Make sure the SSPP and referenced/supporting procedures clearly describe the composition and structure of any RTA committees devoted to safety issues, their roles and responsibilities, and a schedule for when meetings will be conducted. ✓ Ensure that clear lines of authority are established within the SSPP for the RTA Safety Department to work with other RTA departments and RTA Executive Leadership to receive information, identify safety concerns, conduct internal audits and inspections, develop recommendations and corrective action plans to address safety concerns, track and verify the implementation of recommendations and corrective action plans, and report, on a regular basis, to the RTA's Executive Leadership.
Rules Review	Review any existing rules or operating procedures related to Safety Committees, Rules Committees, Hazard Management Committees, Inter-Departmental Task Forces, etc. to ensure that they have been updated to reflect current practices and distributed to appropriate personnel.
Records Review	Review records to: ✓ Ensure that the organization chart accurately depicts both the RTA's organization and the organization of the Safety Department. Perform other records review activities to: ✓ Review agendas and minutes from committee meetings led by the Safety Department to verify that they took place and that they followed the requirements specified in rules or procedures or the SSPP. ✓ Review agendas and minutes from committee meetings led by the other RTA departments to verify that they took place and that the Safety Department participated. ✓ Review memos, reports, and interdepartmental task force records to assess the Safety Department's activities to support interdepartmental coordination regarding safety issues and concerns. Randomly select 3 major issues confronting the RTA over the last year, and assess the level of Safety Department involvement in each of them. ✓ Is there evidence (i.e., meeting minutes, hazard analysis documents) that the Safety Department was consulted and involved? ✓ Is there evidence (i.e., meeting minutes, review of CAP) that the

SSPP Element # 3: Overview of Management Structure

✓ An overview of the management structure of the rail transit agency, including: (i) an organization chart; (ii) a description of how the safety function is integrated into the rest of the rail transit organization; and (iii) clear identification of the lines of authority used by the rail transit agency to manage safety issues.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Records Review *continued*	Safety Department contributed to resolution of the issue? Review the Safety Department's resources and personnel to make an assessment regarding the resources devoted to safety and if they are adequate. ✓ What is the current level of personnel resources devoted to rail transit safety issues, both in the Safety Department and in other RTA departments? ✓ If Safety Department resources have been reduced or personnel reorganized, has the RTA conducted a safety resource allocation assessment? ✓ What are the qualifications of Safety Department staff? ✓ Is the Safety Department able to maintain schedules for plan updates and key activities, such as internal audits and accident investigations? ✓ Does the Safety Department have personnel resources allocated to support interdepartmental coordination on safety issues and concerns? ✓ Have the RTA's Safety Department's personnel and resources been cut or increased disproportionately with the RTA's overall budget over the last three (3) years?
Interviews with RTA Senior Management	Covered in the meeting conducted for SSPP Element #1.

Interviews with RTA Safety Personnel	Meet with RTA Chief of Safety and Safety Department representatives to:
	 ✓ Discuss the organization used by the RTA to integrate the safety function into RTA operations and maintenance activities.
	 ✓ Discuss the standing of the RTA Chief of Safety in comparison with the heads of other RTA departments.
	 ✓ Solicit opinions from RTA safety personnel regarding the effectiveness of the organization, requesting a few examples of how this organization has worked to resolve identified safety issues.
	 ✓ Discuss the current staffing and funding of the RTA's Safety Department.
	     o How has it changed over the last three (3) years?
	     o Is it adequate?
	     o Are there specific needs that the RTA Safety Department cannot meet due to limitations in personnel or resources?

Interviews with Other RTA Personnel	Interview rank and file RTA employees who participate in Employee Safety Committees or Operator Safety Committees: ✓ Have them describe how often these meetings take place, what occurs at these meetings, any recent outcomes, and their level of interface with the Safety Department.
Field Observations	n.a.
Inspections and Measurements	n.a.

SSPP Element # 4: SSPP Control and Update Procedure

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ The process used to control changes to the SSPP, including: (i) specifying an annual assessment of whether the SSPP should be updated; and (ii) required coordination with the oversight agency, including timeframes for submission, revision and approval.	
Document Review	Review the SSPP to: ✓ Ensure that it describes the process for an annual SSPP assessment and update. ✓ Ensure that it describes the process for coordinating with the oversight agency, including timeframes for submission, revision and approval. ✓ Ensure that it contains a distribution and change control process.
Rules Review	n.a.

Records Review	Review records to:
	✓ Verify that all SSPP revisions have been submitted to the oversight agency according to the approved process and timeframes by reviewing past correspondence and records.
	✓ Verify that the annual review process is being implemented according to the approved process specified in the SSPP:
	   o Review responsibility
	   o Internal timeframes
	   o Comprehensiveness
	   o Sign-offs

Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Discuss the SSPP review and update process with representatives from the RTA's Safety Department to ensure that they understand the requirements and are implementing them.
Interviews with Other RTA Personnel	Covered in the interviews conducted for SSPP Element #1.
Field Observations	During visits to facilities during the course of the review, ask to see department head's SSPP and verify that it is current.
Inspections and Measurements	n.a.

SSPP Element # 5: SSPP Implementation Activities and Responsibilities

✓ A description of specific activities required to implement the system safety program, including: (i) tasks to be performed by rail transit agency safety function, by position and management accountability, specified in matrices and/or narrative format; and (ii) safety-related tasks to be performed by other rail transit agency departments, by position and management accountability, specified in matrices and/or narrative format.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	Review the SSPP to: ✓ Ensure that the SSPP accurately lists the safety-related activities necessary for the RTA Safety Department to effectively implement the safety program in a matrix or narrative format. ✓ Ensure that each activity is assigned to a specific position with management accountability. ✓ Ensure that the SSPP accurately lists the safety-related activities to be performed by other RTA departments to effectively implement the safety program in a matrix or narrative format. ✓ Ensure that each activity for the other RTA departments is assigned to a specific position with management accountability.
Rules Review	n.a.
Records Review	Pick, at random, 3 activities performed by the safety function and 3 activities performed by other RTA departments, and collect and review documents to: ✓ Verify that the safety-related activities are being performed. ✓ Verify that identified positions are carrying out the safety-related tasks assigned in the SSPP. ✓ Verify management accountability for the performance of the safety-related activities. ✓ If serious or potentially serious deficiencies are found, expand the review to include additional and/or related activities.
Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	✓ Verify through interviews of RTA safety personnel that identified positions are carrying out the safety-related tasks assigned to them in the SSPP. ✓ Ask Safety Department representatives to identify any challenges that they experience in carrying out the safety-related tasks as specified in the SSPP.
Interviews with Other RTA Personnel	✓ Verify through interviews of other RTA personnel that identified positions are carrying out the safety-related tasks assigned to them in the SSPP. ✓ In interviews, ask the RTA representatives to identify any challenges that they experience in carrying out the safety-related tasks as specified in the SSPP.
Field Observations	Pick at random 3 activities performed by other RTA departments and observe their performance in the field. ✓ Make a determination regarding whether the observed practices comply with the RTA SSPP and referenced or supporting rules and procedures.
Inspections and Measurements	n.a.

SSPP Element # 6: Hazard Management Process

✓ A description of the process used by the rail transit agency to implement its hazard management program, including activities for: (i) hazard identification; (ii) hazard investigation, evaluation and analysis; (iii) hazard control and elimination; (iv) hazard tracking; and (v) requirements for on-going reporting to the oversight agency regarding hazard management activities and status.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	✓ Review the SSPP and any supporting/referenced procedures to ensure that it contains an adequate description of the RTA's hazard management process, including requirements for on-going reporting to the SSO agency. ✓ Review the RTA's hazard management process against FTA's *Hazard Management Process Clarification Letter* of September 6, 2007 to ensure that all elements of this letter are addressed.
Rules Review	Review any rules related to the reporting and evaluation of hazards and determine if they have been updated to reflect current conditions and distributed to appropriate RTA personnel.

Records Review	Review records to:
	✓ Ensure that the RTA is identifying hazards through the sources described in the SSPP. Sources may include, but are not be limited to:
	   o Reports and complaints from passengers through contact with customer service, field personnel, or management personnel;
	   o Data mining of agency control center logs and maintenance management information systems;
	   o Monitoring of special orders and speed restrictions;
	   o Reports from operators and supervisors;
	   o Review of Unusual Occurrence Reports;
	   o Monthly or quarterly safety statistics reports;
	   o Internal audits performed by the Safety Department personnel;
	   o Facility inspections conducted by the Safety Department;
	   o Rules Compliance Program, including results from efficiency/proficiency testing;
	   o Results from the SSO agency Three-Year Safety Review; and
	   o Results from accident investigations and trend analysis of minor incidents and near-misses.
	✓ Verify that the Safety Department maintains a mechanism to capture and track identified hazards through analysis and resolution.
	✓ Verify that identified hazards are being evaluated according to the methods established in the SSPP.
	✓ Ensure that the SSO agency is being notified of identified hazards as specified in the Program Standard and SSPP.
	✓ Verify that the appropriate entities are performing hazard evaluation/categorization activities (Safety Committee, Director of Safety, etc.)
	✓ Verify that CAPs are being developed to address identified hazards and that the CAPs include the individual or department responsible for implementation and a schedule for completion.
	✓ Verify that the Safety Department follows-up on outstanding CAPs developed to mitigate or resolve hazards.

Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.

SSPP Element # 6: Hazard Management Process

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ A description of the process used by the rail transit agency to implement its hazard management program, including activities for: (i) hazard identification; (ii) hazard investigation, evaluation and analysis; (iii) hazard control and elimination; (iv) hazard tracking; and (v) requirements for on-going reporting to the oversight agency regarding hazard management activities and status.	

