RAIL TRANSIT STATE SAFETY PROGRAM STANDARD v 7.0

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Definitions and Acronyms

Note: Each definition that appears within another definition is denoted within a parenthesis and italicized.

Accident means an *(event)* that involves any of the following: A loss of life; a report of a serious injury to a person; a collision involving a rail transit vehicle; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause. An accident must be reported in accordance with the thresholds for notification and reporting set forth in Appendix A to this part. (*While FTA removed from 674, this term is still used to distinguish a state reportable from an FTA reportable event*)

Accountable Executive means a single, identifiable individual who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326. (As per 674.7)

Administrator means the Federal Transit Administrator or the Administrator's designee. (As per 674.7)

Agency Safety Plan (ASP) means the comprehensive agency safety plan for a transit agency, including a Rail Transit Agency, which is required by 49 U.S.C. 5329(d) and based on a Safety Management System.

AIP means Accident/Incident Investigation Plan.

APTA means American Public Transportation Association.

Asset Category means a grouping of asset classes, including a grouping of equipment, a grouping of rolling stock, a grouping of infrastructure, and a grouping of facilities. See Appendix A of 49 CFR Part 625/630 for examples of asset categories, asset classes, and individual assets.

Asset Class means a subgroup of capital assets within an asset category. For example, buses, trolleys, and cutaway vans are all asset classes within the rolling stock asset category. See Appendix A of 49 CFR Part 625/630 for examples of asset categories, asset classes, and individual assets.

Asset Inventory means a register of capital assets, and information about those assets.

Capital Asset means a unit of rolling stock, a facility, a unit of equipment, or an element of infrastructure used for providing public transportation.

Chief Safety Officer means the person to whom the *(Accountable Executive)* has delegated day-to-day responsibility for carrying out the safety management system at the *(RTA)*, including the development and implementation of the *(PTASP)*, *(TAM Plan),* and subordinate policies and procedures and practices in accordance with 49 U.S.C. 5329 and 49 U.S.C. 5326.

Collision (non-Rail Grade Crossing) includes a train to train, train to vehicle, train to object, and train to individual collision that DO NOT OCCUR at a *(Rail Grade Crossing).* Suicides or trespassing-related collisions not occurring at a *(Rail Grade Crossing)* are defined as "Collision (non-Rail Grade Crossing)" with a probable cause of "suicide" or "trespasser" as applicable.

Conflict of Interest generally means a scenario when a person places him/herself in a position where any official act or action taken by them is, may be, or appears to be, influenced by considerations other than the general public interest. All employees and *(Contractors)* subject to the requirements of the Program Standard occupy a position of public trust and confidence and should avoid not only actual breaches of public trust, but also even the appearance of conflicts of interest. An organizational conflict of interest occurs where a contractor is unable, or potentially unable, to render impartial assistance or advice to the recipient due to activities, relationships, contracts, or circumstances which may impair the contractor's objectivity, or a contractor has an unfair competitive advantage.

Contractor means an entity that performs tasks on behalf of *FTA,* a *State Safety Oversight Agency,* or a Rail Transit Agency, through contract or other agreement. (As per 674.7)

Corrective Action Plan (CAP) means a plan developed by the Rail Transit Agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a corrective action plan. (As per 674.7)

CSSP means Construction Safety and Security Plan**.**

Day means calendar day, unless otherwise specified. When a period of time, such as 30 days, ends on a weekend or holiday, then the next working day is acceptable.

Derailment means a non-collision *(Event)* in which one or more wheels of a rail transit vehicle unintentionally leaves the rails.

Designated Personnel means (1) Employees identified by a rail public transportation system whose job function requires them to be directly responsible for safety oversight of the public transportation provided by the system; or (2) Employees and contractors of a *(State Safety Oversight Agency)* whose job function requires them to conduct safety audits and safety examinations of the rail public transportation systems subject to the jurisdiction of the *(State Safety Oversight Agency)*. Designated personnel may also be referred to as "covered" personnel.

Direct Recipient means an entity that receives Federal financial assistance directly from the Federal Transit Administration.

Directly Responsible for Safety Oversight means public transportation agency personnel whose primary job function includes the development, implementation, and review of the agency's safety plan, and/or the SSOA requirements for the (*Rail Fixed Guideway Public Transportation System*) pursuant to 49 CFR Part 674.

Disruption of Operations means an *(Event)* that requires the *(RTA)* to implement a set of control actions (e.g., cancel trips, delay trips, establish bus bridges, reverse move, single track, etc.) that reestablish the continuity in the planned flow of rail transit vehicles and operations and maintenance personnel such that all passengers can reach their intended destinations as soon as possible.

Eligible State means a State that has a *(Rail Fixed Guideway Public Transportation System)* within the jurisdiction of the State that is not subject to regulation by the *(Federal Railroad Administration)*; or a (*Rail Fixed Guideway Public Transportation System)* in the engineering or construction phase of

development within the jurisdiction of the State that will not be subject to regulation by the *(Federal Railroad Administration).*

EPP means Emergency Preparedness Plan.

Equipment means an article of nonexpendable, tangible property having a useful life of at least one year.

Evacuation due to life safety reasons means all evacuations of *(Rail Transit Controlled Property)* for life safety events. A life safety event is one that presents an imminent danger to ALL people in or on *(Rail Transit Controlled Property).* This includes evacuations of rail transit vehicles and rail transit property, such as stations. The evacuation may be due to the presence of smoke, fuel fumes, suspicious package, bomb threat, etc.

Evacuation for non-life safety reasons means evacuations that are not for a life safety reason such as an evacuation of a train into the right-of-way or onto adjacent track; or customer self-evacuation or transfer of passengers to rescue vehicles or alternate means of transportation due to obstructions, loss of power, mechanical breakdown and system failures, or damage.

Event means an Accident, Incident or Occurrence. (As per 674.7)

Exclusive-Use Maintenance Facility means a maintenance facility that is not commercial and either owned by a transit provider or used for servicing their vehicles.

Facility means a building or structure that is used in providing public transportation.

FAST Act means Fixing America's Surface Transportation Act.

FRA means the Federal Railroad Administration, an agency within the U.S. Department of Transportation. (As per 674.7)

FTA means the Federal Transit Administration, an agency within the U.S. Department of Transportation. (As per 674.7)

Full level of performance means the objective standard established by *(FTA)* for determining whether a *(Capital Asset)* is in a state of good repair.

Group TAM Plan means a single *(TAM)* plan that is developed by a sponsor on behalf of at least one (1) *(Tier II Provider).*

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a rail fixed guideway public transportation system; or damage to the environment. (As per 674.7)

HMP means Hazard Management Plan.

Horizon Period means the fixed period of time within which an *(RTA)* will evaluate the performance of its *(TAM)* plan.

IAPP means Internal Audit Program Plan.

Implementation Strategy means an *(RTA's)* approach to carrying out *(TAM)* practices, including establishing a schedule, accountabilities, tasks, dependencies, and roles and responsibilities.

Incident means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a rail transit agency. An incident must be reported to FTA's National Transit Database in accordance with the thresholds for reporting set forth in Appendix A to this part. If a rail transit agency or State Safety Oversight Agency later determines that an Incident meets the definition of Accident in this section, that event must be reported to the SSOA in accordance with the thresholds for notification and reporting set forth in Appendix A to this part. (As per 674.7)

Individual means a passenger, employee, contractor, rail transit facility worker, pedestrian, trespasser, or any person on the property of a *(Rail Fixed Guideway Public Transportation System).*

Infrastructure means the underlying framework or structures that support a public transportation system.

Initial Submission means any standard, plan, procedure, or other SSOA-related document to be submitted by a *(RTA)* to *(TDOT)* for review and approval that has not been previously reviewed and approved in accordance with the requirements of the *(Program Standard).*

Injury means any harm to person(s) as a result of a safety event that requires immediate medical attention away from the scene. Does not include harm resulting from a drug overdose, exposure to the elements, illness, natural causes, or occupational safety events occurring in administrative buildings. (As per 49 CFR 674.7.)

Inspection means a physical observation of equipment, facilities, rolling stock, operations, personnel, or records for the purpose of gathering or analyzing facts or information. (As per 49 CFR 674.7.)

Investigation means the process of determining the causal and contributing factors of an Accident, Incident, or Hazard, for the purpose of preventing recurrence and mitigating Risk. (As per 674.7)

Investment Prioritization means an *(RTA's)* ranking of capital projects or programs to achieve or maintain a state of good repair. An investment prioritization is based on financial resources from all sources that a *(Transit Provider)* reasonably anticipates will be available over the *(TAM)* plan horizon period.

ISAP means Internal Safety Audit Program.

ISR means Internal Safety Review.

Key Asset Management activities means a list of activities that an *(RTA)* determines are critical to achieving its *(TAM)* goals.

Life-Cycle Cost means the cost of managing an asset over its whole life.

MAP-21 means Moving Ahead for Progress in the 21st Century Act.

National Public Transportation Safety Plan means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53. (As per 674.7)

Near Miss/Face-Up means an undesired *Event* (as defined in the *(RTA's)* Accident/Incident Investigation Plan) that under slightly different circumstances could have resulted in injuries to people, damage to property or the environment, and/or loss or disruption of service.

New Start Project means any rail fixed guideway system funded under FTA's 49 U.S.C. 5309 discretionary construction program.

NPRM means Notice of Proposed Rulemaking.

NTD means National Transit Database, a federal reporting system for transit statistics.

NTSB means the National Transportation Safety Board, an independent federal agency. (As per 674.7)

OCC means Operations Control Center.

Occurrence means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a rail transit agency. (As per 674.7)

Participant means a *(Tier II Provider)* that participates in a *(Group TAM Plan).*

Passenger means, for the purposes of *(Event)* reporting, a person who is on board, boarding, or alighting from a rail transit vehicle for the purpose of travel.

Passenger Operations means the period of time when any aspect of the *(RTA)* operations is initiated with the intent to carry passengers.

Patron means, for the purposes of *(Event)* reporting, an individual waiting for or leaving rail transit at stations, in mezzanines, on stairs, escalators, or elevators, in parking lots, and other transit-controlled property.

Performance Measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets (e.g., a measure for on-time performance is the percent of trains that arrive on time, and a corresponding quantifiable indicator of performance or condition is an arithmetic difference between scheduled and actual arrival time for each train).

Performance Target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the *(FTA).*

Person means a passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a *(Rail Fixed Guideway Public Transportation System).*

PMP means Project Management Plan**.**

Program Standard means a written document developed and adopted by the *(State Safety Oversight Agency)* that describes the policies, objectives, responsibilities, and procedures used to provide *(RTA)* safety and security oversight.

Public means, for the purposes of *(Event)* reporting, all others who come into contact with the rail transit system, including pedestrians, automobile drivers, and trespassers.

Public Transportation Agency Safety Plan (PTASP) means the comprehensive agency safety plan for a transit agency, including a Rail Transit Agency, which is required by 49 U.S.C. 5329(d) and based on a Safety Management System. (As per 674.7)

Public Transportation Safety Certification Training Program means either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329 (c)(1). (As per 674.7)

Rail Fixed Guideway Public Transportation System means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction. Rail Fixed Guideway Public Transportation Systems include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway. (As per 674.7)

Rail Grade Crossing (as defined in the National Transit Database glossary) means an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar (SC), light rail (LR), commuter rail (CR), heavy rail (HR) or pedestrian traffic, either in mixed traffic or semi-exclusive situations. The boundaries of the intersection will be defined by the municipal, county, or State jurisdiction that owns and controls the roadway.

Rail Grade Crossing Collision includes train to train, train to vehicle, train to object, and train to individual collisions that occur at rail grade crossings. For mixed traffic environments, rail grade crossing collisions are defined ONLY as collisions that occur at street intersections. Suicides or trespassing-related collisions occurring at a *(Rail Grade Crossing)* are defined as "Rail Grade Crossing Collision" with a probable cause of "suicide" or "trespasser" as applicable. The boundaries of the intersection will be defined by the municipal, county, or State jurisdiction that owns and controls the roadway.

Rail Transit Agency (RTA) means any entity that provides services on a Rail Fixed Guideway Public Transportation System. (As per 674.7)

Rail Transit Vehicle (RTV) means the *(Rail Fixed Guideway Public Transportation Agency's)* assets used to conduct or support rail revenue service.

Rail Transit-Controlled Property means property that is used by the *(RTA)* and may be owned, leased, or maintained by the *(RTA).*

Recipient means an entity that receives Federal financial assistance under 49 U.S.C. Chapter 53, either directly from *(FTA)* or as a subrecipient.

Right-of-way (ROW) means the area through which a rail transit vehicle travels (the vehicle's dynamic envelope).

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard. (As per 674.7)

Risk Based Inspections – The use of qualitative and quantitative data analysis to inform ongoing inspection activities. Risk Based inspection programs are designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk.

Risk Mitigation means a method or methods to eliminate or reduce the effects of hazards. (As per 674.7)

Rolling Stock means a revenue vehicle used in providing public transportation, including

rolling stock, including, but not limited to, passenger and maintenance vehicles.

Safety and Security Certification means the process applied to project development to ensure that all practical steps have been taken to optimize the operational safety and security of the project during engineering, design, construction, and testing before the start of passenger operation.

Safety means freedom from harm resulting from unintentional acts or circumstances.

Safety Risk Management means a process within a Rail Transit Agency's Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk. (As per 674.7)

Security and Emergency Preparedness Plan (SEPP) means a document developed and adopted by the (*RTA)* describing the application of operating, technical, and management techniques and principles to the security aspects of the system throughout its life to reduce threats and vulnerabilities and describing the emergency preparedness policies and procedures for mobilizing the system and other public safety resources to assure rapid, controlled, and predictable responses to various types of transportation and community emergencies.

Security means freedom from harm resulting from intentional acts or circumstances.

Serious Injury means any injury which:

(1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received.

(2) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose).

(3) Causes severe hemorrhages, nerve, muscle, or tendon damage.

(4) Involves any internal organ; or

(5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. (As per 674.7)

Service Vehicle means a unit of equipment that is used primarily either to support maintenance and repair work for a public transportation system or for delivery of materials, equipment, or tools.

Small Starts Program is a *(Federal Transit Administration)* grant program for capital costs associated with new fixed guideway systems, extensions, and bus corridor improvements. Grants must be for under $75 million in New Starts funds and total project costs must be under $250 million.

SMS means Safety Management System.

Split Switch occurs when a rail transit vehicle is executing a facing-point movement and a wheel flange unintentionally forces the switch point open or out of proper correspondence, and the wheel continues between the back of the switch point and the running rail (also referred to as stock rail).

Sponsor means a State, a designated recipient, or a direct recipient that develops a *(Group TAM)* for at least one *(Tier II Provider).*

SSCP means Safety and Security Certification Plan.

SSCVR means Safety and Security Certification Verification Report.

SSMP means Safety and Security Management Plan.

SSO means State Safety Oversight.

SSO Program Manager means the (*State Safety Oversight Agency)* representatives. For *(TDOT)* this position refers to the Program Manager which is assigned to each *(RTA)*.

State means a state of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of Good Repair (SGR) means the condition in which a (*Capital Asset)* is able to operate at a full level of performance.

State Safety Oversight Agency (SSOA) means an agency established by a State that meets the requirements and performs the functions specified by 49 5329(e) and the regulations set forth in this part. (As per 674.7)

Subrecipient means an entity that receives Federal transit grant funds indirectly through a State or a direct recipient.

Substantial damage means any physical damage to transit or non-transit property including vehicles, facilities, equipment, rolling stock, or infrastructure … which adversely affects the structural strength, performance, or operating characteristics of the vehicle, facility, equipment, rolling stock, or infrastructure requiring towing, rescue, onsite maintenance, or immediate removal prior to safe operation."

TDOT means the Tennessee Department of Transportation.

Tennessee Code (TCA) means a compilation of the laws of the State of Tennessee.

TERM Scale means the five (5) category rating system used in the *(FTA's)* Transit Economic Requirements Model (TERM) to describe the condition of an asset: 5.0— Excellent, 4.0—Good; 3.0—Adequate, 2.0—Marginal, and 1.0— Poor.

Threat means any real or potential condition that can cause injury or death to passengers or employees, or damage to/loss of transit equipment, property, and/or facilities.

Tier I Provider means a recipient that owns, operates, or manages either (1) one hundred and one (101) or more vehicles in revenue service during peak regular service across all fixed route modes or in any one non-fixed route mode, or (2) rail transit.

Tier II Provider means a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe.

Trailed Switch occurs when a rail transit vehicle is executing an un-authorized trailing-point movement, (i.e. the switch is not designed to be trailed through or operational rules prohibit such movement through the switch) and the wheel flange unintentionally forces the switch point against the running rail (also referred to as stock rail) or out of proper correspondence.

Transit Asset Management (TAM) means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit *(Capital Assets)* to manage their performance, risks, and costs over their life cycles, for providing safe, cost-effective, and reliable public transportation.

Transit Asset Management (TAM) Policy means a *(Transit Provider's)* documented commitment to achieving and maintaining a state of good repair for all its (*Capital Assets)*. The *(TAM)* policy defines the transit provider's *(TAM)* objectives and defines and assigns roles and responsibilities for meeting those objectives.

Transit Asset Management (TAM) Strategy means the approach a *(Transit Provider)* takes to carry out its policy for *(TAM)*, including its objectives and performance targets.

Transit Asset Management (TAM) System means a strategic and systematic process of operating, maintaining, and improving public transportation *(Capital Assets)* effectively, throughout the life cycles of those assets.

Transit Asset Management Plan (TAM Plan) is a document developed and adopted by the (*RTA)* describing, at a minimum, inventory of *(Capital Assets)* condition assessments of inventoried assets, a decision support tool, and a prioritization of investments. The plan also includes a description of the reporting process for condition of the system, changes in the system, performance measures and targets, and progress for meeting targets.

Transit Provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. chapter 53 that owns, operates, or manages *(Capital Assets)* used in providing public transportation. For the purposes of this *(Program Standard)*, *(Transit Provider)* refers to the *(RTA).*

TTP means Technical Training Plan.

Useful Life Benchmark (ULB) means the expected life cycle or the acceptable period of use in service for a *(Capital Asset)*, as determined by a *(Transit Provider (RTA))*, or the default benchmark provided by *(FTA).*

Useful Life means either the expected life cycle of a *(Capital Asset)* or the acceptable period of use in service determined by *(FTA).*

Vehicle means any rolling stock used on a rail fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles. (As per 674.7)

Vulnerability means a characteristic of passengers, employees, vehicles, and/or facilities that increases the probability of a security breach.

Worker means, for the purposes of *(Event)* reporting, a *(RTA)* employee or contractor.

Approvals

The individuals below, submitting and signing this Rail Transit Safety Oversight Program Standard, verify that it was prepared in accordance with the requirements set forth by the Federal Transit Administration (FTA) in 49 US Code § 5329, Public Transportation Safety Program / Fixing America's Surface Transportation (FAST) Act Sections 3013, 3020, 3021, 3022, and the current implementation rules, 49 CFR Part 674, State Safety Oversight; 49 CFR Part 673, Public Transportation Agency Public Transportation Agency Safety Plan; 49 CFR Part 672, Public Transportation Safety Certification Training Program; 49 CFR Part 671, Rail Transit Roadway Worker Protection; 49 CFR Part 670, National Public Transportation Safety Program; and 49 CFR Parts 625 and 630, National Transit Database / Transit Asset Management; that they are authorized representatives of the State of Tennessee Department of Transportation, the designated State Safety Oversight Agency; and that their signatures attest that all items and conditions contained in this Program Standard are understood, accepted, and approved.

APPROVED BY:

Daniel Pallme — 02/02/2026

Daniel Pallme, Assistant Chief of Planning Bureau — Date

RECOMMENDED BY:

Erik Andersen — 02/02/2026

Erik Andersen, Manager, Rail Safety and Engineering — Date

Kathy Combs (Feb 2, 2026 12:33:18 CST)

Kathy Combs, Team Lead, Freight Planning and State Safety Oversight — Date

PREPARED BY:

Chris Broach (Jan 28, 2026 09:07:53 CST) — 01/28/2026

Christopher Broach, Sr. Technical Specialist/State Safety Oversight Officer — Date

Revisions

Version #	Date	Revised Section(s)	Purpose
V. 7.0		Definitions	Grammatical repairs
		Approvals	Adjusted titles to match EPIC
		1.6.8	Added normal business hours and weekend submission policy
		3.3.4-3.3.6	Clean up/clarify escalation procedures
		4.0	Adjust PTASP submission procedures to be more inclusive of upper RTA management and documented Safety Committee approval; clarify submission requirements for approval
		4.5	Adjust/clarify RTA Internal Safety Review final report requirements regarding corrective actions
		6.0 & 7.0	2-Hour Notification, and accident reporting information updated
		8.3.1	Corrective Action Plan language adjusted to ensure RTA management awareness
		9.0	Reporting requirement clarification; access to PTSTCP records
		13.0	Roadway Worker Protection sections placeholder added with basic information
V. 6.1	12/3/2024 2/5/2025	Definitions	Adjusted definitions correspond to revised final rules for 49 CFR 671, 672,673, and 674
		Approvals	Adjusted titles and names to correspond to TDOT EPIC restructuring.
		All	Various language adjustments for consistency on Risk Based Inspections
		1.4	Contact Information
		4.3.3	Clarification language added for restarting suspended rail services.
		4.5	Reporting requirement clarification on RTA internal safety reviews
		12	Risk Based Inspection Information
		Appendix B	TDOT Org Chart
V 6.0	9/13/2024	1.2.2	Updated section to include language from Section 1.5.3
		1.5.3	Updated language and moved bullets to Section 1.2.2

		12 (new) Appendix A-D Appendix C	Section to address FTA's Safety Directive for an RBI Program Re-titled Appendix A to: TDOT SSOA Enabling Legislation Re-titled old Appendix B thru D to represent Appendix C thru E RTA-specific policies and procedures to collect safety data and conduct inspections (new)
V 5.0	11/15/2023	Approvals 1.2 1.5 1.6 1.4 1.6 3.3 4.3 5.3 6.3 7.3 8.4 9.4 10.8	Replaced SSO officer Risk Based Inspection Language Primary, Emergency, and RTA Contacts PTSTCP Recertification Authority Requirements for RTA meetings with outside regulatory agencies Process and Procedures for identified risks being addressed Return to Revenue Service Language Audit/Review evaluation elements updated Reportable events to the SSO Monthly updates on safety events, CAPs, and Safety Risk plans Corrective Action Plan concurrence letter update Reporting and Documents submissions updates SSC Plan Submission deadlines updated
V 4.0	10/12/2022	Approvals 1.4 3.3 4.3 4.4 6.3 7.3 9.4 11 Appendix A Appendix D	Vacant Planning Supervisor Secondary contact Added emergency ordered shut down by Commissioner Elevated noncompliance for late submittal of ASP Required safety risk assessment and mitigation for identified hazards Included testing of drugs and alcohol in the preliminary accident report Revised accident reporting to 60-day post-accident with 30-day follow-up reporting Included list of safety designated personnel in annual reporting Clarified rail only Organization charts Updated for Infrastructure Investment and Jobs Act
v 3.0	12/20/2021	All	Revised the Program Standard to streamline and clarify 49 CFR Part 673/674 requirements. Added Sections 10, 11, Appendix A, Appendix B, Appendix C, Appendix D
v 2.5	7/20/ 2020	All	Removed all 49 CFR Part 659 requirements post agency safety plan implementation by rail transit agencies. Updated Accident Supplement (added table).
v 2.0	5/10/2019	All	Incorporated 49 CFR Part 673 requirements for Public Transportation Agency Safety Plan and other revisions for clarification.
v 1.5	8/17/2018	All	Program Standard Revisions base on FTA Transit Safety & Oversight (TSO) Comments • Page 23 Revised language • Page 56 Deleted language to Correct for Supplement I • Page 65 Revised language • Revised Table of Contents to Reflect Changes

v 1.4	7/16/2018	All	Program Standard Revision Version 1.4 Post FTA Comments • Page 63 Add Enforcement Authority Sequence of Events
v 1.3	11/30/2017	All	Program Standard Revision Version 1.3 Post FTA Comments
v 1.2	9/30/2017	All	Program Standard Revision for Draft Version 1.2
v 1.1	8/29/2017	All	Comments Received from Consultants
Initial Draft	7/3/2017	All	Baseline Document

Introduction

The Tennessee Rail Transit State Safety Standard is for the Tennessee Department of Transportation (TDOT) State Safety Oversight (SSO) Program. The Federal Transit Administration (FTA) requires this program standard which applies to rail properties in the State of Tennessee regulated by the FTA.

Evolution from System Safety to Safety Management Systems

In 1996, FTA required rail SSO programs in 49 United States Code (U.S.C.) Section 5330, State Safety Oversight. Prior to this, FTA had published their SSO rule in December 1995 as 49 Code of Federal Regulations (CFR) Part 659, which became effective on January 1, 1997. In April 2005, FTA published a revised version of 49 CFR Part 659. The State of Tennessee established an SSOA program through TDOT for Tennessee's rail transit agencies (RTAs) in 2006. In 2012, as part of Moving Ahead for Progress in the 21st Century Act (MAP-21), Congress set higher expectations and responsibilities for safety oversight and safety performance for transit agencies, states, and FTA in 49 U.S.C. Section 5329. The new expectations and responsibilities required RTAs to move from system safety programs to transit-specific safety management systems (SMS). SMS is a formal, top-down, organization-wide approach to managing safety risk and ensuring the effectiveness of an RTA's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

On March 16, 2016, the FTA published the final 49 CFR Part 674, State Safety Oversight rule. FTA published the rule in 2016 based on 49 U.S.C. Section 5329, which further codifies an SSO agency's authority to investigate accidents and oversee rail properties' implementation of its safety program plan and Public Transportation Agency Safety Plan (PTASP). The TDOT SSO program received FTA certification of compliance with 49 CFR Part 674 in July 2018. Under the rule, SSO agencies must certify their programs as 49 CFR Part 674 compliant and receive approval from FTA three years from the regulations' effective date.

