



Pennsylvania Department of Transportation State Safety Oversight Agency

Program Standard

July 2023

**ADMINISTERED BY:
PENNSYLVANIA DEPARTMENT OF TRANSPORTATION
STATE SAFETY OVERSIGHT DIVISION
400 NORTH STREET, 7TH FLOOR
HARRISBURG, PA 17120**

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Policy Statement and Signatures

1.1 Policy Statement

Ensuring the safety and security of fixed guideway transit in the Commonwealth of Pennsylvania (also referred to as “Pennsylvania”) is of the utmost importance, and as the designated State Safety Oversight Agency (SSOA), the Pennsylvania Department of Transportation (“PennDOT”) maintains this *Program Standard*.

The PennDOT SSOA derives its authority from Pennsylvania State Law, Title 74 Part II (Public Transportation). With this authority, PennDOT acts as the designated SSOA responsible for oversight of fixed guideway transit systems in Pennsylvania to meet Federal Transit Administration (FTA) requirements.

In response to federal requirements precipitated by the Moving Ahead for Progress in the 21st Century Act (hereafter “MAP-21”) of 2012, the Commonwealth enacted the 2013 amendment to Title 74 (known as “Act 89”), which is discussed in more detail in Section 2.2 of this document.

The PennDOT SSOA *Program Standard* is the governing document for rail safety and security oversight specifying the requirements that rail fixed guideway public transportation systems within the Commonwealth of Pennsylvania must meet to comply with federal and state safety laws and rules including 49 U.S.C § 5329, Public Transportation Safety Program / Fixing America's Surface Transportation Act of 2015, as amended by the Infrastructure Investment and Jobs Act of 2021 and the associated regulations, 49 C.F.R. Part 672, Public Transportation Safety Certification Training Program; 49 C.F.R. Part 674, State Safety Oversight; and 49 C.F.R. Part 673, Public Transportation Agency Safety Plan.

Meredith Biggica

7/1/2023



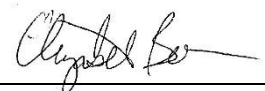
Deputy Secretary for Multimodal Transportation
Pennsylvania Department of Transportation

Date

Signature

Elizabeth G. Bonini, WSO-CSE, TSSP (Rail)

7/1/2023



PennDOT SSOA
State Safety Oversight Division Chief
Pennsylvania Department of Transportation

Date

Signature

2. PennDOT SSOA Authority and Management

PennDOT is the designated agency (49 C.F.R. Part 674.13) for fixed guideway safety and security oversight in the Commonwealth of Pennsylvania. The PennDOT SSOA is authorized to develop, operate, and maintain the safety and security review program. PennDOT SSOA was previously known as the Rail Transit Safety Review Program (RTSRP); however, will be known as the “PennDOT SSOA” effective with receipt of the *2023 Program Standard*. The PennDOT SSOA was established in 1991 as the RTSRP to fulfill requirements of revised Pennsylvania statutes in Title 74. The current state safety oversight (SSO) program for fixed guideway transit safety dates back to section 3029 of the 1991 Intermodal Surface Transportation Efficiency Act (“ISTEA”) (Pub. L. 102– 240). In enacting section 3029, Congress determined that the states, not the FTA, should be the principal oversight authorities for rail transit within their jurisdictions, given that public transportation is an inherently local activity which, with few exceptions, does not cross state boundaries. The PennDOT SSOA also fulfills the requirements of the FTA SSO Rule 49 C.F.R. § 674, requiring oversight of safety of rail fixed guideway public transportation systems (RFGPTS). The PennDOT SSOA reserves the right to update this *Program Standard* as additional regulation or guidance is released.

The PennDOT SSO program is legally and financially independent from covered RFGPTS (also known as rail transit agencies (RTAs)). As depicted in PennDOT’s Organizational Chart in Appendix H, the State Safety Oversight Division within the Bureau of Rail, Freight, Ports, and Waterways is responsible for SSOA duties, reports to the Deputy Secretary for Multimodal Transportation, separate from the Bureau of Public Transit, which is responsible for grant funding available to the RTAs for which the SSOA has direct safety oversight powers. The PennDOT SSOA continues to strengthen the oversight program by incorporating new safety and security standards, initiatives, and identified industry best practices.

2.1 Authority Under 49 U.S.C. § 5329(e)

In October 2012, MAP-21 provisions took effect, including new regulatory requirements for states implementing SSO programs in their jurisdictions. Explicit mandates in 49 U.S.C. § 5329(e)(3)-(4) require states to obtain enforcement authority for administering SSO programs of covered RTAs. States must provide their SSOAs with this authority as a condition of the receipt of federal grant funds apportioned under 49 U.S.C. Chapter 53. To maintain eligibility for federal public transportation funding, each state must identify the specific authorities and capabilities that it will use to enforce 49 U.S.C. § 5329(e) provisions.

2.2 Authority Under Pennsylvania Act 89

In 2013, Pennsylvania enacted an amendment to Title 74 (see 74 Pa.C.S.A. § 1510(b) that established enforcement authority for the PennDOT SSOA. The amendment, also known as Act 89, contains language enabling PennDOT to incorporate and comply with requirements and perform the functions specified by 49 U.S.C. § 5329 and the regulations set forth in 49 C.F.R. Part 674

2.3 Authority Under 49 C.F.R. § 674

On March 16, 2016, the FTA released the final SSO rule, 49 C.F.R. § 674 (hereafter “Part 674”). The effective date for this rule is April 15, 2016. Three years after this date, the SSO rule 49 C.F.R. § 659 (hereafter “Part 659”) was rescinded and only Part 674 remains in effect. Within this same timeframe, each designated SSOA was required to achieve certification. The PennDOT SSOA was certified by the FTA Administrator in accordance with 49 CFR Part 674.19 on April 23, 2018. Refer to Appendix G for the Approval and Certification.

Part 674 contains several changes that affected SSOA and RTA activities. These changes include new accident notification criteria, new nomenclature, enhanced enforcement authority for SSOAs, increased SSOA involvement in the corrective action plan (CAP) process, and the requirement for SSOAs to establish minimum safety standards for all rail fixed guideway public transportation systems within its oversight, as detailed in Part 674.25(a).

2.4 PennDOT SSOA Oversight of 49 C.F.R. § 673

On July 19, 2018, the FTA released the Public Transportation Agency Safety Plan (PTASP) Final Rule, 49 C.F.R. § 673 (hereafter “Part 673”). This rule requires all transit agencies that receive funding under 49 U.S.C. Chapter 53 to develop and maintain a PTASP. As the SSOA, PennDOT is required to review and approve the PTASP of each covered RTA.

2.5 PennDOT SSOA Implementation and Oversight of 49 C.F.R. § 672

On July 19, 2018, the FTA released the Public Transportation Safety Certification Training Program (PTSCTP) Final Rule, 49 C.F.R. § 672 (hereafter “Part 672”). This rule dictates training requirements for individuals involved in the oversight of RTAs that receive funding under 49 U.S.C. Chapter 53, as well as designated employees at those agencies. In addition to completing specified training, SSO personnel and contractors conducting safety audits and examinations must also develop and follow a technical training plan (TTP). The PennDOT SSOA also encourages all RTAs to ensure that all employees, including executive teams, are trained and familiar with safety management system (SMS) principles.

The mandatory components of Part 672 training consist of the PTSCTP certification and SMS curriculum. PTSCTP coursework mandatory for designated SSO and RTA personnel (to be completed within a three-year period) includes:

- Transit Rail System Safety
- Transit Rail Incident Investigation
- Effectively Managing Transit Emergencies

The SMS Curriculum includes:

- SMS Awareness
- Safety Assurance
- SMS Principles for Transit
- SMS Principles for SSO Programs

In addition to the PTSCTP, the PennDOT SSOA also requires its employees to obtain the Transit Safety and Security Program (TSSP) certification, which includes an additional 29.5-hour Transit System Security course.

In accordance with Part 672, the PennDOT SSOA developed an Individual Training Plan (ITP) for each SSOA personnel and contractor designated to conduct safety audits and examinations of rail transit systems. Training records for SSOA personnel who perform safety audits and examinations, including refresher training to be completed every two years, will be retained for at least five years.

2.5.1 Part 672 Training Requirements for RTAs

In accordance with Part 672, RTAs and contractors who have been designated as directly responsible for the safety oversight must complete safety training that consists of minimum requirements to enhance the technical proficiency of rail transit safety personnel. In addition to this rule, RTAs must ensure that designated employees receive refresher training every two years following the receipt of the PTSCTP, including a minimum of one hour of safety oversight training, supplied by the SSOA. RTAs are required to describe their refresher training program in their

PTASP for review and approval. Individuals identified by the RTA as directly responsible for the safety oversight are required to obtain an ITP and records for training are to be made available to the PennDOT SSOA upon request.

The PennDOT SSOA requires an RTA's Accountable Executive to receive basic SMS training, including the Transportation Safety Institute's (TSI's) SMS Awareness one-hour online course and RTA-specific SMS training. Additionally, initial familiarization and refresher training regarding the RTAs' employee safety reporting programs is required for RTA safety staff. Under Part 672, RTAs are required to:

- Implement a uniform safety certification training curriculum and requirements to enhance the technical proficiency of individuals who conduct safety audits and examinations of public transportation systems operated by public transportation agencies and those who are directly responsible for safety oversight of public transportation agencies. This does not preempt any safety certification training requirements required by PennDOT SSOA for public transportation agencies within its jurisdiction. 49 C.F.R. § 672.1.
- In general, Part 672 applies to all recipients of Federal financial assistance under 49 U.S.C. chapter 53. The mandatory requirements of this rule applies only to PennDOT SSOA personnel and contractors that conduct safety audits and examinations of rail fixed guideway public transportation systems, and designated personnel and contractors who are directly responsible for the safety oversight of a recipient's rail fixed guideway public transportation systems. Other FTA recipients may participate voluntarily in accordance with this part. 49 C.F. R. § 672.3.

2.5.2 PennDOT SSOA Oversight of Bipartisan Infrastructure Law H.R. 3684

On November 15, 2021, the President of the United States signed H.R. 3684, Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act, Pub. L. 117-58 (Nov. 15, 2021), 135 Stat. 429, into law. The BIL incorporated significant increased federal funding for transportation and infrastructure projects. Included in Section 30012 of this act are new requirements for fixed guideway transit systems and SSOA program requirements.

The additional requirements include:

- In addition to existing inspection activities such as triennial audits, the PennDOT SSOA and the RTAs must develop formal procedures for a risk-based inspection program that includes unannounced inspections of RTA vehicles and facilities. PennDOT is not required to notify an RTA of the inspection before arrival to the scene. This new policy for inspections must be documented in both the PennDOT SSOA Program Standard and in the agencies' PTASPs.
- PTASPs must document how the RTA policies will be consistent with Centers for Disease Control and Prevention (CDC) or state health department guidelines to minimize exposure to infectious diseases as part of the required process to minimize the exposure of the public and RTA personnel to hazards and unsafe conditions.
- RTAs serving an urbanized area with a population of fewer than 200,000 must develop their PTASP in cooperation with frontline employee representatives.
- RTAs that are recipients of FTA's Urbanized Area Formula Program (49 U.S.C. § 5307) funds ("Section 5307 funds") that service urbanized areas with populations of 200,000 or more are required to undertake the following activities:
 - RTAs must establish a Safety Committee, composed equally of representatives that are frontline employees and management, or if applicable, a contractor to the recipient, to the extent frontline employees are represented by labor organizations. The frontline employee representatives on this committee should be selected by the labor organization and management. The labor organization that the frontline workers are part of must be the labor organization that represents the largest plurality of frontline workers.

- The Safety Committee is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the RTA's safety risk assessments.
- The Safety Committee is required to approve the RTA's PTASP along with the Accountable Executive and the Board of Directors or Equivalent Authority.
- RTAs are required to develop, and add to their PTASP, a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the National Transit Database (NTD).
- RTAs must set risk reduction performance targets using a three-year rolling average of the data submitted to the NTD and allocate not less than 0.75 percent of their Section 5307 funds to safety related projects.
- RTAs must develop a comprehensive staff training program for operations personnel and personnel directly responsible for safety of the recipient that includes the completion of a safety training program and continuing safety education and training. RTAs must require maintenance personnel to meet the existing safety training requirements and safety, operations, and maintenance personnel to complete de-escalation training.

2.6 PennDOT SSOA Enforcement Authority and Other Regulatory Entities

2.6.1 Enforcement Authority

The Program Standard is designed to include the requirements and expectations related to current regulations codified in 49 C.F.R. Parts 672, 673, and 674, as well as other Federal, State, and local safety standards. As required by the FTA, under 74 Pa.C.S. § 1510, the PennDOT SSOA has the authority to take action in response to allegations of non-compliance, RTA violations of PennDOT SSOA requirements promulgated in accordance with the SSO rules (see Part 674, Part 673, and Part 672) and Special Directive(s) from the FTA. PennDOT adopts the following processes to enforce action to be taken by RTAs. PennDOT authority determines the appropriate actions to be taken based on the severity of a violation, deficiency, safety issue, and/or emergency. Based on the BIL, the PennDOT SSOA also has authority to collect and analyze data and conduct risk-based inspections of rail fixed guideway transportation systems.

2.6.1.1 Emergency Suspension of Service

Emergency suspension of service will be imposed where the RTA is either unable or unwilling to take appropriate action in response to an unacceptable hazard. In the event that PennDOT SSOA issues an emergency suspension of service order, the following protocols will be followed:

- a. The Pennsylvania Secretary of Transportation or designee will provide notice of the emergency suspension, in the form of an official order, directing the RTA to cease service on a particular infrastructure component, vehicle, fleet, facility, or mode, and identify the reason for the emergency suspension.
- b. Upon receipt of the order suspending service, the RTA must immediately suspend its service as directed by the order, begin to take steps to remediate the reason for the emergency suspension, and inform PennDOT SSOA of the actions and specific timeline to remediate the violation, deficiency, or safety issue.
- c. Upon resolution/mitigation of the violation, deficiency, or safety issue, the RTA shall provide documentation to PennDOT SSOA so that it may verify that the hazard is adequately resolved or mitigated to an acceptable level.
- d. Upon approval of the RTA's remediation, PennDOT SSOA will issue written notice authorizing the RTA to resume service. In the alternative, if PennDOT SSOA finds that the violation, deficiency, or safety issue

has not been resolved, PennDOT SSOA will issue notice to the RTA indicating that the matter has not been resolved, that the suspension shall continue, and that additional remediation by the RTA is required.

- e. If the RTA contests the emergency suspension of service or PennDOT SSOA's determination that the violation, deficiency, or safety issue has not been resolved, the RTA may request a hearing through the Administrative Docket Clerk within 30 calendar days of receiving notice of the suspension and/or the PennDOT SSOA's determination to continue the suspension. The administrative proceedings before the Pennsylvania Department of Transportation shall comply with the statutory and regulatory requirements set forth in 2 Pa.C.S. §§ 501— 508, 1 Pa.C.S. Part II, and 67 Pa. Code §§ 491.1. — 491.13. The RTA's due process rights shall include the right to representation, examination and cross-examination of witnesses, and a complete record of the proceedings (see 2 Pa.C.S. §§ 502, 504, 505). An appeal to court from the Pennsylvania Department of Transportation's final order with respect to the adjudication is governed by 2 Pa.C.S. §§ 701—704.

2.6.1.2 Suspension or Redirection of Grant Funding Due to Failure to Address a Safety Violation

In addition to or in place of an emergency suspension of service following an RTA's violation, deficiency, or safety issue, the following protocols may be initiated:

- a. PennDOT SSOA will provide notice, in the form of an official correspondence or report, to the RTA requesting performance of a hazard analysis to evaluate the violation, deficiency, or safety issue. The notice shall include a reasonable return date for the RTA to provide a copy of the safety review analysis to PennDOT SSOA.
- b. Upon receipt, PennDOT SSOA will review the hazard analysis. If PennDOT SSOA rejects the analysis, or the RTA has not provided the hazard analysis within the time period set forth in the notice, PennDOT SSOA shall:
 - 1. Require an executive level meeting between PennDOT SSOA and the RTA to discuss the concern and agree upon how to resolve the violation, deficiency, or safety issue.
 - i. If a solution is agreed upon, the RTA and PennDOT SSOA shall memorialize the solution through amendment of the hazard analysis submitted by the RTA, and the RTA shall promptly begin to address the violation, deficiency, or safety issue. See Section 4 for more detail regarding hazard resolution.
 - ii. If no solution is agreed upon, and the violation, deficiency, or safety issue remains, PennDOT SSOA will issue notice to the RTA that grant funding will be suspended or redirected towards addressing the violation, deficiency, or safety issue until the issue is remediated to the satisfaction of PennDOT SSOA.
- c. If the RTA wants to contest the suspension or redirection of its grant funds, it may request a hearing through the Administrative Docket Clerk within 30 calendar days of receiving notice of the grant funding being suspended or redirected. Please reference Section 2.6 below relating to any administrative or appeal process.
- d. If PennDOT SSOA agrees with the hazard analysis, PennDOT SSOA shall promptly send written approval to the RTA and, upon receipt of the written approval, the RTA shall promptly begin to address the violation, deficiency, or safety issue as set forth in the hazard analysis.
- e. Upon resolution of the violation, deficiency, or safety issue, the RTA shall provide written notice to PennDOT SSOA, and PennDOT SSOA shall confirm the violation, deficiency, or safety issue has been adequately resolved. If PennDOT SSOA determines that the RTA has not resolved the violation, deficiency, or safety issue adequately, PennDOT SSOA shall follow the procedures set forth in Section 2.5 to enforce further remediation as necessary.



2.6.1.3 PennDOT SSOA Escalation

If PennDOT SSOA is not satisfied with the quantity or quality of information or timeliness of response from the RTA, a follow-up request directly to the Chief Safety Officer (“CSO”) with a requirement to respond within a designated timeframe that will be defined in the request to fulfill the information request. If the RTA CSO does not satisfactorily fulfil the request within the designated timeframe, PennDOT SSOA will elevate the request to the Accountable Executive for immediate remedy. Failure to remedy the request by the Accountable Executive will result in the concern escalating via letter to the RTA Board and Secretary of Transportation. As a part of the letter to the RTA Board, PennDOT SSOA may require an emergency meeting with Board Chair, Accountable Executive and CSO (and others as appropriate).

2.6.2 Cross-Reference to Other Pennsylvania Statutes and Regulations

Chapter 427 of Title 67 of the Pennsylvania Code contains regulations governing RTAs. The purpose of Chapter 427 is to implement Chapter 15 of Title 74 of the Pennsylvania Consolidated Statutes (Transportation Code), 74 Pa.C.S. §§1501—1520, and initiate and maintain financial and performance review and oversight of programs that receive financial assistance under Chapter 15. The transit agencies also receive funding pursuant to 74 Pa.C.S. 1513 and therefore, are subject to the relevant regulations set forth in Chapter 427, including audits and performance reviews.

The Pennsylvania Code also contains regulations that govern the inspection and certification of electric mass transit vehicles 67 Pa. Code §§ 257.1—257.14. The regulations prohibit a mass transit vehicle from being operated unless it displays a current and valid certificate of inspection. These regulations are relevant to PennDOT SSOA because they ensure that deficient equipment is removed from service. As part of the review program, PennDOT reviews vehicle inspection records during routine audits of inspection and maintenance programs to ensure vehicles have maintained certification under this program.

2.6.3 Other Regulatory Entities

Aside from PennDOT SSOA’s enforcement and oversight, there are other Commonwealth agencies that regulate the covered RTAs. The Pennsylvania Department of Labor and Industry (L&I) has regulations that govern inclines (see 34 Pa. Code Chapter 7). L&I also has regulations that govern railroad sanitation (see 34 Pa. Code Chapter 41, Subchapter B).

The Pennsylvania State Police and local police have enforcement authority with respect to operation of mass transit vehicles (see 75 Pa.C.S. §4701—4733). In accordance with Section 4703(f), a police officer may stop a mass transit vehicle and request to see the official certificate of inspection. Pursuant to Section 4704, a police officer may also inspect and remove from service a mass transit vehicle that is found to be in an unsafe condition. In the event that violations under Chapter 47 are found, fines may be imposed and the vehicles in violation may be prohibited from operation (see 75 Pa.C.S. §§ 4703—4704).