Interviews with RTA Safety Personnel	Have Safety Department personnel describe the process used to report, evaluate, assess and resolve hazards.
	  ✓ Ask Safety Department personnel to provide examples of how hazards that have been identified by other RTA departments and reported to them for analysis.
	  ✓ Review how the Safety Department assessed these hazards and ask for the status of activities implemented/performed to address them.
	  ✓ Ask the Safety Department how they monitor other departments to ensure that hazards are being reported to the Safety Department as required.

Interviews with Other RTA Personnel	Interview operations management personnel and at least two (2) Safety Committee representatives to determine if:
	  ✓ An appropriate procedure and reporting form have been developed and periodically distributed to all employees to ensure safety hazards in the work place are reported effectively.
	  ✓ All employee-identified safety hazards during the past 12 months have been either resolved at the department level or submitted to the Safety Department to be addressed by a Safety Committee/Other Process to assess the hazard and develop a CAP as necessary.
	  ✓ Operations management personnel periodically evaluate hazards that are resolved at the local department level to determine if there is a trend that requires Safety Department notification.
	  ✓ For hazards that should be reported to the Safety Department, operations management personnel report the initial short-term mitigation actions to the Safety Department and then meet to determine longer-term corrective actions.
	  ✓ CAPs are being tracked or have been implemented.
	Interview maintenance management personnel and at least two (2) Safety Committee representatives to determine if:
	  ✓ An appropriate procedure and reporting form have been developed and periodically distributed to all employees to ensure safety hazards in the work place are reported effectively.
	  ✓ All employee-identified safety hazards during the past 12 months have been either resolved at the department level or submitted to the Safety Department to be addressed by a Safety Committee/Other Process to assess the hazard and develop a CAP as necessary.
	  ✓ Maintenance management personnel periodically evaluate hazards that are resolved at the local department level to determine if there is a trend that requires Safety Department notification.
	  ✓ For hazards that should be reported to the Safety Department, maintenance management personnel report the initial short-term mitigation actions to the Safety Department and then meet to determine longer-term corrective actions.
	  ✓ CAPs are being tracked or have been implemented.

Field Observations	n.a.

SSPP Element # 6: Hazard Management Process

✓ A description of the process used by the rail transit agency to implement its hazard management program, including activities for: (i) hazard identification; (ii) hazard investigation, evaluation and analysis; (iii) hazard control and elimination; (iv) hazard tracking; and (v) requirements for on-going reporting to the oversight agency regarding hazard management activities and status.	
VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Inspections and Measurements	n.a.

SSPP Element # 7: System Modification

VERIFICATION METHOD	TYPICAL ACTIVITIES
✓ A description of the process used by the rail transit agency to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal certification but which may have safety impacts.	
Document Review	Review SSPP and referenced or supporting procedures to ensure that a process is in place for addressing safety issues and concerns in system modifications.
Rules Review	Review any rules regarding safety-related provisions to be addressed in system modifications and determine if they have been updated to reflect current conditions and distributed to appropriate RTA personnel.
Records Review	Review any documentation that proves the RTA Safety Department was involved in assessing at least two (2) system modifications over the last three (3) years prior to their placement in revenue service (i.e., emails, meeting minutes, sign-offs, inspection checklists, etc.) ✓ Verify that this process was consistent with SSPP requirements and included an evaluation of potential hazards the modification could pose to the system. ✓ Verify that these hazards were addressed. ✓ Verify that any changes made as a result of a system modification are now reflected in final as-built drawings for the facility and/or specifications for the vehicle and/or equipment. ✓ Verify that the RTA's configuration management process has been followed to address system modification.
Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Conduct interviews with RTA Safety Department representatives to discuss their role in ensuring that safety concerns are addressed in system modifications. ✓ Be sure to have them identify any specific activities they perform, such as participation in testing and inspections, receipt of sign-off inspection sheets from the field, observations performed at work sites, etc.
Interviews with Other RTA Personnel	Conduct an interview with RTA personnel who managed a recent system modification to assess the role of the RTA Safety Department addressing and resolving safety concerns regarding the modification.
Field Observations	n.a.
Inspections and Measurements	Conduct an inspection of three (3) system modification projects (i.e., station improvement, vehicle upgrade, etc.). Determine if the modification meets the specifications or project requirements, and if any unauthorized modifications were performed.

SSPP Element # 8: Safety Certification

✓ A description of the safety certification process required by the rail transit agency 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.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	Review the SSPP and any referenced or supporting procedures to ensure that a process has been established for safety certification for New Starts and major projects to extend, rehabilitate, or modify the existing system or to replace vehicles and equipment.
Rules Review	Review any rules related to safety certification and determine if they have been updated and distributed to RTA personnel.
Records Review	Review documentation to determine if New Starts and major projects undertaken by the RTA: ✓ Address safety certification management, including organizational authority and responsibilities. ✓ Address the controls used to maintain effective communication and liaison with RTA project staff throughout the life of the project. ✓ Identify the process used to verify and document conformance with safety and security requirements during design, construction, testing, and operational readiness. ✓ Are overseen and approved by FTA and its Project Management Oversight Consultants (PMOCs). If a formal safety and security certification program plan has been written for a specific project, review it to verify consistency with SSPP. ✓ Is the certification program being administered by the transit agency or a contractor? ✓ Was a PHA performed? ✓ Are hazards being addressed as per the process defined in the safety certification program plan? ✓ Is the hazard management process identified in the safety certification program plan consistent with the SSPP? ✓ Has a certification committee been created? ✓ Has a certifiable items list been created? ✓ How are federal, state, and local agencies involved? This includes the SSO agency and emergency responders. ✓ Have all designs been reviewed, stamped and sealed by a licensed Professional Engineer? ✓ Are design changes and Non-Conformance Reports (NCRs) analyzed for safety impacts? Have these been thoroughly documented? ✓ Have training programs been updated as necessary and have all employees been trained? ✓ Has a testing program been developed and administered? ✓ Have emergency drills and simulations been performed involving local emergency responders? ✓ Is the GM/CEO required to formally sign and certify the project complete and safety for operations?
Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.

SSPP Element # 8: Safety Certification

✓ A description of the safety certification process required by the rail transit agency 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.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Interviews with RTA Safety Personnel	Conduct interviews with safety department personnel to determine how the department has been involved in the certification of RTA New Starts and major projects.
Interviews with Other RTA Personnel	Conduct interviews with RTA project staff involved in New Starts and major projects to discuss how safety concerns were addressed and the level of interaction with the Safety Department.

Field Observations	Prior to the Three-Year Safety Review, participate in at least two (2) Quarterly Review Meetings conducted by FTA at the RTA:
	   ✓ Participate in discussions regarding safety certification activities.
	Also, observe the RTA's safety certification process for the project:
	   ✓ Participate in safety certification activities.
	   ✓ Participate in design reviews and PHA or other hazard analysis processes.
	   ✓ Observe testing programs and review test results.
	   ✓ Participate in emergency drills and simulations.

Inspections and Measurements	n.a.

SSPP Element # 9: Safety Data Collection and Analysis

✓ A description of the process used to collect, maintain, analyze, and distribute safety data, to ensure that the safety function within the rail transit agency receives the information necessary to support implementation of the system safety program.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	Review the SSPP and any referenced or supporting procedures to ensure that the RTA has adequately described its process for the collection, maintenance, analysis and distribution of safety data, including the role of the RTA Safety Department.
Rules Review	Review any rules related to safety data acquisition and analysis and determine if they have been updated to reflect current conditions and distributed to the appropriate RTA personnel.
Records Review	Verify that data sources identified in the SSPP are used to collect safety data by selecting a random sample of safety data sources identified in the SSPP and checking records to see how reports from these sources were managed in the safety data collection and analysis process. Possible sources include: ✓ Claims databases; ✓ Daily activity reports; ✓ Hazard Identification Forms; ✓ Unusual Occurrence Logs; ✓ Accident/incident reports; ✓ Customer service inputs; ✓ Audits; ✓ Departmental performance reports; ✓ Mining of maintenance management information systems and documentation (including work orders); and ✓ Police Reports. Review the safety data acquisition and analysis program requirements, records, and reports to determine if: ✓ The data collected includes, at minimum, information concerning RTA rail transit accidents and incidents, employee performance failures, equipment failures, software failures, procedural deficiencies, external factors contributing to failures, environmental factors contributing to failures, accidents/incidents involving fatalities and/or injuries, accidents/incidents resulting in property damage, and accident/incidents resulting in environmental damage. ✓ The safety data is supplied by and collected from all departments including Operations, Legal, Claims Management, and Maintenance as appropriate. ✓ The data collected is then analyzed and, if necessary, incorporated into the RTA's hazard identification and resolution process. ✓ The data collected and the resulting analyses are made available to all RTA departments for use in planning their safety-related activities. ✓ Monthly or quarterly reporting regarding the results of the safety data analysis is provided to the RTA's Executive Leadership as appropriate. The SSPP may establish a regular cycle of safety data analysis and reporting for internal and/ or external distribution. Verify that the analysis and distribution process is being implemented as described.