Furthermore, 49 CFR Part 674 neither defined nor required the content of system security and emergency preparedness plans. The TDOT SSOA requires RTAs to develop a system security and an emergency preparedness plan. TDOT SSOA will oversee system security and emergency preparedness plans as they intersect with a rail property's safety program from a risk assessment and management perspective.

Section 1: Program Management

49 CFR PART 674.27(A)(1) - PROGRAM MANAGEMENT REQUIREMENTS - THE STATE SAFETY OVERSIGHT (SSO) PROGRAM STANDARD MUST EXPLAIN THE AUTHORITY OF THE STATE SAFETY OVERSIGHT AGENCY (SSOA) TO OVERSEE THE SAFETY OF RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEMS; THE POLICIES THAT GOVERN THE ACTIVITIES OF THE SSOA; THE REPORTING REQUIREMENTS THAT GOVERN BOTH THE SSOA AND THE RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM; AND THE STEPS THE SSOA WILL TAKE TO ENSURE OPEN, ONGOING COMMUNICATION BETWEEN THE SSOA AND EVERY RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM WITHIN ITS OVERSIGHT.

1.1 Purpose

TDOT is designated as the Tennessee agency responsible for carrying out the functions of the Federal SSO Program for rail fixed guideway public transportation systems operating in Tennessee. Currently, TDOT's rail safety oversight is limited to the Memphis Area Transit Authority (MATA) Trolley System and Chattanooga Area Transportation Authority (CARTA) Incline Railway. The purpose of this Program Standard is to provide standards, procedures, and technical guidance/direction to assist RTAs in implementing their Agency Safety Plans (ASP), the TDOT SSOA Program Standard and Federal requirements. This Standard describes the roles and responsibilities of the TDOT SSOA (hereinafter TDOT) and each RTA for implementing rail safety program standard requirements. This Program Standard also specifies the safety information requirements for ongoing communication between TDOT and the affected RTAs, as well as TDOT's responsibilities and communication with the FTA. Additional supplemental information is provided in the appendices referenced throughout this Standard.

1.2 Roles & Responsibilities

1.2.1 Responsibility of the State

The primary responsibility of the State of Tennessee is designating an independent entity to oversee and enforce safety standards at RTAs within its jurisdiction. Initially, the State of Tennessee established an SSO program through TDOT in 2006. On September 5th, 2013, TDOT was re-designated the SSOA by the Governor, per FTA requirement and Tennessee State law TCA 13-10-201. The TDOT SSO program received FTA certification of compliance with Part 674 in July 2018.

1.2.2 Responsibilities of the SSOA

a. Prepare a Program Standard, which is a written document developed and adopted by TDOT that describes the policies, objectives, responsibilities, and procedures used to provide oversight of RTA safety programs. The Program Standard will coordinate with the FTA data collection and information systems established to implement 49 USC Section 5329, including the requirements to:

    1. Adopt and use the reporting standards, systems, and forms required by the FTA to record work activities performed under the TDOT SSO Program.

2. Establish a program to ensure that accurate, complete, and timely data is collected and reported.
3. Verify submitted data through an audit program.

b. Protect confidential accident and hazard investigation information from public disclosure as far as it is permitted by law.

c. Audit, at least once every three years, the implementation of Agency Safety Plans (ASPs) of the RTAs in the State of Tennessee subject to Section 5329(d).

d. Require, review, approve, oversee, and enforce the implementation of the ASP by each RTA in the State of Tennessee.

e. Enforce the RTA's compliance with TDOT's Program Standard

f. Provide at least once annually a status report on the safety of the RTAs within the State of Tennessee to the FTA, the Governor of the State of Tennessee, and the Board of Directors or equivalent entity of each RTA that TDOT oversees.

g. Prepare and submit to the FTA, upon request, all reports required in connection with the Program Standard and other conditions of the grant.

h. Participate in capital projects planning related to rail transit and safety program aspects of the project, including design through safety and security certification and successful transition from the project to revenue operations and maintenance.

i. Establish and maintain a Technical Training Plan in compliance with 49 CFR Part 672, as amended.

j. Maintain safety oversight records for a minimum of five (5) years. At the end of the retention period, electronic records will be destroyed by the state-approved method.

k. Require TDOT access to the rail fixed guideway system surveillance capability.

l. Require, for all State employees and other individuals who work on the Program Standard, and auditing of the same, specific capabilities, qualifications, and certification (or in the process of certification) through the FTA Public Transportation Safety Certification Training Program (PTSCTP) per the Technical Training Plan.

m. Require, for personnel supporting the safety function at the RTAs, specific resources, training, and qualifications and reporting relationships with executive leadership.

n. Require a program of internal audits, inspections, reviews, and certification at each RTA within the State of Tennessee regarding the implementation of the agency's ASP and relevant sub-plans procedures and the verification of corrective action implementation.

o. Address each RTA's Accountable Executive and board of directors to review safety performance and the implementation and functioning of safety and security risk management and safety and security assurance processes.

p. Provide concurrence with RTA Safety and Security Certification (SSC) for the

safety of capital projects to include RTA rail system components, extensions, modifications, rehabilitations, replacements, and upgrades for passenger operations, including active projects currently in the preliminary engineering phase.

q. Require the notification, reporting, investigation, and resolution through corrective action of accidents, incidents, hazards, threats, and conditions of concern by the RTA's agency.

r. Conduct, and require to be conducted on the State's behalf, investigations into any incidents, circumstances, or concerns affecting the safety and security of the RTAs.

s. At reasonable times, in a reasonable manner, whether announced or un-announced, and for risk-based inspections enter and inspect rail transit property, equipment, infrastructure, facilities, vehicles, operations, and maintenance activities following all safety and security rules and requirements established by the RTAs.

t. Issue emergency orders regarding the immediate resolution of serious safety and security deficiencies up to and including system shutdown.

u. Receive and investigate complaints regarding the compliance of each RTA in the State of Tennessee.

1.2.3 Responsibility of the Rail Transit Agency

RTAs under the Authority of the SSO Program must develop and implement an ASP. According to schedules specified in this Standard, these plans and any supporting or referenced procedures must be submitted to TDOT for review and approval. In addition, the RTA's responsibilities include, but are not limited to:

a. Conduct, at a minimum, annually scheduled reviews to determine if the ASP requires updating and coordinate updates and reviews/approvals with the TDOT SSOA.

b. Perform an internal safety review of ASP implementation annually and encompass the ASP in its entirety over a three-year cycle.

c. Submit annual reports and supporting documentation to the TDOT SSOA within 60 days following completion of its internal safety review process, , including compliance with the schedule established for the internal audit/ review program, the activities performed, completed checklists, and a listing of findings, corrective actions, recommendations, and status of their implementation.

d. Submit to the TDOT SSOA a certification signed by the RTA's Accountable Executive regarding the agency's compliance with its ASP by February 1st of each calendar year. If the Accountable Executive cannot submit this certificate, the RTAs must submit to TDOT the steps necessary to achieve compliance with the ASP.

e. Implement an SMS as required by 49 CFR Part 673, scaled appropriately to the RTA size.

f. Report any events that meet the criteria and thresholds developed by the FTA and published as a rule (i.e., 49 CFR Part 674 Appendix A), guidance under the National Public Transportation Safety Plan (Part 670), or any other applicable reporting guidelines.

g. Conduct accident/incident investigations on behalf of TDOT SSOA unless otherwise directed.

h. Prepare corrective action plans (CAPs) (or Safety Improvement Plans dependent on the RTA's policy) and implement the plans per the approved timeline to minimize, control, correct, or eliminate risk conditions resulting from an accident/incident finding, three-year audits, internal reviews, or at the request of TDOT SSOA.

i. Designate personnel and contractors who are directly responsible for safety oversight and ensure their compliance with the applicable training requirements in accordance with § 672.13.

1.3 Affected Rail Transit Agencies

RTAs affected by the TDOT SSO program include any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, or automated guideway operating within the State's jurisdiction that is not subject to regulation by the Federal Railroad Administration (FRA). The current RTAs subject to the provisions of the TDOT SSO Program are:

Agency	Address	System Description	Operations Date
Memphis Area Transit Authority Trolley	547 N Main St, Memphis, TN 38105	MATA, the governing agency for rail transit initiatives in the Memphis metropolitan area, operates a 6.3-mile heritage streetcar transit system over three routes.	1993
Chattanooga Area Regional Transportation Authority Incline Railway	1617 Wilcox Blvd Chattanooga, TN 37406	CARTA operates an incline plane funicular railway to the top of Lookout Mountain over approximately one-mile railway up a maximum grade of 72.7%.	1895

1.4 Authorized Representatives and Points of Contact

1.4.1 TDOT SSO Representatives and Points of Contact

SSOA Primary Contact				
Name	**Title**	**Phone**	**Email**	**Address**
Christopher Broach	Sr. Technical Specialist SSO Officer	(615) 306-2273	Christopher.Broach@tn.gov	Public Transportation , Rail, and Freight Division W.R.S Tennessee Tower, 10th Nashville, TN 37243
Kevin Heidrich	HATCH Consulting Services, Inc	(469) 450-2959	Kevin.heidrich@hatch.com	

In the event Primary SSO and secondary contacts are unavailable or documented notification is provided, contact the following individuals in the order provided, being sure to copy primary contacts.

SSOA Emergency Contacts				
Name	**Title**	**Phone**	**Email**	**Address**
Kathy Combs	Team Lead	615-741-7894	Kathy.l.combs@tn.gov	Public Transportation , Rail, and Freight Division W.R.S Tennessee Tower, 10th Nashville, TN 37243
Erik Andersen	TDOT Manager	615-253-1043	Erik.andersen@tn.gov	
Dan Pallme	Assistant Bureau Chief of Planning	615-741-4031	Daniel.pallme@tn.gov	

1.4.2 RTA Representatives and Points of Contact

RTA	Primary Contact
Memphis Area Transit Authority	Keith Watson Chief Safety & Security Officer 1370 Levee Road Memphis, TN 38108 kwatson@matatransit.com 901-333-3774
Chattanooga Area Regional Transportation Authority	Mark Logan Director of Safety of Safety & Training/ Chief Security Officer 1617 Wilcox Boulevard Chattanooga, TN 37406 Office: (423) 629-1411 x109 MarkLogan@gocarta.org

1.5 TDOT Authority

The State of Tennessee and TDOT are committed to overseeing RTA implementation and compliance with Federal and State safety standards for rail transit systems operating within the State of Tennessee, as specified in the following laws, rules, and regulations, as amended:

1.5.1 Federal Laws, Rules, Regulations, and Special Directives

- 49 US Code § 5329, Public Transportation Safety Program / Fixing America's Surface Transportation (FAST) Act/ Bipartisan Infrastructure Law (2022)
- 49 CFR Part 674, State Safety Oversight
- 49 CFR Part 673, Public Transportation Agency Safety Plan
- 49 CFR Part 672, Public Transportation Safety Certification Training Program
- 49 CFR Part 671, Rail Transit Roadway Worker Protection
- 49 CFR Part 670, National Public Transportation Safety Program
- 49 CFR Part 630, National Transit Database
- 49 CFR Part 625, Transit Asset Management
- Special Directive 22-46, Risk-Based Inspection Program

1.5.2 Tennessee State Laws

- Tennessee Code – Title 13, Chapter 10, Part 2, Section 13-10-202, Financial and legal independence
- Tennessee Code– Title 13 - Public Planning and Housing, Chapter 10 - Mass Transit Part 2 - State Safety Oversight Program, § 13-10-203
- Tennessee Code– Title 13, Chapter 10, Part 2, Section 13-10-204, Confidentiality of Information

1.5.3 TDOT State Safety Oversight Program Enforcement Authority

TDOT has the authority to establish a State Safety Oversight Program and promulgate State rail transit safety regulations, via this Program Standard. This authority is derived from 49 U.S.C. § 5329, as amended, and TDOT's enabling legislation under Tennessee Code, Title 13, Chapter 10, Part 2 (201-206). For additional details regarding Tennessee Code authority, see **Appendix A** to this Program Standard. As such, TDOT has the authority to access each RTA within its jurisdiction to inspect infrastructure, equipment, records, personnel, RTA activities, and data, including the data that the RTA collects when identifying and evaluating safety risks.

1.5.4 Resolution of Identified RTA Deficiencies

Resolution of identified RTA deficiencies will rely on timely implementation of comprehensive agency CAPs agreed to by both the SSOA and RTA. In the event of non-responsiveness, the escalation procedure described in Section 3.3.2 will be applied.

1.5.5 Enforcement Authority

While TDOT has the authority to require the above actions, TDOT may elect to not enforce actions when not required by Federal, State, or local laws and/or to implement actions above and beyond the above requirements to remain in compliance with applicable Federal, State, or local laws.

1.6 Policies That Govern SSOA Authority

1.6.1 Organization

The TDOT SSO program is administered through the Passenger Transportation, Rail and Freight Division. The Director (or designee) is authorized to dedicate resources to perform safety oversight activities, including personnel and technical contractor support. TDOT SSOA retains authority to use contractors as required to support the performance of safety or security oversight activities. The Director (or designee) is also authorized to require, review, approve, monitor, and verify the implementation of CAPs. The Director (or designee) is supported by the SSO Program Manager, who serves as the official point of contact for the RTAs on all matters of the SSO Program, the Program Standard, and related federal safety rules and is responsible for day-to-day oversight and communication. Organization charts for TDOT are provided in ***Appendix B TDOT Organizational Charts.***

1.6.2 Confidentiality of Information

Data collected for and reports concerning investigations conducted by the RTA, or a contractor acting on behalf of the RTA, shall be confidential and not open for inspection by members of the public pursuant to Tennessee Code, Title 13 – Public Planning and Housing and may not be admitted into evidence or used in a civil action for damages resulting from a matter mentioned in such a report. Any portion of an RTA's documentation that concerns security for the system shall be confidential and not open for inspection by members of the public pursuant to the open records law. This protection aims to allow open discussions and analyses of the RTA's safety-related risk and performance.

1.6.3 Conflict of Interest

Potential COI situations are required to be identified, disclosed, assessed, and resolved for the TDOT SSO program. For any situation that might arise as a potential COI, the TDOT SSO Program Manager must assess and determine if the COI poses an actual conflict of interest violation of the SSO regulation (49 CFR Part 674). This assessment and determination may require discussions with other staff, TDOT Legal, and/or TDOT management. Ultimately, a formal communication (i.e. letter, email) will be sent for each COI assessment that describes the potential COI situation from either an external organization or TDOT. The assessment and resolution process begins internally to determine if the COI is resolved or outline the steps necessary to resolve the COI. TDOT SSOA will then issue a letter with the assessment and resolution and a subsequent step concurrence or non-concurrence letter to the external organization or within TDOT of the COI situation. If an outline of steps was necessary, another COI Review and Assessment communication (i.e. letter, email) will be generated and used for the assessment and resolution process documentation. As a part of this COI assessment process, each potential COI situation communication and COI Review and Assessment communication becomes a record and will be retained on file as part of the TDOT SSO program.

1.6.4 Risk Monitoring

The TDOT SSO Program conducts risk monitoring activities in accordance with the SMS process, as described in the National Public Transportation Safety Plan. These risk monitoring activities are shown in **Appendix C *TDOT Risk Monitoring Activities*** and are designed to ensure active involvement of all parties in the TDOT SSO program and monitoring of all safety-related activities identified at the RTA. In addition, the TDOT SSO program tracks all relevant communications, reports, investigations, audits, safety reviews, and submissions made by each RTA, as well as programmatic record keeping.

TDOT has developed a risk-based inspection program to meet requirements of FTA Special Directive 22-46 that includes the following items:

- TDOT's authority to perform risk-based inspections as permitted under this SSPS and Tennessee Code
- Developing risk-based policies and procedures in conjunction with the RTAs
- Identifying data sources and collection methods for risk-based inspections
- Developing an inspection prioritization methodology
- Ensuring adequate SSOA staffing and qualifications, including additional training opportunities, are available.

1.6.5 SSOA and RTA Safety Certification Training

State Safety Oversight Agency employees and contractors who conduct safety reviews, inspections, examinations, and other safety oversight activities of rail fixed guideway public transportation systems. (As per 672.11)

Thereafter, recertification training shall be completed within two (2) years of completing the Public Transportation Safety Certification Training Program curriculum to maintain certification and every two (2) years thereafter. Required recertification training shall consist of two elements:

1. Element 1: Recertification training defined by FTA, and
2. Element 2: Recertification training defined by the SSOA, which must include, at a minimum, one (1) hour of safety oversight training.

(As per August 2024 changes to 49 CFR part 672.

Recertification for each individual's PTSCTP certification will be determined by either the SSO Program Manager for SSOA and consultant staff or the Chief Safety Officer for RTA personnel and included in their respective technical training plans.

49 CFR 672.21 (d) states that "Semiannually, between January 1st and January 31st and between July 1st and July 31st of each calendar year, the identified POC must submit documentation to FTA, via electronic method defined by FTA, that identifies:

1. All employees and contractors of the recipient who are designated as PTSCTP participants; and
2. The course or courses the recipient has identified as required recertification training for their designated personnel. The agency identified recertification training must include, at a minimum, one (1) hour of safety oversight training. The documentation must include the complete name and length of each course, as well as the name of the course training provider.

1.6.6 SSOA Contractor Selection

49 CFR, Part 674 prohibits the SSOAs from considering contractors who are engaged in safety-related activities with the RTAs under their jurisdiction. TDOT SSOA must consider COI and properly vet contractor proposals for SSOA oversight assistance. Contractors must not currently or within the past 36 months have rendered service to the same RTA where the state safety oversight applies. Exceptions to this policy

are based upon discretion of SSO Officer and require TDOT Senior Management/Legal approval.

1.6.7 Federal Funding

TDOT receives Federal financial assistance, subject to uniform administrative requirements for grants and cooperative agreements to State and local governments. Under the Office of Management and Budget's Uniform Administrative Requirements (commonly referred to as the "Super Circular"), as determined applicable by the FTA, is responsible for the non- Government share of the cost of the Program Standard that meets the requirements of 49 USC 5329 (e)(6)(C)(iii). TDOT SSO Program can allocate adequate funds for the administration of the Program Standard, including the enforcement of federal rules or regulations or compatible State laws or regulations. TDOT SSOA does not directly provide funding and/or public transportation services in an area with an RTA subject to these requirements.

1.6.8 SSOA and RTA Communications

The SSOA will maintain ongoing communications with the RTA regarding safety-related aspects of the RTA. To facilitate communications, the SSOA will attend monthly meetings to discuss the status of accident/incident/event investigations, open CAPs, identified unacceptable hazards, and other safety-related topics.

The SSOA will participate in safety-related training and events. In addition, the SSOA will conduct on-site inspections. The inspections may include, but are not limited to, reviewing and approving accident investigation procedures and reports; reviewing monthly construction reports, as appropriate; and collecting and reviewing other data as leading indicators of safety-related operating procedures, manuals, and events to identify mitigation measures.

Any requests made by the SSO Officer to the RTA, either by phone call or email, shall be returned via email within a five-day period unless otherwise noted in the request.

RTAs must communicate with TDOT a confirmation of receipt proposing a plan to address items or request a meeting to discuss findings or recommendations within 14 days of receiving an inspection report.

Any submissions of documentation or requests by an RTA should be sent to TDOT during normal operations, Monday-Friday, 7:00 AM – 4:00 PM. Items received outside these hours will be processed the next business day. Submissions on weekends or holidays are considered on-time if received prior to start of next business day.

Federal Law mandates that RTAs relay any communications with federal agencies such as the FTA, National Transportation Safety Board (NTSB), FRA, or the Transportation Security Administration (TSA) regarding their safety program. If a meeting is scheduled with a regulatory agency the TDOT SSO staff should be informed and invited to attend. If TDOT SSO program staff are unable to attend, an RTA's CSO, or accountable executive, should be in attendance, and should submit a summary and/or minutes from the meeting within 14 days.

TDOT SSO program will also provide any additional RTA-desired support, input, or review of the RTAs' responses to these federal agencies. At a minimum, a courtesy copy of the correspondence and attachments is required. The TDOT SSO program also intends to share, when allowable, with the affected RTA any contact received from, or responses required to federal agencies that include or directly affect the RTAs in the state, such as contact by FTA investigators or TSA Surface Transportation Security Inspectors.

1.6.9 Safety Standards

The TDOT SSO program requires direct access to the RTA's safety standard documents, any changes to the document, or new standards developed by the RTA. Each of these documents has its own process for updating based on requirements or experience.

Changes to the minimum standards for safety at each of the RTAs will be based on the RTAs' experience, investigations, audits, industry best practices, and Federal guidelines. These new or updated minimum standards for safety will be mutually agreed to with the TDOT SSO program through discussions or based on corrective actions defined by the RTA and approved by the TDOT SSO program.

Section 2: Program Standard Development

49 CFR PART 674.27(A)(2) – PROGRAM STANDARD REQUIREMENTS – THE SSO PROGRAM STANDARD MUST EXPLAIN THE SSOA'S PROCESS FOR DEVELOPING, REVIEWING, ADOPTING, AND REVISING ITS MINIMUM STANDARDS FOR SAFETY AND DISTRIBUTING THOSE STANDARDS TO THE RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEMS.

2.1 Purpose

This section includes an explanation of TDOT's processes for developing, reviewing, adopting, and revising minimum standards for safety and distributing those standards to the affected RTAs. These processes will provide reasonable opportunities for open and transparent communication with RTAs, expecting that each RTA shall fully implement the TDOT Program Standard in compliance with Federal and State law.

2.2 Development

This Program Standard was developed in compliance with:

- 49 U.S. Code § 5329, Public Transportation Safety Program / FAST Act
- 49 CFR Part 674, State Safety Oversight
- 49 CFR Part 673, Public Transportation Agency Safety Plan, Proposed Rule
- 49 CFR Part 672, Public Transportation Safety Certification Training Program
- 49 CFR Part 670, National Public Transportation Safety Program
- 49 CFR Part 625, Transit Asset Management
- 49 CFR Part 630, National Transit Database
- State of Tennessee, Tennessee Code, Title 13 – Public Planning and Housing

The SSOA may require additional safety standards based on observations from investigations, audits, inspections, industry standards, federal and state laws, or updates to practices and procedures. Affected RTAs are to adhere to those additional safety standards.

2.3 Review and Revision

At a minimum, the Program Standard will be reviewed annually to determine if any revisions are necessary. This annual revision schedule may change depending on the scheduling of other SSO program activities, such as FTA SSOA audits, three-year audits of the RTA, or significant events. The review schedule is as follows:

By **October 1st**, the annual review and identification of proposed revisions (if any) to the Program Standard will be completed by TDOT. At this time, TDOT will circulate the revised/draft Program Standard to the affected RTAs and FTA for review and comment.

By **November 1st,** a 30-day review and comment period for the revised/ draft Program Standard will be completed by the affected RTAs and FTA.

By **January 31st**, a 90-day review and update period for the revised/final Program Standard will be completed by TDOT. At this time, TDOT will adopt and distribute the final version of the Program Standard to the affected RTAs' designated point of contact.

By **March 15th**, the updated Program Standard is submitted to the FTA as a part of TDOT's annual reporting and become effective.

2.4 Approval

The Assistant Bureau Chief of Planning will give final approval of all revisions to the Program Standard, on recommendation by State Safety Oversight Officer, TDOT Team Lead, and TDOT Manager.

2.5 Distribution

The Program Standard is distributed by the TDOT SSO Officer to various internal and external SSO program stakeholders. The Program Standard may also be requested directly from the TDOT SSO Program Manager at:

Tennessee Department of Transportation
Public Transportation, Rail & Freight Division
State Safety Oversight
W.R.S Tennessee Tower, 10th Floor
Nashville, TN 37243

Copies of the approved Program Standard are distributed directly to the FTA and designated safety and security points of contact established by the RTA. **Appendix D *Program Standard Acknowledgement of Receipt*** includes a copy of the Program Standard Acknowledgement of Receipt that documents the review, understanding, and agreement to comply with the requirements of the Program Standard on behalf of the RTA.

Section 3: Program Policy and Objectives

49 CFR PART 674.27(A)(3) PROGRAM POLICY AND OBJECTIVES THE SSO PROGRAM STANDARD MUST SET AN EXPLICIT POLICY AND OBJECTIVES FOR SAFETY IN RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEMS THROUGHOUT THE STATE

3.1 SSOA Program Policy

TDOT's mission is to provide a safe and reliable transportation system that supports economic growth and quality of life.

TDOT provides oversight and technical assistance to the RTA. TDOT also evaluates the effectiveness of and enforces the RTA's Agency Safety Plan (ASP). Through participation in safety meetings and reviewing investigations of accidents/incidents/events, the SSOA will provide guidance and input to the RTA safety implementation program, which is wholly owned by and implemented by the RTA.