Further, if actions uncovered during a review involve criminal matters that would be subject to the authority of the Pennsylvania Office of Attorney General (OAG), the matter would be submitted to the OAG for investigation and prosecution if appropriate (see 71 P.S. §§ 732-205 & 732-206). For instance, the OAG has the authority to prosecute “[c]riminal charges against State officials or employees affecting the performance of their public duties or the maintenance of public trust and criminal charges against persons attempting to influence such State officials or employees or benefit from such influence or attempt to influence” (see 71 P.S. §732-205(a)(1)).

2.7 Due Process

If a finding or other action by PennDOT SSOA constitutes an “adjudication,” the RTA is entitled to request a hearing to challenge the validity of the adjudication before PennDOT through PennDOT’s Office of the Administrative Docket Clerk. An adjudication is defined as “[a]ny final order, decree, decision, determination or ruling by an agency affecting personal or property rights, privileges, immunities, duties, liabilities, or obligations of any or all of the parties to the proceeding in which the adjudication is



made” (see 2 Pa.C.S. § 101). Section 504 of the Administrative Agency Law, 2 Pa.C.S. § 504, states that “no adjudication of a Commonwealth agency shall be valid as to any party unless he shall have been afforded reasonable notice of a hearing and an opportunity to be heard.”

2.8 Policies and Procedures

In conjunction with the *Program Standard*, PennDOT SSOA has established a series of standard operating procedures (SOPs), safety standards, and manuals that incorporate its policies for operation.

2.8.1 Safety Standards

- PennDOT SSOA (formerly RTSRP) Safety Standard 100 – 1.2: Roadway Worker Protection

2.8.2 Standard Operating Procedures

- Standard Operating Procedure 100 – 1.4: Safety and Security Audits and Reporting
- Standard Operating Procedure 100 – 2.4: Corrective Action Plans
- Standard Operating Procedure 100 – 3.5: Operations and Stations Reviews
- Standard Operating Procedure 100 – 4.1: Event Investigation
- Standard Operating Procedure 100 – 5.2: Risk-Based Assessment Outline
- Standard Operating Procedure 100 - 6.1: Speed Detection Device

PennDOT SSOA SOPs are provided to RTAs as they are released, as well as when updates are made. RTAs may also reach out to PennDOT SSOA for access to the SOPs. For document control, PennDOT SSOA has identified a sunset date on all SOPs. RTAs are encouraged to reference the most recent version of the SOPs for PennDOT SSOA practices.

2.9 Roles and Responsibilities

The FTA: Responsible for ensuring SSOAs and RTAs are in compliance with federal requirements. If the FTA determines that the Commonwealth is not in compliance, or has not made adequate efforts to comply, it may:

- Withhold SSO Formula Grant program funds from the Commonwealth of Pennsylvania;
- Withhold not more than five percent (5%) of the FTA’s Urbanized Area Formula Program (49 U.S.C. 5307) formula funds appropriated for use in the Commonwealth or urbanized areas in the Commonwealth, until such time as the SSO program can be certified; or
- Require all of the RTAs covered by PennDOT SSOA to spend up to 100 percent of their federal funding under 49 U.S.C. Chapter 53 for safety-related improvements on their systems, until such time as the SSO program can be certified.

The Commonwealth: As required by Part 674, PennDOT SSOA is the designated SSOA for Pennsylvania. The primary responsibility of the Commonwealth is to designate an oversight agency to oversee the safety of any RTA within its jurisdiction and must ensure that the SSOA:

- Is financially and legally independent from any public transportation RTA the SSOA is obliged to oversee;
- Does not directly provide public transportation services in an area with a RTA the SSOA is obliged to oversee;
- Does not employ any individual who is also responsible for administering a RTA the SSOA is obliged to oversee;

- Has authority to review, approve, oversee, and enforce the PTASP for a RTA required by 49 U.S.C. 5329(d);
- Has investigative and enforcement authority with respect to the safety of all RTAs within the State;
- Audits every RTA's compliance with the PTASP at least once every three years as required by 49 U.S.C. 5329(d); and
- Reports the status of the safety of each RTA system to the Governor, the FTA, and RTA Boards of Directors, or an equivalent entity at least once each year.

The PennDOT SSOA: Responsible for direct safety and security oversight of fixed guideway transit agencies in the Commonwealth of Pennsylvania. PennDOT SSOA is responsible for developing and adopting its *Program Standard*, which specify the requirements each covered RTA must fulfill. This document outlines the minimum requirements for safety and security programs needed to reduce the likelihood of events that may lead to death, serious injury, or property damage; reduce intentional wrongful or criminal acts (such as Part I and II crimes); and prepare RTAs for emergency response and recovery using an all-hazards approach. Additional information and resources on PennDOT SSOA can be found at [State Safety Oversight \(pa.gov\)](https://www.pa.gov/state/about/pennsylvania-department-of-transportation/safety-over-sight). Other PennDOT SSOA responsibilities include:

- Requiring each covered RTA to develop a PTASP and security and emergency preparedness plan (SEPP) that comply with the PennDOT SSOA's *Program Standard*;
- Reviewing and approving each RTA's PTASP and SEPP, at a minimum annually, to assess whether revisions or updates are necessary;
- Reviewing documents produced by covered RTAs such as SOPs, maintenance manuals, and incident investigation manuals;
- Requiring RTAs to perform internal safety and security audits as an ongoing activity and submit an annual performance report to PennDOT SSOA;
- Conducting ongoing safety and security audits to assess whether each RTA's safety and security practices and procedures comply with the *Program Standard*, as well as the RTA's PTASP and SEPP;
- Requiring the RTAs to report the safety and security events and hazards that meet thresholds as documented in the PennDOT SSOA *Program Standard*;
- Investigating safety and security events and hazards and requiring RTAs to prepare CAPs to minimize, control, correct, or eliminate incidents and hazards;
- Verifying implementation of CAPs, either through field observations, personnel interviews, or document review;
- Working with covered RTAs to respond to the FTA with respect to safety advisories; and
- Reporting safety and security performance annually, as requested, to the FTA.

PennDOT State Safety Oversight Agency Contact:

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RTAs: Responsible for ensuring the safety and security of their systems and complying with Commonwealth of Pennsylvania and federal laws. Each RTA subject to SSO must develop and implement a PTASP and a SEPP that complies with the PennDOT SSOA's *Program Standard*. RTAs are also responsible for participating in external audits of their safety and security programs conducted by PennDOT SSOA and FTA. RTAs have the responsibility to respond to applicable FTA Safety Advisories with the requested information in the appropriate timeframe

identified by the FTA or PennDOT SSOA.

RTAs and their modes covered under PennDOT SSOA include:

- The Southeastern Pennsylvania Transportation Authority (SEPTA)
 - Market-Frankford Subway/Elevated
 - Broad Street Subway
 - Subway-Surface Trolleys
 - Media-Sharon Hill Trolleys
 - Norristown High Speed Line
 - Route 103 Busway
 - Center City Concourse
- The Pittsburgh Regional Transit (PRT)
 - Light Rail Transit System – Blue, Red, and Silver Lines
 - Monongahela Inclined Plane
 - PRT’s private busways, including the Martin Luther King, Jr. (East) Busway, South Busway, and West Busway
- The Cambria County Transit Authority (CamTran)
 - Johnstown Inclined Plane

2.10 Coordination with RTAs

PennDOT SSOA will meet and correspond with covered RTAs’ safety and security representatives as needed. PennDOT SSOA will hold formal status meetings with safety and security representatives from CamTran, PAAC, and SEPTA approximately each quarter, although more frequent meetings may be conducted as needed. In addition, PennDOT SSOA will hold regular meetings with all RTAs to discuss programmatic activities.

PennDOT SSOA is expected to perform ongoing, proactive oversight of covered agencies. PennDOT SSOA representatives coordinate with RTA personnel in safety, security, operations, maintenance, facilities, engineering, and other safety- and security-critical areas as needed. PennDOT SSOA may monitor the RTA’s progress in carrying out a CAP through announced or unannounced on-site inspections, or any other means deemed necessary or appropriate. In addition, PennDOT SSOA meets with RTA executive personnel and Board members at least once annually.

PennDOT SSOA maintains a schedule/agenda depicting PennDOT SSOA’s ongoing coordination activities, quarterly meetings with each RTA, RTA internal safety and security audits, PennDOT SSOA external audits, and similar activities. The schedule/agenda is maintained at the PennDOT SSOA Project Office and is shared with the PennDOT SSOA Manager and staff. The PennDOT SSOA Manager has primary responsibility for meetings and correspondence with covered RTAs. The PennDOT SSOA Manager may assign certain meetings, correspondence, or audits to the PennDOT SSOA’s contractors. In cases where RTA personnel are designated to correspond on behalf of the RTA’s Accountable Executive, the Accountable Executive must be copied on the correspondence; in cases where PennDOT SSOA personnel are designated to correspond on behalf of the PennDOT SSOA Manager, the PennDOT SSOA Manager must be copied.

In the event of an unprecedented event (e.g., a public health emergency), PennDOT SSOA, at the Manager’s discretion, may temporarily modify program oversight activities, extend submission deadlines, and/or alter program requirements. All decisions related to such modifications will prioritize the continuation of oversight activities to the greatest extent practicable during this period.

2.11 Conflict of Interest

In accordance with Part 674.13(a) and 674.41, an SSOA must be financially and legally independent from any overseen RTA; accordingly, no individual or entity may provide services to both PennDOT SSOA and a covered RTA when there is a conflict of interest (COI) or an appearance of a conflict. A COI occurs when an individual or entity performing work for an RTA or PennDOT SSOA is unable, or potentially unable, to render impartial assistance or advice on the development or implementation of the standards and provisions of the PennDOT SSOA *Program Standard*, or to objectively perform such work without bias.

2.12 PennDOT Contractor Support

PennDOT retains contracted support for various tasks conducted by SSOA. PennDOT abides by PennDOT Policy and Procedures for the Administration of Consultants Agreements (Publication 93, 2019), and contractors comply with the Commonwealth of Pennsylvania's Contractor Integrity Provisions (Commonwealth of Pennsylvania Governor's Office Management Directive 215.8 Amended, see Appendix F). Per this policy:

Contractor, by submission of its bid or proposal and/or execution of this contract and by the submission of any bills, invoices or requests for payment pursuant to the contract, certifies and represents that it has not violated any of the PennDOT Contractor Integrity Provisions in connection with the submission of the bid or proposal, during any contract negotiations or during the term of the contract.

Additionally, a third-party contractor to the PennDOT SSOA or an RTA may not have an unfair competitive advantage over other contractors.

2.12.1 Identifying Conflicts of Interest

All contractors are subject to full disclosure of all present and potential COI in their activities or relationships prior to the awarding of a contract with PennDOT SSOA or an affected RTA.

The FTA is aware of the growth of large, multi-faceted consultancy firms that are capable of providing services to both SSOAs and RTAs. If necessary, PennDOT SSOA will work with the FTA to acquire a waiver if there is a consultant conflict of interest. PennDOT SSOA will document and avoid, to the most practicable extent, any instances of COI; in instances where conflicts cannot be eliminated, they must be mitigated. PennDOT SSOA will use appropriate mitigations and external consultations between the SSOA, PennDOT leadership, PennDOT legal advisors, and the Commonwealth's Attorney General on matters relating to a potential COI. These mitigations may be demonstrated through self-certification and periodic independent reviews of PennDOT SSOA.

2.13 PennDOT SSOA Reporting

In conformance with Part 674, the PennDOT SSOA must provide annual reports to the FTA. Current direction from the FTA stipulates submissions be made electronically using a specified reporting system. As designated by the FTA, the annual submission includes:

The PennDOT SSOA *Program Standard* adopted in accordance with Part 674.27, with an indication of any changes to the *Program Standard* during the previous year;

- Evidence that each of its employees and contractors have completed the requirements of the PTSCTP, or, if in progress, the anticipated completion date of the training;
- A publicly available report that summarizes its oversight activities for the previous year describing the causal factors of accidents identified through investigation and identifying the status of corrective actions, changes to PTASPs, and the level of effort by the SSOA in carrying out its oversight activities for each

RTA;

- A summary of the triennial audits completed for each RTA during the previous year and the RTAs' progress in carrying out CAPs arising from triennial audits conducted in accordance with Part 674.31;
- A summary of internal reviews completed by each RTA during the previous year;
- Evidence that the SSOA has reviewed and approved any changes to each RTA's PTASP during the previous year; and
- A certification that the SSOA is in compliance with the requirements of Part 674.

PennDOT SSOA will develop the FTA Annual Report in the template requested by the FTA. The primary method for ongoing tracking and submission of annual report criteria will be the FTA SSO Reporting tool; however, PennDOT SSOA will comply with any format requested.

As a result of FTA requests, PennDOT SSOA is also involved in reviewing RTAs' incident reports in relation to NTD submittals. While PennDOT SSOA does not make or directly manage NTD entries, it reviews the RTAs' NTD submittals against information sent to PennDOT SSOA as needed to verify the consistency of reporting.

In addition to the annual submission, periodic submissions including special studies and status reports of incidents, hazards, and CAPs are provided to the FTA upon request.

3 Program Standard Development

The PennDOT SSOA *Program Standard* was developed using guidance from the FTA that dictates minimum content for RTA safety and security programs and Part 674 requirements. In addition, PennDOT SSOA expanded on the minimum requirements to include industry safety and security guidance from organizations such as the American Public Transportation Association (APTA) to continue to improve the safety and security at covered RTAs. The following section describes the development and revision processes associated with the PennDOT SSOA's *Program Standard*.

3.1 Program Standard Sources

The PennDOT SSOA's *Program Standard* has been created to account for sources including, but not limited to:

1. 49 Code of Federal Regulation Part 672;
2. 49 Code of Federal Regulation Part 673;
3. 49 Code of Federal Regulation Part 674;
4. H.R. 3684, Bipartisan Infrastructure Law;
5. The FTA's SSO Implementation Guidelines, Webinars, and Technical Assistance Center; and
6. APTA standards and other industry best practices.

3.2 Program Standard Revision

PennDOT SSOA will review the *Program Standard* at least annually and submit it to transit agencies no later than May 15 each year. Any updates required by new or changed FTA rules, as well as any improvements suggested by changes in industry best practices, will be added as needed. When appropriate, PennDOT SSOA will incorporate any suggested changes that enhance safety and/or security or facilitate RTA compliance with this document as discussed with covered RTA personnel. Additionally, PennDOT SSOA may issue interim revisions or amendments to the *Program Standard* when immediate changes are needed.

When the PennDOT SSOA Manager determines it appropriate and/or necessary, PennDOT SSOA may provide an updated or revised draft of *Program Standard* to seek comments from RTA safety and security personnel.

3.3 Program Standard Approval and Implementation

Before the updated *Program Standard* document is published, RTAs will receive a draft version for review and comment. Upon receipt of this draft document, RTAs must provide comments within the time specified by PennDOT SSOA. All comments will be reviewed and discussed with each RTA, and PennDOT SSOA approved revisions will be incorporated into the final document. The final PennDOT SSOA *Program Standard* will be reviewed and approved by the PennDOT SSOA Manager before officially being adopted and distributed to covered RTAs.

3.4 Program Standard Distribution

This document is distributed directly to each RTA's Accountable Executive and RTA managers responsible for safety and security plans, typically the chief safety officer (CSO) and police chief. This document is also distributed to the FTA on an annual basis when completed and signed, and it is freely available to other RTA stakeholders and interested parties, on the PennDOT website as requested. Distribution of revised *Program Standard* will occur immediately after approval by the PennDOT SSOA Manager and the PennDOT Deputy Secretary for Multimodal Transportation.

4 RTA Safety Management Program

4.1 General Requirements

Each RTA must have an established Safety Management Program (SMP) that is based on the policies, procedures, and programs that are documented or referenced in the RTA's PTASP. The SMP utilizes the RTA's PTASP and Safety Management System (SMS) principles and terminology to analyze all aspects of the RTA's operations, including but not limited to:

- Establishing organizational accountabilities related to the safety of all RTA functions;
- Utilizing a risk management program for the identification, assessment, mitigation, and monitoring process for all hazards within the operating environment;
- Establishing a safety committee, comprised of representatives of RTA frontline workers and supervision, that is responsible for detecting, recommending, and evaluating the effectiveness of risk-based mitigations or approaches to reduce deficiencies found in the RTA's safety risk assessment;
- Self-monitoring of performance relative to established safety performance goals and objectives, including, but not limited to, those described in the National Public Transportation Safety Plan (NTSB);
- Ensuring safety through the routine internal audits of all aspects of the RTA's SMP and the incorporation of findings from external agencies; and
- Reporting all events as mandated by PennDOT SSOA, FTA, and NTSB.
- Possible SMS implementation plan from RTAs and approved by PennDOT SSOA

4.2 Safety Management System

SMS is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a RTA's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards. As described in Part 673, each covered RTA must develop their SMS to incorporate the following components:

1. Safety Management Policy as described in 49 CFR § 673.23;
2. Safety Risk Management; as described in 49 CFR § 673.25;
3. Safety Assurance; as described in 49 CFR § 673.27 and
4. Safety Promotion as described in 49 CFR § 673.29.

RTAs are required to implement SMS and are responsible for providing PennDOT SSOA updates on their SMS implementation on a monthly basis. In addition to a summary of all relevant SMS activities undertaken during the previous month, updates must include a forward-looking schedule of planned SMS activities covering no fewer than three months with a plan and timeline. In addition, RTAs must track progress using SMS key performance indicators (KPIs), providing a quantifiable measure of improvement over time. Ask RTAs work to implement their SMS, PennDOT SSOA will, in addition to overseeing this process, provide guidance and support as appropriate.

4.3 Hazard Identification and Thresholds

Each RTA's SMP must describe how hazards are identified, including the following elements:

- Hazards in ongoing transit operations and maintenance, including from sources such as rules compliance checks, maintenance processes, operator and supervisor reports, employee hazard reporting, customer service logs, general public reports, and facilities and employee safety assessments;

- Hazards introduced by RTA rules and/or procedure changes and system changes, including system expansions, capital projects, engineering changes, and configuration changes; and
- Hazards in RTA investigations and audits, including event investigations, internal audits, external audits, drills and exercises, inspections, other regulatory entities, and safety analyses.

Additionally, the RTA's SMP must have specific thresholds defined within its PTASP at which further analyses, investigations, and reporting will take place. Hazard Investigation, Analysis, and Prioritization

The SMP of each covered RTA must include the RTA's approach to hazard investigations, pursuant with the requirements outlined in PennDOT SSOA's investigations procedures. Furthermore, the RTA must specify the type and extent of investigation that will be applied to any hazard. As part of the reporting requirements below, PennDOT SSOA reserves the right to require additional investigation or conduct its own investigation of hazards.

Within the RTA PTASP, the RTA's approach to hazard analysis must be explicitly described for PennDOT SSOA approval. For example, if the United States Military Standard 882E serves as the primary means of hazard analysis, the RTA must detail what position or department has primary responsibility for implementing the hazard analysis protocol and how the associated personnel are trained or qualified on this hazard analysis procedure. Other methods may be used, so long as the RTA can demonstrate that appropriate personnel are familiar with the method and can apply it appropriately and consistently. Hazard analysis procedures and methods must also discuss how the RTA will evaluate and prioritize hazards.

Baseline hazard analysis requirements include, but not limited to:

- Documenting the system safety approach;
 - Describing the risk management effort and how the program is integrating risk management
- Identifying and documenting hazards through a systematic analysis process;
 - The hazard identification process shall consider the entire system life-cycle and potential impacts to personnel, infrastructure, defense systems, the public, and the environment
- Assessing and documenting risk using appropriate severity and probability categories;
- Identifying and documenting risk mitigation measures;
- Reducing risk through selecting and implementing chosen mitigation measures;
- Accepting and documenting risk; and

Managing life cycle risk.

The RTA may use alternative hazard analysis procedures on a case-by-case basis; however, any deviations from the RTA's standard analysis protocols must be introduced in the hazard analysis report and must be accompanied by a discussion of the RTA's expertise in and reason for using the alternative analysis protocol.

4.4 Hazard Notification, Tracking, and Reporting Requirements

Pursuant with the principles of SMS, the SMP at each covered RTA must include processes for the identification, tracking, and reporting (as mandated) of hazards present throughout all levels of the organization. Each RTA's SMP must include reporting protocols for hazards based on the thresholds and timelines specified in the event notification procedure (see Section 4.10). It must also include a detailed review/analysis of all levels of hazards on a monthly basis. The exact reporting threshold will depend on the hazard classification process used by the RTA and therefore is not specified herein.

PennDOT SSOA will investigate identified hazards based on the RTA's own SMP, including any CAPs developed. PennDOT SSOA will conduct additional independent verification of the RTA's safety risk mitigation(s) to address identified hazards as deemed necessary.