SSPP Element # 9: Safety Data Collection and Analysis

✓ A description of the process used to collect, maintain, analyze, and distribute safety data, to ensure that the safety function within the rail transit agency receives the information necessary to support implementation of the system safety program.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Records Review *continued*	✓ Timeframe for generation. ✓ Distributed to required parties.
Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview Safety Department representatives to discuss how safety data is collected, analyzed and distributed through the RTA. ✓ Ask the representatives to explain how they receive safety-related information from other departments, including the operations and maintenance departments. ✓ Ask the Safety Department representatives to provide examples of how information received from the operations and maintenance departments was used to support safety data collection and analysis activities. ✓ Ask the RTA Safety Department representatives to explain how they collect information on derailments and rules violations in the RTA's yard. ✓ Ask the RTA Safety Department how it ensures the quality and integrity of collected safety data. ✓ Ask the RTA Safety Department representatives to explain how the RTA reports to FTA's National Transit Database (NTD).
Interviews with Other RTA Personnel	Interview RTA representatives from operations and maintenance and ask them to explain how safety data collected by their personnel and in their information systems is shared with the RTA Safety Department and other RTA divisions. For example, has the Maintenance of Way department identified any problems related to what may be poor quality track components (i.e., track inserts, concrete ties, plates, etc.) and has this information been shared with the procurement department to assure different vendors are used in the future. ✓ Ask them to provide examples of this process, including data from inspections that may indicate quality or maintenance issues.
Field Observations	✓ Ask a Safety Department representative to review and demonstrate the automated systems used by the RTA to report, analyze and track safety data. ✓ Ask Operations and Maintenance department representatives to review and demonstrate the systems used by their departments to report, analyze, and track safety. ✓ Ask a Safety Department representative to review and demonstrate the process for reporting to FTA's NTD.
Inspections and Measurements	n.a.

SSPP Element # 10: Accident/Incident Investigations

✓ A description of the process used by the rail transit agency to perform incident notification, investigation and reporting, including: (i) notification thresholds for internal and external organizations; (ii) investigation process and references to procedures; (iii) the process used to develop, implement and track corrective actions that address investigation findings; (iv) reporting to internal and external organizations; and (v) coordination with the oversight agency.	

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Document Review	Review the SSPP and referenced or supporting procedures to ensure that the RTA has established an accident/incident investigation process as required by the SSO agency in its Program Standard and FTA's 49 CFR Part 659. Review the Accident Investigation Procedure developed by the RTA to verify that it: ✓ Includes incident notification, investigation and reporting thresholds. ✓ Identifies primary roles and responsibilities for performing investigations consistent with the SSPP. ✓ Includes processes for root cause analysis (this should include processes for accident scene investigation, equipment and vehicle inspection, interviewing of witnesses, etc.). ✓ Identifies when external, specialized expertise is needed to identify root causes. ✓ Identifies how the SSO agency is involved. ✓ Includes the review of rules and procedures that may have contributed to the accident. ✓ Includes an assessment of the role that fatigue may have played in the accident, including work histories for involved employees. ✓ Includes a process for developing CAPs that are consistent with the accident root causes. ○ Verify this process includes representatives from all necessary departments (i.e., Safety, Operations, Maintenance, Engineering, Vehicles, Systems, Track). ✓ Includes a process for evaluating and implementing CAPs consistent with the Hazard Management Process defined in the SSPP. ✓ Contains a process for monitoring of CAPs to validate their effectiveness.
Rules Review	Review any rules related to accident/incident investigation and determine if they have been reviewed, updated as necessary, and distributed to RTA personnel.
Records Review	Randomly select at least five (5) accidents involving an injury or fatality reportable to the SSO agency during the past 24 months and determine if: ✓ The accident was reported to the SSO agency as specified in the Program Standard, and the final written report on the accident was delivered to the SSO agency as specified in the Program Standard. ✓ The accident was investigated in compliance with the Accident Investigation Procedures reviewed and approved by the SSO agency. ✓ Verify timeline of accident notifications and to whom the notifications were made. ✓ Ensure that the final investigation report identified:

Recommended Best Practices for States Conducting Three-Year Safety Reviews

SSPP Element # 10: Accident/Incident Investigations

✓ A description of the process used by the rail transit agency to perform incident notification, investigation and reporting, including: (i) notification thresholds for internal and external organizations; (ii) investigation process and references to procedures; (iii) the process used to develop, implement and track corrective actions that address investigation findings; (iv) reporting to internal and external organizations; and (v) coordination with the oversight agency.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Records Review *continued*	o Each item covered by the investigation. o The investigation findings of the most probable cause. o Underlying contributing causes. o A CAP to addresses the identified causes and that it minimize the incident from recurring. o A schedule for implementing the CAP, which has been completed or is being monitored on an on-going basis. For the last 12 months, review the NTD reports filed with FTA by the RTA and compare them with RTA records and notifications to the SSO agency: ✓ Identify any discrepancies in reporting. For the last 36 months, review the notifications filed with NTSB by the RTA and compare them with RTA notifications to the SSO agency: ✓ Identify any discrepancies in reporting. Review accident reports from incidents occurring in the RTA's rail yard: ✓ What are the most commonly occurring incidents? ✓ What corrective actions have been developed to address them? ✓ Are any special monitoring programs in place to review yard accidents?
Interviews with RTA Senior Management	Covered in interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview Safety Department representatives and discuss: ✓ Past issues with the SSO agency receiving accident reports on-time and what has been done to address them. ✓ Coordination of investigation process with the SSO agency. ✓ Submission to the SSO agency of all supporting reports and documentation that comprise the full accident investigation report. ✓ Any other problems or issues with this process.
Interviews with Other RTA Personnel	Conduct random interviews with operations personnel, including supervisors, to assess their familiarity with the RTA's investigation process.
Field Observations	Participate in an at least one (1) RTA accident investigation (prior to the Three-Year Safety Review) and assess how well the RTA follows its adopted procedures.
Inspections and Measurements	n.a.

SSPP Element # 11: Emergency Management Program

✓ A description of the process used to develop an approved, coordinated schedule for emergency management program activities, which include: (i) meetings with external agencies; (ii) emergency planning responsibilities and requirements; (iii) process used to evaluate emergency preparedness, such as annual emergency field exercises; (iv) after action reports and implementation of findings; (v) revision and distribution of emergency response procedures; vi) familiarization training for public safety organizations; and (vii) employee training.	

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Document Review	✓ Review SSPP to ensure that it addresses the requirements specified in the State's Program Standard and 49 CFR Part 659. ✓ Review the RTA's Emergency Operation Plan (EOP) and procedures to assure consistency with SSPP. ✓ Verify these documents include a description of the transit agency's activities with external emergency response agencies to support emergency planning and response. ✓ Verify SSPP, EOP, and procedures clearly define RTA personnel roles and responsibilities. ✓ Verify SSPP, EOP, and procedures include a process for evaluating emergency drills and exercises. o Verify this process is linked to the hazard management process requirements of the SSPP. ✓ Verify SSPP, EOP and procedures require the development of after action reports for all real-life emergencies and practice drills and exercises. ✓ Review SSPP, EOP and procedures to verify that they include a description of the processes used to train local emergency responders. ✓ Verify SSPP, EOP and procedures clearly document how and to whom updated emergency response procedures will be distributed.
Rules Review	Review any rules related to emergency response and determine if they have been updated to address current conditions and distributed to appropriate RTA personnel. Verify when EOP and procedures were last reviewed and revised. ✓ Determine who was involved in the review and revision process (safety, security, emergency responders, operations, maintenance, committees, contractors, the SSO agency, etc.)? ✓ Determine if revisions were evaluated to ensure they would not create new hazards or system risks? Verify SSPP, EOP and procedures define how often drills, table-tops, and field exercises will be performed.

Records Review	✓ Verify that a drill/exercise schedule has been created and followed:
	    o When was the last one performed?
	    o Was an after action report developed?
	    o Was the after action report used to make changes to the RTA's EOP and/or procedures? If so, have these changes been communicated to RTA personnel?
	✓ Review training programs to verify they contain training curriculums for emergency response procedures and activities appropriate for each job classification.
	✓ Review training programs to verify frequency of employee

SSPP Element # 11: Emergency Management Program

✓ A description of the process used to develop an approved, coordinated schedule for emergency management program activities, which include: (i) meetings with external agencies; (ii) emergency planning responsibilities and requirements; (iii) process used to evaluate emergency preparedness, such as annual emergency field exercises; (iv) after action reports and implementation of findings; (v) revision and distribution of emergency response procedures; vi) familiarization training for public safety organizations; and (vii) employee training.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Records Review *continued*	emergency response training and if this frequency is consistent with SSPP requirements. ✓ Randomly select six (6) employees from the following safety sensitive job classifications and review their training records to verify who has been trained and that training has been properly documented: 　o Train Operators 　o Train Supervisors 　o Train Controllers 　o Power and Support Controllers 　o Communications Specialists 　o Other OCC Employees ✓ Verify the process through which emergency responders and other outside agencies are involved in the RTA's emergency planning. 　o Contact local emergency response agency liaisons to verify that they have received familiarization training and that they participate in the emergency planning process with the RTA. ✓ Review past documentation to verify that drill outcomes and evaluations were incorporated into response plans and procedures as appropriate. ✓ Review records and documentation for the past 12 months to determine if: 　o The RTA has held periodic Fire Life Safety meetings with police and fire departments in the applicable RTA jurisdictions. 　o Emergency response agency familiarization activities have occurred as scheduled. 　o Corrective actions have been implemented.
Interviews with RTA Senior Management	Covered in interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview RTA Safety Department representatives to discuss the RTA's emergency planning, training, and drill/exercise program. ✓ Ask for an overview of this process. ✓ Ask for specific examples of coordination with emergency response agencies on emergency planning and drill/exercises. ✓ Ask the representatives to describe the biggest challenges they face in coordinating or supporting the RTA's emergency planning process.
Interviews with Other RTA Personnel	✓ Conduct random interviews of transit personnel to verify they are familiar with the RTA's emergency response procedures. ✓ Conduct random interviews of transit personnel to verify that they have received training.

SSPP Element # 11: Emergency Management Program

✓ A description of the process used to develop an approved, coordinated schedule for emergency management program activities, which include: (i) meetings with external agencies; (ii) emergency planning responsibilities and requirements; (iii) process used to evaluate emergency preparedness, such as annual emergency field exercises; (iv) after action reports and implementation of findings; (v) revision and distribution of emergency response procedures; vi) familiarization training for public safety organizations; and (vii) employee training.	