3.2 SSOA Program Objective/Expectations

TDOT SSOA program objectives and expectations include the following:

a. Takes responsibility for this State's safety program authority and requirements from the Federal and State governments

b. Assures qualifications and training for SSO program-related staff for the performance of SSO related duties

c. Provides the State's RTAs with transparency and flexibility in safety oversight program execution

d. Drives productive partnership with the RTAs in support of each agency's safety program, which includes oversight and technical assistance for maintaining and improving safety performance at the RTAs for employees and patrons alike

e. Expects and requires that the RTA Safety representatives and staff be competent in executing the TDOT SSO program's requirements and safety program. In addition, TDOT expects and requires that the RTA executives and rail-related management be responsive and committed to the RTA safety program and to fulfilling the TDOT SSO program requirements, in accordance with State and Federal law and the Program Standard, as well as the RTA minimum safety standards

f. Commits to support safety program-related investigations and internal reviews/audits at the RTAs. The expectation is that the RTAs are responsible for leading these investigations and internal audits/reviews. The TDOT SSO program may, at its discretion, participate in these safety program-related activities, including the conduct of independent or cooperative on-site investigations/audits

g. Commits to the RTAs owning their safety-related risk, not the State. The SSO program staff will technically review safety-related investigations, internal

reviews/audits, and complete independent investigations/audits, such as the triennial audit. TDOT may also make recommendations and provide input and technical assistance as needed or requested. However, the RTAs will develop and own their corrective actions and coordinate with the SSOA to approve those corrective actions when they are deemed appropriate and complete with respect to the findings of the investigations and reviews/audits

h. Commits to provide periodic and three-year audits as required and determined necessary by the TDOT SSO program and to assure that the SSOA is appropriately aware of the safety risk environment at each RTA

i. Commits to providing annual and periodic information and data to the FTA SSO program, as required and appropriate

3.3 Risk Monitoring and Escalation

TDOT SSO program tracks all relevant communications, reports, investigations, audits, and submissions made by each RTA to ensure the RTAs comply with TDOT's mission, policy, and objectives, as well as all Federal and State laws. See **Appendix C for *TDOT Risk Monitoring Activities.***

When an RTA is found to be non-compliant and/or non-responsive in any requests made by TDOT SSOA, these requests may need to be escalated to ensure appropriate actions are taken.

3.3.1 Initial Actions

Once the SSOA identifies a potentially significant hazardous condition, this situation is discussed directly with RTA staff and management. These risk-related issues are typically and almost always resolved at this level of informal discussion and interaction. The SSOA documents these observations, inspections, interviews, and planned resolutions and will continue to monitor for resolution to ensure that the risk issues are adequately resolved in a timely manner.

3.3.2 Official Notification and Request for Information

Should the SSOA determine that an RTA is not adequately addressing or responding to questions/concerns raised through evidence of a pattern of inaction, the SSOA will initiate an Official Request for Information or Response addressed to the RTA Accountable Executive and/or Chief Safety Officer. The RTA Accountable Executive shall issue a written response within 14 days of this correspondence being initiated. This level of correspondence serves as the formal correspondence of addressing issues. Corrective actions are not required at this stage, unless specifically mentioned by the Accountable Executive in their response.

3.3.3 First Level of Escalation

If the SSOA continues to observe a pattern of potentially significant risk issues already communicated to the RTA or the RTA is non-responsive, further communication will be made with the RTA. Typically, this is performed through a formal letter from the TDOT SSOA to the RTA Chief Safety Officer, Accountable

Executive, and/or Board Chairman. This letter will provide the risk issues that were of concern to the SSOA accompanied by a formal request to respond to the letter, including an explanation of how the RTA plans to address the identified concerns from the SSOA. If the explanations from the RTA are reasonable/acceptable, the issues and responses are documented, the risk monitoring continues. If the RTA determines that the identified risk issues need more attention, the TDOT SSOA requires the RTA to develop appropriate corrective actions that are agreed to and then tracked to completion.

3.3.4 Second level of escalation.

If the RTA does not comply with the direction provided in the first level of escalation, a formal letter will be sent from TDOT's Assistant Bureau Chief of Planning to the RTA Accountable Executive and Board of Directors. The letter will describe the risk concerns and require the RTA Accountable Executive to formally respond, within a provided timeline, via a letter that explains how the RTA plans to address the identified risk concerns. If the provided information from the RTA is reasonable and an acceptable timetable is established, the concerns and responses are documented, and the SSOA will continue risk monitoring. If the SSOA determines that the identified risk concern needs additional attention, the SSOA will require the RTA to develop or amend previously developed, appropriate corrective action plan(s).

3.3.5 Third level of escalation

If at any time during the second level of escalation, the identified risk concerns cannot be resolved due to a lack of communication or responsiveness from the RTA, the SSOA may wholly suspend the rail operations of the RTA until the situation is corrected.

3.3.5.1 To enact a suspension for non-compliance and non-responsiveness, a formal written recommendation will be sent to the Commissioner of TDOT through the Bureau Chief of Planning recommending a suspension of rail operations of the RTA. The recommendation will include a timeline and details of non-compliance during the first and second levels of escalation. The Commissioner may approve the suspension or request a formal meeting with the RTA Accountable Executive to attempt to resolve the identified risk concerns before the suspension.

3.3.5.2 Concurrently while the Commissioner reviews the recommendation of a suspension, the SSOA will alert the RTA's Accountable Executive and RTA Chief or Director of Safety and Security that the SSOA is recommending a suspension to the Commissioner due to non-compliance and non-responsiveness.

3.3.6 Emergency Suspension of Rail Operations by TDOT Commissioner

At any time, the Commissioner has the authority to enact an emergency suspension of rail operations to ensure the safety of employees, contractors, and the traveling public. If this occurs, the RTA's accountable executive will be verbally notified by Commissioner or executive level designee, and a letter will be sent to the affected RTA's Accountable Executive, RTA Chief Safety Officer, and Board of Directors.

Section 4: Public Transportation Agency Safety Plans (PTASP) and Internal Safety Reviews (ISR)

49 CFR Part 674.27(4) – Oversight of Rail Public Transportation Agency Safety Plans Requirements
The SSO program standard must explain the role of the SSOA in overseeing an RTA's execution of its Public Transportation Agency Safety Plan and any related safety reviews of the RTA's fixed guideway public transportation system. The program standard must describe the process whereby the SSOA will receive and evaluate all material submitted under the signature of an RTA's accountable executive. Also, the program standard must establish a procedure whereby an RTA will notify the SSOA before the RTA conducts an internal review of any aspect of the safety of its rail fixed guideway public transportation system.

49 CFR Part 674.29 –Public Transportation Agency Safety Plans: General Requirements

(a) In determining whether to approve a Public Transportation Agency Safety Plan for a rail fixed guideway public transportation system, an SSOA must evaluate whether the Public Transportation Agency Safety Plan is consistent with the regulations implementing such Plans; is consistent with the National Public Transportation Safety Plan; and is in compliance with the program standard set by the SSOA.

(b) In determining whether a Public Transportation Agency Safety Plan is compliant with 49 CFR Part 673, an SSOA must determine, specifically, whether the Public Transportation Agency Safety Plan is approved by the RTA's board of directors or equivalent entity; sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail fixed guideway public transportation system; includes a process and timeline for annually reviewing and updating the safety plan; includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA; identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA; includes adequate methods to support the execution of the Public Transportation Agency Safety Plan by all employees, agents, and contractors for the rail fixed guideway public transportation system; and sufficiently addresses other requirements under the regulations at 49 CFR Part 673.

(c) In an instance in which an SSOA does not approve a Public Transportation Agency Safety Plan, the SSOA must provide a written explanation, and allow the RTA an opportunity to modify and resubmit its Public Transportation Agency Safety Plan for the SSOA's approval.

49 CFR Part 674.27(4) – Oversight Rail Transit Agencies' Internal Safety Review
The SSO program standard must explain the role of the SSOA in overseeing an RTA's execution of its Public Transportation Agency Safety Plan and any internal safety reviews of the rail fixed guideway public transportation system. The program standard must describe the process whereby the SSOA will receive and evaluate all material submitted under the signature of an RTA's accountable executive. Also, the program standard must establish a procedure whereby an RTA will notify the SSOA before the RTA conducts an internal review of any aspect of the safety of its rail fixed guideway public transportation system.

4.1 Purpose

This section of the Program Standard identifies the minimum requirements for the ASP review to be developed, approved, adopted, and implemented by the RTA prior to, and following, the start of revenue operations for new start, system modification, or extensions. This section also includes the minimum requirements to develop and implement a process for ongoing internal safety reviews (ISRs).

4.2 ASP General Requirements

The ASP must comply with 49 CFR Part 673.11 General Requirements, which include the following elements (see **Appendix E *ASP Checklist***, for a complete list of ASP requirements):

a. The initial and subsequent updates must be signed by the Accountable Executive and approved by the agency's Safety Committee, Board of Directors or an Equivalent Authority.
b. Must document the processes and activities related to SMS implementation, as required under Subpart C of § 673.
c. Must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan. **NOTE:** the RTA must coordinate with their Metropolitan Planning Organizations (MPOs) and State to communicate their safety performance measures.
d. Must address all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program, the National Public Transportation Safety Plan, and this Standard within the date of enforcement.
e. Each transit agency must establish a process and timeline for conducting an annual review and update of the ASP.
f. Must include or incorporate by reference in an emergency preparedness and response plan or procedures that address, at a minimum, the assignment of employee responsibilities during an emergency, and coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area.
g. Must include or incorporate by reference a description of the safety certification process required by the RTA to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations and for New Starts and subsequent major projects to extend, rehabilitate, modify an existing system, or to replace vehicles and equipment.

4.2.1 Safety Management Systems

Each transit agency must establish and implement an SMS as required by 49 CFR Part 673. A transit agency SMS must be appropriately scaled to the size, scope, and complexity of the transit agency and include the following elements:

a. Safety Management Policy as described in **§ 673.23**
b. Safety Risk Management as described in **§ 673.25**
c. Safety Assurance as described in **§ 673.27**
d. Safety Promotion as described in **§ 673.29**

4.2.2 Written Consent Requirement for Accessing Training Records

To ensure full compliance with 49 CFR Part 672 and this Program Standard, the RTA's PTASP must include a provision requiring that all RTA employees and contractors designated under the PTSCTP provide explicit written consent authorizing the TDOT SSOA to obtain copies of their relevant training records from all internal and external sources.

This must be submitted within 30 days of any request by the TDOT SSOA

4.3 ASP Review

TDOT will review and evaluate each ASP for compliance with 49 CFR Part 673, the TDOT Program Standard, and the National Public Transportation Safety Plan. At the time the ASP is submitted for initial approval and subsequent updates, the RTA is required to submit via email or file sharing:

- All referenced materials and supporting procedures to document each required element that is addressed. Examples of referenced materials and supporting procedures include, but are not limited to standard operating procedures, training plans, rule books and bulletins, hazard/ risk management plans, maintenance rules and procedures, emergency response plans and agreements, security plan, and compliance programs.
- A completed **Appendix E *ASP Checklist.***
- Evidence of that RTA established safety and/or risk reduction targets have been communicated to State public transportation and MPO partners
- A document identifying all the changes made to the plan since it was last approved by TDOT.

On-site meetings and video conferences may be conducted to address issues identified during the review of the ASP.

4.3.1 Annual Update Determination

Annually, each RTA shall begin a review of its ASP and notify TDOT SSOA via email if the ASP is current or requires an update. The purpose of the review is for RTAs to assess whether the plans are current, accurate, and effective in improving safety performance. If an agency has a single ASP, they must ensure that all modes are included in the annual review and update process, not just rail.

4.3.1.1 RTA Determines Updates Needed

If the RTA determines that its ASP must be updated, the notification shall summarize the areas requiring an update and the date the revised ASP will be submitted to the TDOT SSOA. The revised, signed and internally approved ASP must be submitted to TDOT SSOA annually, no later than **February 1st.**

4.3.1.2 RTA Determines No Updates Needed

If the RTA conducts its annual ASP review and determines that an update is not necessary for the year, it must prepare and submit by **January 1st** formal correspondence notifying the TDOT SSOA of this determination.

If the TDOT SSOA wishes to object to this determination, the TDOT SSOA will notify the RTA within **30 days.**

4.3.2 ASP Annual Review Process:

1. TDOT will acknowledge receipt of an ASP submission within **10 days**.
2. TDOT will complete the ASP review and provide review comments, including areas requiring revisions, to the RTA within **30 days** of ASP receipt.
3. TDOT and the RTA will reach a mutually agreeable date for the resubmission of ASPs that require revisions. Upon receipt of the requested revision, the process will continue.
4. Upon approval, TDOT will send an approval letter via email to the Accountable Executive and the RTA Safety point of contact.

Unless clearly communicated that a submission is a draft version for review and a documented reply received from DOT, all submissions of safety plans after January 1 will be considered an RTA's final version and should bear all approval signatures. Submissions not bearing all dates and approved signatures will be rejected and returned for completion.

The RTA will be considered noncompliant if the SSOA does not approve their ASP prior to the FTA annual report submission date. This violation is elevated to the second level of escalation as an approved PTASP is required to conduct revenue service.

4.3.3 ASP Initial Submittals for New Systems or Returning/Reopening Service

Each new RTA entering the SSO program, or re-entering revenue service after a complete suspension of revenue service, shall make an initial written submission of their ASP and all referenced materials and supporting procedures a minimum of **180 days** prior to the target date of pre-revenue operations.

While conducting its review, TDOT may request additional information, clarifications, or revisions to the ASP and referenced materials and supporting procedures.

- Initial ASP approval may take longer than the annual review sequence. Timelines will be communicated after the initial submittal.
- On-site meetings and video conferences may be conducted to address any issues identified during the review of the ASP.

- TDOT will issue a formal letter of approval to the Accountable Executive and the RTA Safety point of contact upon approval of the initial ASP submission.
- An approved PTASP is required for revenue service to resume.

4.3.4 ASP Updates for RTA Extension and System Modification

The RTA must ensure safety concerns and impacts are addressed in modifications to existing systems, vehicles, equipment, or system extensions. The RTA shall submit the updated ASP and all referenced materials and supporting procedures a minimum of **180 days** prior to the target date of pre-revenue operations or system modification.

While conducting its review, TDOT may request additional information, clarifications, or revisions to the ASP and referenced materials and supporting procedures. TDOT may conduct on-site reviews prior to the approval of the updated ASP.

- ASP approval for RTA extensions and system modifications may take longer than the annual review sequence. Timelines will be communicated after ASP submittal.

- TDOT will issue a formal letter via email of approval to the Accountable Executive and the RTA Safety point of contact upon approval of the updated ASP.

4.4 RTA Internal Safety Reviews

RTAs must develop and document a process for the performance of Internal Safety Reviews (ISRs) on an annual calendar basis that assesses the elements and implementation of the ASP to ensure that the agency has an inclusive and effective process for continuous improvement and direct resources to manage safety optimally. Each ASP component must be reviewed at least once during a three-year cycle.

If an RTA has a single ASP that covers multiple modes of transportation (i.e. bus and rail), their internal audit policies should include a description and schedule of how all modes will be reviewed, not just rail.

4.4.1 ISR Process

The ISR process, at a minimum must contain:

a. Description of a process used by the RTA to determine if all identified elements of the ASP are performing as intended.
b. Determination if areas of non-compliance and hazards are being identified in a timely manner. Should areas of non-compliance be identified, the RTA must conduct a safety risk assessment and develop mitigating measures to minimize the risk.

c. Description of a process to ensure that all components are being reviewed in an on-going manner and over a three-year cycle.
d. Ensure that no reviewer leads an internal review of the department in which there is a conflict of interest.

4.4.2 Notification Process

RTAs must notify TDOT SSOA in writing at least **30 days** before an ISR is scheduled to begin. This notification must include:

a. ISR date
b. ISR scope
c. ISR checklists
d. Names of interviewees
e. Names of reviewers
f. ISR procedures

TDOT will review and provide comments to the RTA within **10 days.**

Once approved, TDOT SSOA will issue a letter of concurrence via email to the RTA that the audit scope and checklists are consistent with an RTA's three-year audit schedule to the Chief Safety Officer or RTA safety point of contact.

At the discretion of TDOT or its designated contractors, the SSOA or contractors may attend, physically or virtually, to observe the RTA's all internal reviews.

4.5 Reporting Requirements

RTAs must submit the ISR report to TDOT within **60 days** of conclusion of ISR activities. Examples of ISR activities may be, but are not limited to, field observations, supplemental interviews, and document reviews. The following items must be in the ISR Report:

a. A listing of the safety components reviewed.
b. Identification of the departments, functions reviewed, auditor reviewer for each department.
c. Completed approved associated checklists
d. Identified findings, associated corrective actions, and recommendations for improvement, including the process taken to conduct risk assessment.

The ISR report will not be approved until all documents have been received and CAPs have been approved by TDOT.

RTAs must submit the ISR annual report of ISRs completed during the previous calendar year no later than **February 1st.**

The following two items must be submitted by the above-referenced deadline:

1. The ISR annual report containing the following:
    a. A listing of the safety components reviewed during the calendar year.
    b. Identification of the departments and functions reviewed.
    c. An update of the RTA's three-year schedule ISR schedule.

d. Findings of non-compliance with approved CAPs.

2. A formal letter signed by the RTA's Accountable Executive that:

   a. Certifies the RTA is in compliance with its agency safety plan, or

   b. States the RTA, as indicated through the ISR final report, is not in compliance with its agency safety plan. If the RTA cannot certify compliance, then this letter must specify each non-compliance issue, the RTA's activities to achieve compliance, the date that those activities will be completed, and the projected date that compliance will be achieved.

See Section 9 *Reporting Requirements* for a complete list of RTA annual reporting requirements.

Section 5: SSO Safety Audits

49 CFR Part 674.27(5) - Triennial SSO agency audits of Rail Public Transportation Agency Safety Plans - The SSO program standard must explain the process the SSOA will follow and the criteria the SSOA will apply in conducting a complete audit of the RTA's compliance with its Public Transportation Agency Safety Plan at least once every three years, in accordance with 49 U.S.C. 5329. Alternatively, the SSOA and RTA may agree that the SSOA will conduct its audit on an on-going basis over the three-year timeframe. The program standard must establish a procedure the SSOA and RTA will follow to manage findings and recommendations arising from the triennial audit.

49 CFR Part 674.31 - Triennial Audits: General Requirements - At least once every three years, an SSOA must conduct a complete audit of an RTA's compliance with its Public Transportation Agency Safety Plan. Alternatively, an SSOA may conduct the audit on an on-going basis over the three-year timeframe. At the conclusion of the three-year audit cycle, the SSOA shall issue a report with findings and recommendations arising from the audit, which must include, at minimum, an analysis of the effectiveness of the Public Transportation Agency Safety Plan, recommendations for improvements, and a corrective action plan, if necessary or appropriate. The RTA must be given an opportunity to comment on the findings and recommendations.

5.1 Purpose

This section addresses TDOT SSOA's procedure and schedule for conducting audits performed on-site or virtually of the RTA. This section also includes the schedule for the FTA audit of the TDOT SSO program. Included are other audits, reviews, and inspections of issues related to safety oversight of the RTA.

5.2 SSO Triennial Audit Schedule

At least once every three years, TDOT will conduct an audit to determine the extent to which the RTA meets the requirements of its ASP, the effectiveness of these plans, and whether the plans and subordinate procedures should be updated. If an agency has a single ASP that covers multiple modes of transportation, all modes operated under the ASP will be included in the SSO triennial audit to ensure the plan is being used to its full extent and not biased to only covering rail activities.

Projected Triennial Audit Schedule

Agency Audited	Program Audited	Next Audit Date	Auditor
TDOT	State Safety Oversight	2028	FTA
Memphis Area Transit Authority	Rail Safety	TBD	TDOT
Chattanooga Area Regional Transportation Authority	Rail Safety	2027	TDOT

5.3 Triennial Audit Process and Procedures

TDOT SSOA will establish an audit team and prepare a schedule, procedures, and approach to guide the audit process. Criteria will be established through which the TDOT SSOA can evaluate the RTA's implementation of its ASP. At the conclusion of the audit, TDOT SSOA will prepare and issue a report containing evaluation assessment results from the audit, which will analyze the effectiveness of the ASP and whether the plans should be updated.

5.3.1 General Audit Process

a. TDOT will notify the RTA via letter when the on-site or virtual audit is scheduled.
b. TDOT will transmit a formal notification and agenda to the RTA.
c. TDOT will confirm the detailed logistics (e.g., meeting rooms, participant names, and titles, etc.) no less than **30 days** prior to the audit.
d. TDOT will conduct the audit following the agenda transmitted to the RTA.
e. TDOT will prepare and submit a Draft Report to the RTA after the conclusion of the audit.
f. The RTA will review and respond to the Draft Report and prepare any corrective action plans (CAPs) required by TDOT SSOA.
g. TDOT will respond to the RTA's comments and make necessary revisions and issue a Final Report.
h. TDOT will transmit the completed Three-Year Audit Final Report to the FTA as part of its annual submission.

5.3.2 Audit Schedule

The TDOT SSOA point-of-contact will establish a schedule for conducting the audit at the RTAs. This schedule will include milestones for:

a. The development of an approach to guide the audit.

b. Notification to the RTA.

c. Conducting the audit.

d. Preparation of a draft report.

e. Delivery of the draft report to the RTA for review and comment.

f. Issuance of a final report; and the receipt, review, approval, and tracking through implementation of the RTA's CAPs, if required.

Based on the milestone schedule, the TDOT SSOA point-of-contact will assign a team to conduct the audit. Each team will have a designated Lead Auditor and supporting Team Members.

Once assigned, the team will begin its work by reviewing the RTA's ASP, referenced materials, and supporting procedures. These materials will form the basis of TDOT SSOA's audit approach. As necessary, the TDOT SSOA point-of-contact may contact the RTA's safety point-of-contact and request additional information, procedures, or documentation. These requests may be transmitted via email or secure file sharing and storage system.

Utilizing these materials, the team will develop its audit approach, including:

a. The safety requirements to be audited.

b. The applicable reference documents that establish the acceptance criteria for those requirements.

c. The method of verification.

TDOT SSOA will formally notify the RTA's safety point-of-contact of the upcoming audit within the timeframe specified by TDOT before the audit is scheduled. This notification will occur via email or secure file sharing and storage system.

Shortly after notification (or as a component of the notification), TDOT SSOA will transmit the agenda prior to the start date of the audit.

5.3.3 Audit Procedure

The audit is intended to be an open and collaborative process with the RTA with the primary goal of improving safety procedures documentation and implementation at the RTA. The audit procedure is conducted as follows:

a. Conduct an entrance meeting with the RTA Accountable Executive, Operations Management, Chief Safety Officer, and Rail Safety employees.

b. Conduct interviews with appropriate RTA employees and contractors.

c. Evaluate documents and data maintained on-site if audit is conducted on-site.

d. Observe on-site operations of the RTA if audit is conducted on-site.

e. Take measurements and conduct spot checks as appropriate.

f. Conduct a debriefing with RTA management at the conclusion of the audit to provide an overview of initial findings and observations.

5.3.4 Evaluation Criteria

TDOT will assess each audit element according to the following evaluation criteria:

1. *Finding of Non-Compliance:* A non-compliance finding refers to an instance where the RTA is not operating in compliance or accordance with an applicable internal or external written requirement, including, but not limited to, this Standard, the RTA's ASP, and all referenced plans, policies, and procedures. Findings may be safety-critical in nature; however, some findings may be related to a deficiency in the content or material reviewed. Depending on the severity of the deficiency, the RTA may be required to develop immediate or emergency corrective actions.

2. *Observations for Improvement:* An observation refers to a condition whereby the RTA may technically be following applicable internal and external requirements; however, there may be no appropriate written plan, policy, or procedure in place, or the existing plan, policy, or procedure is not appropriate, or is not written in accordance with applicable industry practices or adopted standards. Alternatively, such an observation may constitute a resource or organizational issue preventing the allocation of sufficient resources to system safety activities. Depending on the area of concern, TDOT may make recommendations to the RTA to improve compliance of concern.

3. *Recommendations:* Where applicable, TDOT may also provide remarks based on the professional judgment of the review team and its knowledge of industry best practices. These noteworthy

recommendations may highlight areas in which the RTA maintains an exemplary policy, practice, or procedure. The recommendation may also describe opportunities for potential improvements. TDOT does not require the RTA to develop a formal, written CAP to address each recommendation. The decision to formulate CAPs or to otherwise respond to the comments and notes contained in recommendations rests entirely with the RTA.

5.3.5 Draft and Final Reports

Following the completion of the on-site or virtual audit, the TDOT SSO team will prepare a draft report. This draft report will provide:

a. Verification that the ASP is an integral parts of the RTA's overall management, engineering, operating, and maintenance practices and/or identification of deficiencies or areas requiring improvement.

b. Verification that the ASP are reviewed, at a minimum, on an annual basis to ensure that they remain dynamic and viable documents and/or to identify deficiencies or areas requiring improvement.

c. Verification that the RTA regularly monitors compliance with the ASP through a continuous and on-going internal safety review process and/or identification of deficiencies or areas requiring improvement.

d. Verification that the RTA identifies potentially serious conditions, hazards, threats, and vulnerabilities and ensures that methods to eliminate, control, and mitigate them are implemented.

e. Verification that investigations are being conducted following established procedures adopted by the RTA and/or identification of deficiencies or areas requiring improvement.

f. Verification that the RTA's emergency preparedness programs are being implemented as specified in the ASP and/or identification of deficiencies or areas requiring improvement.

g. Verification that specific activities and tasks identified in the ASP are being carried out as specified in these plans and/or identification of deficiencies or areas requiring improvement.