4.4.1 Hazard Reporting Requirements

The RTA must report hazards using the incident notification email, PDSSOANOTIFY@pa.gov; events defined as reportable monthly (see Section 4.10) are to be submitted to PennDOT SSOA no later than the 15th day of the month following identification. The consolidation of these reportable hazards within a log, including all other identified hazards, is encouraged. Each hazard submitted in this manner must be accompanied by the following elements:

- Unique identifier;
- Origin of hazard (e.g., investigation, capital project hazard analysis, location safety committee);
- Verification documentation from safety committees.
- Whether or not the hazard is PennDOT SSOA reportable (see Table 4-1 in Section 4.10 of this document);
- Date hazard was identified, source of discovery, transit mode, location, and other identifying information as appropriate to the RTA's programs;
- Description of the hazard;
- Immediate mitigation (if needed);
- Hazard analysis results (e.g., frequency and severity, hazard rating, etc.);
- CAP or proposed permanent hazard resolution;
- Hazard resolution verification/follow-up activities;
- Date hazard was closed; and
- Responsible investigator or committee leader.

Hazard logs may be kept in separate files for separate projects or departments (e.g., operations, maintenance). It is important that all hazard logs, including open and closed items, results from all inspections are submitted on a monthly basis for review by PennDOT SSOA..

4.5 Safety Data, Safety Performance, and Hazard Trends

As an SMS program is implemented, the amount of safety data collected by covered RTAs will increase in both scope and volume; correspondingly, safety personnel at each RTA may play a larger role in data gathering and analysis, at least until each agency department has formalized and applied processes related to safety data collection.

PennDOT SSOA will work with the RTAs to analyze this increased volume of safety data across the system, in particular highlighting areas of concern that may become hazards or are trending toward unsafe conditions. Potential sources of hazardous trend identification include, but are not limited to, PennDOT SSOA triennial safety and security audits, inspections, operations and stations reviews, event investigations, and the RTAs' employee safety reporting program. RTAs will also be required to create a process for securely storing data, as well as regularly assessing trends and interdepartmental communication regarding any issues or concerns resulting from this analysis. Similar to PennDOT SSOA, RTAs are expected to utilize data to focus on specific hazards and perform concentrated assessments.

RTAs are required to establish safety performance targets to address the Safety Performance Measures (SPMs) identified in the National Public Transportation Safety Plan (49 CFR § 673.11(a)(3)). The SPMs must be submitted to PennDOT SSOA using the PDSSOANOTIFY@pa.gov email address on an annual basis. Based on the BIL, RTAs that utilize 5307 funds and serve a population of more than 200,000 are required to develop a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on the data submitted to the National Transit Database. Furthermore, the RTA is to set risk reduction performance targets using a three-year rolling average of the data submitted by the recipient to the National Transit Database and allocate not less than

0.75% of their Urbanized Area Form I program funds to safety related projects.

RTAs are required to provide PennDOT SSOA with safety data on a monthly basis, including but not limited to:

- Operation rules compliance;
- Maintenance Preventive Maintenance performance;
- Employee hazard reporting, customer service logs, general public reports;
- Investigations;
- Audits, including event investigations, internal audits, external audits,
- Drills and exercises, inspections;
- Other regulatory entities, and safety analyses

At the RTAs discretion, safety data submitted to PennDOT SSOA may constitute the same monthly report to senior leadership or the board.

PennDOT SSOA will work alongside covered RTAs to jointly assess safety data to identify emerging hazards. In support of these efforts, RTA staff must continuously collect, organize, and share data with PennDOT SSOA. If RTA or PennDOT SSOA staff determine a particular trend merits further action, PennDOT SSOA may either issue a Finding of Non-Compliance or DIHI or notify the RTA of the SSOA conducting an investigation of the potential hazard or trend or delegate this responsibility to the RTA. If an investigation is deemed necessary, the RTA must coordinate communication with the relevant department(s) to conduct an investigation and assign corrective actions as necessary to mitigate the risk.

Covered RTAs must conduct analysis of events as well as operational and maintenance data to identify emergent safety and security risk(s) requiring mitigation. PennDOT SSOA, as part of its risk-based inspection program, may also identify trends relevant to a covered RTA. Upon discovery of a trend that results in safety or security risks, the RTA must develop and submit a CAP within 30 calendar days to the PennDOT SSOA for review and approval.

4.6 Standard for RTA Public Transit Agency Safety Plan and Security and Emergency Preparedness Plan

4.6.1 Public Transportation Agency Safety Plan

In July 2018, the FTA finalized Part 673, requiring transit agencies to develop a compliant PTASP, which went into effect in July 2019. In accordance with Part 673, RTAs that receive federal financial assistance under 49 U.S.C. Chapter 53 are responsible for maintaining an SSOA-approved PTASP. Each covered RTA's PTASP shall include, at a minimum, the FTA Part 673 and PennDOT SSOA specific required elements outlined in Appendix C. PennDOT SSOA retains the right to create Data of Information for Hazard Identifications (DIHIs), which are PTASP recommendations requiring RTA response and consideration, as referenced in Section 4.9 of this *Program Standard*. As per the BIL, the RTA is required to develop their PTASP in cooperation with RTA frontline workers or worker representatives.

4.6.2 Security and Emergency Preparedness Plan

With the release of Part 674, the FTA relinquished its security oversight authority, noting the Transportation Security Administration's (TSA) responsibility for rulemaking and oversight of security across all transportation modes, including rail transit. PennDOT SSOA will work collaboratively with the TSA to ensure that its requirements do not conflict with any potential requirements developed by the TSA.

PennDOT SSOA's oversight of security requires RTAs to maintain and implement a compliant SEPP. PennDOT's SEPP requirements are consistent with Presidential Policy Directive / PPD-8: National Preparedness. As such, PennDOT

SSOA will use the SEPP to ensure that RTA security entities can fulfill both SSO and other federal requirements with a single comprehensive plan. The SEPP shall include, at a minimum, the elements outlined in Appendix D.

4.6.3 Submission of Public Transportation Agency Safety Plan and Security and Emergency Preparedness Plan

RTAs covered under the PennDOT SSOA must review and update their PTASP and SEPP once each calendar year. Each RTA must submit a PTASP and SEPP to PennDOT SSOA each year within 60 days of the receipt of PennDOT SSOA's completed and signed *Program Standard* for review and approval

RTAs must submit to the PennDOT SSOA any PTASP or SEPP revisions made between annual updates in the requested file format (e.g., Word, PDF). RTA revisions to the PTASP should be clearly identified for PennDOT SSOA to review (i.e., by using Microsoft Word Track Changes). Such submissions must be made a minimum of 30 calendar days prior to the time the revision is to be implemented. The PennDOT SSOA will review using checklists in Appendix C and Appendix D and approve appropriate revisions in a manner similar to the annual review described in this section. PennDOT SSOA maintains the right to update the *Program Standard* PTASP Approval Checklist during its annual review to incorporate the latest guidance or requirements from the FTA.

4.6.4 Review Procedure for Public Transportation Agency Safety Plans and Security and Emergency Preparedness Plans

PennDOT SSOA will review revised PTASPs and SEPPs to ensure that they comply with its standards for such plans. PennDOT SSOA will complete this review within 30 calendar days of receipt of the plans and either provide a preliminary approval of the plan or provide questions and comments to the RTA for further revision. PennDOT SSOA will notify the RTA if additional time is needed to complete the review. If the RTA's plan complies with the *Program Standard*, PennDOT SSOA will issue a formal written approval of the plan and request the RTA to send a final copy with appropriate approval signatures and any other endorsements, as needed. The reviewed and approved PTASP or SEPP will go into immediate effect until another PTASP or SEPP is approved.

If PennDOT SSOA determines that the submitted PTASP or SEPP does not meet its published standards, it will send a written notice of rejection and a description of changes needed to gain approval. This written notice will typically be in the form of a completed checklist and, if needed, an additional narrative or memo. The RTAs will have 30 calendar days to make such changes, unless extended by the written notice of rejection. PennDOT SSOA may meet with an RTA to discuss its review of the PTASP or SEPP, if the RTA so desires. In the event the RTA objects to a noted deficiency or requested change, it shall provide written notice of its objections and suggest alternatives within five calendar days. PennDOT SSOA and the RTA shall review the objections and suggested alternatives and agree to an appropriate course of action within 15 calendar days. This review process may include a meeting of PennDOT SSOA and the RTA to clarify any deficiencies or issues. If an appropriate course of action cannot be agreed upon within 15 calendar days, then a meeting between PennDOT SSOA and the RTA must be scheduled. This meeting must include, but is not restricted to, the RTA Accountable Executive and the PennDOT Secretary of Transportation (or designee). If no resolution is reached at this meeting, then the disagreement will be resolved through due process as described in Section 2.6 of this document.

Whether the plan is approved or rejected, PennDOT SSOA will send the RTA a copy of the completed checklist it used to review the PTASP or the SEPP. PennDOT SSOA will also transmit to the RTA any additional information that it believes would be helpful in improving the PTASP or SEPP. This may include information about transit industry standards, or the practices or requirements of other agencies (e.g., APTA). The PennDOT SSOA PTASP and SEPP review checklists, contained in Appendix C and Appendix D respectively, will be the standard used for approval or rejection. Additional information from other agencies or the transit industry will be sent to provide

suggestion or useful information only. PennDOT SSOA maintains the right to incorporate any guidance or requirements from the FTA that is released in the year prior to its annual review and update of the *Program Standard* PTASP Approval Checklist (Appendix C) to ensure RTA PTASPs are in accordance with 49 CFR Part 673.

Plans shall be transmitted to PennDOT SSOA in a format agreed to by PennDOT SSOA and the RTA. Once a plan has been approved by both PennDOT SSOA and the RTA itself, the RTA must submit an electronic copy to the PennDOT SSOA in an unalterable format with all attachments, and appendices. In addition, PennDOT SSOA is required to have access to all referenced and updated RTA internal documents identified in the PTASP in a means that is organized, easily accessible and allows for review. Plans that require PennDOT SSOA approval signatures are required to be submitted to PDSSOANOTIFY@pa.gov

4.7 RTA Internal Safety and Security Audits and Inspections

PennDOT SSOA requires covered RTAs to develop and document a process for the performance of ongoing internal safety and security audits to assess compliance and implementation of the PTASP and the SEPP. PennDOT SSOA requires that the individual leading the internal audit have their PTSCTP requirement completed.

The internal safety and security audit program may be part of the PTASP and SEPP documents or may be a stand-alone plan(s). The audit program must, at a minimum:

- Describe the process used by the RTA to determine if all identified elements of its PTASP and SEPP are performing as intended
- Determine if areas of PTASP or SEPP non-compliance and hazards are being identified in a timely manner;
- Ensure that all elements of the PTASP and SEPP are reviewed in an ongoing manner and distributed over a three-year cycle; and
- Ensure that the auditing party is from a work group or department that is not responsible for the program or personnel of a work group being audited;
- Document participants in the audit (both RTA auditor(s) and RTA auditees);
 - Document the lead auditor who has obtained their PTSCTP
- Document records and materials reviewed as part of the internal audit; and
- Document any field inspections that were conducted as part of the internal audit.

4.7.1 Internal Audit Schedule Reporting Requirements

4.7.1.1 Three-Year Audit Schedule

On or before December 1 of each year, each RTA must submit to PennDOT SSOA an outline of planned audit activity for safety and security internal audits over the next three years. The three-year audit schedule must include a system-wide evaluation of the agency's implementation of SMS. If PennDOT SSOA responds to the RTA with comments, the RTA must respond with a re-submitted three-year audit reschedule within 15 calendar days.

4.7.1.2 Annual Audit Schedule

On or before December 1 of each year, the RTA must submit specific scheduling detail to PennDOT SSOA (at a minimum the anticipated month or quarter) for any audit activities they expect to perform in the next calendar year. If PennDOT SSOA responds to the RTA with comments, the RTA must respond with a re-submitted three-year audit reschedule within 15 calendar days.

4.7.1.3 Thirty Day Notification of Internal Audits

RTAs must notify PennDOT SSOA at least 30 calendar days before conducting internal safety and security audits, threat and vulnerability assessments (TVAs), and drills and exercises. As scheduling information becomes more certain, the RTA should update PennDOT SSOA as soon as possible (email or phone notification is acceptable). Additionally, RTAs should notify PennDOT SSOA of upcoming external reviews/audits (e.g., TSA BASE [Baseline Assessment for Security Enhancement] Review, APTA Peer Reviews, etc.) in advance of the scheduled activities. PennDOT SSOA will provide notification of its intent to participate in RTA activities.

4.7.1.4 Internal Audit Checklists

RTA audit checklists and procedures to be used for scheduled audits must be provided to PennDOT SSOA at least 30 days prior to conducting audits. Checklists submitted must incorporate questions which address safety management system requirements as well as adherence to the PennDOT SSOA Program Standard and RTAs' PTASPs and other agency documentation.

4.7.2 Safety and Security Audit Items

As described in its PTASP and SEPP, the RTA must implement a process for the performance of ongoing internal safety and security audits to ensure the implementation of the PTASP and SEPP and to evaluate the effectiveness of the plans. Internal audits may not be conducted in a compressed period once every three years, or even once a year; rather, they must be conducted in an ongoing manner throughout the three-year cycle. Internal audits of RTA functions must be conducted by an individual outside of the chain of command for that function so as to avoid a conflict of interest (e.g., personnel within the RTA's safety department) or contractors working on behalf of the safety department may not conduct the review of the RTA's safety tasks, and personnel within the RTA's internal audit department may not conduct the review of the RTA's internal audit function).

PennDOT SSOA requires internal safety and security audits conducted by each covered RTA to cover all PTASP and SEPP components. These components must be audited at least once during a three-year cycle. Closely related items may be combined into a single audit.

4.7.3 RTA Safety and Security Audit Reports

4.7.3.1 Audit Report Minimum Content and Reporting Requirements

Reports from internal safety and security audits conducted by covered RTAs or an outside third-party must be submitted to PennDOT SSOA within 45 calendar days of the date on which the audit was completed. In the event an RTA will not be able to comply with PTASP approved deadlines for submitting internal audit report, RTAs are required to notify and get approval from PennDOT SSOA on any adjusted timeline and findings from a concurrent audit. The audit report must, at a minimum:

- Describe the process used by the RTA to determine if all identified elements of its PTASP and SEPP being audited are performed by the audited party as intended;
- Document participants in the audit (both RTA auditor(s) and RTA auditees);
- Document records and materials reviewed as a part of the internal audit;
- Document any field inspections that were a part of the internal audit;
- Document all hazards and DIHI follow-up concerns identified during the internal audit; and
- Describe areas of PTASP or SEPP non-compliance and if hazards are being identified in a timely manner.

PennDOT SSOA will review internal audit reports from the RTAs as they are transmitted and will follow-up with agencies with any questions, concerns, or requests for clarification. If PennDOT SSOA is not satisfied that an RTA internal audit or the follow-up to DIHI from the RTA sufficiently assessed compliance with the PTASP or SEPP, it

will contact the RTA via memorandum or email with specific concerns or edits required to accept an RTA internal audit report. If an RTA identifies unacceptable hazards or any areas of non-compliance with its PTASP or SEPP during internal audits of its safety or security programs, they must be remedied by CAPs. The CAPs must be developed within 30 calendar days of publication of the audit report and sent to the PennDOT SSOA for review and approval. For information about CAP requirements associated with internal audits, refer to Section 7 of this document, current version of the PennDOT SSOA SOPs for Safety and Security Audits and Reporting, and Corrective Action Plans.

4.7.3.2 RTA Annual Safety and Security Report to PennDOT SSOA

Every year, each RTA must submit to PennDOT SSOA a report of all safety and security internal audits performed in the previous calendar year. The annual safety and security report(s) must be submitted to PennDOT SSOA on or before February 1. The annual safety and security report must be submitted by the RTA's Accountable Executive, or the Accountable Executive must be copied on the electronic submission to PDSSOANOTIFY@pa.gov on or before February 1.

The safety and security reports may be submitted separately if more convenient. Individual internal audit reports that were previously submitted either as completed or on a monthly basis do not need to be resubmitted but should be referenced in the RTA's annual audit report as being reviewed as a part of the internal audit process. The report(s) must include the following elements:

- A summary of corrective actions generated by each internal audit;
- The status of each CAP generated in the given year;
- A list of all internal audits included in the original schedule, which was submitted by December 1 of the previous year, indicating dates each internal audit was completed or identifying the internal audit was moved or incomplete;
- Checklists used for internal audits;
- A summary of significant internal audit findings; and
- A statement by the RTA's Accountable Executive certifying compliance with the PTASP and SEPP or identifying areas of noncompliance and activities the RTA will undertake to achieve compliance.

4.7.3.2.a PennDOT SSOA Review of RTA Safety and Security Report

Within 15 calendar days of receipt, PennDOT SSOA will issue a written response either accepting or rejecting the annual safety and security report. In this written response, the SSOA will include a completed checklist containing all the necessary requirements of the report per Section 4.7.3.2 (shown in Appendix I).

If PennDOT SSOA rejects the report, it will respond in writing with noted deficiencies and /or necessary changes. The RTA will have 15 calendar days to address noted deficiencies and/or requested changes to the report and submit a revised report to PennDOT SSOA. PennDOT SSOA, at its discretion or at the RTA's request, may arrange for a meeting with the RTA to discuss the noted deficiencies and requested changes.

In the event that the RTA objects to a noted deficiency or requested change from PennDOT SSOA, it shall state its objections and suggest alternatives in writing within five calendar days of receipt of PennDOT SSOA's response. PennDOT SSOA will review the updated submission and respond to the RTA within five calendar days.

4.7.4 RTA Internal Inspections

RTAs must develop and include in their PTASP a mitigation monitoring program that ensures all railway track and rail facilities are inspected by the RTA at least quarterly. Details of the program must include processes to perform

inspections, notify PennDOT SSOA of upcoming inspections, and conduct follow-up regarding the results or outcomes from the inspections.

4.7.4.1 Routine Maintenance Inspections

RTAs must reference their current track and facilities maintenance plans, or other plans which describe routine inspections, in their PTASPs and provide them to the PennDOT SSOA annually. The PennDOT SSOA reserves the right to participate in all routine inspections.

4.7.4.2 Non-Routine Maintenance Inspections

RTAs must notify the PennDOT SSOA of all non-routine inspections. The PennDOT SSOA reserves the right to participate in all other inspections.

4.7.4.2.a Thirty Day Notification of Internal Inspections

RTAs must notify PennDOT SSOA at least 30 calendar days before conducting non-routine internal inspections. As scheduling information becomes more certain, the RTA should update the PennDOT SSOA as soon as possible (email or phone notification is acceptable). PennDOT SSOA will provide notification of its intent to participate in RTA activities.

4.7.4.2.b Inspection Report Minimum Requirements

Reports from internal inspections conducted by covered RTAs must be submitted to PennDOT SSOA within 45 calendar days of the date on which the inspection was completed. In the event an RTA will not be able to comply with PTASP approved deadlines for submitting internal audit report, RTAs are required to notify and get approval from PennDOT SSOA on any adjusted timeline and findings from a concurrent audit. The audit report must, at a minimum:

- Document participants in the inspection (all RTA personnel involved in the inspection)
- Document records and materials reviewed as a part of the internal inspection;
- Document any field inspections that were a part of the internal inspection;
- Document all hazards and DIHI follow-up concerns identified during the internal inspection;
- Describe areas of non-compliance and/or unacceptable hazards; and
- Describe the effectiveness and appropriateness of mitigations.

PennDOT SSOA will review internal inspection reports from the RTAs as they are transmitted and will follow up with agencies with any questions, concerns, or requests for clarification. If PennDOT SSOA is not satisfied that an RTA internal inspection or the follow-up to DIHI from the RTA sufficiently assessed compliance with the PTASP or SEPP, it will contact the RTA via memorandum or email with specific concerns or edits required to accept an RTA internal inspection report. If an RTA identifies unacceptable hazards or any areas of non-compliance during internal inspections, they must be remedied by CAPs. The CAPs must be developed within 30 calendar days of publication of the inspection report and sent to PennDOT SSOA for review and approval. For information about CAP requirements associated with internal audits, refer to Section 7 of this document.

4.8 PennDOT SSOA Audits, Operations and Stations Reviews, and Risk-Based Inspection Program

4.8.1 SSOA SMS-Based Safety and Security Audits

In accordance with Part 674, PennDOT SSOA must conduct a complete audit of a RTA's compliance with its PTASP at least every three years. Alternatively, an SSOA may conduct the audit on an ongoing basis over the three-year timeframe. For the purposes of this program, the referenced safety plan will be comprised of the RTA's PTASP. Additionally, PennDOT SSOA will ensure compliance with its *Program Standard*, FTA regulations, and industry best practices.