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Field Observations	Prior to the Three-Year Safety Review, attend at least one (1) emergency drill or field exercise to verify its performance and assess its quality in testing the RTA's EOP and procedures. ✓ After participation in an emergency drill or field exercise, participate in the debrief and review the after action report for consistency with the SSO agency's perspective and findings.
Inspections and Measurements	Inspect the Operations Control Center to determine if: ✓ SOPs, lists, and plans are available, current and accessible; ✓ If these items are used during emergency response; and ✓ If the RTA's safety function checks on the availability and accessibility of these materials from time to time during accident investigations, internal audits, or other activities.

SSPP Element # 12: Internal Safety Audits

> ✓ A description of the process used to ensure that planned and scheduled internal safety audits are performed to evaluate compliance with the SSPP, including: (i) identification of departments and functions subject to review; (ii) responsibility for scheduling reviews; (iii) process for conducting reviews, including the development of checklists and procedures and issuing of findings; (iv) review of reporting requirements; (v) tracking the status of implemented recommendations; and (vi) coordination with the oversight agency.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Document Review	Verify that SSPP includes a description of the processes used by the transit agency to perform internal safety audits. ✓ Verify this process is consistent with Part 659 and the SSO agency's requirements. ✓ Verify SSPP identifies what departments and functions are subject to review. ✓ Verify SSPP clearly defines roles and responsibilities for performing the internal safety audits. ✓ Verify this process is fully endorsed by the GM/CEO. ✓ Verify the internal safety audit process and any findings are tied to the hazard management process defined in the SSPP. ✓ Verify internal safety audit process findings are analyzed to determine if they pose a hazard. ✓ Verify the SSPP includes a description of the process used to document and communicate internal safety audit results to appropriate personnel and departments, as well as the SSO agency. ✓ Verify the SSPP and/or referenced or supporting procedures require that CAPs be developed, documented, and implemented to address internal safety audit findings and concerns.
Rules Review	Review any rules related to the conduct of the RTA's internal safety audit process and determine if they have been updated to reflect current conditions and distributed to appropriate RTA personnel.
Records Review	Review RTA documents/records to determine if: ✓ A Three-Year Internal Safety Audit Schedule was developed and submitted to the SSO agency. ✓ Internal safety audit procedures have been developed and submitted to the SSO agency for each audit area. ✓ The internal safety audits have been performed as scheduled and following the procedures submitted to the SSO agency. ✓ The scope of audit activities includes the required elements specified in the SSO agency Program Standard and in 49 CFR Part 659. ✓ Internal safety audits have been properly documented and include references for documents and activities reviewed, criteria for evaluation, and notes to support findings and recommendations. ✓ An Annual Report has been submitted to the SSO agency for each of the last three (3) years documenting the results of the internal safety audit process. ✓ The Annual Report is accompanied by a letter from the GM/CEO, stating the RTA's compliance status with its SSPP and corrective actions for elements determined not to be in compliance. ✓ Corrective actions to address findings from the internal safety audit process were scheduled and implemented.

SSPP Element # 12: Internal Safety Audits

> ✓ A description of the process used to ensure that planned and scheduled internal safety audits are performed to evaluate compliance with the SSPP, including: (i) identification of departments and functions subject to review; (ii) responsibility for scheduling reviews; (iii) process for conducting reviews, including the development of checklists and procedures and issuing of findings; (iv) review of reporting requirements; (v) tracking the status of implemented recommendations; and (vi) coordination with the oversight agency.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Interviews with RTA Senior Management	Covered in interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview RTA Safety Department representatives to determine if: ✓ The internal safety audit process assesses implementation of the RTA's SSPP, including the use of field verification methods to verify the condition of infrastructure and rules compliance activities. ✓ The RTA's internal safety audit process adequately addresses interdepartmental and interagency communication issues. ✓ The interdepartmental and interagency communications process and requirements are clearly defined in detail. ✓ Any deviations from the approved procedure, identified during an internal safety audit or by any other means, are brought to the attention of management. ✓ There is a process in place for addressing and overcoming non-responsiveness of other RTA departments in responding to internal safety audit findings.
Interviews with Other RTA Personnel	Interview RTA operations and maintenance personnel supporting the RTA's internal safety audit process to: ✓ Obtain an overview of how these department representatives support the Safety Department in conducting the internal safety audit. ✓ Assess the level of effort devoted to supporting the RTA's internal safety audit process. ✓ Determine how required expertise for auditing specific functions, such as track or signal inspection, is provided to ensure the rigor and quality of the internal safety audit. ✓ Assess the level of commitment to the internal safety audit process evidenced by these representatives from RTA operations and maintenance departments.
Field Observations	Prior to the Three-Year Safety Review, participate in at least one (1) internal safety audit conducted by the RTA's Safety Department and one (1) internal audit conducted with the support of another RTA department.
Inspections and Measurements	n.a.

SSPP Element # 13: Rules Compliance

✓ A description of the process used by the rail transit agency to develop, maintain, and ensure compliance with rules and procedures having a safety impact, including: (i) identification of operating and maintenance rules and procedures subject to review; (ii) techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing; (iii) techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules; and (iv) process for documenting results and incorporating them into the hazard management program.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	✓ Review SSPP to verify that contents include the RTA's processes for developing, maintaining and ensuring compliance with operating and maintenance rules and procedures having a safety impact. ✓ Verify that the SSPP lists or references all operating and maintenance rules and procedures subject to review. ✓ Verify that the SSPP identifies all techniques used by the RTA to assess effective implementation of, and compliance with, operating and maintenance rules with safety impacts. ✓ Verify that the SSPP identifies how supervisors are evaluated to assess their effectiveness in overseeing implementation of, and compliance with, operating and maintenance rules with safety impact. ✓ Verify that the SSPP specifies that concerns identified through the RTA's rules compliance programs are reported to the Safety Department for inclusion in the hazard management process.
Rules Review	Review the status of the RTA's operating and maintenance rules and procedures: ✓ When was the last time the operating rulebook was reviewed and revised? ✓ Is the RTA keeping to the review/revision schedule specified in the SSPP and/or referenced and supporting procedures? ✓ Have all operators and other necessary personnel been given a copy of the most current rulebook as specified in the SSPP? ✓ Determine how many operating bulletins are issued each year and how the RTA Safety Department is involved in the review, approval and dissemination of these bulletins. ✓ How long to do operating bulletins typically stay in effect? Does the RTA have a process in place to review operating bulletins to determine when they should be incorporated into the rulebook? ✓ Does the RTA Safety Department conduct assessments to evaluate safety-related impacts to rules changes and bulletins? ✓ How does the RTA ensure that updated rules and bulletins are addressed in RTA initial, remedial, and refresher training? ✓ Is a list available regarding the most current versions of (and updates to) the RTA's maintenance procedures for activities having a safety-impact? ✓ Have all maintenance personnel been given a copy of the most current version of the procedures germane to their work? ✓ How does the RTA ensure that updated maintenance procedures are addressed in initial, remedial, and refresher training courses provided for maintenance personnel? ✓ Has the SSO agency received a copy of the current operating

SSPP Element # 13: Rules Compliance

✓ A description of the process used by the rail transit agency to develop, maintain, and ensure compliance with rules and procedures having a safety impact, including: (i) identification of operating and maintenance rules and procedures subject to review; (ii) techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing; (iii) techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules; and (iv) process for documenting results and incorporating them into the hazard management program.	

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Rules Review *continued*	rulebook and current versions of the most germane maintenance procedures? Review agendas and minutes from Rules Committee meetings to verify that they took place as specified in SSPP or supporting rules/procedures. ✓ Assess level of involvement of the Safety Department in supporting the RTA's Rules Committee. ✓ Confirm that a thorough review was conducted as specified in the SSPP.

Records Review	✓ Review documentation to verify that the RTA performs ride-alongs and other formal observations of train operators as specified in the SSPP.
	✓ Review documentation to verify that the RTA performs observations of maintenance employees as specified in the SSPP and/or referenced or supporting procedures.
	✓ Review documentation to verify that both operations and maintenance employees are evaluated based on their performance during unannounced observations to determine their compliance with safety rules, procedures, and/or practices.
	✓ Review past accident records to verify if any accidents were caused by a failure to follow operating rules and procedures.
	   o If so, verify what steps were taken to correct these issues (i.e., employee retraining, suspension, dismissal, etc.).
	✓ Review RTA "Fitness for Duty" program documentation, and ensure that the following are addressed:
	   o Medical Monitoring
	   o Hours of Service
	   o Fatigue Management
	   o Drug & Alcohol Program
	   o Over-the-Counter Medications
	   o Stress
	✓ Review documentation to verify that supervisors are citing operating and maintenance personnel for rule violations. *If there is no record of employees being disciplined for failing to follow a rule or procedure, then the supervisor is not likely performing these activities appropriately.*
	✓ Randomly select six (6) employees from the following safety sensitive job classifications:
	   o Train Operators
	   o Supervisors
	   o Train Controllers
	   o Power and Support Controllers
	   o Other OCC Employees