5.3.6 Report Timeline

After completing the on-site or virtual audit, the TDOT SSO team will prepare a draft report within **60 days** of the audit. The draft report will be delivered to the RTA's safety points-of-contact via email or via secure file sharing and storage system after the conclusion of the on-site or virtual audit.

The RTA will have **30 days** to respond to the draft report and to prepare preliminary corrective actions as requested by TDOT in the draft report to address any identified findings, recommendations, or concerns.

- If the RTA does not agree with the recommendations or findings, the SSOA and RTA shall meet to resolve differences.

Upon receiving the RTA's response, TDOT will make any required revisions to the draft and issue the final report within **15 days**.

The RTA's CAPs to address audit findings will be reviewed, approved, and tracked through to implementation following the process specified in Section 8 of this document.

TDOT SSOA will transmit the completed three-year safety audit report to the FTA as part of its annual submission.

5.4 Other TDOT SSO Monitoring Activities

In accordance with the developed procedures, TDOT will conduct:

- A generalized quarterly safety inspection of each rail transit agency's vehicles, infrastructure, and facilities, with focus on any risk-based hazards
- A monthly risk monitoring call with safety and operations staff to discuss progress or obstacles on established mitigations for identified hazards.
- A quarterly meeting with rail transit agency key safety, executive, and operation personnel to discuss federal and state updates on industry issues, agency specific projects and progress, rail transit agency corrective action progress.

At TDOT's discretion, they may conduct additional risk-based audits, inspections, and special assessments of issues related to system safety at the RTA. TDOT may initiate a special assessment of a particular subject matter area in response to a given hazard, accident, or incident or trend of such events.

All assessments, inspections, or audits may be announced or unannounced.

At the completion of any TDOT's monitoring activities, TDOT may issue a Report or other documents containing findings and recommendations to be evaluated by the RTA for implementation of their Safety Management Process per their ASP.

Any CAP developed as a result of this activity is subject to the corrective action plan process described in Section 8 *Corrective Action Plans* of this Program Standard.

- If the RTA does not agree with the recommendations or findings, the SSOA and RTA shall meet to resolve differences.

Section 6: Safety Event Definitions and Notification Requirements

49 CFR Part 674.27 (6) - Accident Notification Requirements - The SSO program standard must establish requirements for an RTA to notify the SSO agency of accidents on the RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM. These requirements must address, specifically, the time limits for notification, methods of notification, and the nature of the information the RTA must submit to the SSO agency.

49 CFR Part 674.33 - Notification of Accidents Requirements

(a) Two-hour notification. In addition to the requirements for accident notification set forth in an SSO program standard, an RTA must notify both the SSOA and the FTA within two hours of any accident occurring on a RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM. The criteria and thresholds for accident notification and reporting are defined in a reporting manual developed for the electronic reporting system specified by FTA as required in § 674.39(b), and in appendix A.

(b) FRA notification. In any instance in which an RTA must notify the FRA of an accident as defined by 49 CFR Part 225.5 (i.e., shared use of the general railroad system trackage or corridors), the RTA must also notify the SSOA and FTA of the accident within the same time frame as required by the FRA.

49 CFR Part 840.3

(a)(1) - The operator of a railroad shall notify the Board by telephoning the National Response Center at telephone 800-424-0201 at the earliest practicable time after the occurrence of any one of the following railroad accidents: (a) No later than 2 hours after an accident which results in: (1) A passenger or employee fatality or serious injury to two or more crewmembers or passengers requiring admission to a hospital; (2)The evacuation of a passenger train;(3) Damage to a tank car or container resulting in release of hazardous materials or involving evacuation of the general public; or (4) A fatality at a grade crossing.

(b) No later than 4 hours after an accident which does not involve any of the circumstances enumerated in paragraph (a) of this section but which results in: (1) Damage (based on a preliminary gross estimate) of $150,000 or more for repairs, or the current replacement cost, to railroad and nonrailroad property; or (2) Damage of $25,000 or more to a passenger train and railroad and nonrailroad property

(c) Accidents involving joint operations must be reported by the railroad that controls the track and directs the movement of trains where the accident has occurred

(d) Where an accident for which notification is required by paragraph (a) or (b) of this section occurs in a remote area, the time limits set forth in that paragraph shall commence from the time the first railroad employee who was not at the accident site at the time of its occurrence has received notice thereof.

6.1 Purpose

This section defines types of safety events, notifications and methods, and reporting requirements for each type of event. While FTA has adjusted the usage and application of the terms “Accident”, “Incident”, and “Occurrence”, TDOT will continue to utilize them to assist in classification and level of response needed.

6.2 Event Definitions

Types of events:

6.2.1 Accident: means an event that involves any of the following:

a. Loss of life
b. A report of a *serious injury* to a person
c. A collision involving a rail transit vehicle (RTV) that results in serious injury, fatality, or *substantial damage*
d. A runaway train
e. Fire, smoke, or fume conditions that result in an evacuation, serious injury, or fatality
f. Any derailment of a rail transit vehicle, at any location, at any time, whatever the cause

6.2.1.1 *Serious injuries* are injuries that may or may not require transport from the scene for medical attention that results in any one of the following:

a. Requires hospitalization for more than 48 hours, commencing within **7 days** from the date of the event
b. Results in a fracture of any bone (except simple fractures of fingers, toes, or nose)
c. Causes severe hemorrhages, nerve, muscle, or tendon damage
d. Involves an internal organ
e. Involved second-degree burns affecting more than 5 percent of the body surface

6.2.1.2 *Substantial damage*

a. Includes damage to transit or non-transit property including vehicles, facilities, equipment, rolling stock, or infrastructure that disrupts the operations of the rail transit agency and adversely affects the structural strength, performance, or operating characteristics of the property, requiring towing, rescue, on-site maintenance, or immediate removal prior to safe operation.
b. Excludes damage such as cracked windows, dented, bent or small punctured holes in the body, broken lights, mirrors, or

removal from service for minor repair or maintenance, testing, or video and event recorder download.

6.2.2 *Incident* means an event with any of the following:

a. A personal injury that is not a serious injury
b. One or more injuries requiring medical transportation away from the event
c. Rail transit vehicle collisions occurring at a *grade crossing*
d. Non-collision related damage to equipment, rolling stock, or infrastructure that disrupts the operations of the RTA
e. Evacuation of a train into the right-of-way (ROW) or onto the adjacent track, including self-evacuations, for reasons other than life safety reasons

6.2.1.1 ***Grade Crossing*** means an intersection of a roadway and a rail ROW that cross each other at the same level (at grade). For street-running operations, each street intersection is considered a grade crossing (excludes driveways and parking lot entrances). Pedestrian crosswalks in stations are also included.

6.2.2 ***Occurrence*** means an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a rail transit agency.

6.3 Notification Requirements and Methods

6.3.1 State Required Reporting

49 CFR Part 674 only requires notification be provided to FTA for events that meet the specific criteria. The TDOT SSO program, for safety performance evaluation, requires additional reporting of all serious safety events or hazardous conditions, as determined by the RTA's ASP, to be a State reportable condition.

6.2.2.1 The following examples of events are treated as a State reportable event and/ should be tracked and analyzed via the RTA's SMS, which is reviewed regularly:

a. Signal device failures, rail/track buckle, railcar braking failure.
b. Near misses with other rail vehicles, employees, automobiles, or pedestrians. This event is a State reportable if deemed a significant hazardous condition.
c. Door faults, including wrong-side door openings or door openings during train movement.
d. Arcing electrical equipment is a State reportable if the event included a serious injury.
e. OSHA-reportable accidents, including, but not limited to a significant hazardous condition, are State reportable events.
f. Any safety event that is submitted to NTD, OSHA, or other regulatory agency is a state reportable event.

g. Any time normal revenue service is halted, reduced to a point that fixed rail vehicles are not being used for service, and/or another mode (any rubber wheel vehicle) is required to maintain service is a state reportable event.

The RTA must report these events or hazardous conditions to the TDOT SSOA as soon as practical, but no later than **7 days following** initial knowledge of serious safety events or hazardous conditions, via email or telephone.

6.3.2 FTA Reportable Events

The RTA must notify FTA and TDOT regarding the following events as defined in FTA's Two-Hour Safety Event Notification Guide (8/7/2025):

a. Fatality
b. Two or more injuries
c. Derailment
d. Collision resulting in injury
e. Collision between two rail transit vehicles
f. Collision resulting in disabling damage to a rail transit vehicle
g. Evacuation for life safety reasons
h. Unintended train movement

The RTA provide an initial telephone notification to the TDOT SSOA within two (2) hours of a reportable event, leaving a detailed message or text if there is no answer.

The RTA will follow up with a preliminary report via email within **7 days** of the event. The preliminary report must provide as much of the following information as possible:

a. Name of the RTA
b. Name and job title of person reporting
c. Event type (fatality, injuries, property damage, evacuation, derailment, or other)
d. Notification times of all applicable agencies
e. NTSB, FRA, TSA reportable
f. Location, date, and time of event (including grade crossings)
g. Initial assessment of the extent of fatalities, injuries
h. Preliminary estimate of property damage
i. Rail transit vehicle(s) involved (type, number)
j. Other vehicle(s) involved (type, number)
k. Whether the RTA required an employee to be drug/alcohol tested
l. RTA primary person (i.e., Chief Investigator) conducting the investigation (name, title, and contact information)
m. Provide brief description of the event generating notification

Upon receipt of the email notification, TDOT will respond with an email acknowledging receipt. The RTA will provide additional information at TDOT SSOA's request, including but not limited to a copy of any video footage, pictures, or information from the scene of a safety event for FTA reportable event(s).

The RTA will maintain a current list of contact information for all primary and alternate TDOT SSOA contact personnel, including delivery street addresses, email addresses, telephone, and cell phone numbers.

6.3.2.1 The RTA must provide the two-hour initial accident notification to FTA by contacting the U.S. DOT Transportation Operations Center (TOC) by email or phone for events that meet the accident reporting thresholds specified in FTA Two-Hour Safety Event Notification Guide (8/7/2025).

EMAIL: ***(preferred)***	TOC-01@DOT.GOV	TDOT SSO Program Manager MUST be copied on all FTA notifications sent via email.
PHONE:	(202) 366-1863	The date and time of the phone call must be documented

6.3.2.2 FTA Notifications

Include a summary of the event and at minimum the following important details:

a. Accident date, time, location, and name of the RTA providing the notification
b. When the RTA has more than one rail mode, providing the rail mode and/or line involved in the accident (Heavy Rail/Subway, Light Rail, Streetcar, etc.)
c. Number of fatalities, serious injury, persons requiring immediate medical transport
d. After an RTV related collision, was there substantial damage or towing of RTV or Non-Transit Motor Vehicle (POV)
e. Primary and secondary event types (e.g. collision, derailment, fire, etc.)

6.3.2.3 NTSB

The RTA will notify the NTSB Response Operations Center at (800) 424-0201 following any one of the following accidents, per 49 CFR Part 840.3:

1) No later than 2 hours after an accident which results in:
   - A passenger or employee fatality or serious injury to two or more crewmembers or passengers requiring admission to a hospital.
   - The evacuation of a passenger train; or
   - A fatality at a grade crossing.
2) No later than 4 hours after an accident which does not involve any of the circumstances enumerated in paragraph (a) above, but which results in:
   - Damage (based on a preliminary gross estimate) of $150,000 or more for repairs, or the current replacement cost, to the railroad and nonrailroad property.
   - Damage of $25,000 or more to a passenger train and railroad and non-railroad property.

6.3.2.4 FRA

Each RTA that shares track/Right-of-Way with a general railroad system and is subject to the FRA notification requirements must notify TDOT SSOA within 2 hours of an incident for which the RTA must notify the FRA.

Whenever the RTA notifies the FRA of events meeting the FRA notification thresholds, the RTA must also notify TDOT via email.

6.3.2.5 National Transit Database

All safety events meeting the defined reporting criteria should be recorded and submitted on the appropriate and applicable NTD Safety & Security forms within 30 days as required by NTD policies.

All information provided to NTD should be consistent with what is reported to FTA and TDOT. RTAs should follow any guidance provided by their NTD analyst for adjusting information submitted and include TDOT SSO in communications to ensure consistency.

Failure to timely report events may result in corrective actions issued at the discretion of the SSO and/or FTA.

Section 7: Accident Investigations

49 CFR Part 674.27(7) – Investigations
(7) The SSO program standard must identify thresholds for accidents that require the RTA to conduct an investigation. Also, the program standard must address how the SSOA will oversee an RTA's internal investigation; the role of the SSOA in supporting any investigation conducted or findings and recommendations made by the NTSB or FTA; and procedures for protecting the confidentiality of the investigation reports.

49 CFR Part 674.35 – Investigations
(a)An SSOA must investigate or require an investigation of any accident and is ultimately responsible for the sufficiency and thoroughness of all investigations, whether conducted by the SSOA or RTA. If an SSOA requires an RTA to investigate an accident, the SSOA must conduct an independent review of the RTA's findings of causation. In any instance in which an RTA is conducting its own internal investigation of the accident or incident, the SSOA and the RTA must coordinate their investigations in accordance with the SSO program standard and any agreements in effect.
(b) Within a reasonable time, an SSOA must issue a written report on its investigation of an accident or review of an RTA's accident investigation in accordance with the reporting requirements established by the SSOA. The report must describe the investigation activities; identify the factors that caused or contributed to the accident; and set forth a corrective action plan, as necessary or appropriate. The SSOA must formally adopt the report of an accident and transmit that report to the RTA for review and concurrence. If the RTA does not concur with an SSOA's report, the SSOA may allow the RTA to submit a written dissent from the report, which may be included in the report, at the discretion of the SSOA.
(c) All personnel and contractors that conduct investigations on behalf of an SSOA must be trained to perform their functions in accordance with the Public Transportation Safety Certification Training Program.
(d) The Administrator may conduct an independent investigation of any accident or an independent review of an SSOA's or an RTA's findings of causation of an accident.

7.1 Purpose

This section addresses the requirements for the investigation and reporting of events in accordance with the thresholds specified in FTA's 49 CFR Part 674.39(b), and in Appendix A to 49 CFR Part 674: Notification and Reporting of Accidents, Incident, and Occurrences.

7.2 Investigation of Reportable Events

7.2.1 RTA Investigations

In most cases, TDOT requires RTAs to investigate their own accidents, that meet FTA reporting requirements of 674.39, and TDOT will conduct an independent review of the RTA's findings of causation. Investigations may also be appropriate for other incidents or occurrences at the written discretion of the SSOA. When conducting an investigation on behalf of TDOT, investigations are performed in accordance with

investigation procedures developed by the RTAs and adopted by the TDOT SSOA as sufficient. The RTA investigation personnel will have the proper investigation training and expertise outlined in the Public Transportation Safety Certification Training Program and requirements per the RTA's approved Technical Training Plan. The RTAs will maintain investigation procedures that meet or exceed all rules, guidance, or industry standards associated with investigation procedures, including this Standard. Investigation procedures will be reviewed annually by the RTAs against industry standards and updated as appropriate and necessary.

During investigations conducted by the RTA, TDOT will provide any technical assistance or guidance requested by the RTAs in support of the investigation.

7.2.2 TDOT Investigations

TDOT SSOA may conduct an independent investigation of any event reported by the RTA. The SSOA will inform the RTA of its intention to investigate or participate in an RTA investigation of a reported event no later than 7 days following receipt of the initial event notification.

The RTA will be provided with a list of SSO investigation team members. The SSO investigation team will arrive at the RTA's property as soon as practicable. The SSO investigation team will wait until the RTA and/or other emergency response personnel have secured the scene before commencing its investigation. The TDOT SSOA reserves the right to request that the RTA preserve the scene to the maximum extent feasible until the arrival and start of the investigation.

All SSO investigation personnel will be granted authority to access records, materials, data, analysis, and other information which is pertinent to the investigation. The RTA is expected to provide the SSO investigation team with the resources and information necessary to conduct the investigation in an effective and efficient manner.

7.2.3 Joint Investigations

The SSOA may request or conduct a joint participation of any investigation. In such cases, the RTA will cooperate to the extent practicable in preserving the scene and/or any evidence until SSO investigation team members arrive.

TDOT SSO investigation personnel will have the proper investigation training and expertise outlined in the Public Transportation Certification Training Program or by TDOT's SSO Officer discretion based on experience.

The SSO investigation team will observe or participate in field analysis, operational surveys, interviews, record checks, data analysis, and other onsite and off-site tasks that may be necessary for a comprehensive investigation.

The SSO investigation team will observe or participate in assessing physical evidence of the scene and document the environmental and physical factors of the scene through measurements, diagrams, and photographs.

As part of the investigation, the SSO investigation team will observe or participate in assessing compliance with operating rules and procedures, conducting follow-up interviews (if required), analyzing employee records and the results of post-accident drug and alcohol tests, and conducting vehicle and equipment inspections.

If the SSO investigation team requires information or analysis which is not readily available or which may require additional resources by the RTA, TDOT will request this information or analysis in a written request to the RTA.

7.2.4 National Transportation Safety Board (NTSB) Investigations

In any instance in which a safety event is the subject of an investigation by the NTSB, jurisdiction of the scene and investigation default to NTSB. The SSOA will participate in the investigation where requested and possible to evaluate whether the findings or recommendations by the NTSB require a CAP development by the RTA, and if so, the SSOA will order the RTA to develop and carry out the CAP(s). TDOT SSO reserves the authority to require items above any NTSB recommendations to ensure long-term mitigation and monitoring of the issues.

7.3 Accident Investigation Reports

TDOT requires a preliminary (see Section 6) and a final report from the RTA for every investigation of an FTA reportable event.

State level safety events do not require the full final investigation report, unless specifically requested by the SSO in the acknowledgement sent to an RTA when the preliminary report/notification is made.

In addition, for investigations that take more than **30 days** to complete, TDOT requires monthly status reports by the 15th day of the month, or next business day. All reports may be transmitted to the TDOT SSOA in electronic copy via email or secure file sharing.

7.3.1 Status Reports

Until the investigation is completed, the RTA will prepare and submit monthly status investigation reports. The status investigation reports, at a minimum, will include the following information:

a. List of any meetings and minutes held by an RTA's ad hoc reportable event investigation committee or contractor.
b. Disclosure of any immediate actions the RTA has taken or completed.
c. Principal issues or items currently being evaluated.
d. Overall progress and status of the investigation.
e. Estimated date of completion.

At any time during an investigation, the RTA must be prepared to provide a full briefing on the known circumstances of the event, the status of the RTA, FTA, FRA or NTSB investigation, and investigation activities.

7.3.2 Final Accident Report for FTA Reportable Events

Each RTA investigation conducted on behalf of TDOT must be documented in a draft final report that includes, at a minimum, the following information:

a. Executive summary.
b. Sequence of events, including a comprehensive description of injuries, fatalities, and property damage with an estimated dollar value.
c. Clear description of events before, during, and after the accident/incident.
d. Findings and analysis, including investigation activities.
e. Description of the investigation process and methodology.
f. Description of post-accident/incident testing and research conducted.
g. Conclusions, including any findings.
h. Probable and contributory causes.
i. Recommendations to prevent recurrence.
j. Supporting analysis to defend any recommendations made.
k. Short- and long-term actions.
l. Changes to rules, policies, or procedures.
m. CAP(s) and/or Plans to address any findings resulting from the investigation.

Within **30 days** of receiving a report designated as draft final, TDOT will review the report and issue a written reply, either accepting or rejecting the report. If TDOT does not accept the RTA's report, TDOT will communicate in writing the area(s) of disagreement.

The report will not be considered final until all exceptions are addressed, all safety related plans are reviewed, and associated CAPs are approved.

7.4 Data Reconciliation

No less than quarterly, TDOT will compare and reconcile RTA past accident data reported to the National Transit Database (NTD). The SSOA will complete the reconciliation using FTA's State Safety Oversight Reporting System. The SSOR System is a web-based data reporting system that is linked to the NTD. Any accidents, as defined by 49 CFR Part 674, reported by the RTA to the NTD are displayed in the SSOR system.

The data reconciliation review will ensure the RTA's accident investigation data submitted to both TDOT and the FTA, through the NTD, match and is complete. All data provided to NTD will be part of this reconciliation process.

All safety event reporting data must be submitted to NTD within 30 days of the associated event, and all applicable NTD deadlines met. Failure to consistently provide data to NTD affects the FTA and TDOT's data integrity and could result in corrective actions.

If data revisions are required, the SSOA will contact the RTA and convey which safety event requires revision and why a revision is warranted. The SSOA may require a corrective action plan if the safety event reconciliation indicates non-compliance with accident reporting requirements.

Section 8: Corrective Action Plans

49 CFR Part 674.27(8) - Corrective Action Requirements - The program standard must explain the process and criteria by which the SSO agency may order an RTA to develop and carry out a Corrective Action Plan (CAP), and a procedure for the SSO agency to review and approve a CAP. Also, the program standard must explain the SSO agency's policy and practice for tracking and verifying an RTA's compliance with the CAP, and managing any conflicts between the SSOA and RTA relating either to the development or execution of the CAP or the findings of an investigation.

49 CFR Part 674.37 – Corrective Action Plans
(a) In any instance in which an RTA must develop and carry out a CAP, the SSOA must review and approve the CAP before the RTA carries out the plan; however, an exception may be made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that the SSOA has been given timely notification, and the SSOA provides subsequent review and approval. A CAP must describe, specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.
(b) In any instance in which a safety event on the RTA's rail fixed guideway public transportation system is the subject of an investigation by the NTSB, the SSOA must evaluate whether the findings or recommendations by the NTSB require a CAP by the RTA, and if so, the SSOA must order the RTA to develop and carry out a CAP.

8.1 Purpose

TDOT's primary concern is the safety of the general public, RTA employees, and contractors. CAPs are an integral part of ensuring safety. TDOT will work with the RTAs to ensure that corrective actions are timely implemented and corrective actions commensurate to the severity of the potential safety-related hazard. This section describes the process for CAP identification, development, submittal, approval, tracking, and closure.

8.2 CAP Identification

In any instance where the RTA must develop and carry out a CAP, the SSOA will review and approve the CAP before the RTA carries out the plan.

> An exception may be made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that the SSOA has been given notification by email within **5 days**, and TDOT provides subsequent review and approval by email within **7 days**.

CAPs may be identified and developed through several processes and procedures, including accident investigation reports developed by the RTA, SSOA, FTA or NTSB, internal safety reviews conducted by the RTA, three-year audits conducted by the SSOA or FTA, or by the RTA's Safety Risk Management process in their Agency Safety Plan (ASP). CAPs may also be identified by other activities, as well as required by TDOT.

If the RTA disagrees with a TDOT finding or other request for a CAP, TDOT may require the RTA to perform a detailed risk analysis. The risk analysis is meant to ensure that the deficiency, if unmitigated, does not present an unnecessary risk to passengers, personnel, or the public. TDOT will review the risk analysis and decide whether to approve it or require additional information. Revisions may be necessary if the analysis does not address the intent of the identified finding or does not follow hazard analysis process requirements. If the risk analysis shows that the deficiency presents an unacceptable level of risk when left unmitigated, TDOT will require the RTA to propose a CAP.

8.3 CAP Development

A CAP must describe the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified, the schedule for taking those actions, and the individuals responsible for taking those actions. Proposed CAPs must include:

a. Date of identification.

b. Unique identification number for the CAP.

c. Source of the hazard or deficiency.

d. Identified hazard or deficiency description.

e. Hazard or deficiency cause and effect.

f. Actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards.

g. Initial and mitigated Safety Risk Assessment.

h. Issues preventing closure.

i. Proposed implementation date for taking those actions.

j. Individuals and Departments responsible for taking those actions.

8.3.1 Accountable Executive Review and Acknowledgement

Each CAP and, if applicable, new Standard Operating Procedure (SOPs) related to proposed corrective action plans submitted to TDOT for review and approval must include documentation that the RTA's Accountable Executive or their approved designee has:

- Reviewed the CAP and the associated findings
- Acknowledged the proposed corrective actions, implementation timeline, and resources necessary for implementation
- Signed the CAP or provided written confirmation of the review, concurrence, and access/availability of necessary resources

The signature or written confirmation must accompany the CAP submission to TDOT and be retained as part of the CAP documentation. CAPs submitted without this acknowledgement will be considered incomplete.

8.4 CAP Submittal and Approval

The RTA will submit the CAP to TDOT for approval within **45 days** after the need for a CAP is identified. Depending on the issue's complexity requiring corrective action, and at TDOT's discretion, additional time may be granted to prepare the CAP.

The CAP may be submitted utilizing the CAP log, RTA Internal CAP form, or any other method described in the RTA's ASP, policies, or procedures.

TDOT will notify the RTA of its approval or rejection of a CAP within **15 days** of receiving the CAP. The approval may be on official letterhead or by signing the RTA's internal CAP documentation. As part of the approval process, TDOT will also communicate the suggested minimum requirements for verification of CAP implementation.

When TDOT approves or rejects a CAP, the reasons will be stated in writing. The RTA shall submit a revised CAP to TDOT no later than **15 days** following the CAP rejection unless a previously discussed time frame has been authorized.

If the RTA disagrees with the proposed revisions, TDOT and the RTA will meet to resolve differences regarding the CAP.

8.5 CAP Tracking

The RTA is responsible for maintaining the CAP tracking matrix, monitoring the implementation status of CAPs, compiling and submitting **monthly status updates** to TDOT, and ensuring assigned personnel adhere to the CAP's process. The RTA must review its process as necessary and apply appropriate updates to ensure compliance with this Standard and with RTA's plans, policies, and procedures.