PennDOT SSOA is responsible for the continuous, independent oversight of safety and security at covered RTAs.

PennDOT SSOA utilizes an ongoing process to address all safety and security audit items within a three-year period. This section outlines the methodology used to accomplish the PennDOT SSOA's audit activities. For additional information on how the PennDOT SSOA conducts triennial audits see the current version of the PennDOT SSOA Safety and Security Audits and Reporting SOP.

PennDOT SSOA must promulgate appropriate standards for PTASPs and SEPPs and must ensure that covered RTAs have appropriate plans that meet these standards. Once appropriate plans are in place, PennDOT SSOA is responsible for conducting reviews of plan implementation and general safety and security conditions. These audits are intended to address the following issues:

- Whether PennDOT SSOA-approved safety and security plans are being followed by the RTAs;
- Whether RTA safety and security plans (or other RTA safety or security program documents) require update or modifications;
- Whether RTA internal procedures are effectively constructed, implemented, and followed;
- Whether the RTA's safety risk management process is being effectively applied; and
- The effectiveness of the RTA's internal safety and security review process.

4.8.1.1 SSOA Safety and Security Audit Schedule

PennDOT SSOA maintains a comprehensive safety and security oversight process and, as such, utilizes a rolling audit schedule to review safety and security plan implementation on an ongoing basis over a three-year cycle, rather than in a compressed period once every three years.

PennDOT SSOA maintains an audit schedule of PTASP and SEPP elements to be reviewed during the three-year cycle. PennDOT SSOA may change audit dates within the three-year cycle to align with and/or accommodate concurrent audits of the same elements or in response to recently identified hazards or unforeseen circumstances.

As described above, the PennDOT SSOA's audits are intended to determine an RTA's compliance with its own plans and PennDOT SSOA requirements. The PennDOT SSOA's reviews also seek to highlight any areas where existing plans, procedures, or activities could be improved. As such, the following criteria form the basis for PennDOT SSOA audits:

- The RTA's approved PTASP or SEPP (as appropriate to the review area) will be the primary review criterion. Additionally, other RTA plans and procedures that support the safety or security plan as appropriate (e.g., operations rules, SOPs, maintenance standards).
- Applicable standards from outside agencies, including both those that may be binding on the RTA (e.g., government regulations as well as the PennDOT SSOA *Program Standard* and SOPs) and those that are advisory (e.g., APTA).
- Reports and CAPs from prior internal and external audits.
- Professional judgment and analyses conducted by the PennDOT SSOA's review as needed to supplement the first three criteria if they are non-existent or unclear.

PennDOT SSOA will work directly with RTA safety and security managers, as well as operations and maintenance managers, to plan and coordinate the PennDOT SSOA's audit. PennDOT SSOA will provide RTAs with at least 30 calendar days' notice prior to an audit.

In advance of audit activities, PennDOT SSOA will assess plans and procedures associated with the audit topic. Many topics warrant specific requests for documentation, which PennDOT SSOA will make prior to the audit. These documents will be used as the basis for formulation of appropriate review questions or checklists. The FTA's guidance for conducting triennial safety and security reviews is also consulted during checklist development.

The PennDOT SSOA's representatives will meet with personnel responsible for the particular review topic and will describe the SSOA audit process to RTA personnel as needed. The goals and criteria associated with the audit will be explained during an introductory meeting. The PennDOT SSOA audit team will interview managerial and frontline personnel as appropriate to glean information about how relevant processes and activities are conducted at the RTA.

The PennDOT SSOA's auditors may review a sample of documentation and records associated with the review topic. In particular, this applies to such areas as personnel training, operational rules compliance testing, hours of service, preventive maintenance inspections, and drug and alcohol testing. The record sample size and timeframe will depend on the topic audited. PennDOT SSOA will also assess implementation of the audit topic through field review as appropriate.

After assessing records for the topic area as well as implementation of the topic area, PennDOT SSOA will assess if the RTA is following its safety and security plans and procedures. PennDOT SSOA will also identify any other areas where the RTA might be able to improve its activities. The results of this preliminary assessment – including initial findings – will be verbally reviewed with the RTA managers through a close-out discussion.

PennDOT SSOA may take additional time to review documents or other materials after the initial review. Further, the PennDOT SSOA may make a supplemental request for documentation during or after the audit.

4.8.1.2 SSOA Audit Reporting

After audit activities are complete, PennDOT SSOA will transmit its preliminary results (generally in memorandum format) to the RTA. The preliminary results memo will include any identified findings of non-compliance, DIHI, and observations. The preliminary results will be sent to the RTA within seven calendar days of the conclusion of all audit activities. Following the transmission of the preliminary results, PennDOT SSOA will draft a written report stating its audit methodology and findings within 30 calendar days of completion of audit activities. This letter will first be sent to the safety department, who is expected to share it with the RTA manager responsible for the topic area as well as any other safety or security managers as is deemed appropriate for a review of factual accuracy. PennDOT SSOA will consider feedback from RTA personnel and make necessary changes before issuing the final audit report barring unusual or extenuating circumstances, which must be documented in PennDOT SSOA meeting agendas and the internally-maintained audit schedule. PennDOT SSOA will transmit the final report letter within 45 calendar days of the end of the audit.

PennDOT SSOA's written report will contain the following information:

1. Description of the topic audited, scope, personnel interviewed, facilities visited, assets observed, and documents reviewed.
2. **Findings of Non-Compliance:** A finding of non-compliance refers to an instance under which the RTA is not operating in compliance or accordance with an applicable internal or external written requirement, including, but not limited to, Part 672; Part 673; Part 674; 49 U.S.C. § 5329(e); the National Public Transportation Safety Plan; the RTA's PTASP, SEPP, and referenced RTA plans, policies, and procedures; and the PennDOT SSOA *Program Standard* and SOPs. Some non-compliance findings may be safety- or security-critical in nature; however, some findings may be related to a deficiency in the content or material reviewed. The RTA must develop a CAP in response to each finding of non-compliance following the specific instructions in Section 7 of this document.
3. **Data or Information for Hazard Identification:** DIHI refers to data and/or information that is compliant with an RTA's PTASP but has been identified to present a 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 public transportation system; or damage to the environment. If the data and information identified by the PennDOT SSOA reaches the thresholds for hazard reporting to the PennDOT SSOA and subsequent CAP

development per the process outlined in the PTASP, then the RTA will be required to follow CAP process as described in Section 7 of the Program Standard and the current version of the PennDOT SSOA Corrective Action Plans SOP.

4. **Observations:** Observations are noteworthy conditions of a positive or negative nature, found by the PennDOT SSOA audit team. In documenting these conditions via the audit report, auditors wish to acknowledge the practices of the RTA or direct the attention of relevant RTA personnel to these observations. In general, negative observations are not significant enough in nature to constitute non-compliance with an established policy or procedure or modification of any policies or procedures that is not necessarily warranted. The RTA may choose to develop follow-up action(s) to observations. The RTAs may also develop CAPs as they see fit for observations, but this is not required.

The RTA will have 30 calendar days from receipt of the final report to assemble and transmit a response, unless otherwise advised by PennDOT SSOA. When PennDOT SSOA has identified findings of non-compliance, the RTA must also submit appropriate corrective actions in accordance with PennDOT SSOA's CAP procedures (See Section 7) for review and approval.

PennDOT SSOA immediately reports unacceptable safety and security conditions to covered RTA representatives and notifies safety or security points-of-contact either through phone call, email, or formal letter/memo depending on the immediacy of the concern.

PennDOT SSOA maintains the authority to order an RTA to develop a CAP to minimize, control, correct, or eliminate risks and hazards as outlined in Section 7.2 of the *Program Standard*.

In consideration of concurrent audit performance by the PennDOT SSOA and an RTA, PennDOT SSOA will follow the current version of the PennDOT SSOA Safety and Security Audits and Reporting SOP to issue an external audit report within 45 days of the conclusion of the audit.

4.8.1.3 SSOA Annual Reports and Other Reporting Documents

PennDOT SSOA produces an annual report that meets the minimum requirements of 49 C.F.R. Part 674.13(a)(7) that summarizes major program activities. This report summarizes PennDOT SSOA 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 PennDOT SSOA in carrying out its oversight activities. The annual report also includes a detailed review of reportable events and any major trends identified in the previous year. PennDOT SSOA works with RTAs to review trends and determine if corrective actions or additional analysis is needed. The report highlights any safety and security related initiatives that took place during that year and forthcoming initiatives at each RTA. In accordance with 49 C.F.R. Part 674.13(a)(7), PennDOT SSOA will also share this report with the Governor, the FTA, and the Boards of Directors at each RTA.

Additionally, PennDOT SSOA produces general informational materials to share with covered RTA Boards. The PennDOT SSOA Manager and staff meet with RTA Boards and executive leadership at least once annually to review program activities, provide familiarization with SSO work, and updates on relevant legislative and regulatory actions.

4.8.2 Operations and Stations Reviews

Certain ongoing review activities, such as station safety/security checks and rules compliance observations, may be conducted independently by PennDOT SSOA without advanced notice to RTAs. Unless accompanied by RTA personnel, these will be confined to publicly accessible areas and will not interfere with transit system operations. Additionally, PennDOT SSOA reserves the authority to conduct unannounced observations and inspections in order

to assess rules compliance, employee training, safety and security related conditions, and to generally stay apprised of the workings of the system. During these reviews, PennDOT SSOA personnel may speak informally with frontline personnel and supervisors. PennDOT SSOA will provide each RTA with a list of PennDOT SSOA project members that will perform operations and stations reviews at least once a year. If major changes occur to the project team throughout the year, an updated list will be circulated for awareness.

In the case of ongoing assessments, such as those of stations or transit operations, PennDOT SSOA may use its internal checklist/form or freehand notes to record its observations. Results of such reviews are transmitted as memoranda or letters to the affected transit system. Results will be sent to the affected RTA and the PennDOT SSOA Manager as soon as possible, typically within 24 hours of the review activity. Any critical safety concerns observed by PennDOT SSOA will be communicated to the RTA safety department immediately. If PennDOT SSOA requests follow-up information regarding an observation from a review, the RTA must respond to the SSOA within 15 calendar days.

4.8.3 Risk-Based Inspections

PennDOT SSOA analyzes data from ongoing SSO activities to assess safety and security risks and use this information to assign resources and perform follow-up inspections. In accordance with 49 U.S.C. § 5329(k), PennDOT SSOA will develop policies and procedures for inspection access and data collection and will share these with the RTAs as they are developed. PennDOT SSOA has the authority and capability to enter RTA facilities to inspect infrastructure, equipment, records, personnel, and data, including the data that the rail fixed guideway public transportation agency collects when identifying and evaluating safety risks. These inspections may be announced or unannounced, as necessary. Additionally, the policies and procedures will address how PennDOT SSOA will collect data from each rail transit agency to support its risk-based inspection monitoring and prioritization activities. This includes data that each RTA collects when identifying and evaluating safety risks that shall be provided to the PennDOT SSOA. The RTAs PTASPs must acknowledge this requirement and reflect agreement for PennDOT SSOA inspection access and data collection, either in detail or by reference.

The PennDOT SSOA risk-based inspection program is intended to establish a baseline set of performance indicators and continuously evolve as trends become apparent. Sources of such data will include ongoing audits, inspections, operations and stations reviews, RTA corrective actions, reportable events, regular meetings, and RTA coordination. PennDOT SSOA's risk-based inspection program uses qualitative and quantitative data analysis to inform ongoing inspection activities designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk.

Details regarding the risk-based inspection program are subject to change pending updates from the FTA regarding Special Directive No. 22-44: Special Directive Under 49 U.S.C. § 5329 (k) and 49 C.F.R. Part 670 Required Actions to Implement a Risk-Based Inspection Program at the Pennsylvania Department of Transportation.

4.8.3.1 Risk-Based Inspection Reports

The results of PennDOT SSOA's risk-based inspections will be documented reports to be shared with the RTAs within 30 calendar days of the completion of the inspection. The PennDOT SSOA's written inspection reports will follow the same methodology for communicating results as Section 4.8.1.2 of the *Program Standard*. PennDOT SSOA personnel are responsible for notifying the appropriate RTA representative of any concerns that require immediate attention identified during the inspection.

4.8.3.2 Ongoing Monitoring

Following the conclusion of an inspection, PennDOT SSOA will continue to monitor identified deficiencies. Any identified Findings of Non-Compliance will be added to the SSOA's CAP process for tracking and resolution; DIHI will also be tracked by PennDOT SSOA to ensure the RTA conducts a safety risk assessment and subsequent CAP

development, if necessary.

4.8.3.3 CAP Inspections

When necessary, in accordance with Part 674.37(a), PennDOT SSOA may conduct on-demand inspections of RTA procedures and operational and maintenance activities, as well as the RTA's operating environment to monitor the RTA's progress in carrying out a CAP. Based on data reported through ongoing surveillance, event notifications, audits, or other oversight activities, PennDOT SSOA reserves the right to conduct targeted (risk-based) inspections. Targeted inspections may be limited in scope to a specific system or piece of equipment or a specific issue that may be systemic. PennDOT SSOA will provide notification of its intent to conduct a targeted inspection as soon as possible, recognizing that this could be same-day notification. Inspections may include:

- Document, video, record, and data requests relevant to the inspection activities;
- Interviews and observations;
- Measurements and testing;
- An inspection report, submitted to the RTA for review; and/or
- Findings requiring CAPs.

PennDOT SSOA will work in cooperation with RTA personnel to ensure these inspections are conducted so as not to unnecessarily interfere with the operation of the fixed guideway system. PennDOT SSOA expects the full support and cooperation of the RTA in completing such inspections in accordance with all applicable laws and RTA rules and procedures. PennDOT SSOA will ensure that it does not introduce any hazards or circumvent the RTA's rules and procedures pertaining to safety and operations on the fixed guideway system. Requests by PennDOT SSOA for such activities or materials will be submitted within a reasonable timeline for compliance.

4.9 Data or Information for Hazard Identification

PennDOT SSOA will notify RTAs of data and information that is compliant with the PTASP but has been identified to present a 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 public transportation system; or damage to the environment as Data or Information for Hazard Identification (DIHI). Performing trend analysis on accident, incident and occurrence data is a valuable source for hazard information and for developing proactive programs to prevent accidents.

The RTA must respond to PennDOT SSOA within 30 calendar days for any DIHI identified by PennDOT SSOA. If additional time is needed, the RTA must notify the SSOA with progress to date and its schedule for DIHI assessment. PennDOT SSOA will review and approve any extension requests.

Per 673.25(b) the RTAs must consider, as a source for hazard identification, data and information provided by PennDOT SSOA and the FTA. The RTA is authorized to conduct a safety risk assessment per Section 673.25(c) and any associated safety risk mitigations per Section 673.25(d) according to the process outlined in its PTASP. If the data and information identified by the PennDOT SSOA reaches the thresholds for hazard reporting to PennDOT SSOA and subsequent CAP development per the process outlined in the PTASP, then the RTA will be required to follow CAP process as described in Section 7 of the *Program Standard* and the current version of the PennDOT SSOA Corrective Action Plans SOP.

The RTAs will coordinate and communicate with the PennDOT SSOA in the evaluation of DIHI, including risks accepted, owned, and embraced by the Accountable Executive, staff, and employees, as an organization.

4.10 Event Notifications

4.10.1 Event Notification Procedure

The event notification criteria and requirements in this section detail FTA requirements under Part 674.33. For those systems and modes covered under PennDOT SSOA, the RTA must notify PennDOT SSOA and the FTA within the defined timescale. This may be either **two hours or 24 hours after the confirmed event, or by the 15th day of the following month.** For guidance on what events need to be reported and required timeframes, refer to Table 4-1. Appendix E of the PennDOT SSOA *Program Standard* provides a decision tree for two-hour and 24-hour notifications. For the PennDOT SSOA's reporting purposes, an accident shall be defined as an event involving a transit vehicle or taking place on property controlled by the RTA that involves any of the following:

1. A loss of life;
2. Serious injury to a person;
3. Collision involving a fixed guideway transit vehicle;
4. Runaway rail transit vehicle;
5. Derailment of a rail transit vehicle, at any location, at any time, whatever the cause; or
6. Evacuation for life safety reasons.

Initial report notification must include at least the following preliminary basic information to be accepted by PennDOT SSOA:

- The caller's name and transit system;
- Event type (e.g., accident, incident, or occurrence);
- Time of the event;
- Date of the event;
- Event location (in the form of the closest transit station, intersection, or address)
- Transit vehicle line/route, direction of travel, and lead vehicle number;
- Information about any other vehicles involved;
- Number of injuries or fatalities as defined above; and
- Hospital (if known) to which any injured parties may have been transported

If the RTA does not provide sufficient pertinent information, such as the nature of the event, location, and time of occurrence, the SSOA reserves the right to reject the notification and will follow up with the RTA to obtain additional details. Additionally, in the event that any of the preliminary basic information initially provided requires updating or correction, the RTA is required to contact PennDOT SSOA within 48 hours of the SSOA's request.

In order to notify PennDOT SSOA of an event, the RTA must contact PennDOT SSOA using the email address below. In cases of major events, the RTA shall also contact PennDOT SSOA Manager in addition to the standard email notification.

PennDOT SSOA Contact	
Email	PennDOT SSOA Manager Phone
PDSSOANOTIFY@pa.gov	717-433-2523

The FTA requests RTAs contact the U.S. Department of Transportation Crisis Management Center within two hours of a reportable accident by email (recommended method) or phone.

FTA Contact	
Email	Phone

TOC-01@dot.gov	202-366-1863
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Please note that the event definition herein does not discriminate as to the cause of an event. Injuries, facility closures, and other events that may be the result of security issues (i.e., the result of an intentional act) are incorporated into the event definition by design. Separate RTA departments may be made responsible for notification to PennDOT SSOA for safety or security events at the RTA's discretion.

Subsequent to event notification by the RTA, PennDOT SSOA will commence the PennDOT SSOA investigation process as described in its investigation procedures. This process will also include additional requests for documentation and investigation by the RTA. The notification requirements under 49 C.F.R. § 674 and PennDOT SSOA's required reporting are contained in the following table.