SSPP Element # 13: Rules Compliance

> ✓ A description of the process used by the rail transit agency to develop, maintain, and ensure compliance with rules and procedures having a safety impact, including: (i) identification of operating and maintenance rules and procedures subject to review; (ii) techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing; (iii) techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules; and (iv) process for documenting results and incorporating them into the hazard management program.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Records Review *continued*	✓ Review the selected employees' "time on duty" records prepared during a three- month period in the past 18 months to determine if they complied with the minimum rest requirements specified by the RTA.
Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	✓ Interview RTA Safety Department representatives to determine when rules and procedures were last reviewed (certain rules and procedures should be reviewed after accidents) and revised. ✓ Conduct interviews with RTA Safety Department representatives to discuss their role in ensuring that safety concerns are addressed in the RTA's rules compliance program. o Do Safety Department representatives support any rules compliance activities? o Do they receive reports from the RTA's operations and maintenance departments regarding the performance of rules checks, assessments, and testing? o Are hazards identified from the rules compliance process and reported to the RTA Safety Department and managed through the hazard management process? o Discuss process used to review and update rules and to review and issue operating bulletins. o Determine if the RTA has experienced any challenges in implementing this process or keeping to its review schedule.
Interviews with Other RTA Personnel	✓ Interview operations and maintenance supervisory staff to determine how they monitor employee compliance with rules and procedures. ✓ Interview operations and maintenance supervisory staff to determine their familiarity with rules and procedures. ✓ Conduct random interviews of operators and mechanics to verify how often they receive training on rules and procedures and how the transit agency monitors their compliance with rules and procedures.
Field Observations	✓ At random, select several operating procedures (4 or 5) and ride the system to verify that these rules are being followed (such as performing station announcements, look-back procedures, or end of line vehicle inspections, etc.). ✓ At random, select several maintenance rules and procedures (4 or 5) and perform an inspection of the maintenance shop to verify they are being followed. Basic steps would include verifying that mechanics are wearing appropriate Personal Protective Equipment, that they are using and storing hazardous materials correctly, or that

SSPP Element # 13: Rules Compliance

✓ A description of the process used by the rail transit agency to develop, maintain, and ensure compliance with rules and procedures having a safety impact, including: (i) identification of operating and maintenance rules and procedures subject to review; (ii) techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing; (iii) techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules; and (iv) process for documenting results and incorporating them into the hazard management program.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Field Observations *continued*	safety signs, barricades or other warning systems are being used appropriately. ✓ At random, select several basic track maintenance procedures (2 or 3) and observe performance of track maintenance activities to verify that procedures are being followed.
Inspections and Measurements	✓ Conduct a random sample inspection of transit operators to determine if they are carrying their rulebook, if they have the proper safety equipment in their cabs, and if their radios are functioning. ✓ Accompany line management personnel during compliance checks and assess how these checks are conducted and ensure that final reporting matches the findings in the field.

SSPP Element # 14: Facilities and Equipment Inspections

✓ A description of the process used for facilities and equipment safety inspections, including: (i) identification of facilities and equipment subject to regular safety-related inspection and testing; (ii) techniques used to conduct inspections and testing; (iii) inspection schedules and procedures; and (iv) description of how results are entered into the hazard management process.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**

Document Review	✓ Review the RTA's SSPP and/or referenced and supporting procedures to:
	     o Ensure that they identify the facilities and equipment subject to regular safety-related inspection and testing.
	     o Ensure that they identify the techniques used to conduct the inspections and testing.
	     o Ensure that they include or reference inspection schedules and procedures.
	     o Ensure that they provide a description of how results from the inspections are entered into the RTA's hazard management process.
	 ✓ Review the transit agency's "Facilities Maintenance Plan" and/or "System Operations and Maintenance Plan" to ensure it specifies general categories and inspection requirements of safety-related facilities and equipment.

Rules Review	Review any rules related to facilities and equipment inspections and determine if they have been updated and distributed to RTA personnel.

Records Review	✓ Review the safety inspection schedules, checklists, and procedures to be used to inspect facilities and equipment and ensure that they are consistent with the SSPP and referenced/supporting procedures.
	 ✓ Review checklists to be used by inspectors to ensure that items to be inspected are listed and include safety-related characteristics.
	 ✓ Review the inspection procedures and verify that testing and measurement criteria for facilities and equipment are included and to verify the use of machine guarding and appropriate hazardous materials storage.
	 ✓ Review the inspection procedures for maintenance facilities and shops to verify that compliance with personal protective equipment (PPE), Material Safety Data Sheets (MSDS), inspections of equipment, housekeeping inspections, inspection to verify industrial hygiene, conduct of fire drills, and facilities evacuation plans are required.
	 ✓ Review past documentation to verify that inspections are being performed and documented according to the SSPP and referenced/supporting procedures.
	     o Is an inspection report developed?
	     o Is this report provided to Safety Department for review?
	 ✓ Verify audit checklists include an examination of tools and test equipment used by the mechanics and ascertain if test equipment and measurement devices are properly calibrated according to the transit system's QA procedures and if the mechanic has available to them the necessary tools denoted in the "Maintenance Manuals" to perform the required tasks.
	 ✓ Verify that if hazardous conditions are identified, are they analyzed

SSPP Element # 14: Facilities and Equipment Inspections

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ A description of the process used for facilities and equipment safety inspections, including: (i) identification of facilities and equipment subject to regular safety-related inspection and testing; (ii) techniques used to conduct inspections and testing; (iii) inspection schedules and procedures; and (iv) description of how results are entered into the hazard management process.	

Records Review *continued*	according to hazard management process and tracked until mitigated?
	 ✓ Verify that the *"Hazard Tracking Log"* includes facilities and equipment hazards found during the transit agency's inspections.
	 ✓ Check a sampling of hazards identified during inspections to ensure they are immediately reported, documented, and tracked through resolution.
	 ✓ Check a sampling of *"Corrective Action Plans"* to determine timeliness of resolution and ensure follow-up activities are performed, hazard resolution has taken place, and a measure of the effectiveness of implemented hazard controls has taken place.
	 ✓ Randomly select one (1) aerial station, one at-grade station, and one (1) subway station (if applicable) and review the corresponding fire alarm and fire sprinkler system inspection, testing, and maintenance records to determine if:
	    o The required annual fire alarm inspections and fire sprinkler system inspections were performed during the past year as specified in the referenced procedure.
	    o The inspections were properly documented and noted discrepancies were corrected in a timely manner.
	    o Other inspections, testing, and maintenance were performed as specified in the referenced procedure.
	    o The inspections, testing, or maintenance were properly documented and noted discrepancies were corrected in a timely manner.

Interviews with RTA Senior Management	Covered in the interviews conducted for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview Safety Department representatives to review the inspections they perform in the RTA's shops and facilities: ✓ Ask these representatives to explain the activities they perform during these inspections and the conditions under which they perform them. ✓ Ask these representatives to describe the process through which corrective actions are developed, implemented and tracked to address findings from the inspections. Interview Safety Department representatives to review the accident and injury rates at the RTA's maintenance shops and facilities. ✓ Discuss the most significant shop safety issues and what is being done to address them. Ask if the State EPA has conducted an audit of the facilities and if they found any problems. ✓ If so, what corrective actions were taken by the transit agency?
Interviews with Other RTA Personnel	✓ Randomly select employees and ask if they are familiar with the RTA's PPE requirements, location of MSDSs, facilities evacuation plan, and when the last fire drill was conducted.

SSPP Element # 14: Facilities and Equipment Inspections

✓ A description of the process used for facilities and equipment safety inspections, including: (i) identification of facilities and equipment subject to regular safety-related inspection and testing; (ii) techniques used to conduct inspections and testing; (iii) inspection schedules and procedures; and (iv) description of how results are entered into the hazard management process.	

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Interviews with Other RTA Personnel *continued*	o Verify that answers are consistent with OSHA requirements and the SSPP and/or referenced or supporting procedures.
Field Observations	✓ Periodically participate in the transit agency's' facility and equipment inspections to ensure that they are conducted in accordance with the SSPP and the RTA's checklists. ✓ If shop safety meetings are conducted, "tool box talks" etc., periodically attend to ensure that they are conducted as denoted in the approved SSPP. ✓ Verify if OSHA "Right to Know" poster is posted. ✓ Ask for their lost time injury rate and compare to industry standards. ✓ Verify that the OSHA injury/illness log is posted or on file. ✓ Verify spill containment and waste water reclamation process are in place to prevent environmental damage.

Inspections and Measurements	✓ Randomly check fire extinguisher tag dates, elevator/escalator inspections/certifications, exit sign illumination, shop housekeeping, and other safety related items from the checklist noted above for compliance.
	✓ Verify use of machine guarding and appropriate hazardous materials storage.
	✓ Select five (5) different items on the list of equipment that requires calibration, review their documentation, and inspect the equipment to determine if:
	    o The selected items have a calibration label firmly affixed stating the date the item was last calibrated and the date the item is due for calibration.
	    o The selected items are properly inventoried, stored, distributed for use, and calibrated with certified standards at the prescribed intervals.

SSPP Element # 15: Maintenance Audits and Inspections

✓ A description of the maintenance audits and inspections program including identification of the affected facilities and equipment, maintenance cycles, documentation required, and the process for integrating identified problems into the hazard management process.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	✓ Verify that the SSPP provides a description of the RTA's maintenance audits and inspection program, including identification of the affected facilities and equipment to be audited/inspected, maintenance cycles, and required documentation. ✓ Review the transit agency's SSPP to identify referenced plans, such as "Original Equipment Manufacturer (OEM) Recommendations," "Fleet Management Plan," "Facilities Maintenance Plan," and/or "System Operations and Maintenance Plan." Review the identified plans to verify the specific facilities and equipment are included in their maintenance program and that they are consistent with items to be audited. ✓ Verify that a process has been created (and documented in the SSPP) to integrate concerns identified during maintenance audits and inspections into the transit agency's hazard management process.
Rules Review	Review any rules related to maintenance audits and inspections and determine if they have been updated and distributed to RTA personnel.
Records Review	✓ Conduct a general review of maintenance records and documentation to verify that maintenance is being performed and documented. - Does the system use Maximo or a similar electronic system? ✓ Randomly select three (3) audited system elements and review the maintenance records for those elements for the past year. Check to see that: - The preventive maintenance (PM) performed was consistent with the transit agency's maintenance program; - The PMs were conducted on schedule; - The proper type of PM was conducted according to the maintenance cycles promulgated in the maintenance program. ✓ Randomly select three (3) audited system elements and check failure history and hazard tracking log for the previous three years. Note if a correlation between the PM maintenance cycle and corrective action/hazard reports exist to ascertain possible PM procedural deficiencies. ✓ Review corrective action and failure records for three (3) audited systems and note repetitive failures that might indicate mechanic error and/or training requirement, ineffective procedure, and/or material deficiencies. ✓ Review "*Maintenance Manuals*", "*Preventive Maintenance Checklists*", "*Inspection Records*", "*Original Equipment Manufacturer Recommendations (OEM)*" if available, *Corrective Maintenance Records*", "*Operational QA/QC Program*", and other documented information and/or procedures, guidelines, etc. Randomly cross check documents for consistency, i.e. document control.