TDOT may request a status report or a meeting regarding CAPs at any time.

The RTA is responsible for utilizing and maintaining a CAP tracking matrix or log, which contains all CAPs that must be monitored and approved by TDOT. The CAP tracking matrix or log must include all CAP elements listed in 8.2.3 above, as well as the current status (see 8.6 CAP status categories) of the CAP and spaces for monthly updates and comments by the RTA and TDOT.

8.6 CAP status categories:

a. Development: The CAP is being developed or CAP is going through internal approval processes.

b. Emergency Implementation: CAP is emergently being implemented, and the RTA will or has given notification by email within **5 days**. Once TDOT approves, the status will change to In Progress.

c. Pending TDOT Acceptance: The CAP has been submitted to TDOT and awaiting approval.

d. In Progress: The CAP has been approved and being implemented.

e. Pending TDOT Closure: Request has been submitted, with support documentation, for TDOT's approval for closure.

f. Closed: CAP has been fully implemented, and TDOT has provided a CAP closure letter.

Other status categories may be utilized if approved by the TDOT SSOA.

When changes to any CAP parameters are required, the RTA must propose and request an update to these elements. TDOT will review and either approve or request justification/ clarification for the proposed revisions.

8.7 CAP Closure

Only TDOT SSOA has the authority to close a CAP.

The RTA may request to close a CAP from TDOT once corrective actions have been fully implemented. TDOT will verify that the CAP has been implemented in compliance with the approved plan.

Verification of the satisfactory implementation of a CAP may be by one or more of the following methods, as applicable: records reviews, on-site inspections, unannounced site visits, observations, photographs, review of submitted documents, interviews with staff responsible for implementing the CAP(s), or otherwise determined by TDOT SSOA.

After the CAP has been verified that the corrective actions have been fully implemented, TDOT SSOA will send a CAP closure letter to the RTA safety department informing them that the CAP implementation has been verified. This letter will include the CAP RTA number, description, and method utilized for verification.

The corrective measure shall be monitored according to the RTA's ASP for SMS process when a CAP is closed.

Section 9: Reporting Requirements

49 CFR PART §674.39 STATE SAFETY OVERSIGHT AGENCY ANNUAL REPORTING TO FTA

(a) ON OR BEFORE MARCH 15TH OF EACH YEAR, AN SSOA MUST SUBMIT THE FOLLOWING MATERIAL TO FTA:

(1) THE SSO PROGRAM STANDARD ADOPTED IN ACCORDANCE WITH § 674.27, WITH AN INDICATION OF ANY CHANGES TO THE SSO PROGRAM STANDARD DURING THE PRECEDING TWELVE MONTHS.

(2) EVIDENCE THAT EACH OF ITS EMPLOYEES AND CONTRACTORS HAS COMPLETED THE REQUIREMENTS OF THE PUBLIC TRANSPORTATION SAFETY CERTIFICATION TRAINING PROGRAM, OR, IF IN PROGRESS, THE ANTICIPATED COMPLETION DATE OF THE TRAINING.

(3) A PUBLICLY AVAILABLE REPORT THAT SUMMARIZES ITS OVERSIGHT ACTIVITIES FOR THE PRECEDING TWELVE MONTHS, DESCRIBES THE CAUSAL FACTORS OF ACCIDENTS IDENTIFIED THROUGH INVESTIGATION, AND IDENTIFIES THE STATUS OF CORRECTIVE ACTIONS, CHANGES TO PUBLIC TRANSPORTATION AGENCY SAFETY PLANS, AND THE LEVEL OF EFFORT BY THE SSOA IN CARRYING OUT ITS OVERSIGHT ACTIVITIES.

(4) A SUMMARY OF THE TRIENNIAL AUDITS COMPLETED DURING THE PRECEDING TWELVE MONTHS, AND THE RTAS' PROGRESS IN CARRYING OUT CAPS ARISING FROM TRIENNIAL AUDITS CONDUCTED IN ACCORDANCE WITH § 674.31.

(5) EVIDENCE THAT THE SSOA HAS REVIEWED AND APPROVED ANY CHANGES TO THE PUBLIC TRANSPORTATION AGENCY SAFETY PLANS DURING THE PRECEDING TWELVE MONTHS; AND

(6) A CERTIFICATION THAT THE SSOA IS IN COMPLIANCE WITH THE REQUIREMENTS OF THIS PART.

(B) THESE MATERIALS MUST BE SUBMITTED ELECTRONICALLY THROUGH A REPORTING SYSTEM SPECIFIED BY FTA

9.1 Purpose

This section addresses the TDOT SSO Program requirements of document submission for both TDOT and the RTAs initially, annually, and periodically.

9.2 TDOT Reporting to FTA

9.2.1. Transfer of Oversight Authority

If the State of Tennessee should ever determine that oversight authority should be transferred to another agency of the State, TDOT SSOA will work with that agency to ensure that at no point are the RTAs affected by 49 CFR Part 674 left without a duly authorized oversight agency. TDOT will report such change to the FTA.

9.2.2. Annual Reporting

By March 15th of each year, TDOT will submit an Annual Report to the FTA in compliance with 49 CFR Part 674.39. TDOT will submit the annual report data and documentation to FTA using FTA's SSOR System and other instructions provided by the FTA. The following items shall be submitted as part of the Annual Report to the FTA:

a. Tennessee's SSO Program Standard adopted in accordance with 49 CFR Part 674.27.

b. Data of Internal SSOA Coordination Frequency, including SSOA Agency Executives and SSO Program Manager.
c. Data of Coordination Frequency of the SSOA and RTA Personnel meetings, SSOA field visits, SSOA meetings with the RTA Executive Leader.
d. TDOT annual spending plan.
e. Evidence that designated TDOT employees and contractors, per the Technical Training Plan, have completed the requirements of the Public Transportation Safety Certification Training Program or if in progress, the anticipated completion date of the training.
f. All approved CAPs and their status developed by the RTAs from the preceding year.
g. Accident and investigation reports from the preceding year.
h. Level of effort by TDOT and their consultants in carrying out its oversight activities.
i. If applicable, the Triennial Audits completed during the preceding twelve months.
j. Evidence that TDOT has reviewed and approved any changes to the ASPs during the preceding twelve months and the RTAs' approved ASPs.
k. Certification that TDOT complies with the requirements 49 CFR Part 674.
l. Certification that the RTA is in compliance with its ASP.
m. RTA Annual ISR Reports.
n. Any additional data, information, or documentation requested by FTA.
o. TDOT's publicly available Annual Safety Report submitted to the FTA, Governor, and RTAs' Board of Directors.

9.3 TDOT Annual Reporting to Other Agencies

By **March 15th** of the next calendar year, TDOT will report the status of the safety of each RTA system to the Governor, Chairperson of each RTA Board of Directors, and copy each RTA Accountable Executive Director. The report will summarize the activities of TDOT's SSO Program in addressing State and Federal safety regulations during the previous calendar year. This report is submitted during the FTA annual report the following year and emailed to the TSO Program Manager.

9.4 RTA Reporting to TDOT

9.4.1 Annual Submissions

Annual submissions from the RTAs are due to TDOT SSOA on **February 1st** unless otherwise noted:

a. Annual Internal Safety Review Report with any findings of noncompliance, including approved corrective action plans and an updated three-year review schedule.

b. Annually reviewed ASP (Notification must be made to TDOT by **January 1st** if the RTA determines an update is not necessary).
c. Certification by the RTA's Accountable Executive regarding the agency's compliance with its ASP.
d. Annually reviewed Emergency Preparedness Plan (EPP).
e. Annually reviewed ISR Program Plan.
f. Annually reviewed Accident/Incident Investigation Plan.
g. Annually reviewed CAP Plan or Procedure.
h. Annually reviewed comprehensive staff training program for the operations and list of designated safety personnel with PTSCTP certification status as required by 49 CFR, Part 672, Training Requirements.
i. Emergency Drills, Exercise Plans, and Reports.
j. Updated Operations and Maintenance Plans, procedures, and manuals.
k. Updated Organizational Chart.
l. Transit Asset Management (TAM) Plan in accordance with Section 11.

No later than **March 1st**, the RTA must make all requested data corrections and submit any requested documentation to TDOT. TDOT SSOA will coordinate with RTA staff until all document and data requests are completed so that TDOT may submit the annual report by FTA's March 15th deadline.

9.4.2 Other Reporting/ Document Submission –

Submissions due to TDOT by 15th of following month, unless otherwise noted

a. Monthly CAP logs.
b. Monthly Safety Risk Tracking Logs, or equivalent document
c. Data or trend analysis applicable to the RTA SMS or other programs as requested by TDOT SSOA, including identified information for risk-based inspection program
d. Safety and Security Certification Plan, as required per project.
e. Safety and Security Certification Verification Report, as required per project.
f. Project Management Plan, as required per project.
g. Design Criteria and Construction Specification Conformance Checklists, as requested.
h. System Integrated Test Plans, as required per project.
i. Safety meeting agenda and minutes for risk monitoring

Section 10: Safety and Security Certification

10.1 Purpose

As described earlier in this document, Safety and Security are two overlapping functions that should not be exclusive. As such, the purpose of this section is to describe TDOT SSOA's oversight activities of the RTA during the design, construction, testing, and start-up phases for New Starts, Small Starts, or other federally funded grant projects subject to the State safety and security certification program and as determined necessary by the TDOT SSOA.

10.2 Notification and Plan Review

TDOT SSOA requires written notification to the State by the RTA when a rail fixed guideway project has entered the Preliminary Engineering (PE) phase.

The RTA will submit a project-specific Safety and Security Certification Plan (SSCP) to TDOT SSOA for review and approval.

TDOT SSOA reviews will address verification of the RTA's compliance with all applicable FTA and TDOT safety and security program requirements for the design, construction, testing, and pre-revenue operations phases of the project. TDOT SSOA's reviews will be consistent with 49 CFR Part 633, FTA Circular 5800.1, the FTA Handbook for Transit Safety and Security Certification, and other applicable requirements.

In addition to the review activities, TDOT SSO may attend and observe safety and security committee and working group meetings established by the RTA to carry out safety and security certification activities.

At any time, TDOT SSOA may arrange meetings with the RTA and FTA to resolve its safety and security comments and concerns.

10.3 Performance Standards

TDOT SSOA requires the adoption of a minimum set of standards, guidelines, and best industry practices necessary to achieve an acceptable level of safety, security, and performance for rail fixed guideway public transportation system operating within its jurisdiction.

TDOT SSOA also requires that the minimum requirements apply to all phases of the rail system life cycle, including design, construction, operation, and maintenance.

These requirements, at a minimum, must encompass the following elements:

a. Operating Environment
b. System Safety
c. System Dependability
d. Signals/Communications
e. Vehicles
f. Propulsion and Braking Systems

g. Electrical Systems
h. Stops/Stations
i. Guideways
j. System Security
k. Emergency Preparedness
l. System Integration/Testing
m. Operations and Maintenance

TDOT SSOA requires that the minimum requirements apply to the fixed facilities, vehicles, systems, test requirements, training, operations and maintenance plans, and procedural elements of the RTA be available for review upon request.

10.4 Design Criteria Conformance Phase

At the various stages of design development (i.e., 30%, 60%, 90%, 100%), TDOT SSOA may review the design documents (contractor design review submittals, drawings, specifications, and calculations). TDOT SSOA may review the designs to monitor that the safety and security requirements in the design criteria are included in the design of the various project facilities and systems.

TDOT SSOA may review designs that have changes or deviations from the baseline criteria, including those changes resulting from hazard assessments and analysis. TDOT SSOA's intent is to ensure that the RTA has considered and addressed all safety critical changes that may impact project safety and security prior to these changes being incorporated into the final design.

10.5 Construction Specification Conformance Phrase

TDOT SSOA may conduct field observations, during construction, after work completion, and during testing by the RTA.

The purpose of these field observations is to ensure that the system is constructed in accordance with the design and assess the effectiveness of the RTA safety and security certification program. TDOT SSOA may provide oversight of the RTA's construction safety and security activities that are being carried out in accordance with its Construction Safety and Security Plan (CSSP).

TDOT SSOA may prepare reports detailing its observations and open items requiring resolution by the RTA.

10.6 Pre-Revenue Operations and Maintenance Phase

TDOT SSOA may review the safety and security-related operations and maintenance plans and documents developed by the RTA for revenue operation in accordance with the TDOT SSO Program Standard, 49 CFR Part 674, and other applicable requirements and guidelines.

TDOT SSOA may provide review comments to the RTA on various plans, which may include Standard Operating Procedures (SOP), Emergency Operating Procedures (EOP), Operations and Maintenance Plan, Rule Books, and Right-of-Way Safety Training.

10.7 Testing, Start-Up, and Training Phase

TDOT SSOA may review plans and documents developed by the RTA for the testing, pre-revenue operation, and start-up phases of the project. TDOT SSOA may provide review comments to the RTA for each individual plan and/or document, including Training and Qualification Program Plans, System Integration Test Plan (SITP) and Procedures, Start-Up and/or Pre-Revenue Operations Plan, and Emergency Preparedness Plans, including Drills and Exercises Plan and Schedule.

TDOT SSOA may observe the RTA training and qualification programs. TDOT SSOA may observe and review the RTA tabletop exercises and emergency drills. TDOT SSOA may provide review comments to the RTA.

10.8 Project Readiness and Issue Safety and Security Certification

At the completion of the safety and security certification process and prior to the start of revenue service (required at least **30 days** prior, unless documented emergency), the RTA is to submit a Safety and Security Certification Verification Report (SSCVR) to TDOT SSOA for review and acceptance.

The SSCVR attests that the system, as constructed, is ready for revenue service from a safety point of view and will behave as intended. It summarizes the readiness of the project for revenue service by addressing the following elements:

a. Executive Summary regarding status of SSC and restrictions
b. Description of verification activities performed for SSC, including:
    i. Design criteria checklist
    ii. Construction checklists
    iii. Integrated testing
    iv. Emergency Preparedness documentation, including drills
    v. Contractual Operations and Maintenance Manuals
    vi. Fire/Life Safety training
    vii. Operations and Maintenance training
c. Description of Current Certification Status including:
    i. Signed Certificates of Conformance for each certifiable element listed within the SSCP
    ii. Final Project Safety and Security Certificate
d. Recommendation of actions required to mitigate or minimize the consequences of the remaining restrictions and open items
e. Schedule for closing out restrictions, work arounds, and open items

TDOT SSOA will respond in writing to the SSCVR. In the event TDOT SSOA's review determines the SSCVR to be unacceptable or incomplete, TDOT SSOA will coordinate with FTA and the RTA to address and resolve the issues and concerns in a timely manner and to avoid impacting the project implementation schedule or other resources.

The Project Safety and Security Certificate signifies that the project complies with the established Federal, State, and Local regulations and the RTA safety and security design criteria and standards. This Certificate may also serve as official notice from the RTA to TDOT SSOA that the project has been designed, constructed, and successfully tested in accordance with all contractual requirements and that the system is ready for revenue service from a safety point of view.

At the time of revenue service, open items affecting the safety and/or security, or operations of project may remain on certain facilities, systems, equipment, plans, or procedures. All open items must be monitored for their effective temporary measures and remain open until resolved.

TDOT SSOA requires that such open items be listed on a Safety and Security Open Items List or Log for the purpose of on-going tracking and monitoring of safety assurance by TDOT SSOA and the RTA.

Section 11: Transit Asset Management Plan

49 CFR PART 625.1 PURPOSE. THIS PART CARRIES OUT THE MANDATE OF 49 U.S.C. 5326 FOR TRANSIT ASSET MANAGEMENT. THIS PART ESTABLISHES A NATIONAL TRANSIT ASSET MANAGEMENT (TAM) SYSTEM TO MONITOR AND MANAGE PUBLIC TRANSPORTATION CAPITAL ASSETS TO ENHANCE SAFETY, REDUCE MAINTENANCE COSTS, INCREASE RELIABILITY, AND IMPROVE PERFORMANCE.

49 CFR PART 625.3 APPLICABILITY. THIS PART APPLIES TO ALL RECIPIENTS AND SUBRECIPIENTS OF FEDERAL FINANCIAL ASSISTANCE UNDER 49 U.S.C. CHAPTER 53 THAT OWN, OPERATE, OR MANAGE CAPITAL ASSETS USED FOR PROVIDING PUBLIC TRANSPORTATION.

11.1 Purpose

The purpose of this section is to describe the Transit Asset Management System as specified in § 625, the rule that requires RTAs that own, operate, and manage capital assets to develop asset management plans for their public transportation assets, including vehicles, facilities, equipment, and other infrastructure as applicable to fixed rail.

11.2 General Requirements

To support the development of the transit asset management system, FTA recommends the RTA consider the following steps:

a. Collect inventory and condition data for rolling stock and infrastructure.
b. Establish life-cycle policy for system preservation, including maintenance, repair, rehabilitation and renewal activities, and modeling the application of the policy on physical assets; and
c. Develop alternative capital programing scenarios that use the above steps together with projections of the RTA funding to characterize predicted future conditions and maximize the effectiveness of agency investments.
d. Include functionality in the asset management system for storing a complete asset inventory; recording condition and performance data for the inventory; identifying deficiencies in existing assets; providing decision support capability for predicting future conditions and needs; tracking data on work accomplishments, including maintenance actions and capital projects; and supporting monitoring and reporting.

As specified in § 625.5, FTA has grouped recipients into two categories.

<table>
<tr><th>Tier 1
Owns, operates, or manages:</th><th>Applicable Agencies in State of Tennessee</th></tr>
<tr><td>One hundred and one (101) or more vehicles in revenue service during peak regular service across all fixed route modes
OR</td><td rowspan="4">MATA
CARTA</td></tr>
<tr><td>One hundred and one (101) or more vehicles in revenue service during peak regular service in any one (1) non-fixed route mode
OR</td></tr>
<tr><td>Rail transit</td></tr>
<tr><th>Tier 2
Owns, operates, or manages:</th><td rowspan="5">N/A</td></tr>
<tr><td>One hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes
OR</td></tr>
<tr><td>One hundred (100) or fewer vehicles in revenue service during peak regular service in any one (1) non-fixed route mode
OR</td></tr>
<tr><td>A subrecipient under the 5311 Rural Area Formula Program
OR</td></tr>
<tr><td>Any American Indian tribe</td></tr>
</table>

* See § 625.25 *TAM Plan* requirements for tier specific plan requirements and § 625.29 *TAM Plan: horizon period, amendments, and updates* for plan management requirements.

11.3 Performance Measures

The FTA issued a final rule to establish performance measures based on the state of good repair standards established under Section 5326. After the date on which the FTA issued the final rule under MAP-21, Section 5326, and each fiscal year thereafter, the RTA, a recipient of Federal financial assistance under Section 5326, must establish performance targets in relation to the performance measures established by the FTA.

Specifically, as required by § 625.43, the RTA must establish performance measures for the following assets:

- *Equipment:* Service vehicles (non-revenue). The performance measure for non-revenue, support-service, and maintenance vehicles equipment is the percentage of those vehicles that have either met or exceeded their ULB.
- *Rolling stock:* The performance measure for rolling stock is the percentage of revenue vehicles within a particular asset class that have either met or exceeded their ULB.
- *Infrastructure:* Rail fixed guideway, track, signals, and systems. The performance measure for rail fixed guideway, track, signals, and systems is the percentage of track segments with performance restrictions.
- *Facilities:* The performance measure for facilities is the percentage of facilities within an asset class, rated below condition 3 on the TERM scale.

11.4 Performance Targets

As required by § 625.45, the RTA must implement a process to establish performance targets for the assets discussed above according to the following requirements:

a. A provider must set a performance target based on realistic expectations, and both the most recent data available and the financial resources from all sources that the provider reasonably expects will be available during the TAM Plan horizon period.

b. A provider must set a timeline for target setting.

c. Within three months after the effective date of § 625, a provider must set performance targets for the following fiscal year for each asset class included in its TAM Plan.

d. At least once every fiscal year after initial targets are set, a provider must set performance targets for the following fiscal year.

e. A provider must ensure that the provider's Accountable Executive approves each annual performance target.

f. A Sponsor must set performance targets for group plan participants.

g. A Sponsor must set one or more unified performance targets for each asset class reflected in the group TAM in accordance with paragraphs (a)(2) and (b) of § 625.45.

h. To the extent practicable, a Sponsor must coordinate its unified performance targets with each participant's Accountable Executive.

i. To the maximum extent practicable, a provider and Sponsor must coordinate with the TDOT SSOA and the MPO on the TDOT SSOA and MPO performance targets.

11.5 Annual Review

Following the initial acceptance of the TAM Plan, the RTA will conduct an annual review of the TAM to ensure that the TAM is current at all times.

- In the event that the RTA conducts its annual TAM review and determines that an update is not necessary for the year, it must prepare and submit by January 1 formal correspondence notifying the TDOT SSOA of this determination. If TDOT SSOA wishes to object to this determination, the TDOT SSOA will notify the RTA within **30 days**.

- In the event that the RTA conducts its annual review of the TAM and determines that an update is necessary for the year, the RTA will submit a revised TAM to the TDOT by **February 1st**. As appropriate, referenced materials affected by the revision(s) must also be submitted with the TAM.

Each revised TAM submitted to TDOT SSOA by the RTA must include a text or tabular summary that identifies and explains proposed changes and includes a time frame for completion of the associated activities.

11.6 Four-Year Update

As specified in § 625.29, the RTA must implement a process to update the entire TAM at least once every four (4) years. The four-year update process will follow the same steps as required for the annual review process. To explain, a provider's TAM update should coincide with the planning cycle for the relevant Transportation Improvement Program or Statewide Transportation Improvement Program. The horizon period of at least four (4) years was established with the intent to link the TAM development process to the traditional Planning process. However, the rule allows grantees to update their TAMs more frequently if the horizon period is four years or more.

- If the RTA experiences a significant unexpected change that exceeds the agency's established threshold for a simple amendment to the existing TAM Plan, a full TAM Plan update (revision) is required. Within the TAM Plan, RTAs may establish criteria and a standard operating procedure (SOP) for significant change based on their assets and policies in order to ensure consistency in determining when an update is appropriate. These SOPs could be identified in Agreements with Stakeholders, the Evaluation Plan, and/or Group Plan Sponsor communication.
- If a TAM Plan is amended, its four-year horizon timeline remains the same. However, if a TAM Plan is formally updated, the update establishes a new four-year horizon timeline and update cycle. Either type of change should be documented in the TAM Plan and provided during Oversight reviews.

11.7 Record Keeping

As specified in § 625.53, TDOT SSOA requires that the RTA perform the following record-keeping duties to maintain the TAM Plan:

a. At all times, the RTA must maintain records and documents that support, and set forth in full, its TAM Plan.
b. The RTA must make its TAM Plan, any supporting records or documents, performance targets, investment strategies, and the annual condition assessment report available to TDOT and MPO to aid in the planning process.

Section 12: TDOT Safety Data Collection and Inspections Program

The Bipartisan Infrastructure Law amended 49 U.S.C § 5329 to require SSSOAs to conduct risk-based inspections of the RTAs that the SSOA oversees. The Bipartisan Infrastructure Law also added a provision directing FTA to issue a Special Directive to each SSOA on the development and implementation of risk-based inspection programs (see 49 U.S.C. § 5329(k)(5)).

As described in 49 U.S.C. § 5329(k), each SSOA must develop policies and procedures for inspection access and data collection in consultation with each rail transit agency that the SSOA oversees. The policies and procedures must address SSOA authority and capability to enter and conduct inspections of the rail fixed guideway public transportation system, including access for inspections that occur with and without advance notice. Additionally, the policies and procedures must address how the SSOA will collect data from each rail transit agency to support its risk-based inspection monitoring and prioritization activities, including data that the rail fixed guideway public transportation agency collects when identifying and evaluating safety risk.

These policies and procedures must be incorporated into the SSOA Program Standard required by the SSO regulation at 49 CFR Part 674, and the rail transit agency's Agency Safety Plan required by the Public Transportation Agency Safety Plan regulation at 49 CFR Part 673.

This State Safety Program Standard section formalizes current safety inspection procedures, to conduct routine Periodic Safety Inspections (PSI) and adds FTA's required Risk-Based Inspections (RBI) procedures to meet the FTA Special Directive SD No. 22-46 assigned to TDOT on October 21, 2022.

The following subsections address the consistent and descriptive policies and procedures of TDOT's PSI and RBI inspections program to include the following elements:

- Right to Access (Section 12.1)
- Types of TDOT Inspections and Notification to RTA (Section 12.2)
- RTA Safety Data Collection and Sharing with TDOT (Section 12.3)
- TDOT Data Management System (Section 12.4)
- Inspection Prioritization Process (Section 12.5)

12.1 Right to Access

TDOT has the capability and authority to access and enter RTA properties, with and without notice, to inspect infrastructure, equipment, records, personnel, RTA activities, and data, including the data that the RTA collects when identifying and evaluating safety risk. TDOT's authority to do so is established in Tennessee Code § 13-10-201 thru § 13-10-206, as detailed in **Appendix A** to this Program Standard.

RTAs shall provide TDOT and its contractors with the means for physical access to RTA facilities. This includes physical access to the necessary training required by the RTA for non-employee access to facilities, track right of way, and other RTA infrastructure. RTA-specific procedures to facilitate physical access to RTA facilities, for TDOT representatives, is included in **Appendix C** to this Program Standard.