Table 4-1: PennDOT SSOA Reportable Event Type	Investigation Report Required?
Accidents: Reportable to the PennDOT SSOA within two hours of event.	
Fatality A death or suicide confirmed within 30 calendar days of a reportable event. <i>Note:</i> Fatalities resulting from illness or natural causes are excluded from reporting requirements.	Yes
Serious Injury Any serious injury sustained by: <ul style="list-style-type: none"> (a) A passenger on a fixed guideway transit vehicle (including any serious injury sustained in the process of boarding or alighting); (b) An individual making contact with a fixed guideway transit vehicle; or (c) An RTA employee in the delivery of fixed guideway transit operations. Serious Injury: <ul style="list-style-type: none"> (a) Requires hospitalization for more than 48 hours, commencing within seven calendar days from the date the injury was received; (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 any internal organ; or (e) Involves second- or third-degree burns or any burns affecting more than five percent of the body surface. 	Yes
Collision A collision of any fixed guideway transit vehicle, at any location, at any time that includes the following categories <ul style="list-style-type: none"> a) Collision: Rail Transit Vehicle (Involves another fixed guideway transit vehicle); Collision: Resulting in Substantial Damage (Results in substantial damage); or Collision: Individual (Involves an individual not inside a vehicle). Substantial Damage: Substantial damage is any damage 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.	Yes
Runaway Vehicle Runaway fixed guideway vehicle on the mainline or in a yard, defined as uncontrolled movement of a train, vehicle, or other equipment regardless of the presence of an operator.	Yes
Derailment Derailment of any vehicle, at any location, at any time, whatever the cause.	Yes

Table 4-1: PennDOT SSOA Reportable Event Type	Investigation Report Required?
<p>Evacuation Persons withdrawn or removed from rail transit vehicles or facilities for life safety reasons, into the right-of-way, or self-evacuations to a location that potentially could expose passengers to imminent danger.</p> <p>Life Safety Reason: Any situation such as a fire, the presence of smoke or noxious fumes, fuel leak, electrical, or other hazard, that constitutes an imminent danger to passengers, employees, contractors, or other persons. Evacuations for security purposes include but are not limited to: arson; suspicious packages and objects; bomb threats; chemical/biological/nuclear and radiological releases; or any other situation that is an immediate threat to passenger, employee, or patron safety.</p> <p>Note: Reporting is not required for the offloading of passengers at a <i>platform</i> for a mechanical failure or transfer of passengers to a rescue train unless there was imminent danger to passengers.</p>	Yes
<p>Other Any safety event for which the RTA notifies the National Response Center (NRC) or the NTSB.</p>	Upon SSOA Request
Incidents: Reportable to the PennDOT SSOA within 24 hours of event.	
<p>Red Signal Violation</p> <p>Note: The reporting period begins when the violation is confirmed.</p>	Yes
<p>Including;</p> <ul style="list-style-type: none"> a) Fire: Arson/Vandalism; b) Fire: Debris, or; c) Fire: Electrical 	Upon SSOA Request
<p>Near-miss Any event that did not result in injury or damage but had the potential to do so. This includes a face-up, yard activity, and right-of-way safety (e.g. workzone incursions).</p>	Yes
<p>Homicide Any death confirmed within 30 calendar days as the result of criminal actions not related to operations or maintenance of a transit system.</p>	Upon SSOA Request
<p>Assault Any serious injury (see above) confirmed within 30 calendar days to be the result of criminal actions not related to operations or maintenance of a transit system.</p>	Upon SSOA Request

Table 4-1: PennDOT SSOA Reportable Event Type	Investigation Report Required?
Service Disruption or Modification The closure or modification of all, or a portion of, a rail transit system due to a hazardous condition, threat, or recommendation made by a governmental or regulatory body (related to an existing hazardous condition). <i>Note:</i> The reporting period begins when the disruption occurs or the decision is made to modify service.	Upon SSOA Request, also refer to section 4.10.3: Recovery Plan Procedures
Incline Plane Cable or Major Component Failure Any malfunction of the plane cable or other major component of an Inclined Plane.	Yes
<p align="center">Occurrences: Reportable to the PennDOT SSOA monthly.</p> <p align="center">(15th day following the month of the event)</p>	
Door Event Any potentially hazardous door operation on a revenue vehicle, including: (a) Door opening during train movement; (b) Door opening on the wrong side or off-platform; or (c) An un-commanded door opening.	Upon SSOA Request
Falls to the Track Persons entering the track area – accidental (known to the RTA and where no serious injuries have been sustained).	Upon SSOA Request
Trespassing Unauthorized persons entering the track area in subway/tunnel – trespassing (known to the RTA and where no serious injuries have been sustained).	Upon SSOA Request
System Failure Any signal or control system failure that does not result in fail-safe.	Upon SSOA Request
Minor Collision A collision of any fixed guideway transit vehicle not meeting any of the above requirements for reporting as an accident.	Upon SSOA Request

4.10.2 Federal Railroad Administration Reportable Incidents

For those RTAs and modes that share track with the general railroad system and are subject to **both** Federal Railway Administration (FRA) and PennDOT SSOA oversight, the RTA must notify PennDOT SSOA within two hours of an event for which the RTA must also notify the FRA. This section does not apply to any system currently covered by PennDOT SSOA but is required by the FTA Recovery Plan Procedures

Following notification of a service disruption or modification, PennDOT SSOA requests that RTAs provide a summary of recovery activities as part of the event notification. In addition to normal reporting requirements, recovery activities shall include the following:

- Internal departments and external parties involved in recovery activities;
- Procedures to be utilized;
- Inspections and tests to be performed; and
- Anticipated time of the return to normal operation.

PennDOT SSOA reserves the right to further investigate recovery activities and requires that all necessary inspections are documented and available upon request. If the event disrupts service for more than 24 hours, the PennDOT SSOA may request the submittal of a recovery plan to be approved by PennDOT SSOA.

4.10.3 PennDOT SSOA Unacceptable Hazard Identification

In the event that PennDOT SSOA identifies a potentially unacceptable hazard, PennDOT SSOA will immediately contact the affected RTA's safety department via telephone or electronic notification to report the hazard and issue official correspondence to the RTA, including:

- A description of the hazard;
- How the hazard was identified;
- The root cause of the hazard (if known); and
- Proposed steps to mitigate the hazard.

4.11 Event Investigations

PennDOT SSOA investigates all accidents in accordance with Part 674.33. PennDOT SSOA may also investigate accidents, incidents, and occurrences identified in Table 4-1 that do not require an investigation under Part 674.33. To ensure all events are appropriately investigated, PennDOT SSOA has developed the following procedures. There are three scenarios for event investigations: PennDOT SSOA may authorize the RTA to conduct the investigation on PennDOT SSOA's behalf; SSOA may conduct its own independent investigation; or PennDOT SSOA and the RTA may agree to conduct a joint investigation.

In each case, the goal of the PennDOT SSOA's investigation efforts will be to identify the primary and contributory causes of each accident, incident, or occurrence as well as identify corrective actions required to minimize the likelihood of recurrence. Through its ongoing review of individual events, PennDOT SSOA also has a goal of determining root causes. PennDOT SSOA encourages RTAs to employ root cause analyses or similar approaches in their own investigations.

Each RTA must specify or reference in its PTASP which positions or personnel are qualified to conduct event investigations on behalf of PennDOT SSOA and what process is used to qualify those individuals. PennDOT SSOA will examine these qualifications as a part of the PTASP and review and approval of each RTA's event investigation procedure. The minimum requirements for investigators to be considered qualified to complete accident investigations on behalf of PennDOT SSOA include attending TSI Rail Transit Accident Investigation class.

Each RTA is hereby authorized to use approved procedures to conduct investigations on behalf of PennDOT SSOA.

PennDOT SSOA may request that the RTA safety department conduct the event investigation and produce a formal report in accordance with Section 4.11.1 of this document. When requesting the RTA to investigate and produce a formal event report, PennDOT SSOA will notify the RTA in as timely a manner as possible, typically within seven calendar days of the event. When the RTA's operating and maintenance department reports are not sufficient to meet the PennDOT SSOA's information requirements, PennDOT SSOA may request a formal safety department investigation report. The timing of such requests may be more than seven calendar days depending on when event report materials are received. RTAs are responsible for providing the SSOA with all documentation and records requested in association with an event investigation. The RTA must maintain communication with PennDOT SSOA lead investigator throughout the span of any investigation. The RTA must provide responses to questions from PennDOT SSOA concerning specific investigations.

PennDOT SSOA utilizes a database to track events and a checklist form for each reported accident and incident to record investigation details and status. PennDOT SSOA sends a formal weekly report to the designated investigation personnel at each covered RTA. These checklists indicate what materials and reports have been received, and what additional materials are needed to adopt the investigation. When appropriate, this form is also used to convey the PennDOT SSOA's adoption of each investigation report.

PennDOT SSOA will formally notify the RTA in writing in cases where PennDOT SSOA intends to conduct its own investigation (See Section 4.11.4) and does not intend to utilize the RTA's investigation. In the case that PennDOT SSOA elects to conduct its own investigation, the RTA must fully cooperate with all PennDOT SSOA requests and may not withhold information potentially relevant to the investigation.

Note that, to the extent allowed by law, the Commonwealth will withhold an investigation report that may have been prepared or adopted by PennDOT SSOA from being admitted as evidence or used in a civil action for damages resulting from a matter mentioned in the report. In addition, to protect the confidentiality of investigation reports, access to electronic and hard copies of those reports is controlled at both PennDOT's and the PennDOT SSOA's Project Offices.

4.11.1 Final Investigation Report Content

All final event reports produced for PennDOT SSOA must contain, at a minimum, the following information:

1. Description of event investigation activities;
2. Identification of causal and contributing factors; and
3. Determination of whether a CAP is needed to prevent recurrence.

More information may be included, based on the RTA's event investigation procedures or external recommendations (such as APTA incident investigation procedure standards, RT-OP-S-002-02). Likewise, PennDOT SSOA may request more information in order to clarify or evaluate circumstances about a particular event or about trends.

For certain events, PennDOT SSOA will specifically request that the safety department produce a more formal investigation report, which coordinates evidence from other RTA departments and from external sources and agencies as appropriate to the event. In all investigations, the RTA must submit relevant documents, e.g., field reports, statements, photos, maps, analyses, and logs, necessary to fulfill the report content requirements in this section.

In cases where reports from operations, maintenance, or other departments are used to make up the final investigation report, or where the safety department's summary report is the only available document, all of the content requirements in this section must still be met. The safety department may use a summary report to outline the final event report content or to highlight its location in other departments' reports. This summary report may be

a completed, hand-written form, a database report, or some similar document. Safety department representatives are encouraged to review the format of such reports with PennDOT SSOA to ensure that their content is sufficient to address the PennDOT SSOA's requirements.

4.11.2 RTA Authorized to Conduct Investigation

PennDOT SSOA may authorize the RTA to conduct an event investigation on PennDOT SSOA's behalf.

PennDOT SSOA will also request that the RTA conduct hazard investigations, both at the level dictated by the RTA's Safety Risk Management program and in accordance with the PennDOT SSOA requirements. For some hazards, PennDOT SSOA may request a more detailed investigation or that particular investigation elements be included in the final report.

RTAs must submit their event investigation procedures and associated training program for review and approval annually or upon revision. Investigation procedures that require PennDOT SSOA approval signatures are required to be submitted to PDSSOANOTIFY@pa.gov. Additionally, RTAs are responsible for providing the PennDOT SSOA with a list of qualified event investigators on an annual basis, or upon revision. PennDOT SSOA will review and approve the manual and list of qualified investigators within 30 days of submittal. The RTA must submit any revisions to PennDOT SSOA for review and approval. At the conclusion of the review process, PennDOT SSOA will transmit a letter to the RTA approving its event investigation procedures.

PennDOT SSOA requires that the RTA conduct an investigation for accidents, incidents, and occurrences in accordance with Table 4-1. The RTA may utilize investigations from its safety department or from frontline departments, such as operations or maintenance. In each case, a clear and objective identification of probable cause must be made, and the report content requirements above must be met.

The RTA must make event notifications to PennDOT SSOA in accordance with the Event Notifications Section 4.10 of the PennDOT SSOA's *Program Standard*. Investigation reports, composed of reports from operations and maintenance departments as appropriate, and safety department investigation documentation as appropriate, must be sent to PennDOT SSOA on the following schedule:

1. **Preliminary Report**: Basic information about the reportable event must be transmitted to PennDOT SSOA during the notification process, as described in Section 4.10.1.
2. **Investigation Status Update**: PennDOT SSOA may, at its discretion, request from the RTA an update indicating the status of the investigation, including any significant new information, findings, preliminary conclusions, and any corrective actions. The RTA must respond within 48 hours of PennDOT SSOA's request.
3. **Final Investigation Report**: At the conclusion of its investigation, the RTA safety department must transmit to PennDOT SSOA a final investigation report that comports with the content requirements outlined in Section 4.11.1. PennDOT SSOA will work with the RTA to adopt investigations with consideration of needed investigative processes, including (but not limited to) transportation investigations, derailment reports, police investigations, medical examiner reports, and other required materials. This final investigation report will be required within sixty calendar days of the event, unless the deadline is explicitly extended in writing by PennDOT SSOA. Such extensions will be made in letter format or as part of the PennDOT SSOA's weekly written event updates with each RTA.

If PennDOT SSOA requires more information, it will notify the RTA as soon as possible. PennDOT SSOA will provide the RTA with a weekly document request checklist to outline what event report documentation has been received and what additional documentation it requests of the RTA for each open event. If PennDOT SSOA does not require further information, it will adopt the RTA's investigation, as well as associated reports, conclusions, and corrective actions as its own. If PennDOT SSOA requires that the RTA safety department conduct an investigation

with a formal, independent report, it will request such an investigation in accordance with the procedures outlined below in 4.11.3. RTA Event Investigators. If PennDOT SSOA is unsatisfied with the quality of event investigation initial and/or final reports, it may suspend an RTA event investigator from leading event investigations on behalf of PennDOT SSOA until retrained or reinstructed.

4.11.3 RTA Safety Department Formal Report

For certain types of events, generally including those listed below, PennDOT SSOA will request that the RTA safety department issue a formal written report. These events will generally include:

- Events with a significant number of injuries;
- Events resulting in fatalities;
- Events which, upon preliminary report, involve a seemingly significant unmitigated, unidentified, or unquantified hazard;
- Events involving vehicle, infrastructure, rules, or systems anomalies which have caused or could cause significant loss; or
- Events where an RTA safety department investigation is necessary.

As part of this investigation methodology, PennDOT SSOA may explicitly request a formal safety department report containing all factual, investigative, and corrective action information. Alternatively, SSOA may request, or the RTA may suggest, that a safety department memorandum or other document be used to address specific issues or information deficiencies in operating, maintenance, or engineering reports.

When SSOA requests that the RTA safety department produce a formal investigation report, refer to the investigation documentation schedule as outlined in Section 4.11.2.

Upon the completion of the investigation process, the RTA will submit a draft final report to PennDOT SSOA. PennDOT SSOA will review this report and acknowledge receipt within ten calendar days. Following review, PennDOT SSOA will notify the RTA in writing of its approval of the report, request additional information, or require specific revisions. If revisions are required, the time frame for revising the report will be determined jointly by PennDOT SSOA and the RTA on a case-by-case basis. In reviewing the investigation report PennDOT SSOA will ensure that the report has:

1. Description of the event and sequence of events before, during, and after;
2. Description of investigation process and methodology;
3. Description of the post-event testing and research conducted including hours-of-service information;
4. Conclusions (including findings and identified causal and contributing factors such as fatigue);
5. CAP(s), if necessary (See Section 7);
6. Supporting analysis to defend recommendations in report; and
7. Recommendations.

If PennDOT SSOA approves the report, it will ask the RTA to finalize it and will make the final version the PennDOT SSOA's own investigation report. In the event that the RTA and PennDOT SSOA disagree about investigative findings and cannot come to an agreement, PennDOT SSOA will include the RTA's concerns alongside additional information, as needed, to thoroughly document the investigation.

Investigation reports may be delivered to PennDOT SSOA in a format specified by the PennDOT SSOA Manager (electronic or hard copy).

4.11.3.1 Event Investigation CAP Requirements

Any required CAPs must be developed within 30 calendar days of the event.

4.11.4 PennDOT SSOA Investigations

PennDOT SSOA may elect to conduct an independent event investigation or supplemental investigation activities separate from those of the RTA. Such independent PennDOT SSOA investigations may be necessary if there is a problem with investigation independence or if the RTA declines a request to conduct an investigation on PennDOT SSOA's behalf.

PennDOT SSOA will notify the RTA of any decision to conduct its own formal incident investigation in writing to the RTA's CSO and Accountable Executive as soon as possible.

PennDOT SSOA may choose to conduct an investigation of the event utilizing its own personnel or an authorized contractor. PennDOT SSOA will identify a team of investigation personnel and expects the RTA to provide the investigation team with the resources and information necessary to conduct the investigation. Such resources might include: operations, maintenance, and inspection records; photographs, interview materials, and other evidence documentation; access to incident sites or physical evidence such as vehicles or infrastructure that were involved in the incident; and any other information which is pertinent to the investigation.

All of the PennDOT SSOA-authorized investigation personnel are granted authority under the PennDOT SSOA program to conduct an investigation and evaluate records, materials, data, analysis, equipment, and other information which is pertinent to the investigation. It is required that the RTA will provide the PennDOT SSOA investigation team with all of the resources and information necessary to conduct the investigation in an effective and efficient fashion. PennDOT SSOA will provide reports and/or other evidence developed by the PennDOT SSOA investigation team to appropriate RTA personnel.

In some cases, PennDOT SSOA will not conduct its own investigation but may decide to designate itself as a party to the RTA's investigation. Under this arrangement, PennDOT SSOA will not produce its own investigation report but may respond to the event scene and will participate in RTA investigation activities and meetings.

4.11.4.1 PennDOT SSOA Investigation Procedures

If PennDOT SSOA elects to conduct an independent investigation, it will do so using all available industry best practices and manuals, including the PennDOT SSOA Standard Operating Procedure Event Investigation as a guide. Generally, the process will occur as follows:

1. Upon notification of an event and when PennDOT SSOA determines that it will conduct its own investigation, the PennDOT SSOA Manager or designee will notify the RTA verbally and in writing and will request any immediate assistance that is needed to facilitate the investigation.
2. If PennDOT SSOA plans to conduct an independent on-scene investigation, the PennDOT SSOA Manager may request that the RTA hold the scene until the SSOA's personnel arrive, complete their investigation, and clear the scene. The PennDOT SSOA's personnel will attempt to be as efficient as possible and will try to avoid interference with the RTA's own investigation, where applicable. If first-hand, independent investigation is not necessary, PennDOT SSOA may simply oversee the RTA's field investigation process.
3. PennDOT SSOA will communicate with RTA safety personnel to arrange any document reviews, equipment or site inspections, interviews, or other reviews that may be necessary after the initial on-scene investigation. As with the on-scene investigation, PennDOT SSOA may oversee and adopt follow-up investigation components conducted by RTA personnel.
4. PennDOT SSOA will, as appropriate, employ any special resources available to it, including transit contractor expertise. If these resources are utilized, their results will also be made available to the RTA for use in its event investigation.

5. PennDOT SSOA will assemble collected evidence, data, and information, and will draft an appropriate investigation report, based on the following format:
 - Executive summary;
 - Sequence of events;
 - Findings/analysis;
 - Conclusions;
 - Probable cause;
 - Contributing causes; and
 - Recommendations.
6. PennDOT SSOA will issue its draft investigation report to the RTA within 60 calendar days following the end of the investigation and will allow ten calendar days for comments by the investigation team. PennDOT SSOA will attempt to resolve any conflicts or disputes over the draft investigation report in a manner that ensures the best possible report.
7. After the comment period and any associated revisions, PennDOT SSOA will provide a copy of the final report to the RTA and will require the RTA to incorporate event report recommendations into its CAP process in accordance with the PennDOT SSOA's *Program Standard*. PennDOT SSOA will use the findings review process to resolve any unaddressed recommendations.

4.11.5 Authority Having Jurisdiction Investigations

Depending on the event, such as the NTSB may conduct an investigation utilizing its own procedures and personnel. PennDOT SSOA will provide the investigation team with any information necessary to conduct the investigation in an effective and efficient fashion. Additionally, PennDOT SSOA will comply with all confidentiality/safety sensitive information (SSI) protocols in the event of an investigation. If the event in question is PennDOT SSOA-reportable, PennDOT SSOA will review the other oversight agency's final report and formally adopt it as its own. Once an outside agency has initiated and assumed jurisdiction over an investigation, PennDOT SSOA will not provide the RTA with a weekly checklist on the status of that investigation. RTAs are, however, still required to provide PennDOT SSOA with investigation materials upon request. If the NTSB investigates an event at an RTA covered under PennDOT SSOA, PennDOT SSOA will request that its representative(s) be permitted to participate in the investigation process.

4.11.6 Joint Investigations

If the RTA and PennDOT SSOA agree to conduct a joint event investigation, the RTA and PennDOT SSOA may use the RTA's procedures, the PennDOT SSOA's procedures, or a combination of these procedures to investigate the event. The procedures to be utilized must be established prior to the investigation and agreed upon in writing by both the RTA and PennDOT SSOA.

If the RTA or PennDOT SSOA determine that a joint investigation may be beneficial, the parties will contact each other either formally or informally to initiate the process. The RTA and PennDOT SSOA will formally agree to the scope and approach for the investigation.

4.11.7 Hazard and Other Investigations

In certain cases, PennDOT SSOA may determine that a formal investigation is necessary for other events occurring at an RTA, even though such events may not meet the PennDOT SSOA's notification and investigation criteria. Most commonly these events will include hazards, significant operational events, FTA safety advisories, whistleblower complaints, and other events that could lead or could have led to significant injury or property

damage.

If PennDOT SSOA determines that an investigation into such a concern is necessary, it will notify the RTA as soon as possible. For events having a discrete time of occurrence, this notification will occur within three calendar days. For hazards, PennDOT SSOA will attempt to match this timeframe; however, some hazards may only become clear after analysis.

In the case of hazard investigations, PennDOT SSOA will often request that the RTA safety department conduct an investigation on PennDOT SSOA's behalf, independent of investigatory activities conducted by other RTA departments. PennDOT SSOA will typically request that the RTA perform a hazard investigation and analysis using its hazard management process as found in its PennDOT SSOA-approved PTASP.

4.12 RTA Safety-Related Committees

The RTAs' safety-related committee meetings must at a minimum meet the following requirements:

- Development of a formal agenda (available electronically);
- Creation of meeting minutes (available electronically); and
- Coordination with PennDOT SSOA
 - Meeting invitations and/or other relevant information for the meetings needs to be communicated with the PennDOT SSOA.