SSPP Element # 15: Maintenance Audits and Inspections

✓ A description of the maintenance audits and inspections program including identification of the affected facilities and equipment, maintenance cycles, documentation required, and the process for integrating identified problems into the hazard management process.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**

Records Review *continued*	o Verify all documentation has dates, approvals, and control numbers.
	o Verify that documentation is available for all identified maintenance elements.
	o Verify that the documentation is current, consistent with each other, readily available to end users, and written and illustrated for the intended users.
	✓ Select a minimum of four separate sections of third rail/overhead catenary and review the relevant maintenance inspection records to determine if:
	    o The required monthly and annual inspections were performed during the past 12 months as required by the referenced procedure.
	    o The inspections were properly documented and noted discrepancies were corrected in a timely manner.
	✓ Review RTA track inspection reports for at least two (2) separate two-month periods during the last three (3) years to determine if:
	    o All mainline tracks, yard leads, and transfer tracks were inspected as specified in the RTA's SSPP, track standards, and supporting procedures.
	    o The required inspections were properly documented and noted defects were corrected in a timely manner.
	✓ Review RTA geometry car inspection reports for at least two (2) separate two-month periods during the last three (3) years to determine if:
	    o All mainline tracks were inspected quarterly and all yard leads and transfer tracks were inspected annually by a geometry car.
	    o The required inspections were properly documented and noted defects were corrected in a timely manner.
	✓ Review RTA rail defect reports during the last three (3) years to determine if:
	    o All mainline tracks were inspected biennially by a device capable of detecting internal flaws in the running rails.
	    o The required inspections were properly documented and noted defects were corrected in a timely manner.
	✓ Review RTA track inspection reports for at least three (3) separate month-long periods during the last three (3) years to determine if:
	    o All mainline and yard turnouts were inspected as required by on-foot inspection.
	    o The required inspections were properly documented and noted defects were corrected in a timely manner.
	✓ Review the methodology by which the transit agency manages maintenance information/records (MMIS), whether electronically or manually.
	✓ Verify that the MMIS is available to supervisors and mechanics

SSPP Element # 15: Maintenance Audits and Inspections

✓ A description of the maintenance audits and inspections program including identification of the affected facilities and equipment, maintenance cycles, documentation required, and the process for integrating identified problems into the hazard management process.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Records Review *continued*	responsible for maintenance and inspection. ✓ Verify that the MMIS tracks inspection and maintenance cycles, failure reports, out of service equipment, materials shortages, corrective action items, and other related maintenance tracking items, etc. ✓ Review past documentation to verify that safety concerns and hazards identified from maintenance audits and inspections are being fed into the RTA's hazard management process. ✓ Review random sampling of three (3) system elements and ensure that the appropriate checklists, i.e. ("I*nspection Card")* include item inspected, type inspection performed, date of inspection, mechanic performing inspection, responsible supervisor, supervisor and mechanic approval signature, that all items associated with the type inspection have been properly inspected, and that deficient items have been properly documented and/or repaired.
Interviews with RTA Senior Management	Covered under the activities performed for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview representatives from the Safety Department to determine: ✓ How they coordinate with the RTA's maintenance functions to ensure that inspections and audits are being performed as required for safety-critical systems, such as track, structures, train control, transit vehicles, tunnel ventilation and flood control, elevators, escalators, and communications. ✓ How they receive assurances that these safety-critical systems are inspected/tested and/or serviced on a scheduled, periodic basis. ✓ How they receive assurances that, if an inspection were to indicate that a safety-critical system failed or was found to be in an out of tolerance condition, operations would be restricted to maintain safety until such time as an appropriate remedial action has been completed. ✓ Any independent inspections/audits performed by Safety Department representatives.
Interviews with Other RTA Personnel	✓ Randomly interview maintenance personnel, including both supervisors and mechanics, to verify that they have available the most current maintenance procedures and that they understand and have been properly instructed on using the information. ✓ Ask these personnel if they have access to the testing and measurement equipment or devices that may be specified by inspection and testing procedures. ✓ Ask these personnel if they know of any immediate safety concerns or hazards that are the result of poor maintenance activities. ✓ Interview maintenance supervisors to verify how they communicate these issues to the RTA's Safety Department and other departments. 　　o Note if their responses are consistent with what is stated in the SSPP and referenced/supporting procedures.

SSPP Element # 15: Maintenance Audits and Inspections

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ A description of the maintenance audits and inspections program including identification of the affected facilities and equipment, maintenance cycles, documentation required, and the process for integrating identified problems into the hazard management process.	
Field Observations	✓ Observe at least one (1) routine maintenance audit or inspection to verify how the process is being implemented.
Inspections and Measurements	✓ Pick one (1) maintenance element at random and field review a sampling of the most recent completed preventive maintenance reports (PMs), and, through visual inspection, ascertain, to the extent possible, whether the required maintenance procedure was completed. o This is best done by using the *"Preventive Maintenance Checklist"* with each item on the list correlated with a specific procedure. Note any areas from the checklist that simply say "checked," "tightened," or "tested" without specific readings. These items should be noted as deficiencies if specific readings are supposed to be noted in the maintenance documentation. ✓ Using contractor services, in-house personnel, or FRA-certified track inspectors, perform detailed visual and dimensional inspections/measurements of sample sections of mainline track, switches, crossovers, and turnouts to determine if the selected components are in compliance with the RTA's track standards. ✓ Using contractor services, in-house personnel, or FRA-certified vehicle inspectors, select and inspect at least one (1) vehicle from each of the RTA's vehicle fleets to determine if the RTA is maintaining its vehicles properly and adequately. ✓ Using contractor services, in-house personnel, or FRA-certified signal inspectors, perform detailed inspections of selected mainline train control and signal systems and components to ensure that they are being maintained to the RTA's standards. ✓ Using contractor services or in-house personnel, inspect a minimum of three (3) separate third rail segments/overhead catenary system segments to determine if they are in compliance with RTA standards. Also, inspect a minimum of three (3) Traction Power Substations to determine if they are in compliance with RTA standards.

SSPP Element # 16: Training and Certification Program for Employees and Contractors

✓ A description of the training and certification program for employees and contractors, including: (i) categories of safety-related work requiring training and certification; (ii) a description of the training and certification program for employees and contractors in safety-related positions; (iii) process used to maintain and access employee and contractor training records; and (iv) process used to assess compliance with training and certification requirements.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	Verify that, in the SSPP and referenced or supporting procedures, the RTA has established a program to ensure that employees and contractors are qualified to perform their job duties in compliance with established rules and procedures. ✓ Verify that the SSPP and referenced or supporting procedures describe the categories of safety-related work requiring training and certification. ✓ Verify that the SSPP and referenced or supporting procedures describe the training and certification program for employees and contractors in safety-related positions. ✓ Verify that the SSPP and referenced or supporting procedures describe the process used to maintain and access employee and contractor training records. ✓ Verify that the SSPP and referenced or supporting procedures describe the process used to assess compliance with training and certification requirements.
Rules Review	Review any rules related to the training and certification program for employees and contractors and determine if they have been updated and distributed to RTA personnel.

Records Review	✓ Through a records review:
	  o Verify that a process for maintaining and accessing employee and contractor training records is in place.
	  o Verify that categories of safety-related work requiring training and certification have been identified.
	  o Verify that employee and contractor job classifications requiring initial and refresher training and certification have been identified.
	  o Verify that the RTA has process is in place to assess compliance with its training and certification requirements.
	  o Verify that corrective actions taken to discipline employees and contractors for failure to follow established procedures once trained and certified are established and consistent.
	✓ Review training programs to verify:
	  o That training records are maintained in both hard copy and soft copy formats.
	  o That training consists of both classroom and hands-on training.
	✓ Verify that contractor training requirements are specified in contract documents.
	  o Review documents and verify that requirements are being met.
	✓ Review past documentation to verify training oversight and discipline processes.
	✓ Randomly select at least six (6) RTA employees in each of the

SSPP Element # 16: Training and Certification Program for Employees and Contractors

✓ A description of the training and certification program for employees and contractors, including: (i) categories of safety-related work requiring training and certification; (ii) a description of the training and certification program for employees and contractors in safety-related positions; (iii) process used to maintain and access employee and contractor training records; and (iv) process used to assess compliance with training and certification requirements.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES

Records Review *continued*	following classifications:
	  o Train operator
	  o Operation Control Center (OCC) Supervisor
	  o Line Supervisor
	  o Yard Supervisor
	  o Track Inspector
	  o Vehicle Maintainer
	✓ Review training and recertification records for the above employees for the past three (3) years to determine if:
	  o The employee has completed the initial training program and refresher and remedial training as necessary.
	  o The course content was appropriate and adequate to meet training and recertification requirements.
	  o The employee has been recertified at the correct frequency and currently meets the criteria to operate a vehicle or perform maintenance work.