12.2 Types of TDOT Inspections and Notifications to RTAs

TDOT conducts Periodic Safety Inspections (PMI) and Risk-Based Inspections (RBI) for each RTA within its jurisdiction. Established policies and procedures for conducting inspection are developed by the SSO Program Manager in consultation with each RTA. These policies and procedures are commensurate with the size and complexity of the RTAs overseen by TDOT and are included below, as well additional RTA-specific details that are included in **Appendix C** to this Program Standard.

Upon request by RTA leadership, TDOT will comply with the RTA's request to provide verification of the certifications and trainings for TDOT inspectors to ensure their compliance with RTA safety protocols and other requirements. RTA-specific details regarding these inspection types and processes/procedures for conducting inspections are included in **Appendix C** to this Program Standard.

12.2.1 Scheduling Announced and Unannounced TDOT Inspections for RTAs

TDOT's SSO Program Manager plans and schedules all RTA inspections. TDOT inspections may be conducted by individual SSO staff members, designated contractors, or a combination of both. All TDOT inspections are pre-approved by the SSO Program Manager or designee, who will designate an inspection lead for each TDOT inspection team who conducts RTA inspections. TDOT is committed to ensuring that its inspectors are properly qualified to conduct inspections, per FTA training requirements at 49 CFR Part 672, as well as RTA-specific safety training for personal protective equipment requirements. TDOT will adhere to RTA-specific protocols for non-employee access to right-of-way and maintenance areas.

Announced Inspections – Announced inspections may include any or all of the types of access listed in Section 12.1 above. TDOT's SSO Program Manager will notify the RTA with a written notice via email, at least 14 days in advance, to provide the RTA with sufficient time to coordinate and schedule the necessary parties and resources. Written notices will include general information for the announced inspection such as initial scope, planned inspection date, and time of which TDOT inspector(s) are planning to conduct a virtual or on-site physical inspection. TDOT's lead inspector will work with the RTA to confirm inspection details and RTA personnel and/or contractors expected to be made available during TDOT inspection activities.

Unannounced Inspections – Unannounced inspections may include any or all of the types of access listed in Section 12.1 above. For unannounced inspections, TDOT's lead inspector will notify the RTA's point-of-contact upon arrival at the RTA property. At that time, TDOT's lead inspector will provide a description of intended inspection, the initial scope and location of which TDOT inspectors intend to conduct an on-site inspection of the RTA and identify which TDOT inspection team members are presently on-site. Within 1 hour, the RTA is required to provide an employee escort to lead the TDOT inspection team to the requested RTA area that is the subject of the unannounced inspection.

TDOT may also conduct unannounced inspections without contacting the RTA's point-of-contact upon arrival if the inspection is limited to unrestricted (public) areas.

12.2.2 TDOT Inspections Report Format

Following completion of each inspection, TDOT may complete follow-on inspection-related activities to include requests for additional data and reports, revisiting original or other related inspection area(s), and conducting additional RTA employee and/or contractor interviews.

TDOT will then create a written inspection report, under letterhead and signed and issued by the SSO Program Manager or designee, typically within 30 calendar days, and formally transmit the report to the RTA for review and follow-up. Additional details regarding inspection report formatting and procedures for distribution of reports and follow-up actions are included in **Appendix C** to this Program Standard.

12.2.3 Identified Serious Safety Concerns

TDOT's number one priority is the safety of its inspection team members and RTA employees/contractors involved with TDOT inspections. Additional details regarding how TDOT will address serious safety concerns are included in **Appendix C** to this program standard.

12.2.4 RTA System Components Subject to TDOT Inspections

TDOT inspections are based upon each RTA's specific structure and system components. As such, RTA-specific equipment, infrastructure, departments, and divisions subject to inspection are detailed in **Appendix C** to this Program Standard.

12.2.5 Safety Event Verification

At any time, TDOT may conduct a PSI or RBI to confirm that the RTA successfully completed needed repair(s) for a safety event scene. TDOT's inspections may also include other RTA infrastructure, having similar characteristics to where the safety event occurred. Additionally, an inspection report may be held open until all necessary post-event inspections have been completed.

12.2.6 Ongoing Monitoring

Following the completion of a PSI or RBI, TDOT may periodically observe RTA personnel performing their job functions to assess whether the functions are performed safely, to RTA safety standards, and at the required frequency (e.g., monthly track inspections). Based on TDOT's safety data collection, ongoing risk tracking for CAPs, and/or noticeable negative RTA safety trends, TDOT may choose to conduct more frequent and focused PSIs or RBIs for specific areas.

Additionally, ongoing safety monitoring is completed via TDOT's quarterly meetings with RTA staff. These meetings and discussions provide TDOT and the RTA's senior leadership with opportunities to discuss current known hazards, planned and

completed risk mitigations, and safety performance results and any identified safety concerns related to the RTA's rail infrastructure.

12.2.7 Inspections Resulting in Defects and Corrective Actions

Following the completion of an inspection, the final report may include findings related to established policies and procedures. Inspection reports which indicate findings will include TDOT's requirements for the RTA to mitigate the findings and may require formal corrective action plans, per this Program Standard, Section 8-Corrective Action Plans.

12.2.8 Corrective Action Plans for Inspection Findings

Inspection findings requiring formal CAPs are addressed by TDOT and the RTAs, per this Program Standard, Section 8-Corrective Action Plans.

12.3 RTA Safety Data Collection and Sharing with TDOT

TDOT shall be provided access to RTA's primary safety-related data (unedited), upon request, as well as the RTA-specified datasets included in **Appendix C** to this Program Standard. Each RTA that TDOT oversees must provide TDOT with the data that the RTA collects when identifying hazards and assessing and mitigating safety risk.

TDOT reserves the right to use RTA data analysis results and/or conduct its own analyses. As such, TDOT's Program Standard, **Appendix C**, specifies the required datasets, data format, frequency and point-of-contact for responsible RTA personnel to share the RTAs datasets with TDOT.

Data that contains Personally Identifiable Information (PII) or Sensitive Security Information (SSI) must also be shared, but the sensitive information can be redacted or protected, and the RTA may require that providing access of PII/SSI data, to TDOT, will be restricted to coordinated on-site reviews. Requests to view PII/SSI will be submitted in writing by TDOT and addressed to the RTA's highest ranking safety staff member for coordination of specific onsite date(s) and time(s) to complete the reviews.

12.3.1 Categories of RTA Safety Data

The specifically defined datasets and the policies and procedures required to establish TDOT's expectations for RTA data sharing are developed in consultation with each RTA within TDOT's jurisdiction. The current safety datasets to be shared, data formatting, processes for sharing the data, and frequency that the data will be shared is included in **Appendix C** to this Program Standard. The RTA-specific categories of data include the following broad categories of data sets:

- Safety Program Data
- Operations & Maintenance Data
- Internal Inspection Data

12.4 TDOT Data Management System

TDOT's data management system is governed by the Enterprise Information Security Policy for the State of Tennessee and is based on the International Standards Organization (ISO) 27000 series standard framework. The State of Tennessee's Records Management Division, Secretary of State (RMD) is responsible for all minimum metadata policies and compliance requirements. All Tennessee government agencies are responsible for ensuring that their personnel are trained on compliance with the State's Electronic Record Policy.

TDOT's data management system complies with electronic records storage requirements in accordance with TCA § 47-18-2901 and TCA § 10-7-121. The system is also included in the State's annual Enterprise Information System (EIS) risk assessment of information servers and records. This assessment includes a review of current and future plans for capacity to store records, including risk-based inspection data, and how the data management system is managed and maintained. Additionally, the EIS risk assessment includes a verification process to confirm that records are accurate, electronically stored, and backed-up per agency procedures and the State's Electronic Records Policy which is governed by the State of Tennessee Public Records Commission (PRC) and the Information Systems Council (ISC). The records and data storage systems are tested as part of the State's annual emergency response planning and drills.

Some aspects of TDOT's data management system are dependent upon TDOT's overarching Information Technology (IT) Department's cybersecurity policies and procedures and may require restricted access for review, due to IT security protocols.

12.4.1 Risk-Based Inspection Data

RBI data will be tracked in TDOT's Risk Tracking Log. TDOT's Risk Tracking Log is a Microsoft® Excel workbook that contains a series of worksheets tracking KPIs, as well as quantitative and qualitative data received from the RTAs and generated from TDOT inspection data. RBI data is updated on a quarterly basis, at minimum, based on new or revised data received from RTAs. The Risk Data Register has two main components: the Key Performance Indicators (KPIs) and quantitative data which is used to conduct analyses and identify patterns and trends. These components provide TDOT with continuous monitoring capabilities for RTAs safety performance results.

12.5 Inspection Prioritization Process

TDOT prioritizes inspections based on information tracked and analyzed in the TDOT Data Management System. Once analyses have been completed, TDOT determines prioritization based on potential impact of the identified risks to include but not limited to the severity of the risk, the likelihood of occurrence, and risk exposure. The process includes the following steps:

1. **Input Data** – Data received from RTAs is put into the TDOT Risk Tracking Log and/or Data Management System.
2. **Analyze Data** – At least annually, TDOT conducts a comprehensive analysis of safety data, for each RTA, to identify trends and patterns.

3. **Create Analysis Summary** – Based on completed analyses, TDOT summarizes levels of safety risk for identified safety metrics and data and determines safety concern/safety risk prioritization.
4. **Identify Risk Based Inspections** – Based upon dataset reviews, TDOT identifies the high-risk areas and initiates plans to conduct inspections. These plans are notated on the Inspection Plan Tab of TDOT's Risk Tracking Log.
5. **Prioritize Inspections** – TDOT assigns prioritization metrics (Table 1) to the inspections (PSI and RBI) based on the real or potential level of safety risk identified during dataset reviews.

Table 1: Definitions of Inspection Prioritization

Inspection Prioritization	
Level 1: High Priority	This level includes equipment and components that pose a high risk of failure which could result in a significant safety event. Inspections for this priority level would be scheduled and completed as soon as possible based on scope, purpose, and level of risk.
Level 2: Medium Priority	This level includes equipment and components that pose a moderate risk of failure. Inspections for this priority level will typically be scheduled and completed within 6-10 weeks from date of analyses based on scope, purpose, and level of risk.
Level 3: Low Priority	This level includes equipment and components that pose a low risk of failure. Inspections for this priority level will typically be scheduled and completed within 6–12 months from analyses based on scope, purpose, and level of risk.

TDOT has established its safety risk monitoring system to track RTA system components, and the full spectrum of activities associated with and specific to each RTA's rail operating systems. As part of an ongoing and continuous process, the risk analysis and prioritization of data from the RTAs is reviewed at least annually. The prioritization of inspections described above informs TDOT personnel which inspections are a high priority and should be addressed first.

TDOT's continuous inspection prioritization process is tailored to be commensurate with the size and complexity of each RTA that TDOT oversees. TDOT's SSO team continuously reviews its ongoing safety oversight methods and procedures for safety risk monitoring activities to assure that TDOT is demonstrating consistent and ongoing inspections of each RTA that TDOT oversees. This process seeks to ensure TDOT's oversight effectiveness, efficacy, and relevance in addressing the safety risks and ongoing operational changes at each RTA within its jurisdiction.

By focusing inspection areas on high priority RTA components, TDOT engages with the RTAs to focus on reducing the likelihood that safety events, injuries, and disruptions to service will occur.

Section 13: Roadway Worker Protection Program

49 CFR 671.25 (a) – The SSOA must review and approve the RWP manual and any subsequent updates for each RTA within its jurisdiction.

49 CFR 671.25 (b) The SSOA must update its program standard to explain the role of the SSOA in overseeing an RTA's execution of its RWP program.

49 CFR 671.25 (c) The SSOA must conduct an annual audit of the RTA's compliance with its RWP program, including all required RWP program elements, for each RTA that it oversees, and issue a subsequent report detailing all required elements, and allow the RTA to comment on any findings or recommendations.

TDOT and the RTA's under its oversight will continue to coordinate and collaborate on meeting all applicable requirements of 49 CFR 671 during the implementation phase(s) of this regulation.

13.1 Review and Approval

TDOT has approved all applicable Roadway Worker Protection programs, manuals, and plans prior to the December 2, 2025 deadline.

13.2 Program standard Updates

Beginning with versions following 7.0 of TDOT's SSPS, the RWP chapter will be reviewed and updated to include this information.

13.3 Quarterly RWP Reporting

As TDOT continues to assist the RTA's under its oversight, additional details will be included on the format, information, and submission requirements for reporting RWP data.

13.4 Annual RWP Audit Procedures

This section will be updated as TDOT continues to coordinate with RTAs on the most efficient methods to meet all regulatory requirements for the RTA and SSOA roles.

Appendix A: TDOT SSOA Enabling Legislation

Tennessee Code

Title 13 - Public Planning and Housing

Chapter 10 - Mass Transit

Part 2 - State Safety Oversight Program

§ 13-10-201. Responsibility for Implementation

The department is designated as the agency responsible for implementing a state safety oversight program that satisfies the requirements of 49 U.S.C. § 5329(e) and shall have the authority to implement all requirements necessary to comply with 49 U.S.C. § 5329(e) and the implementing federal regulations.

The department may enter into an agreement with one (1) or more contractors to act on behalf of the department in carrying out the duties of the department under this part. However, any such contractor may not provide services to both the department and a rail fixed guideway public transportation system under the oversight of the department, unless authorized by a waiver issued by the federal transit administrator or the administrator's designee.

§ 13-10-202. Financial and Legal Independence

Unless waived under 49 U.S.C. § 5329(e), the department:

- Shall be financially and legally independent from any rail fixed guideway public transportation system under the oversight of the department.
- May not employ an individual who is also employed by a rail fixed guideway public transportation system under the oversight of the department; and
- May not directly provide public transportation services in an area with a rail fixed guideway public transportation system under the oversight of the department.
- A rail fixed guideway public transportation system under the oversight of the department may not provide funding to the department in a manner prohibited by the federal transit administration.

§ 13-10-203. Enforcement Authority

The department shall oversee and have the authority to implement all safety aspects of rail fixed guideway public transportation systems in accordance with 49 U.S.C. § 5329(e), including:

- Investigation and enforcement of federal and state laws regarding rail fixed guideway public transportation safety.
- Establishment of minimum safety standards for the rail fixed guideway public transportation systems in the state.

- Review, approval, oversight, and enforcement of the public transportation agency safety plan required under 49 U.S.C. § 5329(d), including implementation by a rail fixed guideway public transportation system of the system's plan; and
- Oversight and enforcement of corrective action by rail fixed guideway public transportation systems in a manner directed by the commissioner or commissioner's designee as needed, including compelling the removal of a specific hazard, immediately suspending or prohibiting rail service as appropriate, or taking other action consistent with this purpose.
- The department shall have the right to access the property, vehicles, accident scenes, and records of each rail fixed guideway public transportation system under the oversight of the department for the purpose of fulfilling its duties under this part.

§ 13-10-204. Confidentiality of Information

The data collected for and reports concerning investigations conducted under this part by the department, or a contractor acting on behalf of the department, shall be confidential and not open for inspection by members of the public pursuant to the open records law, compiled in title 10, chapter 7, and may not be admitted into evidence or used in a civil action for damages resulting from a matter mentioned in such a report.

Any portion of a rail fixed guideway public transportation system safety plan that concerns security for the system shall be confidential and not open for inspection by members of the public pursuant to the open records law.

§ 13-10-205. Audits and Reporting

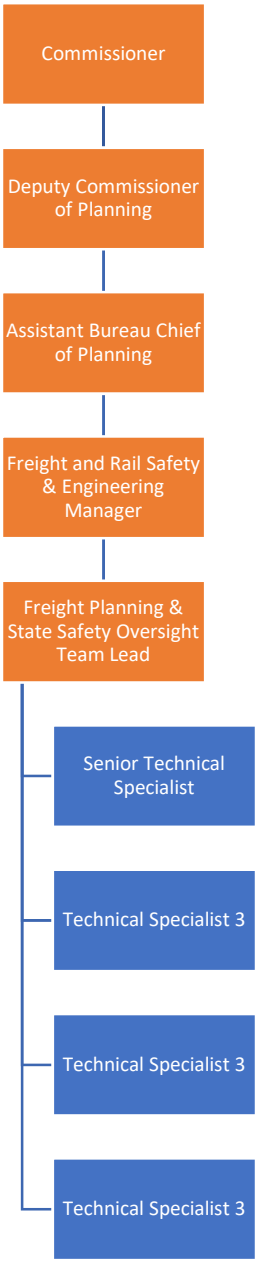
At least once every three (3) years, the department shall audit each rail fixed guideway public transportation system's compliance with the public transportation agency safety plan as required by 49 U.S.C. § 5329(e).

At least once per year, the department shall report the status of the safety of each rail fixed guideway public transportation system to the governor, the federal transit administration, and the board of directors, or equivalent, of the rail fixed guideway public transportation system.

§ 13-10-206. Authority to Adopt Policies and Regulations

The department is authorized to establish policies and promulgate rules and regulations in furtherance of this part. All rules shall be promulgated in accordance with the Uniform Administrative Procedures Act, compiled in title 4, chapter 5.

Appendix B: TDOT Organizational Chart



Appendix C: RTA-Specific Procedures for Compliance with TDOT Inspections Program

TDOT's authority to implement its safety inspections program is referenced within the Program Standard above. The purpose of this appendix is to specify how TDOT will collect safety data and prioritize/conduct its safety inspections for each RTA within its jurisdiction. The sections of this Appendix correlate to TDOT's Program Standard, Section 12. These procedures were originally established and are periodically updated through collaboration with RTA stakeholders. The information may be reviewed and updated more frequently than the established annual review and update for the Program Standard.

This appendix applies to both CARTA and MATA which operate rail systems within the State of Tennessee. The ASP for both CARTA and MATA must acknowledge TDOT's authority to collect safety data and conduct safety inspections. ***Note: As of August 18, 2024, MATA has indefinitely suspended rail-trolley operations as they continue a thorough investigation on a recent brake issue and in alignment with a request from TDOT.***

1.0 TDOT Access to CARTA and MATA Facilities (Ref: SSPS, Section 12.1)

CARTA Facilities: TDOT has the capability to access restricted areas of CARTA, not open to the public, upon request to CARTA's Director of Safety and Security or designee, via cell phone and/or email. Depending on the area(s) to be accessed by TDOT personnel, CARTA assigns an agency escort/guide to lead the inspections and/or may direct TDOT personnel to meet agency staff at their respective work area. CARTA does not require badges or key-cards due to agency escort provided upon request to access any agency area.

MATA Facilities: TDOT has the capability to access restricted areas of MATA, not open to the public, upon request to MATA's Chief Safety & Security Officer or designee, via cell phone and/or email. Depending on the area(s) to be accessed by TDOT personnel, MATA assigns an agency escort/guide to lead the inspections and/or may direct TDOT personnel to meet agency staff at their respective work area. MATA does not require badges or key-cards due to agency escort provided upon request to access any agency area.

2.0 Types of TDOT Inspections and Notification Procedures for RTAs (Ref: SSPS, Section 12.2)

TDOT conducts both Periodic Safety Inspections (PSI) and Risk-Based Inspections (RBI). Periodic Safety Inspection (PSI): Routine announced and unannounced TDOT inspections to verify CARTA and MATA compliance with their respective ASP, management and enforcement of minimum safety standards, and implementation/verification of corrective actions required to mitigate safety risk.

Risk-Based Inspection (RBI): Prioritized announced and unannounced TDOT inspections to review elevated or high level of real or potential safety risk and to address safety concerns and hazards associated with the highest levels of safety risk. TDOT may mandate immediate corrective actions to establish a minimum level of safety risk control until further hazard analysis is conducted by TDOT or the RTA.

2.1 Scheduling TDOT Inspections (Ref: SSPS, Section 12.2.1)

TDOT's procedures for scheduling inspections and notifying CARTA and MATA personnel are detailed within the Program Standard, Section 12.2.1.

2.2 TDOT Inspections Report Format (Ref: SSPS, Section 12.2.2)

TDOT may elect to conduct multiple inspections during a single on-site visit or over the course of several days. The purpose and scope of the inspection(s) being completed, for each on-site time period, will dictate whether or not TDOT chooses to create a combined report of several inspection activities or issue a separate report for each inspection.

At any time prior to publishing a final inspection report, TDOT may revise the type of inspection, PSI or RBI, based upon all available and relevant information obtained by TDOT representatives. TDOT inspection reports are issued by the SSO Program Manager or designee and typically include the following report sections:

- Title and date of final report (PSI or RBI)
- Report revision table
  - Revision Number
  - Date
  - Description
  - Author
  - Reviewer
  - Approval [signature] by TDOT SSO Program Manager
- Introduction and Scope
- Safety Risk Level assigned by TDOT (for RBI inspections only)
- Executive Summary and TDOT Findings
- Inspection Details (Site Visit Activities)
- Inspection delays or rescheduling reason(s) (if applicable)
- Inspection Observations and Findings
- Inspection Recommendations
- Reference Photographs, drawings, and measurements
- Conclusion

Each TDOT inspection report will use objective language and reference objective data, including applicable measurements and photographs to document safety-related issues noted during an inspection. TDOT may also include the use of subjective report content to notate overall safety culture strengths and weaknesses which are not explicitly covered under current policies and/or procedures but noted during an inspection.

Delayed inspections and the reason(s) why will be documented in TDOT's inspection reports. Inspection reports for cancelled and rescheduled inspections will remain open until all intended inspection activities have been completed. Reports will notate inspection delays and/or cancellations to include a timeline of events and needed follow-up (e.g., initiating independent investigation of identified serious safety concern(s)).

Following any needed collaboration, the RTA will submit proposed CAP(s), as applicable, to TDOT for review and approval.

2.3 Procedures to Report Serious Safety Concerns (Ref: SSPS, Section 12.2.3)

TDOT's number one priority for all on-site inspections is to conduct them safely and minimize risk to inspectors and inspection teams.

Communicating an identified serious safety concern to the RTA's management team would follow any need to contact 9-1-1, first, to summons emergency responders if needed. Once TDOT's inspection team has completed steps to withdraw from an area, if necessary, and safeguard inspectors, TDOT's lead inspector will notify the RTA's management team, via phone or in-person, in the following priority order for each transit agency:

CARTA

1) On-site CARTA personnel (at location of TDOT inspection team/area)
2) Operations Control Center
3) CARTA's Director of Safety and Security

MATA

1) On-site CARTA personnel (at location of TDOT inspection team/area)
2) Operations Control Center
3) MATA's Chief Safety & Security Officer

TDOT and both RTAs concur that a serious safety concern includes any immediate or serious safety situation/condition that could cause death risk of serious injury to riders, employees, contractors, inspectors, or significant impacts to RTA infrastructure.

TDOT's notification process is not limited to on-site inspections and may be triggered by any TDOT representative (staff or contractor) who receives information which warrants this action. Based on data review, receipt of a public concern, or actual on-site inspection, TDOT may advise RTA employees to halt movement or other employee actions within the vicinity of imminent danger, until RTA management personnel arrive at the physical area where the serious safety concern exists.

Following any such occurrence, whereby TDOT is compelled to report a serious safety concern and/or halt work during an inspection, TDOT may initiate a separate and independent safety risk control investigation if warranted.

2.4 RTA System Components Subject to TDOT Inspections (Ref: SSPS, Section 12.2.4)

Table 1: CARTA Components

CARTA Components Subject to Inspection		
Equipment	**Infrastructure**	**Policies and Procedures**

• Vehicles
  ○ Incline Cars
• Incline Hoist Equipment
• Vehicle Maintenance
  ○ Lifting Instruments
	• Power Systems
	  ○ Main-Machine Room
	  ○ Transmission Lines
	  ○ Emergency Backup Generator
	• Track Infrastructure
	  ○ Incline Railway Track
	  ○ Rail Trestles (buried and exposed) and Fasteners
	  ○ Roadbed
	  ○ Track Work
	• Structures and Drainage
	  ○ Bridges
	  ○ Drainage
	  ○ Retaining Walls
	• Stations
	  ○ Stairs
	  ○ Platform
	  ○ Hoist
	  ○ Gift Shop
	  ○ Ice Cream Shop
	• Operations and Administration Building
	  ○ Operations Control Center
	  ○ Maintenance Facility
	  ○ Upper Station
	  ○ Lower Station
		• Agency Safety Plan
		• Standard Operating Procedures
		• Safety Committees
		• Incline Rail Vehicle Running Maintenance Manual
		• Emergency Preparedness Plan
		• Internal Safety and Security Audit Program
		• Safety Rules Compliance Program
		• Incline Rail Vehicle Running Maintenance Manual
		• PTSCTP Technical Training and Refresher Training Plan
		• SMS Implementing Standard Procedures
		• Substance Abuse Policy
		• Incline Rail Vehicle Heavy Repair Manual

Table 2: MATA Components

MATA Components Subject to Inspection		
Equipment	**Infrastructure**	**Policies and Procedures**
• Vehicles o Support Vehicles o Trolley Cars o Sweep Cars • Trolley Maintenance and Storage Facility o Maintenance Tracks o Vehicle Servicing Pit o Portable Car Lifts o Paint Booth o Air Brake Room o Battery Storage	• Power Systems o Overhead Contact System (OSC) o Traction Power Substations (TPSS) • Track Infrastructure o Rail o Roadbed o Special Track Work o Track Work Appurtenances o Crossings and Stops • Signal System o Signals o Switches o Crossovers o Warning Signals • Stations o Platform o Covered Waiting Areas • Operations and Administration Building o Central Station o William Hudson Transit Center o Maintenance and Storage Facility (MSF) ▪ Administrative Offices ▪ Maintenance of Way Shop o Headquarters ▪ Radio Control Center	• Safety Plan • Operating Rulebook • Operations and Maintenance Plan • Standard Operating Procedures • Safety Committees • Drug and Alcohol Policy • Internal Audit Program • Safety Risk Management Plan • Trolley Safety Rules Compliance Program • Infrastructure Management Plan • Preventative Maintenance Management System • System Security & Emergency Preparedness Plan • Safety, Security Emergency Plan

2.5 Safety Event Verification Procedures

Refer to TDOT Program Standard, Section 12.2.5.