As part of PennDOT SSOA's safety compliance monitoring program, PennDOT SSOA has the ability to participate in all the RTAs' various safety-related committee meetings. Each RTA's PTASP must document how the RTA will comply with PennDOT SSOA's requirements.

4.12.1 Bipartisan Infrastructure Law Safety Committee

RTAs that are recipients of FTA's Urbanized Area Formula Program (49 U.S.C. § 5307) funds ("Section 5307 funds") that service urbanized areas with populations of 200,000 or more are required to undertake the following activities:

- RTAs must establish a Safety Committee, composed equally of representatives that are frontline employees and management, or if applicable, a contractor to the recipient, to the extent frontline employees are represented by labor organizations. The frontline employee representatives on this committee should be selected by the labor organization and management. The labor organization that the frontline workers are part of must be the labor organization that represents the largest plurality of frontline workers.
 - The Safety Committee is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the RTA's safety risk assessments.
 - The Safety Committee is required to approve the RTA's PTASP along with the Accountable Executive and the Board of Directors or Equivalent Authority.
 - PennDOT SSOA requires that RTAs must adhere to established, relevant standard operating procedures for their Safety Committee.

5 Security and Emergency Preparedness

In addition to the required audit schedule, PennDOT SSOA requests any information pertaining to scheduled Threat and Vulnerability Assessments (TVAs), drills and exercises, and TSA BASE Reviews be included and updated as soon as information is available.

5.1 Threat and Vulnerability Assessment

RTAs in the Commonwealth of Pennsylvania are critical components of the overall transportation network; therefore, it is essential that each RTA take appropriate steps to identify security risks and develop recommendations for practical mitigations. An RTA's TVA should recognize its unique operating environment and understand that because transit operations as a whole are inherently open to the public, the RTA is constantly exposed to threats which reflect that open atmosphere.

RTAs are required to conduct or update their TVAs every three years. A TVA must assess all RTA assets and their importance to RTA operations and should include both the layout and infrastructure of the facilities, as well as any existing detection, delay, and response capabilities. As part of this asset identification, any co-located assets/equipment and other critical infrastructure (e.g., local city, state, federal assets or key business structures such as airports or stadiums) must be addressed. The resulting TVA must include a baseline asset characterization relative to each identified threat. Threats should be identified as intentional, accidental, or natural and categorized by likelihood and severity.

Upon reviewing each asset, the RTA must look beyond terrorism and natural hazards to consider general security issues that passengers may encounter on a more regular basis, including those that influence their perception of security. The final report should provide a detailed assessment of risk per identified threat and its subcomponents for each critical asset, including site-specific recommendations to mitigate risk, along with system-wide findings and recommendations.

Within their TVAs, each covered RTA is required to document its methodology, including how it identifies, manages, and assesses vulnerabilities system-wide using an all-hazards approach. TVA findings must follow the PennDOT SSOA requirements as prescribed in the Internal Audits Section (See Section 4.8), and any CAPs must go through the formal CAP process (See Section 7).

5.1.1 Notification of Preliminary Hazard Analyses and TVAs

RTAs must notify PennDOT SSOA at least 30 calendar days before conducting Preliminary Hazard Analyses (PHAs) or TVAs.

5.1.2 Reporting of PHAs and TVAs

PHA and TVA reports must be provided to PennDOT SSOA within 30 calendar days of on-site completed activities. If an RTA needs additional time to submit a PHA or TVA, it must submit an extension request in writing to PennDOT SSOA within 30 calendar days of on-site completed activities.

For each finding from a PHA or TVA, the RTA must develop, track, and implement a formal process resolving hazards and risks identified. With the exception of unacceptable hazards, if items resulting from the SSC cannot be resolved prior to opening, PennDOT SSOA will require that the open items be rolled over to the existing CAP log to track through closure.

5.2 Drills and Exercises

As a part of the Three-Year Audit schedule, each RTA is required to identify a full-scale emergency exercise to be performed once every three years. RTAs are recommended to utilize the Department of Homeland Security's (DHS) Homeland Security Exercise and Evaluation Program (HSEEP) to plan, execute, and report the results of the exercise. The DHS HSEEP definition of a full-scale exercise is detailed below.

Full-Scale Exercises (FSEs) are typically the most complex and resource-intensive type of exercise. They involve multiple agencies, organizations, and jurisdictions and validate many facets of preparedness. FSEs often include many players operating under cooperative systems such as the Incident Command System (ICS) or Unified Command. In an FSE, events are projected through an exercise scenario with event updates that drive activity at the operational level. FSEs are usually conducted in a real-time, stressful environment that is intended to mirror a real incident. Personnel and resources may be mobilized and deployed to the scene, where actions are performed as if a real incident had occurred. The FSE simulates reality by presenting complex and realistic problems that require critical thinking, rapid problem solving, and effective responses by trained personnel. The level of support needed to conduct an FSE is greater than that needed for other types of exercises. The exercise site for an FSE is usually large, and site logistics require close monitoring. Safety issues, particularly regarding the use of props and special effects, must be monitored. Throughout the duration of the exercise, many activities occur simultaneously.

5.2.1 Notification of Drills and Exercises

RTAs must notify PennDOT SSOA at least 30 calendar days before conducting any drills or exercises.

5.2.2 Drills and Exercises Reporting Requirements

After-action reports for drills and exercises, must be provided to PennDOT SSOA within 30 calendar days of on-site completed activities. If an RTA needs additional time to submit an after-action report, it must submit an extension request in writing to PennDOT SSOA within 30 calendar days of on-site completed activities.

5.3 Handling of Sensitive Security Information

The PennDOT SSOA follows 49 C.F.R. Part 1520 in the proper handling of Sensitive Security Information. In addition to compliance under this regulation, the PennDOT SSOA will make appropriate arrangements with each RTA to incorporate any RTA-specific SSI in accordance with RTA policy.

6 Safety and Security Certification

An RTA's safety and security certification (SSC) program ensures implementation of its SMS related to the identification and mitigation of safety and security risks associated with new starts or major capital projects. Through the SSC process, hazards and vulnerabilities are analyzed and prioritized and tracked through mitigation or resolution. RTAs are required to coordinate with PennDOT SSOA on capital projects that meet the thresholds specified in Section 6.2 Reviews of System Expansions and System Modifications. PennDOT SSOA engagement is required in the planning phase for capital projects, and RTAs must submit an update on their capital projects program at least once per quarter or on a schedule collaboratively developed by PennDOT SSOA and the RTA. RTAs must complete and include the Safety and Security Certification Required Documentation Form, shown in Appendix J, for each new start or other major capital project in its quarterly update to PennDOT SSOA. Once the Safety and Security Certification Required Documentation Form has been completed and submitted for a New Start or other major capital

project, it does not need to be completed again when submitting future quarterly updates to PennDOT SSOA. PennDOT SSOA will respond in writing within 30 calendar days to approve the quarterly submission and Safety and Security Certification Required Documentation Form or to request additional information.

Based on a review of the updated submissions, the PennDOT SSOA may require an RTA to implement its SSC processes for projects it deems capable of introducing substantial safety and/or security risks to the RTA's operating environment. RTA personnel managing the new starts or major capital projects requiring safety and security certification must participate in a PennDOT SSOA-led SSC training session. Each RTA project manager is only required to participate in the PennDOT SSOA-led SSC training once; this training with applicable RTA personnel will take place no later than the 30 percent design phase of an RTA's SSC project. If RTAs are using contractors on any SSC projects, in addition to their project managers participating in the SSC training, at least one RTA employee must participate in the training. Additionally, each individual project requiring SSC must have its own kick-off meeting with PennDOT SSOA personnel.

6.1 Reviews of Safety and Security Certification Program

Each RTA is required to have an SSC program to ensure that hazards, threats, and vulnerabilities are adequately addressed prior to the initiation of passenger operations for New Starts and major projects to extend, rehabilitate, or modify an existing system or to replace vehicles and equipment. The RTA must notify PennDOT SSOA of any projects and/or procurements that may require SSC prior to the design phase. The RTA shall submit SSC plans and documents to PennDOT SSOA for review and comment on all projects subject to the SSC process based on FTA criteria, RTA criteria, or otherwise required by PennDOT SSOA. PennDOT SSOA will participate, as appropriate, in SSC-related meetings, document reviews, and inspection activities, and may issue specific findings, guidance, or directives to the RTA to address safety and security issues related to certifiable elements and certifiable items. PennDOT SSOA will be involved in such activities in the engineering/design, construction, integrated testing, and pre-revenue operations phases, with more attention to the project as it nears completion.

6.2 Reviews of System Expansions and System Modifications

In order to assess safety and security of new starts projects and to monitor that safety and security processes that are incorporated into any major guideway system modifications and system expansions, PennDOT SSOA may conduct reviews or audits of a project. RTAs are required to establish thresholds for the initiation of SSC projects (described or referenced in the RTA PTASP) and must formally notify PennDOT SSOA of projects considered for SSC prior to the design phase. New starts and/or major capital projects that are in the same location and/or related must be combined as applicable for SSC consideration.

The participation and oversight role by the PennDOT SSOA will be determined based on the type of system expansion or modification under certification. Examples of fixed guideway system expansions or modifications PennDOT SSOA may consider for certification include:

- New Starts projects or system expansions;
- Major reconstruction of existing lines;
- Major redesign and installation of system components;
- New or significantly reconstructed maintenance and operating facilities;
- New vehicle procurements or mid-life overhauls; and
- Other projects deemed to have significant safety implications, including projects implemented by others that have a direct impact on the operations of the covered RTA.

PennDOT SSOA may review any and all development phases of applicable projects including:

- Project planning;
- Preliminary engineering;
- Final design;
- Procurement;
- Construction;
- Operations and maintenance procedures/plans;
- Training;
- Safety certification verification;
- Testing; and
- Start-up.

By reviewing projects at each stage of development, PennDOT SSOA endeavors to resolve any safety/security-critical issues as early as possible.

In reviewing each phase of a major system expansion or modification, PennDOT SSOA will focus its resources on providing an independent review of safety/security-critical system elements and activities, in addition to the more general aspects of a project that could affect the safety or security of existing operations. The materials that PennDOT SSOA may review throughout the project may include the following:

- Planning studies;
- Design criteria and standards manual;
- Design documents;
- Safety certification plan;
- Project management plans (required on major FTA-funded projects);
- Configuration management plans;
- Construction plan and schedules;
- Operating changes and plans during project construction;
- Transportation and maintenance operating procedures;
- Training programs and procedures;
- Integrated test program;
- Emergency Procedures;
- System safety audits and reviews;
- Security plans;
- Safety certification verification review; and
- Exercise documents and results.

After the review of a particular project phase has been completed, PennDOT SSOA may issue written findings and recommendations, as appropriate. PennDOT SSOA will oversee each phase of the project through completion, at which point PennDOT SSOA will issue a formal letter acknowledging concurrence that the safety and security certification process has been completed in accordance with program requirements. Subsequently, the system expansion/modification will be incorporated into the PennDOT SSOA's triennial audit of the operating and maintenance activities of the RTA.

6.3 Pre-Revenue Service Assessments

Upon the transition of a fixed guideway system expansion project from the testing phase to the pre-revenue operations phase, PennDOT SSOA may conduct a Pre-Revenue Service Assessment. PennDOT SSOA's review is intended to ensure that the SSC process has been completed or that there are appropriate solutions in place for any

unfinished certifiable elements or items that do not necessarily preclude the safe operation of the fixed guideway system. PennDOT SSOA will also review operational and maintenance readiness, as well as the completeness of training programs and modifications to RTA plans, policies, and procedures. Following a pre-revenue service assessment, PennDOT SSOA will issue a written report to the RTA documenting its assessment. If applicable, PennDOT SSOA will note any unfinished items and potential hazards and any findings or recommendations requiring a CAP. The review process may be expedited and/or abridged based on the project scope and timeline, as determined by PennDOT SSOA.

6.4 Preliminary Hazard Analyses and TVAs

Covered RTAs must provide results of PHAs and TVAs according to the SSC process described in their PTASPs and/or SEPPs.

6.4.1 Notification of SSC PHAs and TVAs

RTAs must notify PennDOT SSOA at least 30 calendar days before conducting PHAs or TVAs. TVAs must be completed in accordance with Section 5.1.

6.4.2 PHA and TVA SSC Reporting Requirements

PHA and TVA reports must be provided to PennDOT SSOA within 30 calendar days of on-site completed activities. If an RTA needs additional time to submit a PHA or TVA, it must submit an extension request in writing to PennDOT SSOA within 30 calendar days of on-site completed activities.

For each finding from a PHA or TVA, the RTA must develop, track, and implement a formal process resolving hazards and risks identified. With the exception of unacceptable hazards, if items resulting from the SSC cannot be resolved prior to opening, PennDOT SSOA will require that the open items be rolled over to the existing CAP log to track through closure.

7 Corrective Actions

Covered RTAs are required to develop CAPs for deficiencies and hazards identified through the sources detailed in Section 7.1. All CAPs, regardless of the source, must be submitted to PennDOT SSOA within 30 calendar days of an identified deficiency. RTAs are required to track all open CAPs and provide at a minimum monthly updates to PennDOT SSOA with the status of all open CAPs.

RTA CAP tracking must take place on PennDOT SSOA hosted SMS platform located at (Vector EHS Management-formerly IndustrySafe). All proposed CAPs shall include all information listed under Section 7.5. In the event an emergency CAP is required, the RTA must notify the PennDOT SSOA within 24 hours. All timeframes identified in this procedure refer to the RTA's development of a CAP. The timeline for actual implementation of the plan will vary according to the issue being corrected and is not prescribed in this document. www.vectorsolution.com (Vector EHS Management-formerly IndustrySafe). The proposed CAP shall include all information listed under Section 7.5. In the event an emergency CAP is required, the RTA must notify PennDOT SSOA within 24 hours. All timeframes identified in this procedure refer to the RTA's development of a CAP. The timeline for actual implementation of the plan will vary according to the issue being corrected and is not prescribed in this document.

7.1 CAP Sources

PennDOT SSOA requires the covered RTAs to develop CAPs in response to findings associated with the following sources:

PennDOT SSOA Safety or Security Audits

Upon receipt of the final report for a PennDOT SSOA safety or security audit, the RTA will have 30 calendar days to develop CAPs to correct identified Findings of Non-Compliance (See Section 4.8.1.2). RTAs are not required to provide CAPs for Observations unless specifically requested by PennDOT SSOA.

RTA Internal Safety or Security Audits

If an RTA identifies any findings during internal audits of its safety or security programs, they must be remedied by CAPs. The CAPs must be developed and sent within 30 calendar days of publication of the audit report to PennDOT SSOA for review and approval.

Hazards

Pursuant with the principles of SMS, each RTA must have a defined hazard identification, tracking, and reporting process. When a hazard is identified, regardless of which organization conducts the hazard investigation process (the RTA or PennDOT SSOA directly), the hazard investigation may result in CAPs for addressing deficiencies based upon RTA analysis. This includes hazards identified by personnel or the public, all of which must be tracked until a hazard investigation is completed by the RTA. The resolution of these deficiencies will be the primary responsibility of the RTA, with assistance provided by the PennDOT SSOA, as needed. Upon identification of the need for a CAP, the RTA will have 30 calendar days to develop a CAP to correct identified deficiencies and submit the proposed CAP to PennDOT SSOA for review and approval. In cases when PennDOT SSOA believes that the RTA has not sufficiently mitigated or documented its mitigation of a hazard, a finding may be issued requiring the development and implementation of a CAP.

Reviews such as PHAs, TVAs, and other studies that an RTA performs for major capital projects undergoing safety certification may identify hazards and issue findings that require CAPs. Such deficiencies must be addressed through development of a formal CAP within 30 calendar days after completion of the study.

DIHI

DIHI refers to data and/or information that is compliant with an RTA's PTASP but has been identified to present a 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 public transportation system; or damage to the environment. If the DIHI identified by PennDOT SSOA reaches the thresholds for hazard reporting to PennDOT SSOA and subsequent CAP development per the process outlined in the PTASP, then the RTA will be required to follow CAP process as described in Section 7 of the Program Standard and the current version of PennDOT SSOA Corrective Action Plans SOP.

Event Investigations

Any investigation conducted either by the RTA, PennDOT SSOA, or jointly by the two shall result in a final report, which may contain findings and recommendations for addressing deficiencies or unsafe conditions identified during the investigation, no matter what organization published the final report. The resolution of these deficiencies will be the primary responsibility of the RTA with assistance provided by PennDOT SSOA, as needed. Any required CAPs must be developed within 30 calendar days of the SSOA's adoption of the investigation report.

NTSB Recommendations and Guidance

If the NTSB conducts an investigation at a PennDOT SSOA -covered RTA, it may issue a formal report with recommendations to the RTA; should this occur, the RTA shall review the recommendations along with PennDOT SSOA and develop appropriate CAPs.

Independent of investigations performed at PennDOT SSOA-covered RTAs, the NTSB may release industry-wide safety recommendations for improvement. Based on the applicability of the NTSB recommendation(s), PennDOT SSOA may require PennDOT SSOA-covered RTAs to submit corresponding CAPs within 30 calendar days.

FTA Recommendations and Guidance

If the FTA conducts an investigation at an PennDOT SSOA-covered RTA, it may issue a formal report with recommendations to the RTA; should this occur, the RTA shall review the recommendations with PennDOT SSOA and develop and submit appropriate CAPs to PennDOT SSOA for review and approval.

If the FTA releases any of the following documents, PennDOT SSOA will evaluate the bulletin and work with RTAs to determine applicability.

- General Directives
- Special Directives
- Safety Advisories
- Safety Directives
- Safety Bulletins

In the event the safety bulletin applies to an PennDOT SSOA-covered RTA, the RTA is required to submit corresponding CAPs within 30 calendar days to PennDOT SSOA for review and approval.

Data/Trend Analysis

Covered RTAs must conduct analysis of events as well as operational and maintenance data to identify emergent safety and security risk(s) requiring mitigation. PennDOT SSOA, as part of its risk-based inspection program, may also identify trends relevant to a covered RTA. Upon discovery of a trend that results in safety or security risks, the RTA must develop and submit a CAP within 30 calendar days to PennDOT SSOA for review and approval. Potential sources of hazardous trend identification include but are not limited to PennDOT SSOA triennial safety and security audits, inspections, operations and stations reviews, event investigations, and RTA employee safety reporting program. RTAs will also be required to create a process for securely storing data, as well as regularly assessing trends and interdepartmental communication regarding any issues or concerns resulting from this analysis.

Requirement Non-Compliance

If covered RTAs fail to comply with the requirements outlined in the PennDOT SSOA's Program Standard, it must develop and submit a CAP within 30 calendar days to PennDOT SSOA for review and approval.

Other

In addition to the above-noted CAP sources, if PennDOT SSOA or RTA becomes aware of any other hazard or safety concern that requires a corrective action, a CAP should be submitted to PennDOT SSOA within 30 calendar days of identification for review and approval.

7.2 PennDOT SSOA Order for Corrective Action Plan

Pursuant to Part 674.27 (a)(8), PennDOT SSOA may order an RTA to develop a CAP to minimize, control, correct, or eliminate risks and hazards. When an order is issued by PennDOT SSOA, RTAs shall develop a CAP and begin mitigation activities. In such circumstances, the RTA must coordinate with the SSOA to provide CAP required components for review and approval process detailed in the *Program Standard*.

7.3 Emergency Corrective Actions and Follow-up Reporting

If a situation arises that requires immediate mitigation or correction to ensure ongoing safety, RTAs may implement corrective actions prior to notifying PennDOT SSOA and receiving approval for said corrective action. Situations requiring emergency corrective actions include, but are not limited to, the discovery of an unacceptable risk or necessary changes to operations or maintenance as a part of an investigation or as a result of an internal or external audit.

When the need for an immediate corrective action is identified, the responsible RTA shall develop a CAP and begin mitigation activities immediately. In such circumstances, the RTA must notify and document actions using being taken to PennDOT SSOA within 24 hours of its identification of a need for immediate corrective action. Upon receiving the initiation of an emergency CAP from an RTA, PennDOT SSOA will review the submitted information regarding the CAP and either communicate the approval of the CAP or request further information and documentation within three calendar days. PennDOT SSOA reserves the right to request a full briefing from an RTA regarding the nature of any hazard mitigation activities during the corrective action process.