Interviews with RTA Senior Management	Covered in activities to address SSPP Element #1.
Interviews with RTA Safety Personnel	Conduct interviews with representatives from the Safety Department to: ✓ Assess the role of safety in supporting and evaluating the RTA's training needs and programs. ✓ Verify that training programs are reviewed and revised as necessary to ensure accuracy and relevance to current operations and maintenance.
Interviews with Other RTA Personnel	Conduct interviews with representatives of the Training Department to: ✓ Determine the expertise of the trainers. ✓ Determine the extent and types of training offered by the Training Department. ✓ Determine if budget constraints have prevented training. ✓ Determine how changes to training programs are communicated to the Safety Department prior to their implementation.
Field Observations	Prior to the review, audit one or more training courses to assess the quality of instruction and effectiveness of training.
Inspections and Measurements	n.a.

SSPP Element # 17: Configuration Management and Control

✓ A description of the configuration management control process, including: (i) the authority to make configuration changes, (ii) process for making changes, and (iii) assurances necessary for all involved departments to be formally notified.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**

Document Review	✓ Verify that the SSPP and/or referenced and support procedures provide a description of the RTA's configuration management control process.
	✓ Verify that this process includes:
	   o the authority to make configuration changes,
	   o process for making changes, and
	   o assurances necessary for all involved departments to be formally notified.
	✓ Verify that a *"Configuration Management Plan* (CMP)*"* or similar document has been established by the RTA to guide its program.

Rules Review	Review any rules related to the RTA's Configuration Management and Control process and determine if they have been updated and distributed to RTA personnel.

Records Review	✓ Verify the *"Configuration Management Plan"* includes as a minimum the following:
	   o The system's baseline system configuration process.
	   o A tracking mechanism for the evolution of the system through its life cycle.
	   o An Interface process or an attendant "Interface Coordination Document" that defines this process and responsibilities.
	   o Methods used to track configuration control changes, such as engineering change requests (ECRs), engineering change notices (ECNs), field modification instructions (FMIs), etc.
	   o The establishment of a Configuration Control Board (CCB) or similar organization to review change requests and ensure that all departments within the agency that are affected by the proposed change are represented.
	   o Roles, responsibilities and authority for configuration control activities for all departments including their involvement on the Configuration Control Board.
	   o Integration of the Configuration Control Board with the functional organization.
	   o Classification of configuration control changes and coordination activities.
	   o The configuration management process is coordinated with the System Modification Review and Approval Process and the Safety and Security Certification Process.
	✓ Randomly select two (2) safety critical changes that were executed in the last 12 months to ensure documentation was properly updated to include at a minimum:
	   o As-built drawings
	   o As-built specifications
	   o Interface control documentation
	   o Rules, procedures and policies

SSPP Element # 17: Configuration Management and Control

✓ A description of the configuration management control process, including: (i) the authority to make configuration changes, (ii) process for making changes, and (iii) assurances necessary for all involved departments to be formally notified.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**

Records Review *continued*	o Training documents
	    o Operations and maintenance manuals
	✓ Review RTA training curriculums and materials related to configuration management to assess how the RTA trains its employees on this topic.
	✓ Randomly select an ECR, ECN and FMI and verify that:
	    o Proper forms were used.
	    o Forms were properly circulated by the CCB.
	    o Change was reviewed and approved by the CCB.
	    o Change was reviewed and approved by the General Manager.
	    o Change was circulated to the proper departments for execution

Interviews with RTA Senior Management	Covered in activities to address SSPP Element #1.
Interviews with RTA Safety Personnel	Interview Safety Department representatives to assess their knowledge of the RTA's configuration management process and the activities they perform to support this process. ✓ Verify through questioning that RTA personnel have access to the RTA's configuration management system and document control program. ✓ Verify through questioning that RTA Safety Department personnel provide appropriate review and sign-off of updated documents prepared by other RTA departments. ✓ Verify through questioning that the RTA Safety Department follows the RTA's configuration management process in updating its own documents and plans. ✓ Verify through questioning that configuration changes are assessed for potential hazards and entered into the RTA's hazard management process as appropriate.

Interviews with Other RTA Personnel	✓ Conduct employee interviews and document reviews of configuration management-related materials to verify that:
	    o the rest of the transit agency has access to the configuration management plan, and
	    o they are using it.
	✓ Interview individuals that have been identified as having responsibility in the *"Configuration Management Plan"* and/or *"Interface Control Document"* to verify their understanding of the plans and how they coordinate with the RTA's Safety Department on configuration management issues.

Field Observations	Have an RTA employee provide a demonstration of the RTA's configuration management and document control system.
Inspections and Measurements	During the course facility visits, ask to see various operating manuals, rule books and other documents to verify that they are current.

SSPP Element # 18: Local, State and Federal Requirements

✓ A description of the safety program for employees and contractors that incorporates the applicable local, state, and federal requirements, including: (i) safety requirements that employees and contractors must follow when working on, or in close proximity to, rail transit agency controlled property; and (ii) process for ensuring the employees and contractors know and follow the requirements.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	✓ Verify that the SSPP and referenced/supporting procedures include a description of the safety program for employees and contractors that includes applicable local, state, and federal requirements. ✓ Verify that the SSPP and referenced/supporting procedures include safety requirements that employees and contractors must follow when working on, or in close proximity to, rail transit agency controlled property. ✓ Verify that the SSPP and referenced/supporting procedures include a process for ensuring the employees and contractors know and follow the requirements.
Rules Review	If not already covered by other activities, review any rules related to local, state and federal requirements and determine if they have been updated and distributed to RTA personnel.
Records Review	✓ Verify that the transit agency's employee and contractor safety programs incorporate all elements required by local, state or federal law. ✓ Verify that the safety requirements that employees and contractors must follow when working on, or in close proximity to transit agency controlled property, are in place. ✓ If the agency has ever had a problem with complying with local, state, or federal requirements, review past documentation to verify how the issue was handled and resolved by the agency. ✓ Verify construction projects have specific procedures in place to ensure worker protection and public safety by fostering an awareness and concern for safety on the job site. ✓ Verify that implementation of these procedures is the responsibility of the contractor organization performing the work and the transit agency. ✓ Verify the transit agency's operating and maintenance safety rules and procedures are included in construction contracts to bind contractors and employees to fulfilling their roles and responsibilities safely. ✓ Verify that the transit agency has a process in place for ensuring employees and contractors know and follow safety rules and procedures. ✓ Verify appropriate forms of disciplinary action are taken consistently to correct employees and contractors who have not followed established safety rules and procedures.
Interviews with RTA Senior Management	Covered under activities performed for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview RTA Safety Department representatives to discuss the local, state and federal requirements addressed by the RTA in this section of the SSPP.
Interviews with Other RTA Personnel	✓ Randomly interview employees and contractor personnel to determine their levels of awareness regarding local, state, and

SSPP Element # 18: Local, State and Federal Requirements

✓ A description of the safety program for employees and contractors that incorporates the applicable local, state, and federal requirements, including: (i) safety requirements that employees and contractors must follow when working on, or in close proximity to, rail transit agency controlled property; and (ii) process for ensuring the employees and contractors know and follow the requirements.

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
Interviews with Other RTA Personnel *continued*	federal laws. 　o　Are they aware of OSHA Right to Know regulations? 　o　Are contractors aware of the penalties that may be imposed if they fail to comply with laws and regulations?
Field Observations	✓ Conduct field inspections of RTA facilities to verify basic OSHA or state equivalent requirements are being met (i.e., general housekeeping of maintenance facilities, employee use of PPE, hazardous materials storage and MSDS locations, provision of eye wash stations, first aid kits, and fire extinguishers, provision of fall protection and/or warning systems around maintenance pits, etc.). ✓ Conduct field inspections of contractor work sites to verify contractors are following required safety rules and procedures specified in contract documents.
Inspections and Measurements	n.a.

SSPP Element # 19: Hazardous Materials Programs

✓ A description of the hazardous materials program including the process used to ensure knowledge of and compliance with the program requirements.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	Verify that the SSPP and/or referenced and supporting procedures contain a description of the hazardous materials program, including the process to ensure knowledge of and compliance with the program requirements.
Rules Review	Review any rules related to the RTA's hazardous materials program and determine if they have been updated and distributed to RTA personnel.
Records Review	✓ Verify that a hazardous materials (HazMat) program is documented in a hazardous materials plan or procedure. ✓ Verify that the transit agency has developed an OSHA or state equivalent compliant HazMat program (if applicable). ✓ Verify that the program includes a process to familiarize the employees with the hazards presented by materials used in the work place and the Employee Safety Program. ✓ Verify the program assigns roles and responsibilities to specific departments and personnel for reviewing and approving materials used or to be purchased and used on transit agency property. ✓ Verify that follow-up activities are performed to verify field use of approved materials to ensure that safe and proper use, handling, storage, and disposal methods are employed. ✓ Verify that MSDS for all chemicals and other materials that are currently used, or that are being considered for purchase and use are reviewed and approved prior to chemical purchase. ✓ Select at random six (6) RTA employees who handle hazardous materials. o Verify that they have received specific training regarding reporting requirements, inventory control and storage, product release or spill, and the response and cleanup of spill incidents. ✓ Verify that hazardous materials discharge/spill reports for incidents that occurred during the past three (3) years have been prepared and filed. ✓ Verify that all MSDS are available to all personnel who work with hazardous materials.
Interviews with RTA Senior Management	Covered under the activities performed to address SSPP Element #1.

Interviews with RTA Safety Personnel	✓ Interview RTA Safety Department representatives to discuss the RTA's hazardous materials program and the role of the RTA Safety Department in enforcing this program. Be sure to discuss the following:
	   o The procurement process for insecticides, herbicides, chemicals, and solvents.
	   o If a MSDS for each hazardous material is on file with the System Safety Department.
	   o If the approved MSDSs have been entered into an MSDS filing system for tracking.