2.6 Ongoing Monitoring Practices

Refer to TDOT Program Standard, Section 12.2.6.

2.7 Management of Identified Defects and Corrective Actions

Refer to TDOT Program Standard, Section 12.2.7.

2.8 Management of Corrective Action Plans

Refer to TDOT Program Standard, Section 8 and 12.2.8.

3.0 RTA Safety Data Source Lists (Ref: SSPS, Section 12.3)

Table 3: CARTA Data Source List (as amended)

RBI Category	RBI Component	Document/Title	Frequency of Doc/Report	Description	Means for Access by TDOT	Access Notes	CARTA person Assigned to Share
Safety Programs	Reportable Events	2-Hour Notifications	When Applicable	Telephone call or text message if no answer (as applicable) for all reportable events, per SSPS	Call/text from CARTA	Within 2 hours following event time	Incline Director / DOSS
Safety Programs	Reportable Events	Preliminary Event Report	When Applicable	Email to TDOT with key information for all reportable events, per SSPS	Email from CARTA	Within 7 days of the event	Incline Director / DOSS
Safety Programs	Reportable Events	Final Accident Report	When Applicable	Final accident report with root cause(s), contributing factors, and findings/corrective actions.	Email or file share from CARTA	Within 30 days OR monthly status report until completed.	Incline Director / DOSS
Safety Programs	Injuries	Injury Log	Quarterly	List of all reportable (TDOT/NTD/OSHA) injuries and detail that occurred on the system for the quarter	Email to TDOT from CARTA		DOSS
Safety Programs	Corrective Action	CAP Tracking Log	Monthly, when requested	Corrective Action Plans, submitted to TDOT for review and approval, required by CARTA or TDOT and monthly status updates	Email to TDOT from CARTA	CAP submitted for approval within 45 days of identification	DOSS
Safety Programs	Hazard Logs	Safety Risk Log	Monthly	Excel spreadsheet documenting all hazards identified.	Email to TDOT from CARTA		DOSS
Safety Programs	Safety Performance Targets & Results	Safety Performance Targets	Annually, when requested	Reported as the number of event occurrences per Vehicle Revenue Miles. The Accountable Executive and SMS Executive will coordinate with both State and TPO staff to review CARTA's SPTs	Email to TDOT from CARTA		DOSS
Safety Programs	Emergency Management Program (EMP)	EMP Activities	Quarterly	Report lists/describes EMP activities that have taken place for the previous quarter to include, first responder training/meetings, public outreach, employee training, and revision activities for the EMP.	Email to TDOT from CARTA	Requesting quarterly summary report of communications/activities	DOSS
Safety Programs	Part 672 Designated Personnel	Part 672 Designated Personnel Training Log	Quarterly	Training and certification record for Part 672 Designated Personnel Training.	Email to TDOT from CARTA		DOSS
Safety Programs	Employee Reporting Program	Employee Reporting Systems	Quarterly	Log used track reported employee safety concerns	Email to TDOT from CARTA		DOSS
Safety Programs	Safety Committees	IIJA Safety Committee	Quarterly	Written record of meeting, including agenda and minutes	Email to TDOT from CARTA		DOSS

Maintenance Data	Vehicle	Preventative Maintenance Compliance Report	Quarterly	Summary report of Rail Vehicle Maintenance's compliance of completing Preventative Maintenance (PM) activities and a list of defects found during the inspections.	Email to TDOT from CARTA	Requesting quarterly summary report	Director of Incline
Maintenance Data	Vehicle	Periodic Structural Inspection	5,000 miles/6 month	Visually inspect all stressed areas and welds. Any area suspected of having surface cracks or other imperfections must then be further subjected to magnetic particle inspection.	Email to TDOT from CARTA	Requesting summary report within 15 business days following completion	Director of Incline
Maintenance Data	Vehicle	Inspection Following Accidents	When Applicable	A structural inspection of the affected car is to be conducted to confirm its soundness prior to returning it to service.	Email to TDOT from CARTA	Requesting summary report within 15 business days following completion	Director of Incline
Maintenance Data	Vehicle	Door Seal and Latch Inspection	5,000 miles/6 month	Inspect each door, the seal around each door, the door compression, door latches, pins and catches.	Email to TDOT from CARTA	Requesting summary report within 15 business days following completion	Director of Incline
Maintenance Data	Vehicle	Visual Inspection of the Propane Tank	1,000 miles/monthly	Inspect the propane tank for any signs of damage or leaks. Contact the propane supplier should the tank require a refill.	Email to TDOT from CARTA	Requesting quarterly summary report	Director of Incline
Maintenance Data	Vehicle	Post-Deployment Inspection	When Applicable	In the event that the emergency brake lever is activated or the brake governor is deployed when the IRV exceeds 10 mph, the portion of the frame where the anti-derailment device is mounted must be visually inspected for damage.	Email to TDOT from CARTA	Requesting summary report or inspection	Director of Incline
Maintenance Data	Vehicle	CSR Wheel Inspection	Annually	Third party (CSR Engineering) inspection of incline car wheel dimensions.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline
Maintenance Data	Vehicle	Gear/Brake Inspection	Annually	Third party (H&H Brown) inspection of gears and brakes.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline
Maintenance Data	Track	Annual Incline Report	Annually	Third party (CSR Engineering) review of incline track, roadbed, and trestles. As well as the condition of upper and lower stations.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline
Maintenance Data	Track	Cable Inspection Report	Quarterly	Third party (Evergreen Wire Rope Testing) inspection of cables.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline
Maintenance Data	Power	Electrical Inspection	Annually	Third party (Lawson Electric) review of electrical system.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline
Maintenance Data	Power	Motor Inspection	Annually	Third party (Lawson Electric) review of motors.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline
Maintenance Data	Facilities	Facility Safety Inspection Checklist	Annually	Third party inspection for possible safety concerns of facilities.	Email to TDOT from CARTA	Requesting summary report within 30 business days following completion	Director of Incline

Internal Inspection Data	Asset Management	Transit Asset Management (TAM) Performance Measures	Annually if updated, but minimum every 4 yr update by statute	Asset category, asset type, number of assets, useful life benchmark (ULB), condition rating.	Email to TDOT from CARTA	Requesting copy of annual reports as submitted to FTA	DOSS / Facilites Director
Internal Inspection Data	Internal Safety Reviews (ISRs)	ISR 3-year Schedule	Annually	3-year schedule of internal safety review activities conducted by CARTA	Email to TDOT from CARTA	Annually	DOSS
Internal Inspection Data	Internal Safety Reviews (ISRs)	ISR Checklists	As scheduled and completed	Checklists provided to TDOT prior to conducting internal safety reviews	Email to TDOT from CARTA	30 days prior to the scheduled internal safety review	DOSS
Internal Inspection Data	Internal Safety Reviews (ISRs)	Internal Safety Review Final Report	As scheduled and completed	Final report of findings found during the internal safety review, including CAPS.	Email to TDOT from CARTA	Within 60 business days, following completion of the audit	DOSS
Internal Inspection Data	Capital Projects	Incline Railway Timber Project	Quarterly	Summary of activities/milestones	Email to TDOT from CARTA	Requesting quarterly summary report	DOSS / Director of Grants / Facilities Director
Internal Inspection Data	Capital Projects	Incline Upper Station Repairs	Quarterly	Summary of activities/milestones	Email to TDOT from CARTA	Requesting quarterly summary report	DOSS / Director of Grants / Facilities Director

Table 4: MATA Data Source List (as amended)

RBI Data Sources from MATA

RBI CATEGORY		Document/Title	Reference Location	Frequency of Doc/Report	Description	Means for Access by TDOT	Access Notes	MATA Position/Department Assigned to Share
Safety Program	Reportable Events	2-Hour Notifications	SSPS, Section 6, Page 45	When Applicable	Telephone call or text message if no answer (as applicable) for all reportable events, per SSPS	Call/text from MATA	Within 2 hours following event time	Safety Department
		Preliminary Event Report	SSPS, Section 6, Page 45	When Applicable	Email to TDOT with key information for all reportable events, per SSPS	Email to TDOT from MATA	Within 7 calendar days of the event	Safety Department
		Final Accident Report	SSPS, Section 6, Page 50	When Applicable	Final accident report with root cause(s), contributing factors, and findings/corrective actions.	Email to TDOT from MATA	Within 30 calendar days of monthly status report until submitted	Safety Department
	Injuries	Injury Log		Quarterly	List of all injuries and detail that occurred on the system for the quarter.	Email to TDOT from MATA		Safety Department
	Corrective Action	CAP Tracking Log	SSPS, Section 8, Page 53	Monthly, when requested	Corrective Action Plans, submitted to TDOT for review and approval, required by MATA or TDOT and monthly status updates	Email to TDOT from MATA	CAP submitted for approval within 45 days of identification	Safety Department
	Safety Risk Tracking Log	Safety Risk Tracking Log (SRTL)	Safety Risk Management Plan, Page 15	Monthly, when requested	An information management tool MATA uses to document its Safety Risk Management and Safety Assurance activities. Made available monthly or upon request from the SSO Program Manager.	Email to TDOT from MATA		Safety Department
	Safety Performance Targets & Results	Safety Performance Indicators (Lagging Indicators and Leading Indicators)	ASP, Section 5.0, Page 32	Annually	SPIs are specific data points that must be monitored to track overall safety performance.	Email to TDOT from MATA		Safety Department
	Emergency Management Program (EMP)	EMP Activities		Quarterly	Report lists/describes EMP activities that have taken place for the previous quarter to include, first responder training/meetings, public outreach, employee training, and revision activities for the EMP.	Email to TDOT from MATA	Requesting quarterly summary report	Safety Department
	Part 672 Designated Personnel	Part 672 Designated Personnel Training Log		Quarterly	Training and certification record for Part 672 Designated Personnel Training.	Email to TDOT from MATA		Safety Department
	Employee Safety Reporting Program (ESRP)	Employee Safety Reporting Program Log	ASP, Section 9.0, Page 58	Quarterly	Employees can report safety concerns through email, phone, QR code, in person to employees of the Office of CSSO, in person to a member of management, or Safety Committees	Email to TDOT from MATA	Requesting quarterly log of employee safety concerns	Safety Department
	Safety Committees	Safety Executive Management Review Committee	ASP, Section 9.1.1, Page 60	Bi-monthly	MATA's senior executive Safety Committee responsible to execute and advance MATA's SMS strategic direction, implementation, and safety performance. Written record of meeting, including agenda and minutes	Email to TDOT from MATA		Safety Department
		Trolley Safety Committee Meetings Minutes	ASP, Section 9.1.2, Page 61	Monthly	Written record of meeting, including agenda and minutes	Email to TDOT from MATA		Safety Department

RBI Data Sources from MATA

RBI CATEGORY		Document/Title	Reference Location	Frequency of Doc/Report	Description	Means for Access by TDOT	Access Notes	MATA Position/Department Assigned to Share
Maintenance Data	Vehicle	Vehicle Preventative Maintenance	Preventative Maintenance Management System (Section 2.2.b and Appendix B)	402.5 miles or 80 Operating hours.	Approximal 10 days for the most frequent PM service. Trolleys may be serviced prior to date but can only run 40.25 miles past required service.	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Daily Operator Defect Report	SOP 000-033	Daily	Includes Corrective Actions and tracking.	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
	Maintenance (Track and ROW)	Daily Sweep Inspection Form	IMP Section 5.1, Page 18 Sweep Car SOP	Daily	Track Maintainer or Laborer, Inspection criteria: Sweep car SOP	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Mainline Track/Switch Inspection Form	IMP, Section 5.2, Page 21	Weekly	Track Maintainer, Inspection criteria: MATA Track Standards	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Monthly Mainline Switch Inspection Form	IMP, Section 5.1, Page 18 MATA Track Standards	Monthly	Track Maintainer, Inspection criteria: MATA Track Standards	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Yard Track & Switch Lubrication Checklist	IMP, Section 5.1, Page 18 MATA Track Standards	Monthly	Track Maintainer, Inspection criteria: MATA Track Standards	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Quarterly Yard Track/Switch Inspection Form	IMP, Section 5.1, Page 18 MATA Track Standards	Quarterly	Track Maintainer, Inspection criteria: MATA Track Standards	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Semi-Annual Contractor or Track Maintainer Mainline Track and Switch Inspection Form	IMP, Section 5.1, Page 18 MATA Track Standards	Semi-Annual	Alternating Qualified Contractor or Track Maintainer, Inspection criteria: MATA Track Standards	Email to TDOT from MATA	Requesting summary report within 30 calendar days following completion	Safety Department
		Ultrasonic and Geometric Track and Switch Inspection	IMP, Section 5.1, Page 18 MATA Track Standards	Biennial	Qualified Contractor, Inspection criteria: MATA Track Standards	Email to TDOT from MATA	Requesting summary report within 30 calendar days following completion	Safety Department
	Tractions Power	Routine TPSS Maintenance and Inspection Form	IMP, Section 4.2c, Page 10	Weekly	MATA Trolley personnel conduct routine daily and weekly inspections of the OCS and TPSS. Qualified contractors coordinate with the MTI to perform long-interval inspections and most corrective maintenance	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Semi-Annual TPSS Maintenance and Inspection Form	IMP, Section 4.2d, Page 10	Semi-Annual	Detailed Inspection by qualified contractor.	Email to TDOT from MATA	Requesting summary report within 30 calendar days following completion	Safety Department
		Weekly OCS Inspection Form	IMP, Section 4.3c, Page 13	Weekly	SMF/Yard and Inactive OCS - Track Maintainers or Infrastructure Supervisor (Yard, Madison, & Riverfront)	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Semi-Annual OCS Inspection Form	IMP, Section 4.3d, Page 15	Semi-Annual	Mainline MSF/Yard, and Inactive OCS - Qualified contractor	Email to TDOT from MATA	Requesting summary report within 30 calendar days following completion	Safety Department
		2-Year OCS Inspection	IMP, Section 4.3d, Page 15	Every 2 Years	Mainline done by Qualified Contractor	Email to TDOT from MATA	Requesting summary report within 30 calendar days following completion	Safety Department

RBI Data Sources from MATA

RBI CATEGORY		Document/Title	Reference Location	Frequency of Doc/Report	Description	Means for Access by TDOT	Access Notes	MATA Position/Department Assigned to Share
Maintenance Data	Stations	Daily Station Inspection	IMP, Section 6.1b, Page 22	Daily	Conducted by Track Maintainers or Laborers, looking for safety and security items.	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Infrastructure Lift Inspection	IMP, Section 6.1c, Page 22	Weekly	Inspection of infrastructure lifts at Stations	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
	Maintenance and Storage Facility (MSF)	Weekly MSF Inspection Checklist	IMP, Section 7.1b, Page 24	Weekly	The MTI or designees will ensure that MATA Trolley maintenance personnel conduct a general visual inspection of MSF facility and ground weekly. Must be performed on foot, during daylight hours.	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Monthly Building, Ground, and Workshop Safety Inspection Checklist	IMP, Section 7.1c, Page 24	Monthly	MATA B&G personnel will conduct monthly facility inspections of MSF and coordinated with SSOR.	Email to TDOT from MATA	Requesting quarterly summary report of defects found during inspections	Safety Department
		Six-Month Building, Grounds, and Workshop Safety Inspection	IMP, Section 7.1d, Page 25	Every 6 Months	ADOFM will conduct semi-annual facility inspections and coordinate with SSOR.	Email to TDOT from MATA	Requesting summary report within 30 business days following completion	Safety Department
		Annual Fire/Life Safety Inspection Checklist	IMP, Section 7.1e, Page 25	Annual	Comprehensive annual inspection of MSF fire/life safety systems, equipment's, and facility conditions.	Email to TDOT from MATA	Requesting summary report within 30 business days following completion	Safety Department
		Engineering Assessment	IMP, Section 7.1f, Page 25	Every 5 Years	Structural engineer or firm to conduct comprehensive inspection of MSF structure per the APTA Standard for Station, Shop and Yard Maintenance.	Email to TDOT from MATA	Requesting summary report within 30 business days following completion	Safety Department
Inspection Data	Asset Management	Transit Asset Management Plan	Annually if updated, but minimum every 4 yr. update by statute	Annually	Asset category, asset type, number of assets, useful life benchmark (ULB), condition rating.	Email to TDOT from MATA	Requesting copy of annual reports as submitted to FTA within 30 business days of submittal	Safety Department
	Internal Safety Reviews (ISRs)	Safety and Security Review Committee Meeting Minutes	Internal Audit Program Plan, Section 4, Page 3	When Applicable	Responsible for addressing, deciding, and resolving all issues related to safety and security including the IAPP. Written record of meeting, including agenda and minutes	Email to TDOT from MATA		Safety Department
		MATA Trolley Program Internal Audit Annual Schedule	Internal Audit Program Plan, Section 5.4, Page 5	Annually	The SSOR will create an annual audit schedule for ensuring that all required SSPP and SEPP elements will be assessed over a three-year period. The audit schedule will identify the SSPP or SEPP element being audited, the audit timeline, and the responsible manager.	Email to TDOT from MATA	Requesting copy of report within 30 business days upon completion	Safety Department
		MATA Trolley Program Internal Audit Annual Report	Internal Audit Program Plan, Section 5.9, Page 8	Annually	Annually MATA to internally audit their safety and security programs and policies.	Email to TDOT from MATA	Requesting copy of report within 30 business days upon completion	Safety Department
	Capital Projects	Trolley Project Management Meeting Minutes		Monthly	Monthly meeting minutes from Trolley Project Management Meeting	Email to TDOT from MATA		Safety Department

Appendix D: Program Standard Acknowledgement of Receipt

ACKNOWLEDGEMENT:

The undersigned:

- is the Accountable Executive or his/her designee of the listed Rail Transit Agency.
- has received a copy of the Program Standard of the State of Tennessee.
- has read and understands the requirements contained therein.
- hereby agrees to comply with the Program Standard; and
- understands that the Tennessee Department of Transportation, the designated State Safety Oversight Agency, and the listed Rail Fixed Guideway Public Transit System are required by law to be legally and financially independent of each other and are subject to the requirements specified in:
    - 49 U.S. Code § 5329, Public Transportation Safety Program / Fixing America's Surface Transportation (FAST) Act.
    - 49 CFR Part 674, State Safety Oversight.
    - 49 CFR Part 673, Public Transportation Agency Safety Plan.
    - 49 CFR Part 672, Public Transportation Safety Certification Training Program.
    - 49 CFR Part 671, Roadway Worker Protection Program
    - 49 CFR Part 670, National Public Transportation Safety Program.
    - 49 CFR Part 630, National Transit Database.
    - 49 CFR Part 625, Transit Asset Management

AUTHORIZED SIGNATURE:

Signature: Charles D. Frazier
Charles D. Frazier (Feb 4, 2026 12:58:22 EST) **Date:** 02/04/2026

Name / Title: Charles D. Frazier / Chief Executive Officer

Rail Transit Agency: Chattanooga Area Regional Transportation Authroity

Appendix D: Program Standard Acknowledgement of Receipt

ACKNOWLEDGEMENT:

The undersigned:

- is the Accountable Executive or his/her designee of the listed Rail Transit Agency.
- has received a copy of the Program Standard of the State of Tennessee.
- has read and understands the requirements contained therein.
- hereby agrees to comply with the Program Standard; and
- understands that the Tennessee Department of Transportation, the designated State Safety Oversight Agency, and the listed Rail Fixed Guideway Public Transit System are required by law to be legally and financially independent of each other and are subject to the requirements specified in:
    - 49 U.S. Code § 5329, Public Transportation Safety Program / Fixing America's Surface Transportation (FAST) Act.
    - 49 CFR Part 674, State Safety Oversight.
    - 49 CFR Part 673, Public Transportation Agency Safety Plan.
    - 49 CFR Part 672, Public Transportation Safety Certification Training Program.
    - 49 CFR Part 671, Roadway Worker Protection Program
    - 49 CFR Part 670, National Public Transportation Safety Program.
    - 49 CFR Part 630, National Transit Database.
    - 49 CFR Part 625, Transit Asset Management

AUTHORIZED SIGNATURE:

Signature: Rodrick Holmes
Rodrick Holmes (Feb 23, 2026 18:13:16 CST)

Date: 02/23/2026

Name / Title: Trustee

Rail Transit Agency: Memphis Area Transit Authority

Appendix E: PTASP Checklist

See Attached copy of most recent FTA PTASP RTA Agency Checklist (Nov 2024)

This form can be found in the FTA PTASP Resource Library if additional, editable version(s) are needed.

This checklist must be completed and submitted with an RTA's annual safety plan approval by TDOT.

Incorporates the requirements of the PTASP final rule published in April 2024.

AGENCY SAFETY PLAN (ASP) CHECKLIST

Rail Transit Agency
Large Urbanized Area

State Safety Oversight Agency

The Federal Transit Administration (FTA) is providing this Agency Safety Plan (ASP) checklist to assist Rail Transit Agencies (RTAs) that are large urbanized area providers with developing or updating their ASPs in accordance with 49 CFR part 673, as amended by the Public Transportation Agency Safety Plans (PTASP) final rule published on April 11, 2024. State Safety Oversight Agencies (SSOAs) that must review and approve the ASP per 49 CFR part 674, State Safety Oversight, may also choose to use this checklist.

Use of this checklist is voluntary.

Checklist Key

This checklist distinguishes between PTASP requirements and ASP best practices.

- Checklist items that include PTASP sections (for example, *§ 673.11(a)(3)*) are **requirements**.
  - New PTASP requirements are marked with an orange "**NEW REQUIREMENT**."
- Checklist items that do not include PTASP sections are ASP best practices.
  - New checklist items that are best practices are marked with a teal "**NEW BEST PRACTICE**."

Examples:

☐	**NEW REQUIREMENT** 9-h-1. The process includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions. *(§ 673.23(b))*
☐	**NEW BEST PRACTICE** 2-f-3. The website address of the ASP on the transit agency website, if the agency publishes it online.

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The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Recipients and subrecipients should refer to FTA's statutes and regulations for applicable requirements.

1. Transit Agency Information

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	1-a. Name and address of the transit agency that the ASP applies to.		
☐	1-b. Accountable Executive name and/or title *(individual meets §§ 673.5 and 673.23(d)(1) requirements)*.		
☐	1-c. A Chief Safety Officer/Safety Management System (SMS) Executive name and/or title *(individual meets §§ 673.5 and 673.23(d)(2) requirements)*.		
☐	1-d. Mode(s) of transit service covered by the ASP. *(§ 673.11(b))*		
☐	1-e. Mode(s) of service provided by the transit agency (directly operated or contracted).		
☐	1-f. FTA funding types (e.g., §§ 5307, 5337, 5339).		
☐	1-g. Whether the transit agency provides transit service on behalf of another transit agency or entity, including a description of the arrangement(s).		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW BEST PRACTICE** 1-h. The transit agency serves a large urbanized area.		
☐	**NEW BEST PRACTICE** 1-h-1 Which large urbanized area(s) the transit agency serves.		
☐	1-i. The SSOA and authority for the State Safety Oversight (SSO) program.		

2. Plan Development, Approval, and Updates

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	2-a. Accountable Executive signature on the ASP and date of signature. *(§ 673.11(a)(1))*		
☐	**NEW REQUIREMENT** 2-b. Safety Committee approval of the ASP *(§ 673.11(a)(1)(i) and 673.19(d)(1))*, date of approval, and relevant approval documentation *(§ 673.31)*.		
☐	2-c. Transit agency Board of Directors or equivalent entity approval of the ASP *(§ 673.11(a)(1)(i))*, date of approval, and relevant approval documentation *(§ 673.31)*.		
☐	2-d. Review and approval by the State Safety Oversight Agency. *(§ 673.13(a))*		

☒	Checklist Item	ASP Page Number	Comments
☐	2-e. The ASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.[1] *(§ 673.11(a)(4))*		
☐	**NEW REQUIREMENT** 2-f. Any policies and procedures issued by the RTA regarding rail transit workers on the roadway. *(§ 673.11(a)(6)(ii))*		
☐	**NEW REQUIREMENT** 2-g. RTA policies and procedures developed in consultation with the SSOA to provide access and required data for the SSOA's risk-based inspection program. *(§ 673.11(a)(6)(iii))*		
☐	2-h. The process and timeline for conducting an annual review and update of the ASP. *(§ 673.11(a)(5))*		
☐	**NEW REQUIREMENT** 2-h-1. The process and timeline include the Safety Committee's activities to review and approve the ASP and any updates. *(§ 673.19(d)(1))*		

[1] Compliance with the minimum safety performance standards authorized under 49 U.S.C. 5329(b)(2)(C) is not required until standards have been established through the public notice and comment process.

☒	Checklist Item	ASP Page Number	Comments
☐	2-h-2. The ASP version number and other relevant information.		
☐	**NEW BEST PRACTICE** 2-h-3. The website address of the ASP on the transit agency website, if the agency publishes it online.		