7.4 Corrective Action Dispute Resolution

If an RTA disagrees with a CAP closure rejection, PennDOT SSOA may instead authorize the RTA to perform a detailed hazard analysis. The hazard analysis is meant to ensure that the deficiency, if unmitigated, does not present an unnecessary safety or security risk to passengers, patrons and personnel, or to the public. The hazard analysis must follow all requirements outlined in the PennDOT SSOA's *Program Standard* as well as the RTA's Safety Risk Management chapter of its PTASP.

PennDOT SSOA will review the hazard analysis and decide whether to approve it or require revision. Revisions may be necessary if the analysis does not address the intent of the finding or fails to follow the hazard analysis process requirements. If the hazard analysis shows that the deficiency presents an unacceptable level of risk when left unmitigated, PennDOT SSOA will require the RTA to submit a CAP.

7.5 Corrective Action Plan Required Components

PennDOT SSOA expects that the RTAs evaluate each proposed CAP ensure that all parties are satisfied with the planned action and that it does not introduce unforeseen hazards into the system.

Each CAP must include the following information.

- i. Date Identified. Include the date that the CAP was generated. This is the date the event investigation report was adopted or the date the final audit report was published. This will be added by PennDOT SSOA.
- ii. Source. This section should indicate what generated this CAP. Choices include (based on FTA reporting requirements): Accident/Incident, FTA, Hazard, Internal Audit, NTSB, PennDOT SSOA Audit – Safety, PennDOT SSOA Audit – Security, Unacceptable Hazard, and Other (the RTA should specify). An RTA may not issue a single CAP for multiple findings based on a report generated for an event, audit or special directive.
- iii. Finding of Non-Compliance. Description of the deficiency or needed improvement that generated the CAP.

For example, this could be an audit finding or action item based on an event, hazard, or other issue requiring attention.

- iv. Risk Rating. In accordance with the PennDOT SSOA's *Program Standard*, the RTA's PTASP, or as deemed appropriate by the RTA, this entry will reflect the RTA's hazard rating that results from a hazard analysis. Hazard ratings may be used to prioritize the implementation of a CAP. These hazard ratings should be a result of the RTA's hazard assessment methodology.
- v. Corrective Action Plan. This entry should be the same as the CAP found in any event investigation final report. It may also be something developed by the RTA in response to an audit finding or hazard. The CAP must clearly address the precipitating event or hazard and outline the proposed mitigation, and must be comprehensible as written without reference to the report or other source which initiated the need for a CAP. The description should specify what constitutes implementation of the CAP (i.e., completion).
- vi. Notes/Comments. The CAP database will include a section for notes/comments from the RTA and the PennDOT SSOA.
 - a. RTA should enter current notes and/or discussion of CAP progression towards implementation. RTA should note any issues that may be inhibiting progress on the CAP. The RTA may use this area to request support or an extension from PennDOT SSOA. When applicable, the RTA should indicate that the CAP is proposed for completion and ready to be verified by PennDOT SSOA for closure.
 - b. PennDOT SSOA is to provide feedback to the RTA and monitor CAP implementation. If the RTA proposes that a CAP is ready to be verified for closure, PennDOT SSOA may add comments on documentation provided or indicate additional requests or expectations for verification of implementation.
- vii. Responsible Party. The RTA must assign a responsible individual(s) AND department(s) for the CAP.
- viii. CAP Issue Date. The RTA must provide the date that the CAP was submitted to PennDOT SSOA. In most cases, this date should be within 30 calendar days of the Date Identified field.
- ix. CAP Target Date. The RTA must provide a proposed date of completion for every CAP. As the CAP is tracked to completion, the RTA may request this date be revised – PennDOT SSOA must approve any date revisions – to reflect changes in progress. If an RTA submits a CAP Target Date revision request to PennDOT SSOA in writing, the RTA must document the circumstances necessitating additional time for implementation.
- x. CAP Completion Date: The RTA must provide the final date that the CAP was fully implemented.
- xi. Transit Agency Status. Status options include “Open,” “Awaiting Verification,” or “Closed.” PennDOT SSOA monitors the status and will update PennDOT SSOA CAP Status field accordingly. PennDOT SSOA is the only party with authority to change the PennDOT SSOA CAP Status to “Closed.”

7.6 Corrective Action Plan Schedule and Format

RTAs must provide an update on each open CAP at least once per month using www.vectorsolution.com. PennDOT SSOA will review RTA CAP submissions and issue a memorandum recording its analysis and closure of CAPs, as well as any actions or feedback required by the RTA. While RTAs are encouraged to update this database regularly, the PennDOT SSOA will work with each RTA to develop a submittal schedule in the event the RTA plans to provide only monthly updates. As CAPs are due for closure, the RTAs will be required to provide verification or an updated status; if a CAP is closed by the RTA, it is required to be submitted to PennDOT SSOA within seven calendar days of its closure. If a CAP is not yet complete, the RTA must submit a request for an extension in writing, documenting the circumstances necessitating additional time for implementation; the PennDOT SSOA will assess these requests and approve or deny the request in writing. An RTA may modify the following CAP elements without PennDOT SSOA approval: Notes/Comments, Responsible Party, and Transit Agency Status. An RTA may not modify any other CAP elements without the approval of PennDOT SSOA. CAP information must be updated electronically in

accordance with the electronic reporting system provided by the PennDOT SSOA (www.vectorsolution.com).

7.7 PennDOT SSOA Corrective Action Plan Review and Approval

RTAs must submit each CAP to PennDOT SSOA for approval within 30 calendar days of the determination that a corrective action is required. This applies to CAPs resulting from deficiencies identified both internally and externally. Upon submission, PennDOT SSOA will review each CAP within 15 calendar days and evaluate it relative to the finding (root cause, audit finding, hazard, etc.). PennDOT SSOA will notify the RTA in writing either accepting or rejecting the proposed CAP.

Depending on the type of CAP and the issue it addresses, PennDOT SSOA may ask the RTA for additional supporting information, which may include documentation, records, field demonstration of a revised process or procedure, or a follow-up audit or review. At a minimum, the RTA must collect supporting documentation to substantiate the CAP activity to be submitted to PennDOT SSOA alongside verification of implementation at the time CAP closure is requested.

PennDOT SSOA will approve CAPs at three intervals:

1. **On initial submittal:** PennDOT SSOA will review the CAP; consider its appropriateness, timeliness for proposed closure, practicality, and similar factors; and either approve or reject the CAP.
2. **When updated:** PennDOT SSOA will review the CAP, any changes to its scope, timing, or approach, and its progress to date, and will approve the CAP if appropriate. During this phase, PennDOT SSOA may ask for interim verification evidence or an interim demonstration of progress in the field.
3. **When submitted for verification and requesting a closed or completed status:** PennDOT SSOA requests the RTA alert it of any pertinent updates and requests for closure. PennDOT SSOA will review the request for closure and conduct verification as documented in Section 7.9.

PennDOT SSOA will make all CAP approvals as well as requests for additional CAP-related information, in writing.

7.8 Rejection or Modification of Corrective Action Plans

If PennDOT SSOA rejects a proposed CAP, the RTA will have 15 calendar days to address noted deficiencies in the plan and submit a revised CAP to PennDOT SSOA. At its discretion, PennDOT SSOA may arrange for a meeting with the RTA to discuss the noted deficiencies. For example, CAPs may be rejected on the grounds that the implementation timeline is unreasonably long in the absence of plans for short-term mitigation. For CAPs that require long-term implementation, RTAs must identify interim measures to address the deficiency until permanent measures can be completed. Similarly, RTAs must also ensure that budget constraints do not prevent CAPs from effectively mitigating deficiencies. Such constraints may necessitate the RTA to classify the CAP as a long-term effort, as less expensive remedial actions occur in the interim. Alternately, a mix of several economical mitigation efforts may be needed in place of a CAP calling for prohibitively costly improvements.

7.9 PennDOT SSOA Verification and Closure of Corrective Action Plans

For each CAP that an RTA proposes to close, PennDOT SSOA will review the CAP's completeness and will conduct a final verification of documentation, records, or process implementation, as appropriate to the particular CAP. These CAPs should be identified as "Awaiting Verification" in the PennDOT SSOA's electronic reporting system (www.vectorsolution.com). PennDOT SSOA will determine if the CAP has been fully implemented and

may request additional information or action from the RTA. PennDOT SSOA will conduct this verification through one or more of the following means:

- Field observations;
- Photographs provided by the RTA;
- Receipt of new or revised documents;
- Work orders or similar documents showing full completion;
- Audits of RTA records;
- Announced or unannounced inspections; and/or
- Other means as deemed appropriate by PennDOT SSOA.

If PennDOT SSOA disagrees with the RTA's assessment that a CAP is completed, PennDOT SSOA may require the RTA to either perform a more detailed hazard analysis or transmit a letter to the SSOA documenting the RTA's assessment that the hazard or issue is sufficiently mitigated. If the RTA and sPennDOT SSOA cannot agree on the satisfactory completion of a CAP, PennDOT SSOA and senior PennDOT personnel will work together with RTA executives to resolve the issue.

Only PennDOT SSOA has the authority to close a CAP upon receipt or confirmation of appropriate verification from the RTA. No less than quarterly, PennDOT SSOA will prepare a memorandum outlining the closure of CAPs.

Appendix A: Program Standard Revisions

Major updates made in 2023:

1. Changed Rail Transit Safety Review Program (RTSRP) to Pennsylvania Department of Transportation State Safety Oversight Agency (PennDOT SSOA).
2. Added requirement for agency Accountable Executives to take the TSI “SMS Awareness” course and RTA-specific SMS training.
3. Clarified Data or Information for Hazard Identification requirements and reporting timelines.
4. Updated the risk-based assessment program to risk-based inspection and added requirements and authorities.
5. Updated RTA CAP updates to be monthly instead of quarterly.
6. Added a Safety and Security Certification Required Documentation Form to be submitted by the RTAs with their Major Capital Project updates.
7. Added RTA Safety Committee requirements.
8. Added requirement for RTAs to submit monthly SMS implementation and KPI updates.
9. Clarified reporting requirements related to event investigations and proposed CAPs.
10. Expanded and clarified language in the Safety and Security Certification Section of the *Program Standard*.

Major updates made and tracked prior to 2023:

1. Updated title of document from Procedures and Standards to Program Standard
2. Added PennDOT RTSRP certification letter from FTA.
3. Adjusted timeframes for training due to changes in TSI courses.
4. Enhanced the details of RTSRP specific training requirements to comply with PTSCTP.
5. Inserted BIL requirements (Standalone section and as appropriate in other sections of the *Procedures and Standards*)
6. Added two new RTSRP SOPs – Risk Based Assessment and LIDAR Speed inspections.
7. Added the link to the PennDOT SSO website.
8. Removed reference to rtsrpnotify@gmail.com and replaced with RA-PDRTSRPNOTIFY@pa.gov.
9. Expanded and clarified language in the RTA safety and security report section of the *Procedures and Standards*
10. Clarified the process for audit reporting for joint audit performed by the RTSRP and an RTA.
11. Refined definition of “Near Miss” to include yard activity, roadway workers, and right-of-way safety.
12. Added statement on coordination with the RTSRP on investigations.
13. Added statement on RTSRP analysis of CAP submissions by RTAs and the issuance of a memorandum on closure of CAPs and any actions required by the RTA.
14. Updated “Near Miss” definition in Appendix B.
15. Updated the definition for a Rail Fixed Guideway Public Transportation System to reflect the state definition.
16. Clarified language and updated references to regulations in Appendix C.
17. Expanded conflict of interest requirements
18. Revised the findings criteria for 4.9.1.3
19. Introduced language governing Other Inspections (Section 4.9.4)
20. Revised the reporting requirements of Section 4.10.1
21. Added language to clarify threat and vulnerability assessment requirements

22. Added language to clarify safety and security certification requirements
23. Added requirement that RTAs utilize www.vectorsolution.com to track CAPs
24. Updated Appendix E – RTSRP Reportable Event Decision Tree
25. In 2020, collision as an occurrence was renamed to Minor Collision.
26. In 2020, emergency CAP details were included in Section 7.2.
27. In 2020, the RTSRP updated Appendix E – RTSRP Reportable Event Decision Tree.
28. In 2020, Appendix G that outlined PTASP milestones was deleted.
29. The 2019 revision incorporates upcoming PTASP and SMS requirements under the RTSRP Safety Management Program.
30. The 2019 revision includes updated event reporting and investigation procedures in Table 4-1 (page 30).
31. The 2019 revision includes new details and requirements for RTAs during unexpected shutdowns and recovery instances.
32. The 2019 revision includes a timeline for completing the PTASP with specific milestones outlined in Appendix G (page 87).
33. The 2018 revision includes revised hazard reporting timeline requirements.
34. The 2018 revision includes two additional safety elements: Element 22. CAP Program and Element 23. RWP Program.
35. Revised the accident/incident section of the RTSRP Procedures and Standards.
36. Re-formatted the requirements section for SSPPs and SEPPs in the *Procedures and Standards*. Added SSPP requirements regarding description of incident investigation qualifications and employee fitness for duty. Also, updated hazard management requirements.
37. Revised the content of the Hazard Management section of the *Procedures and Standards*.
38. General document revisions for wording and formatting.
39. Moved Definitions section to Appendix B.
40. Added an Appendix with a timeline of documents due to the RTSRP.
41. In the 2014 revision, minor edits for clarification were made. A small number of SSPP requirements, not specifically called out by the FTA in Part 659, were removed from the standard, though they may be included in the SSPP at the transit agency's discretion. The RTSRP incident/hazard notification phone number was also changed.
42. The 2015 revision contains several changes pertaining to Act 89 and MAP-21 implementation, particularly regarding CAP requirements and incident investigation and reporting procedures.
43. The 2017 revision includes new 674 reporting criteria, two new notifiable hazards. Additionally, hazard log requirements were revised.
44. The 2017 revision includes a new CAP process to include the use of an electronic CAP database. Additionally, an Appendix with a CAP closure form was included

Appendix B: Definitions

1. ***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 fixed guideway transit vehicle; a runaway vehicle; 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 Table 4-1.
2. ***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 RTA's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the RTA's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
3. ***Adjudication*** means any final order, decree, decision, determination, or ruling by an RTA affecting personal or property rights, privileges, immunities, duties, liabilities, or obligations of any or all of the parties to the proceeding in which the adjudication is made.
4. ***Administrator*** means the Federal Transit Administrator or the Administrator's designee.
5. ***Busway*** is a special roadway designed for the exclusive use of buses. A busway can be in its own right-of-way or in a railway or highway right-of-way. Short stretches of streets designated for exclusive bus use are sometimes also called busways. A busway can also be built in an active rail corridor. Busways usually have on-line stations, constructed so that there is room for overtaking stopping buses.
6. ***Commonwealth*** means the Commonwealth of Pennsylvania, the government of such, or the entirety of the state as a whole.
7. ***Contractor*** means an entity that performs tasks required on behalf of the oversight or RTA. The RTA may not be a contractor for the oversight agency.
8. ***Corrective Action Plan (CAP)*** means a plan developed by a Rail Transit Agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards and the schedule for taking those actions. Either a State Safety Oversight Agency or the FTA may require a Rail Transit Agency to develop and carry out a corrective action plan.
9. ***Data and Information Hazard Identification (DIHI)*** DIHI refers to data and/or information that is compliant with an RTA's PTASP but has been identified to present a 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 public transportation system; or damage to the environment..
10. ***Designated personnel means:***
 - (1) Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency; or
 - (2) Employees and contractors of a State Safety Oversight Agency whose job function requires them to conduct safety audits and examinations of the rail fixed guideway public transportation systems subject to the jurisdiction of the agency.

11. ***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 parts 659 or 674.
12. ***Event*** means an Accident, Incident, or Occurrence.
13. ***Examination*** means a process for gathering or analyzing facts or information related to the safety of public transportation system.
14. ***Face-up*** – means an event that involves two rail transit vehicles moving towards each other on the same track without protection.
15. ***Fixed Guideway System*** means any fixed-route public transportation service that uses and occupies a separate right-of-way or rail line for the exclusive use of public transportation and other high-occupancy vehicles or uses a fixed catenary system and a right-of-way usable by other forms of transportation. The term includes light rail, commuter rail, automated guideway transit, people movers, ferry boat service and fixed guideway facilities for buses such as bus rapid transit and high-occupancy vehicles.
16. ***FRA*** means the Federal Railroad Administration, an agency within the U.S. Department of Transportation.
17. ***FTA*** means the Federal Transit Administration, an agency within the U.S. Department of Transportation.
18. ***Hazard*** means any real or potential condition (as defined in the Rail Transit Agency's hazard management process) that can cause injury, illness, or death; damage to or loss of a system, equipment, or property; or damage to the environment.
19. ***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 RTA. An incident must be reported to the FTA's National Transit Database in accordance with the thresholds for reporting set forth in Section 4.10 – Event Notifications. If a RTA 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 Section 4.10 – Event Notifications.
20. ***Individual*** means a passenger; employee; contractor; other rail transit facility worker; pedestrian; trespasser; or any person on rail transit-controlled property.
21. ***Injury*** means harm to a person, requiring that person to be transported from the scene of an incident to a hospital or medical facility for treatment.
22. ***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.
23. ***Key Performance Indicator (KPI)*** means a quantifiable measure of performance that can be tracked to show improvement over time.
24. ***Major Capital Project*** means a project that involves the construction of a new fixed guideway or an extension to an existing fixed guideway; involves the rehabilitation of an existing fixed guideway with a total project cost in excess of \$100 million; or is determined by the FTA to be a major capital project because it has determined that FTA Project Management Oversight process will be beneficial to the project.

- 25. *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.
- 26. *Near Miss*** Any event that did not result in injury or damage but had the potential to do so. This includes a face-up, yard activity, and right-of-way safety.
- 27. *New Starts Project*** means any fixed guideway system which utilizes and occupies a separate right-of-way or rail line for the exclusive use of mass transportation and other high occupancy vehicles or uses a fixed catenary system and a right-of-way usable by other forms of transportation, which is funded under FTA's 49 U.S.C. § 5309 discretionary construction program.
- 28. *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 RTA.
- 29. *Passenger Operations*** means the period of time when any aspect of RTA operations is initiated with the intent to carry passengers.
- 30. *PennDOT*** means the Pennsylvania Department of Transportation, an agency within the Commonwealth of Pennsylvania.
- 31. *PennDOT SSOA*** is the entity designated by PennDOT to develop, operate, and maintain the safety review program requirements in the Commonwealth, fulfilling safety review requirements for the Commonwealth of Pennsylvania and the FTA State Safety Oversight Rule (49 C.F.R. Part 674).
- 32. *Person*** means a passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a fixed guideway public transportation system.
- 33. *Program Standard*** means a written document developed and adopted by the oversight agency that describes the policies, objectives, responsibilities, and procedures used to provide RTA safety and security oversight.
- 34. *Public transportation Agency*** means an entity that provides public transportation service as defined in 49 U.S.C. 5302 and that has one or more modes of service not subject to the safety oversight requirements of another Federal agency.
- 35. *Public Transportation Modes*** means heavy rail, light rail, trackless trolley bus, and inclined plane services and related facilities.
- 36. *Public Transportation Agency Safety Plan (PTASP)*** means the comprehensive agency safety plan for a transit agency, including a Rail Transit Agency, that is required by 49 U.S.C. 5329(d) and based on 49 C.F.R. Part 673.
- 37. *Public Transportation Safety Certification Training Program (PTSCTP)*** 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).
- 38. *Rail Transit Safety Review Program (RTSRP)*** is the former name of “the PennDOT SSOA”.
- 39. *Rail Fixed Guideway Public Transportation System*** means a fixed-route public transportation service that

uses and occupies a separate right-of-way or rail line for the exclusive use of public transportation and other high-occupancy vehicles or uses a fixed catenary system and a right-of-way usable by other forms of transportation. The term includes light rail, commuter rail, automated guideway transit, people movers, ferry boat service and fixed guideway facilities for buses such as bus rapid transit and high-occupancy vehicles.