Interviews with Other RTA Personnel	✓ Interview RTA department managers to determine if hazardous materials are being handled properly. Be sure to discuss the following:

SSPP Element # 19: Hazardous Materials Programs

✓ A description of the hazardous materials program including the process used to ensure knowledge of and compliance with the program requirements.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Interviews with Other RTA Personnel *continued*	o The procurement process for insecticides, herbicides, chemicals, and solvents. o If a MSDS for each hazardous material is on file with the System Safety Department. o If the approved MSDSs have been entered into the MSDS filing system for tracking.
Field Observations	Observe RTA maintenance personnel working with hazardous materials. Ensure that they follow all applicable rules and procedures. Note any discrepancies.
Inspections and Measurements	✓ Verify that appropriate personal protective equipment (PPE) is provided and used as required by the MSDS, material manufacturer, and the transit agency. ✓ Verify MSDSs are readily available to all employees and contractors of the transit agency and that they have been properly instructed on the use of the MSDS system.

SSPP Element # 20: Drug and Alcohol Program

✓ A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements.	
VERIFICATION METHOD	**RECOMMENDED ACTIVITIES**
Document Review	✓ Verify that the SSPP contains a description of the RTA's drug and alcohol program requirements. ✓ Verify that the RTA has a drug and alcohol policy and that it is consistent with federal and state requirements.
Rules Review	Review any rules related to the RTA's Drug and Alcohol Program and determine if they have been updated and distributed to RTA personnel and to contractors.

Records Review	✓ Assess whether the RTA has ever undergone a federal or state audit of its drug and alcohol program?
	   o If so, what were the outcomes?
	   o Have all findings or recommendations been addressed?
	✓ Review training program curriculums to verify the transit agency is training all employees regarding its drug and alcohol policy.
	✓ Review RTA records and documents to determine the number of employees in safety sensitive positions who tested positive (or refused to take a test) during the past 3 years:
	   o For pre-employment;
	   o With a reasonable cause;
	   o Post-Accident;
	   o At random;
	   o To return to Work;
	   o As a follow-up.
	✓ Confirm that this information was accurately reported to FTA through the RTA's annual submission to the Drug and Alcohol Management Information System (DAMIS).
	✓ Confirm that the RTA has a policy in place for managing the use of Over-the-Counter drugs.

Interviews with RTA Senior Management	Covered under the activities performed to address SSPP Element #1.
Interviews with RTA Safety Personnel	✓ Interview RTA Safety Department personnel to verify that they are familiar with the requirements and are implementing the program according to federal standards. ✓ Ensure that RTA Safety Department personnel support implementation of the RTA's post-accident drug and alcohol testing during accident investigations.
Interviews with Other RTA Personnel	Interview transit personnel, including supervisors, responsible for administering the program and verify they are familiar with the requirements and are implementing the program according to federal standards.
Field Observations	Prior to the Three-Year Safety Review, participate in the RTA's internal safety audit for the RTA's drug and alcohol program. Prior to the Three-Year Safety Review, participate in an FTA audit of the RTA drug and alcohol program, should one occur.
Inspections and Measurements	n.a.

SSPP Element # 21: Procurement Process

VERIFICATION METHOD	RECOMMENDED ACTIVITIES
✓ A description of the measures, controls, and assurances in place to ensure that safety principles, requirements and representatives are included in the rail transit agency procurement process.	
Document Review	Verify that the SSPP and any referenced or supporting procedures include a description of the process used by the RTA to ensure that safety issues and concerns are addressed in the procurement process.
Rules Review	Ensure that any updated rules relevant to the RTA procurement process are communicated appropriately.

Records Review	✓ Verify that the SSPP contains a description of the basic procurement processes that must be followed by the transit agency to assure that safety concerns and issues are addressed.
	  o Is the procurement process tied to the transit agency's hazard management process?
	  o Are procurements of new equipment and material first reviewed by the safety department, engineering, operations, and/or maintenance staff to verify the new equipment or materials won't present a hazard to the existing system?
	  o Do all procurement processes for hazardous materials address all appropriate rules and regulations?

Interviews with RTA Senior Management	Covered under the activities performed for SSPP Element #1.
Interviews with RTA Safety Personnel	Interview Safety Department representatives and have them explain how they work through their procurement process to ensure that safety issues are identified, assessed, and resolved.
Interviews with Other RTA Personnel	Interview transit personnel responsible for procurement to verify that they are aware of, and are following, the RTA's processes to ensure that safety issues and concerns are addressed in the procurement process.
Field Observations	n.a.
Inspections and Measurements	n.a.

Making Recommendations

As specified in § 659.15(b)(4), FTA's SSO rule requires the SSO agency to establish a process and criteria for conducting "a complete review of each affected RTA's implementation of its SSPP" no less than once every three (3) years. The verification checklists presented in this recommended best practice are intended to assist SSO agencies in the performance of comprehensive reviews of the RTAs under their jurisdiction. The verification activities represent recommended best practice for assessing the effective implementation of an RTA's SSPP.

By employing these verification methods, SSO agencies will be able to make informed assessments regarding the RTA's compliance with its SSPP and referenced or supporting procedures, the SSO Program Standard, and the requirements of Part 659. Use of the verification activities specified in FTA's recommended best practice also support SSO agencies in making clear determinations regarding whether the RTA's SSPP is effective and whether it needs to be updated.

Once the on-site portion of the Three-Year Safety Review has been completed, the SSO agency is responsible for analyzing the results and for developing findings that require CAPs from the RTA. By using the verification methods specified in this recommended best practice, FTA believes that SSO agencies will be able to develop and communicate clear findings to the RTAs.

FTA recommends that findings made by the SSO agencies be as specific as possible. In the past, some SSO agencies have issued broad, generalized findings to address observed weaknesses in SSPP implementation and areas where the SSPP is not performing effectively or where an update is required. Broad findings can be difficult for the RTA to respond to, and can create challenges in tracking implementation of the developed CAP.

For example, in the past, if an SSO agency noted violations of special orders or operating bulletins by train operators, the SSO agency might have made a general finding to the RTA regarding the fact that the operating rules and bulletins were not being consistently implemented. Following FTA's recommended approach, the SSO agency would now make a finding noting the specific special order or operating bulletin that was being violated, requiring the RTA to develop a CAP specifically to improve enforcement of the special order or bulletin or to address needed revisions or updates.

FTA also believes that this approach begins to address concerns regarding the situation where a safety concern or deficiency in SSPP implementation is identified, but specific details are not provided. Therefore, the RTA develops a general CAP, rather than a CAP focused on resolving the specific conditions noted in the field. Where the SSO review has identified a specific concern or deficiency, the CAP should also include an assessment by the RTA to determine that the specific concern or deficiency is, or is not, a systemic issue.

To make findings using this new approach, FTA recommends that SSO agencies focus their findings in five (5) categories. Each of these categories is based on the distinct authorities conferred to SSO agencies in FTA's 49 CFR Part 659. Examples of the types of findings that may be made under each category have also been provided.

1. **Required SSPP Update** – Recommendations for updates/changes that the RTA should make to its SSPP. Examples include:

   - Requiring the RTA to update its SSPP to reflect changes in federal, state or local regulations and requirements.

   - Requiring the RTA to update its SSPP to reflect changes to the RTA's organizational structure.

   - Requiring the RTA to update its SSPP to reflect recent FTA clarifications regarding Part 659 requirements for the hazard management process.

2. **Required Update to Referenced/Supporting Procedures** – Recommendations for updates and changes that the RTA must make to the referenced/supporting procedures identified in its SSPP. Examples include:

   - Requiring the RTA to update its maintenance procedures to reflect changes in maintenance requirements that may result from the use of new equipment, systems or technologies.

   - Requiring the RTA to update its Emergency Operating Procedures to reflect changes to RTA operations or services, or changes to emergency response capabilities.

   - Requiring the RTA to update its employee management policies to better address fatigue management requirements.

   - Requiring the RTA to perform annual reviews and updates of plans, manuals, and standards as specified in the SSPP.

3. **Required Rules Update** – Recommendations for updates and changes that the RTA must make to its operating and/or maintenance rulebooks, bulletins, and procedures. Examples include:

   - Requiring the RTA to update its rulebook to incorporate an operating bulletin that has been in effect for more than a year (if this practice is specified in the SSPP and/or supporting procedures).

   - Requiring the RTA to update its operating or maintenance rules and procedures to reflect changes in operations resulting from the use of new equipment, systems or technologies.

   - Requiring the RTA to update its rules relating to accident investigation to reflect actual investigation practices and reporting protocols required by the SSO Agency.

   - Requiring the RTA to convene its Rules Committee as specified in the SSPP and referenced or supporting procedures.

4. **Required Action for SSPP Implementation** – Recommendations for activities to be performed by the RTA to address deficiencies noted in the implementation of the SSPP. Examples include:

   - Requiring the RTA to address observed violations of operating rules.

- Requiring the RTA to address observed deficiencies in maintenance audits and inspections, where infrastructure, vehicles and equipment are not maintained to RTA standards or following RTA procedures.

- Requiring the RTA to address specific situations in maintenance facilities or shops where safety rules are being violated.

- Requiring the RTA implement its rules compliance program as specified in the SSPP and referenced or supporting procedures.

- Requiring the RTA to implement its hazard management process as specified in the SSPP and referenced or supporting procedures.

5. **Required Resource and Organizational Actions** – Recommendations for activities to be performed by the RTA to address inadequacies in resources or organizations that weaken the safety program. Examples include:

   - Requiring the RTA to create or strengthen a Safety Committee to better identify, analyze and mitigate system hazards.

   - Requiring the RTA to perform an analysis to ensure that sufficient resources are available to the Safety Department to perform the activities specified in the SSPP.

   - Requiring the RTA to provide additional resources to assure that operator certifications remain current and consistent with the most recent equipment, systems and technologies employed by the RTA.

Through these categorizations, FTA believes SSO agencies will be able to better classify and track findings identified during their Three-Year Safety Review.