3. Emergency Preparedness and Response Plan

The ASP includes or references an emergency preparedness and response plan or procedures that address, at a minimum:

☒	Checklist Item	ASP Page Number	Comments
☐	3-a. The assignment of transit worker responsibilities during an emergency. *(§ 673.11(a)(6)(i))*		
☐	3-b. Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the RTA's service area. *(§ 673.11(a)(6)(i))*		

4. General Annual Safety Performance Targets

For all modes[2] covered in the ASP, the ASP includes annual safety performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

☒	Checklist Item	ASP Page Number	Comments
☐	4-a. *Major Events (total)*: Based on safety and security major events as defined by the National Transit Database (NTD).[3] *(§ 673.11(a)(3))*		
☐	4-a-1. *Major Event Rate*: Based on safety and security major events as defined by the NTD, **divided by vehicle revenue miles (VRM)**. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 4-a-2. *Collision Rate*: Based on collisions reported to the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 4-a-3. *Pedestrian Collision Rate*: Based on collisions "with a person" as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		

[2] When setting SPTs based on the safety performance measures in the National Safety Plan, FTA encourages agencies to use the following high-level modal groups: rail, fixed-route bus, and non-fixed-route bus.

[3] The NTD reporting manuals are available on the NTD website.

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 4-a-4. *Vehicular Collision Rate*: Based on collisions "with a motor vehicle" as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	4-b. *Fatalities (total):* Based on fatalities as defined by the NTD. *(§ 673.11(a)(3))*		
☐	4-b-1. *Fatality Rate*: Based on fatalities as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 4-b-2. *Transit Worker Fatality Rate*: Based on transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," **divided by VRM**. *(§ 673.11(a)(3))*		
☐	4-c. *Injuries (total)*: Based on injuries as defined by the NTD. *(§ 673.11(a)(3))*		
☐	4-c-1. *Injury Rate*: Based on injuries as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 4-c-2. *Transit Worker Injury Rate*: Based on transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," **divided by VRM.** *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 4-d. *Assaults on Transit Workers (total)*: Based on assaults on transit workers as defined by the NTD. *(§ 673.11(a)(3))*		
☐	**NEW REQUIREMENT** 4-d-1. *Rate of Assaults on Transit Workers*: Based on assaults on transit workers as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(3))*		
☐	4-e. *System Reliability:* The mean distance between major mechanical system failures as defined by the NTD. *(§ 673.11(a)(3))*		

5. Annual Safety Performance Targets for the Risk Reduction Program

NEW REQUIREMENT

For all modes[4] covered in the ASP, the ASP includes the safety performance targets set by the Safety Committee for the safety risk reduction program based on the safety performance measures established under the National Public Transportation Safety Plan. The Safety Committee sets these targets based on a three-year rolling average of the data submitted by the transit agency to the NTD.[5]

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 5-a. *Major Events (total)*: Based on safety and security major events as defined by the NTD. *(§ 673.11(a)(7)(iii))*		
☐	**NEW REQUIREMENT** 5-a-1. *Major Event Rate*: Based on safety and security major events as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(7)(iii))*		
☐	**NEW REQUIREMENT** 5-b. *Collisions (total)*: Based on collisions reported to the NTD. *(§ 673.11(a)(7)(iii))*		

[4] When setting SPTs based on the safety performance measures in the National Safety Plan, FTA encourages agencies to use the following high-level modal groups: rail, fixed-route bus, and non-fixed-route bus.

[5] The Safety Committee sets the targets based on the level of detail the transit agency is required to report to NTD. The Safety Committee is not required to set a target for a performance measure until the large urbanized area provider has been required to report three years of data to the NTD corresponding to such performance measure. *(§ 673.11(a)(7)(iii)(C))*

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 5-b-1. *Collision Rate*: Based on collisions reported to the NTD, **divided by VRM**. *(§ 673.11(a)(7)(iii))*		
☐	**NEW REQUIREMENT** 5-c. *Injuries (total)*: Based on injuries as defined by the NTD. *(§ 673.11(a)(7)(iii))*		
☐	**NEW REQUIREMENT** 5-c-1. *Injury Rate*: Based on injuries as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(7)(iii))*		
☐	**NEW REQUIREMENT** 5-d. *Assaults on Transit Workers (total)*: Based on assaults on transit workers as defined by the NTD. *(§ 673.11(a)(7)(iii))*		
☐	**NEW REQUIREMENT** 5-d-1. *Rate of Assaults on Transit Workers*: Based on assaults on transit workers as defined by the NTD, **divided by VRM**. *(§ 673.11(a)(7)(iii))*		

6. Coordination with Metropolitan, Statewide, and Non-metropolitan Planning Processes

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	6-a. The transit agency makes its safety performance targets available to the State to aid in the planning process. *(§ 673.15(a))*		
☐	6-b. The transit agency makes its safety performance targets available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process. *(§ 673.15(a))*		
☐	6-c. The transit agency coordinates with the State and MPO(s) in the selection of State and MPO safety performance targets to the maximum extent practicable. *(§ 673.15(b))*		

7. Safety Risk Reduction Program

NEW REQUIREMENT

This section identifies items that transit agencies must include in their ASPs. Requirements for carrying out the safety risk reduction program using SMS processes are in § 673.25(d), which addresses safety risk reduction program requirements associated with safety risk mitigation, and § 673.27, which includes safety risk reduction program requirements associated with continuous improvement. FTA confirms that the safety risk reduction program operates within an SMS and not outside of it or in conflict with it.

The ASP specifies or references documentation that specifies the transit agency's approach to improving safety performance by addressing the following, at a minimum:

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 7-a. The reduction and mitigation of vehicular and pedestrian safety events involving transit vehicles, including mitigations consistent with § 673.25(d)(3). *(§ 673.11(a)(7)(i))*		
☐	**NEW REQUIREMENT** 7-b. The reduction and mitigation of assaults on transit workers, including mitigations consistent with § 673.25(d)(4). *(§ 673.11(a)(7)(ii))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 7-c. The safety risk mitigations identified and recommended by the Safety Committee based on a safety risk assessment for the safety risk reduction program are included or incorporated by reference in the ASP. *(§§ 673.11(a)(7)(iv) and 673.25(d)(5))*		

8. Safety Committee Establishment, Membership, and Procedures

NEW REQUIREMENT

(See the Authorities, Accountabilities, Responsibilities section of this checklist for Safety Committee responsibilities.)

The ASP specifies or references documentation that specifies the establishment of the Safety Committee and Safety Committee membership that includes:

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 8-a. The establishment and operation of a Safety Committee that is appropriately scaled to the size, scope, and complexity of the transit agency. *(§ 673.19(a)(1))*		
☐	**NEW REQUIREMENT** 8-a-1. The Safety Committee was convened by a joint labor-management process. *(§ 673.19(a)(2))*		
☐	**NEW REQUIREMENT** 8-a-2. The Safety Committee consists of an equal number of frontline transit worker representatives and management representatives. *(§ 673.19(b))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 8-a-3. To the extent possible, the Safety Committee includes frontline transit worker representatives from major transit service functions across the transit system, such as operations and maintenance. *(§ 673.19(b))*		
☐	**NEW REQUIREMENT** 8-a-4. The labor organization that represents the plurality of the transit agency's frontline transit workers (includes employees, contractors, or volunteers working on behalf of the transit agency) selected frontline transit worker representatives for the Safety Committee. *(§ 673.19(b)(1))*		
☐	**NEW REQUIREMENT** 8-a-5. If a labor organization does not represent the transit agency's frontline transit workers: The mechanism the transit agency adopted for frontline transit workers to select frontline transit worker representatives for the Safety Committee. *(§ 673.19(b)(2))*		

The ASP specifies or references documentation that specifies Safety Committee procedures for:

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 8-b. The organizational structure, size, and composition of the Safety Committee and how it will be chaired. *(§ 673.19(c)(1))*		
☐	**NEW REQUIREMENT** 8-b-1. How Safety Committee meeting agendas and notices will be developed and shared, and how meeting minutes will be recorded and maintained. *(§ 673.19(c)(2))*		
☐	**NEW REQUIREMENT** 8-b-2. Any required training for Safety Committee members related to the ASP and the processes, activities, and tools used to support the transit agency's SMS. *(§ 673.19(c)(3))*		
☐	**NEW REQUIREMENT** 8-b-3. The compensation policy established by the agency for participation in Safety Committee meetings. *(§ 673.19(c)(4))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 8-b-4. How the Safety Committee will access technical experts, including other transit workers, to serve in an advisory capacity, as needed, to support its deliberations. *(§ 673.19(c)(5))*		
☐	**NEW REQUIREMENT** 8-b-5. How the Safety Committee will access transit agency information, resources, and tools to support its deliberations. *(§ 673.19(c)(5))*		
☐	**NEW REQUIREMENT** 8-b-6. How the Safety Committee will access submissions to the transit worker safety reporting program to support its deliberations. *(§ 673.19(c)(5))*		
☐	**NEW REQUIREMENT** 8-b-7. How the Safety Committee will reach and record decisions. *(§ 673.19(c)(6))*		
☐	**NEW REQUIREMENT** 8-b-8. How the Safety Committee will coordinate and communicate with the transit agency's Board of Directors, or equivalent entity, and the Accountable Executive. *(§ 673.19(c)(7))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 8-b-9. How the Safety Committee will manage disputes to ensure it carries out its operations.[6] *(§ 673.19(c)(8))*		
☐	**NEW REQUIREMENT** 8-b-10. How the Safety Committee will carry out its responsibilities. *(§ 673.19(c)(9))*		

[6] The Safety Committee may use the dispute resolution or arbitration process from the transit agency's Collective Bargaining Agreement, or a different process that the Safety Committee develops and agrees upon, but the Accountable Executive may not be designated to resolve any disputes within the Safety Committee. *(§ 673.19(c)(8))*

9. Safety Management System

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	9-a. The transit agency's establishment and implementation of an SMS. *(§ 673.21)*		
☐	9-b. The SMS is appropriately scaled to the size, scope, and complexity of the transit agency and includes the following SMS components: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion. *(§ 673.21)*		

10. Safety Management Policy

Safety Management Policy Statement

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	10-a. Written statement of the Safety Management Policy (SMP), including the transit agency's safety objectives. *(§ 673.23(a))*		
☐	**NEW REQUIREMENT** 10-a-1. The SMP statement includes a description of the Safety Committee. *(§ 673.23(a))*		
☐	10-b. How the transit agency communicates the SMP throughout the organization. *(§ 673.23(c))*		

Authorities, Accountabilities, and Responsibilities for Management of Safety

The ASP specifies or references documentation that specifies the necessary authorities, accountabilities, and responsibilities for the management of safety related to the development and management of the transit agency's SMS for the following individuals or groups *(§ 673.23(d))*:

☒	Checklist Item	ASP Page Number	Comments
☐	10-c. Accountable Executive 10-c-1. Accountable for ensuring the SMS is effectively implemented throughout the system and action is taken, as necessary, to address substandard performance in the SMS. *(§ 673.23(d)(1))*		
☐	10-c-2. Has ultimate responsibility for carrying out the ASP and the Transit Asset Management (TAM) Plan. *(§ 673.5)*		
☐	10-c-3. Has control or direction over the human and capital resources needed to develop and maintain the ASP and the TAM Plan. *(§ 673.5)*		
☐	10-c-4. May delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. *(§ 673.23(d)(1))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 10-c-5. Implements safety risk mitigations for the safety risk reduction program that are included in the ASP under § 673.11(a)(7)(iv). *(§ 673.23(d)(1)(i))*		
☐	**NEW REQUIREMENT** 10-c-6. Receives and considers all other safety risk mitigations recommended by the Safety Committee. *(§§ 673.23(d)(1)(ii) and 673.25(d)(6))*		
☐	10-d. Chief Safety Officer or SMS Executive 10-d-1. Designated by the Accountable Executive and has the authority and responsibility for day-to-day implementation and operation of the SMS. *(§ 673.23(d)(2))*		
☐	10-d-2. Holds a direct line of reporting to the Accountable Executive.[7] *(§ 673.23(d)(2))*		

[7] A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer or SMS Executive. (§ 673.23(d)(2))

The CSO must be able to communicate directly with the Accountable Executive about safety issues without interruption or intermediaries. Agencies may use a "dotted line" report on an organizational chart to indicate that the CSO has the authority to speak with the Accountable Executive at any time regarding a safety issue, even if another employee supervises the CSO.

☒	Checklist Item	ASP Page Number	Comments
☐	10-d-3. Is an adequately trained individual who has responsibility for safety. *(§ 673.5)*		
☐	10-d-4. Does not serve in other operational or maintenance capacities. *(§ 673.5)*		
☐	**NEW REQUIREMENT** 10-e. Safety Committee 10-e-1. Reviews and approves the ASP and any updates (before approval by the Board of Directors/equivalent entity). *(§§ 673.11(a)(1)(i) and 673.19(d)(1))*		
☐	**NEW REQUIREMENT** 10-e-2. Sets annual safety performance targets for the safety risk reduction program. *(§§ 673.11(a)(7)(iii) and 673.19(d)(2))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 10-e-3. Identifies and recommends safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program. *(§§ 673.19(d)(3)(i) and 673.25(d)(1))*		
☐	**NEW REQUIREMENT** 10-e-4. Identifies safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program. *(§§ 673.19(d)(3)(ii) and 673.27(b)(2))*		
☐	**NEW REQUIREMENT** 10-e-5. Identifies safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program. *(§§ 673.19(d)(3)(iii)) and 673.27(d))*		

☒	Checklist Item	ASP Page Number	Comments
☐	10-f. Transit agency leadership and executive management *(§ 673.23(d)(4))* Those leadership or executive management members, other than the Accountable Executive and Chief Safety Officer/SMS Executive, who have authorities or responsibilities for the day-to-day implementation and operation of the SMS.		
☐	10-g. Key staff *(§ 673.23(d)(5))* Key staff, groups of staff, or committees that support the Accountable Executive, Chief Safety Officer/SMS Executive, and Safety Committee in developing, implementing, and operating the SMS.		

Transit Worker Safety Reporting Program

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	10-h. A process that allows transit workers to report safety concerns to senior management. *(§ 673.23(b))*		
☐	**NEW REQUIREMENT** 10-h-1. The process includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions. *(§ 673.23(b))*		
☐	10-h-2. The process includes protections for transit workers who report. *(§ 673.23(b))*		
☐	10-h-3. The process includes a description of transit worker behaviors that may result in disciplinary action and, therefore, are excluded from protection. *(§ 673.23(b))*		

11. Safety Risk Management

A transit agency must develop and implement a Safety Risk Management process for all elements of its system. *(§ 673.25(a))*

Hazard Identification

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	11-a. Methods or processes to identify hazards and potential consequences of the hazards. *(§ 673.25(b)(1))*		
☐	11-a-1. As a source for hazard identification, the transit agency considers data and information provided by an oversight authority, including but not limited to FTA, the State, or as applicable, the SSOA having jurisdiction. *(§ 673.25(b)(2)(i))*		
☐	**NEW REQUIREMENT** 11-a-2. As a source for hazard identification, the transit agency considers data and information regarding exposure to infectious diseases provided by the Centers for Disease Control and Prevention (CDC) or a State health authority. *(§ 673.25(b)(2)(ii))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 11-a-3. As a source for hazard identification, the transit agency considers safety concerns identified through its Safety Assurance activities. *(§ 673.25(b)(2)(iii))*		

Safety Risk Assessment

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	11-b. Methods or processes to assess the safety risk associated with identified hazards. *(§ 673.25(c)(1))*		
☐	11-b-1. An assessment includes assessing the likelihood and severity of the potential consequences of identified hazards. *(§ 673.25(c)(2))*		
☐	11-b-2. Assessment determines if safety risk mitigation is necessary and informs prioritization of safety risk mitigations. *(§ 673.25(c)(2))*		
☐	11-b-3. Assessment takes into account existing safety risk mitigations. *(§ 673.25(c)(2))*		

Safety Risk Mitigation

Note: Where indicated, this section addresses elements of the safety risk reduction program.

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	11-c. Methods or processes to identify safety risk mitigations or strategies necessary as a result of the transit agency's safety risk assessment to reduce the likelihood and severity of potential consequences. *(§ 673.25(d)(1))*		
☐	**NEW REQUIREMENT** 11-c-1. The methods/processes address the role of the Safety Committee in identifying safety risk mitigations. *(§§ 673.19(d)(3)(i) and 673.25(d)(1))*		
☐	**NEW REQUIREMENT** 11-c-2. As a source for safety risk mitigation, the agency considers guidance provided by an oversight authority, if applicable, and FTA. *(§ 673.25(d)(2)(i))*		
☐	**NEW REQUIREMENT** 11-c-3. As a source for safety risk mitigation, the agency considers guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority. *(§ 673.25(d)(2)(ii))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 11-d. When the Safety Committee recommends a safety risk mitigation unrelated to the safety risk reduction program and the Accountable Executive decides not to implement the safety risk mitigation, the Accountable Executive prepares a written statement explaining their decision and submits and presents it to the transit agency's Safety Committee and Board of Directors or equivalent entity. *(§ 673.25(d)(6))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 11-e. When identifying safety risk mitigations for the safety risk reduction program related to vehicular and pedestrian safety events involving transit vehicles, including to address a missed safety performance target set by the Safety Committee for the safety risk reduction program, the transit agency and its Safety Committee consider mitigations to reduce visibility impairments for transit vehicle operators that contribute to accidents, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments. *(§§ 673.11(a)(7)(i) and 673.25(d)(3))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT (safety risk reduction program)** 11-f. When identifying safety risk mitigations for the safety risk reduction program related to assaults on transit workers, including to address a missed safety performance target set by the Safety Committee for the safety risk reduction program, the transit agency and Safety Committee consider the deployment of assault mitigation infrastructure and technology on transit vehicles and in transit facilities, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators. *(§§ 673.11(a)(7)(ii) and 673.25(d)(4))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 11-g. The transit agency includes or incorporates by reference in the ASP the safety risk mitigations the Safety Committee identifies and recommends based on a safety risk assessment as a part of the safety risk reduction program, including mitigations relating to vehicular and pedestrian safety events involving transit vehicles or assaults on transit workers. *(§§ 673.11(a)(7)(iv) and 673.25(d)(5))*		

12. Safety Assurance

Safety Performance Monitoring and Measurement

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	12-a. Activities to monitor the system for compliance with and sufficiency of the transit agency's procedures for operations and maintenance. *(§ 673.27(b)(1))*		
☐	12-b. Activities to monitor the transit agency's operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. *(§ 673.27(b)(2))*		
☐	**NEW REQUIREMENT** 12-b-1. The Safety Committee's role in safety risk mitigation monitoring. *(§§ 673.19(d)(3)(ii) and 673.27(b)(2))*		
☐	12-c. Activities to conduct investigations of safety events to identify causal factors. *(§ 673.27(b)(3))*		
☐	12-d. Activities to monitor information reported through any internal safety reporting programs. *(§ 673.27(b)(4))*		

Management of Change

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	12-e. A process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. *(§ 673.27(c)(1))*		
☐	12-e-1. Proposed changes that may impact the transit agency's safety performance are evaluated through its Safety Risk Management process. *(§ 673.27(c)(2))*		

Continuous Improvement

Note: Where indicated, this section also addresses elements of the safety risk reduction program.

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	12-f. A process to assess the transit agency's safety performance **annually**. *(§ 673.27(d)(1))*		
☐	**NEW REQUIREMENT** 12-f-1. The process includes identifying deficiencies in the SMS and the agency's performance against its (general) safety performance targets. *(§ 673.27(d)(1)(i))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-f-2. The process includes identifying deficiencies in the agency's performance against annual safety performance targets set by the Safety Committee for the safety risk reduction program. *(§ 673.27(d)(1)(ii))*		
☐	**NEW REQUIREMENT** 12-f-3. The process includes the Safety Committee's role in continuous improvement. *(§§ 673.19(d)(3)(iii) and 673.27(d)(1)(ii))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT** 12-f-4. The process addresses any specific internal safety review requirements established by the SSOA. *(§ 673.27(d)(1)(iii))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-g. Activities to monitor safety performance against annual safety performance targets set by the Safety Committee for the safety risk reduction program. *(§ 673.27(d)(2))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-h. If the agency does not meet an established annual safety performance target set by the Safety Committee for the safety risk reduction program:		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-h-1. The agency assesses the associated safety risk through its safety risk assessment process. *(§ 673.27(d)(3)(i))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-h-2. The agency mitigates the associated safety risk based on the results of a safety risk assessment using its safety risk mitigation process. *(§ 673.27(d)(3)(ii))*		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-h-3. The mitigations developed when an agency does not meet a safety risk reduction program safety performance target are included or incorporated by reference in the ASP. *(§§ 673.11(a)(7)(iv), 673.25(d)(5), and 673.27(d)(3)(ii))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-h-4. The agency allocates its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to help it meet missed safety performance target(s) for the safety risk reduction program in the future. *(§ 673.27(d)(3)(iii))*		
☐	12-i. How the transit agency develops and carries out a plan(s) under the direction of the Accountable Executive to address any deficiencies identified through the safety performance assessment process. *(§ 673.27(d)(4))*		
☐	**NEW REQUIREMENT (safety risk reduction program)** 12-i-1. The plan also includes the mitigations developed when an agency does not meet a safety risk reduction program safety performance target. *(§§ 673.27(d)(3)(ii) and (d)(4))*		

13. Safety Promotion

Competencies and Training

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	13-a. The transit agency established and implemented a comprehensive safety training program. *(§ 673.29(a)(1))*		
☐	**NEW REQUIREMENT** 13-a-1. The safety training program is for all operations transit workers, maintenance transit workers, and transit workers directly responsible for safety. *(§§ 673.29(a)(1)–(2))*		
☐	**NEW REQUIREMENT** 13-a-2. The safety training program includes de-escalation training. *(§ 673.29(a)(1))*		
☐	**NEW REQUIREMENT** 13-a-3. The safety training program includes safety concern identification and reporting training. *(§ 673.29(a)(1))*		
☐	13-a-4. The safety training program includes refresher training, as necessary. *(§ 673.29(a)(1))*		

Safety Communication

The ASP specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	13-b. How the transit agency communicates safety and safety performance information throughout its organization. *(§ 673.29(b))*		
☐	13-b-1. How the transit agency conveys information on hazards and safety risk relevant to transit workers' roles and responsibilities. *(§ 673.29(b))*		
☐	13-b-2. How the transit agency conveys the safety actions taken in response to reports submitted through the transit worker safety reporting program. *(§ 673.29(b))*		
☐	**NEW REQUIREMENT** 13-b-3. How the transit agency conveys the results of Safety Committee activities. *(§ 673.29(b))*		

14. State Safety Oversight Agency Requirements

Some SSOA program standards may require ASPs to include additional elements. **This section is intended only to illustrate possible examples of these elements (or best practices). Please refer to the applicable SSOA program standard for any specific requirements.**

Internal Safety Reviews

The ASP addresses any applicable SSOA requirements related to internal safety reviews, such as:

☒	Checklist Item	ASP Page Number	Comments
☐	14-a. Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA program standard.		
☐	14-b. Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature.		

Safety Event Investigations

The ASP addresses any applicable SSOA requirements related to safety event investigations, such as:

☒	Checklist Item	ASP Page Number	Comments
☐	14-c. SSOA requirements for notifying the SSOA of safety events including time limits for and methods of notification and what information the RTA must submit to the SSOA.		
☐	14-d. FTA requirements to notify the SSOA and FTA within two hours of any safety events occurring on the RTA system.		
☐	14-e. What must be included in any investigation report developed on behalf of the SSOA, including identification of factors that caused or contributed to the safety event and setting forth a Corrective Action Plan (CAP) as appropriate.		
☐	14-f. How the RTA will work with the SSOA when conducting its own internal investigation of a safety event.		
☐	14-g. The process through which the RTA will review investigation reports developed by the SSOA and submit written dissent, as appropriate.		

☒	Checklist Item	ASP Page Number	Comments
☐	14-h. Training requirements for all personnel and contractors that conduct investigations on behalf of an SSOA in accordance with the Public Transportation Safety Certification Training Program.		

Corrective Action Plans

The ASP addresses applicable SSOA requirements regarding CAPs, such as:

☒	Checklist Item	ASP Page Number	Comments
☐	14-i. When the RTA must develop and carry out a CAP.		
☐	14-j. How the RTA will submit CAPs to the SSOA for review and approval.		
☐	14-k. How the RTA will manage immediate or emergency corrective actions.		

☒	Checklist Item	ASP Page Number	Comments
☐	14-l. The required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.		
☐	14-m. How the RTA must periodically report to the SSOA on its progress in carrying out CAPs.		

15. Additional Information

Part 673 does not require transit agencies to include the following information in their ASPs. However, a transit agency could specify or reference documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	15-a. Definitions of terms used in the ASP.		
☐	15-b. List of acronyms used in the ASP.		
☐	15-c. Certification of compliance with part 673 in the Transit Award Management System (TrAMS), including: 15-c-1. Name of the individual or entity that certifies compliance; and		
☐	15-c-2. Date of certification.		
☐	**NEW BEST PRACTICE** 15-d. Description of recordkeeping process for documents that set forth the ASP, including those related to the implementation of SMS; results from SMS processes and activities; and those included in whole, or by reference, that describe the programs, policies, and procedures that the transit agency uses to carry out its ASP.		

☒	Checklist Item	ASP Page Number	Comments
☐	**NEW BEST PRACTICE** 15-d-1. Includes how documents will be made available upon request by FTA or other Federal entity, a State, or a State Safety Oversight Agency having jurisdiction.		
☐	**NEW BEST PRACTICE** 15-d-2. Includes that the transit agency will maintain these documents for a minimum of three years after they are created.		