- 40. **Rail Transit Agency (RTA)** means an entity that operates a fixed guideway system subject to oversight in accordance with FTA and state safety oversight requirements.
- 41. **Rail Transit-Controlled Property** means property that is used by the rail transit agency and may be owned, leased, or maintained by the RTA.
- 42. **Rail Transit Vehicle** means the RTA's rolling stock, including but not limited to passenger and maintenance vehicles.
- 43. **Recipient** means a State or local governmental authority, or any other operator of a public transportation system receiving financial assistance under 49 U.S.C. chapter 53.
- 44. **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
- 45. **Risk Mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- 46. **Safety** means freedom from harm resulting from unintentional acts or circumstances.
- 47. **Safety audit** means a review or analysis of safety records and related materials, including, but not limited to, those related to financial accounts.
- 48. **Safety Management Program (SMP)** means the policies, procedures, and programs that collectively make up the Public Transportation Agency Safety Plan (PTASP) utilizing Safety Management System principles and terminology.
- 49. **Safety Management System (SMS)** means a method of identifying hazards and controlling risks in a work and operational environment that continually monitors these methods for effectiveness.
- 50. **Security** means freedom from harm resulting from intentional acts or circumstances.
- 51. **Serious Injury**, as defined in 49 C.F.R. § 674, means any injury which: (a) Requires hospitalization for more than forty-eight (48) hours, commencing within seven calendar days from the date of the injury; (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 any internal organ or; (e) Involves second- or third-degree burns affecting more than five percent of the body surface.
- 52. **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.
- 53. **State Safety Oversight Agency (SSOA)** State Safety Oversight Agency (SSOA) means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in this part.
- 54. **Stop Signal Overrun** means an occurrence when a rail transit vehicle fails to stop as required in advance

of a stop signal, flag, or other indicator, as specified in a RTA's operating rules and procedures.

55. *Security and Emergency Preparedness Plan (SEPP)* means a document developed and adopted by the RTA, describing its security and emergency preparedness policies, objectives, responsibilities, and procedures.

56. *Vehicle* means any rolling stock used on a fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles.

Appendix C: PTASP Approval Checklist

Transit System:	Dates of Review:
Reviewed by:	Approved [Y/N]:

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 1.0 General						
1.1	• Inclusion of the RTA's name and address	673.11(a)	A-1			
1.2	• Specification of the modes of transit service covered by the PTASP	673.11(b)	A-2			
1.3	• Specification of the SSOA and authority for the SSO program	673.13(a)	A-3			
1.4	• Timeline and process for the annual review and revision of the PTASP, including the version number	673.11(a)(5) and 674.29(b)	B-5			
1.5	• Documentation supporting the establishment and implementation of a safety management system (SMS), including but not limited to:	673.11(a)(2) and 673.21	E-1			
1.5.1	○ Documentation that specifies that the SMS is appropriately scaled to the size, scope, and complexity of the RTA, and includes: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion	673.21, 673.23, 673.25, 673.27, and 673.29	E-2			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
1.5.2	<ul style="list-style-type: none"> Reporting practices and procedures defining SMS goals, objectives, and expectations 	SSOA Specific Requirement				
1.6	<ul style="list-style-type: none"> Identification of the department responsible for the agency's Security and Emergency Preparedness Plan (SEPP), as mandated by the PennDOT SSOA Program Standard § 4.7.2 	SSOA Specific Requirement				
1.7	<ul style="list-style-type: none"> Indication that a safety committee, convened based on a joint labor-management process and comprised of half frontline employees and half management representatives, assists with the development and approval of the PTASP. 	BIL				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 2.0 Safety Management Policy Agency leadership will develop and endorse a clear statement of the RTA's safety objectives through the furtherance of policies, procedures, and organizational mandates. The PTASP will clearly convey management and employee responsibilities, lines of authority, and safety reporting requirements. The approved PTASP will ensure safety is integrated throughout the organization and that management is actively engaged in the oversight of safety.						
2.1	<ul style="list-style-type: none"> Description of or reference to documentation that specifies, a written statement of safety management policy, including the agency's safety objectives. 	673.5, 673.21(a), and 673.23(a)	F-1			
2.2	<ul style="list-style-type: none"> Description of safety department's authority, organizational structure, and function within the RTA 	SSOA Specific Requirement				
2.3	<ul style="list-style-type: none"> Description of departments and roles tasked with the development and revision of the PTASP 	SSOA Specific Requirement				
2.4	<ul style="list-style-type: none"> The RTA specifies, or references documentation that specifies, necessary authorities, accountabilities, and responsibilities for the management of safety and the implementation of the RTA's SMS among the key safety roles within the organization: 	673.23(a) and 673.23(d)	F-4			
2.4.1	<ul style="list-style-type: none"> Accountable Executive 	673.5, 673.23(d)(1), and 674.7	A-4 F-4-a			
2.4.1.1	<ul style="list-style-type: none"> Endorsing the transit agency's safety plan and ensuring its annual certification 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
2.4.1.2	– Designating the Chief Safety Officer (CSO) or SMS Executive to implement the PTASP and the agency's SMS	SSOA Specific Requirement				
2.4.1.3	– Communicating a commitment to the goals and objectives outlined in the PTASP	SSOA Specific Requirement				
2.4.1.4	– Allocating resources for implementation and management of the PTASP	SSOA Specific Requirement				
2.4.1.5	– Encouraging all employees to report safety concerns	SSOA Specific Requirement				
2.4.1.6	– Promoting general safety with passengers and the community at-large	SSOA Specific Requirement				
2.4.1.7	– Ensuring the agency's SMS is effectively implemented throughout the system	673.23(d)(1)	A-4-a			
2.4.1.8	– Ensuring action is taken, as necessary, to address substandard performance in the agency's SMS	673.23(d)(1)	A-4-b			
2.4.2	○ CSO and/or SMS Executive	673.5, 673.23(d)(2), and 674.29(b)	A-5 F-4-b			
2.4.2.1	– Designated by the Accountable Executive	673.23(d)(2)	A-5-a			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
2.4.2.2	– Reporting directly to the CEO or Accountable Executive	673.23(d)(2) and 674.29(b)	A-5-b			
2.4.2.3	– Maintaining adequate training	674.29(b)	A-5-c			
2.4.2.4	– Ensuring the PTASP aligns with applicable regulations including federal, state, and local requirements, laws, regulations, and codes	SSOA Specific Requirement				
2.4.2.5	– Holding the authority and responsibility for day- to-day implementation and operation of the agency's SMS	673.23(d)(2)	A-5-d			
2.4.2.6	– Defining safety performance targets, including metrics for internal and external audits	SSOA Specific Requirement				
2.4.2.7	– Appointing Key Agency Staff and/or SMS committee members tasked with the development and implementation of the SMS	SSOA Specific Requirement				
2.4.2.8	– Ensuring employees are trained on their responsibilities as described in the PTASP	SSOA Specific Requirement				
2.4.2.9	– Developing and implementing a means of conducting safety risk assessments	SSOA Specific Requirement				
2.4.2.10	– Ensuring that employee responsibilities and lines of authority are clearly defined, documented, and communicated throughout the agency	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
2.4.2.11	– Ensuring the promotion of safety expectations to employees and safety awareness to passengers	SSOA Specific Requirement				
2.4.2.12	– Implementing processes for all employees to anonymously report all safety concerns	SSOA Specific Requirement				
2.4.2.13	– Refraining from serving in other operational or maintenance capacities	673.5	A-5-e			
2.4.3	○ Key Agency Leadership, Executive Management, and other Staff and/or appointed SMS committee members	673.23(d)(3) and 673.23(d)(4)	F-4-c F-4-d			
2.4.3.1	– Developing and managing safety roles and responsibilities within their department, to include the promotion of safety awareness	SSOA Specific Requirement				
2.4.3.2	– Identifying training required for the fulfillment of their defined responsibilities	SSOA Specific Requirement				
2.4.3.3	– Measuring risk associated with departmental processes for the CSO and/or SMS Executive to approve or reject	SSOA Specific Requirement				
2.4.3.4	– Establishing lines of authority and procedures reflecting identified roles and responsibilities	SSOA Specific Requirement				
2.4.3.5	– Encouraging anonymous reporting of all safety issues	SSOA Specific Requirement				
2.5	• Employee safety reporting (ESR) program that includes:	673.23(b)	F-2			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
2.5.1	<ul style="list-style-type: none"> ○ A process that allows employees to report safety conditions to senior management 	673.23(b)	F-2-a			
2.5.2	<ul style="list-style-type: none"> ○ Protections for employees who report safety conditions to senior management 	673.23(b)	F-2-b			
2.5.3	<ul style="list-style-type: none"> ○ A description of behaviors that may result in disciplinary action 	673.23(b)	F-2-c			
2.6	<ul style="list-style-type: none"> • Documentation that specifies communication of the safety management policy throughout the organization 	673.23(c)	F-3			
2.7	<ul style="list-style-type: none"> • Identification of emergency preparedness practices, as articulated in the PennDOT SSOA Program Standard § 4.7.2 	673.11(a)(6)	C-1			
2.7.1	<ul style="list-style-type: none"> ○ The assignment of employee responsibilities during an emergency 	673.11(a)(6)	C-1-a			
2.7.2	<ul style="list-style-type: none"> ○ Description of the security and emergency preparedness awareness program for employees and contractors 	SSOA Specific Requirement				
2.7.3	<ul style="list-style-type: none"> ○ Description of the coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response 	673.11(a)(6)	C-1-b			
2.7.4	<ul style="list-style-type: none"> ○ Description of the program used to familiarize outside emergency responders with all RTA operations and infrastructure 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
2.7.5	<ul style="list-style-type: none"> ○ Description of the program used for drills and exercises that ensures compliance with PennDOT SSOA requirements (e.g., Homeland Security Exercise Evaluation Program or other industry best practice) that includes when they should be conducted and how lessons learned are to be captured and incorporated into plans, policies, and procedures 	SSOA Specific Requirement				
2.7.6	<ul style="list-style-type: none"> ○ Description of the process used for threat and vulnerability identification, assessment, and management 	SSOA Specific Requirement				
2.8	<ul style="list-style-type: none"> • Documentation that specifies adequate methods to ensure implementation of the PTASP by all employees, agents, and contractors 	674.29(b)	F-5			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 3.0 Safety Risk Management Transit agencies must develop safety risk management (SRM) processes to understand the operational environment (system description) and critical characteristics of its systems in order to facilitate the identification of hazards, assessment of their risk, and design of controls to mitigate and/or accept these hazards. The goal of SRM is to reduce the likelihood and severity of the identified safety risk.						
3.1	<ul style="list-style-type: none"> System description of the operating environment, including but not limited to: 	SSOA Specific Requirement				
3.1.1	<ul style="list-style-type: none"> Area of operation (system maps) 	SSOA Specific Requirement				
3.1.2	<ul style="list-style-type: none"> Hours of service 	SSOA Specific Requirement				
3.1.3	<ul style="list-style-type: none"> Critical assets and infrastructure, including: <ul style="list-style-type: none"> Control Center Communications network Vehicles (including non-revenue) Stations Maintenance facilities and yards Power delivery infrastructure Track and Switches 	SSOA Specific Requirement				
3.1.4	<ul style="list-style-type: none"> Unique characteristics (e.g., shared right of way, elevated structures, tunnels, bridges, etc.) 	SSOA Specific Requirement				
3.2	<ul style="list-style-type: none"> Documentation that specifies, a Safety Risk Management process for all system elements. 	673.21(b), 673.25, and 674.29(b).	G-1			



Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
3.3	<ul style="list-style-type: none"> Procedures for the application of the hazard identification and mitigation process to current operational procedures, the development of new or revised operational procedures, and reporting from employees, patrons, and the public, including: 	673.25(a), 673.25(b)(1), 674.7	G-2			
3.3.1	<ul style="list-style-type: none"> <ul style="list-style-type: none"> Description of what constitutes a hazard, their triggers, and potential consequences (definitions, thresholds, and integration within PennDOT SSOA <i>Program Standard</i> § 4) 	SSOA Specific Requirement				
3.3.2	<ul style="list-style-type: none"> <ul style="list-style-type: none"> Description of how hazards are identified and reported with sufficient detail to allow for the classification of the associated level of risk and determination of risk acceptability. Sources may include but are not limited to: <ul style="list-style-type: none"> Event investigations Hazard management programs Internal audits PennDOT SSOA/FTA findings NTSB investigations Employee/contractor reporting Patron/community reporting FTA advisory notices Other oversight authorities 	673.25(b)(2)	G-3			
3.4	<ul style="list-style-type: none"> Description of the process for risk assessment: the determination of the severity and likelihood of consequences of all identified hazards associated with providing transit services in their area of operation, including the assignment of risk classifications (including existing mitigations) 	673.25(c), and 674.7	G-4			



Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
3.4.1	<ul style="list-style-type: none"> Establishment of hazard classification specifications (such as MIL-STD-882E), allowing for both quantifiable and qualifiable risk assessment and flexible enough to be applied to any hazard faced during the course of transit operations 	SSOA Specific Requirement				
3.4.2	<ul style="list-style-type: none"> A process for prioritization of hazards based on the safety risk 	673.25(c)(2)	G-5			
3.5	<ul style="list-style-type: none"> The RTA specifies, or references documentation that specifies a process for safety risk management with adequate means of risk mitigation 	674.25 and 674.29(b)	G-7			
3.5.1	<ul style="list-style-type: none"> Description of the management levels at which safety risk mitigation decisions can be made 	SSOA Specific Requirement				
3.5.2	<ul style="list-style-type: none"> Processes for the development and implementation of risk mitigations to reduce the likelihood and/or severity of a hazard, including means through which mitigations will be analyzed prior to the implementation of any risk control 	673.25(a) and 673.25(d)	G-6			
3.5.3	<ul style="list-style-type: none"> Processes through which data and information related to hazards and their mitigations is identified, tracked, managed, and shared with the PennDOT SSOA and the FTA (e.g., any safety management software used) 	SSOA Specific Requirement				
3.5.4	<ul style="list-style-type: none"> The methods and processes to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended 	673.27(b)(2)	H-3			
3.5.5	<ul style="list-style-type: none"> Description of a risk reduction program 	BIL				



Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 4.0 Safety Assurance Transit agencies must monitor and measure safety performance through the collection, analysis, and assessment of data from internal and external sources. Identified safety risks must be managed through the SRM process in order to meet or exceed stated safety goals and objectives through the correction of identified safety deficiencies.						
4.1	<ul style="list-style-type: none"> Documentation that specifies methods or processes to develop and implement a safety assurance process covering Safety Performance Monitoring and Measurement, Management of Change, and Continuous Improvement 	673.27	H-1			
4.2	<ul style="list-style-type: none"> The RTA specifies, or references documentation that specifies, its methods or processes to assess safety performance 	673.27(d)(1)	H-8			
4.3	<ul style="list-style-type: none"> Description of the internal audit structure - general 	SSOA Specific Requirement				
4.3.1	<ul style="list-style-type: none"> Ongoing audit schedule comprising the triennial cycle in coordination with the PennDOT SSOA 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.3.2	<ul style="list-style-type: none"> Verification that reviewers are independent from the area of responsibility being audited 	SSOA Specific Requirement				
4.3.3	<ul style="list-style-type: none"> Development of comprehensive checklists for the plan, policy, or procedure being reviewed/audited 	SSOA Specific Requirement				
4.3.4	<ul style="list-style-type: none"> Notification to the SSOA before conducting any internal safety review, following the requirements of the Program Standard 	674.27(a)(4)	H-8-a			
4.3.5	<ul style="list-style-type: none"> Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature 	674.27(a)(4)	H-8-b			
4.4	<ul style="list-style-type: none"> Description of the process to evaluate and promote adherence to all operational plans, policies, and procedures, including: 	673.27(b)(1)	H-2			
4.4.1	<ul style="list-style-type: none"> Interviews with pertinent employees and contractors 	SSOA Specific Requirement				
4.4.2	<ul style="list-style-type: none"> Rules compliance testing 	SSOA Specific Requirement				
4.4.3	<ul style="list-style-type: none"> Review of qualifications/certifications 	SSOA Specific Requirement				
4.4.4	<ul style="list-style-type: none"> Review of emergency preparedness (e.g., drills and exercises/threat and vulnerability assessments) 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.5	Description of the process to evaluate the inspection and maintenance of stations, parking lots, maintenance facilities, control centers, and other agency property, including:	673.27(b)(1)	H-2			
4.5.1	<ul style="list-style-type: none"> Interviews with pertinent employees and contractors 	SSOA Specific Requirement				
4.5.2	<ul style="list-style-type: none"> Review of emergency preparedness (e.g., drills and exercises/threat and vulnerability assessments) 	SSOA Specific Requirement				
4.6	Description of the process to evaluate the inspection and maintenance of elevated guideways, bridges, tunnels, and busways (PRT Martin Luther King, Jr. East Busway, South Busway, and West Busway; and SEPTA Route 103 Busway), including:	673.27(b)(1)	H-2			
4.6.1	<ul style="list-style-type: none"> Interviews with pertinent employees and contractors 	SSOA Specific Requirement				
4.6.2	<ul style="list-style-type: none"> Review of emergency preparedness (e.g., drills and exercises/threat and vulnerability assessments) 	SSOA Specific Requirement				
4.7	Description of the process to evaluate the inspection and maintenance of rolling stock, and maintenance of way vehicles and equipment, including:	673.27(b)(1)	H-2			
4.7.1	<ul style="list-style-type: none"> Review of state inspection currency 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.7.2	<ul style="list-style-type: none"> Interviews with pertinent employees and contractors 	SSOA Specific Requirement				
4.7.3	<ul style="list-style-type: none"> Review of emergency preparedness (e.g., drills and exercises/threat and vulnerability assessments) 	SSOA Specific Requirement				
4.8	Description of the process to evaluate the inspection and maintenance of the right-of-way, including track, traction power, communications, signals, and SCADA operations, including:	673.27(b)(1)	H-2			
4.8.1	<ul style="list-style-type: none"> Interviews with pertinent employees and contractors 	SSOA Specific Requirement				
4.8.2	<ul style="list-style-type: none"> Review of emergency preparedness (e.g., drills and exercises/threat and vulnerability assessments) 	SSOA Specific Requirement				
4.9	<ul style="list-style-type: none"> Means of incorporating findings, recommendations, and observations from external agencies, including: <ul style="list-style-type: none"> PennDOT SSOA FTA NTSB Threat & vulnerability assessments Drills and exercises APTA standards Peer reviews TSA (BASE reviews) TCRP reports 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.10	<ul style="list-style-type: none"> Description of system(s) through which employees, contractors, and the public can confidentially report hazards, including the feedback systems through which these reports are utilized to identify emerging hazards and assess performance of risk controls 	SSOA Specific Requirement				
4.11	<ul style="list-style-type: none"> Description of methods or processes to monitor information reported through any internal safety reporting programs 	673.27(b)(4)	H-5			
4.12	Process for incorporating information obtained during the identified internal and external reviews and audits into hazard management processes, beginning with a hazard classification	SSOA Specific Requirement				
4.13	<ul style="list-style-type: none"> Process for the initiation of event investigations (accidents, incidents, and occurrences), descriptions of what can and will be investigated, who can conduct those investigations, parties receiving event notifications, how causal factors are identified, and how those investigations are adopted and closed, including: 	673.27(b)(3)	H-4			
4.13.1	<ul style="list-style-type: none"> Identification of personnel responsible for performing event investigations 	SSOA Specific Requirement				
4.13.2	<ul style="list-style-type: none"> Overview of qualifications required to perform event investigations, and blocks of training that meet those qualifications (for all personnel and contractors, in line with the Public Transportation Safety Certification Program) 	674.35(c)	H-4-f			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.13.3	<ul style="list-style-type: none"> ○ Description of the agency internal event notification criteria, including personnel to be notified 	SSOA Specific Requirement				
4.13.4	<ul style="list-style-type: none"> ○ Description of agency external event notification criteria, including agencies to be notified (based on current FTA and NTSB notification requirements and PennDOT SSOA Program Standard) 	674.27(a)(6) and 674.33(a)	H-4-a			
4.13.5	<ul style="list-style-type: none"> ○ FTA requirements to notify the SSOA and FTA within two hours of any accident occurring on the RTA system. Accident is defined as any instance involving a fatality occurring at the scene or within 30 days following the accident, one or more persons suffering serious injury, property damage resulting from a collision involving a rail transit vehicle, or any derailment of a rail transit vehicle. 	673.5, 674.33(a), 674.7, and 674 Appendix	H-4-b			
4.13.6	<ul style="list-style-type: none"> ○ Description of how the RTA will work with the SSOA when conducting its investigation of a safety event 	674.35(a)	H-4-d			
4.13.7	<ul style="list-style-type: none"> ○ Description of the process in which the RTA will review investigation reports developed by the SSOA, and submit written dissent, as appropriate 	674.35(b)	H-4-e			
4.13.8	<ul style="list-style-type: none"> ○ Description of what must be included in an investigation report developed on behalf of the SSOA, including, at minimum, identification of causal and contributing factors as well as CAPs as necessary or appropriate 	674.35(b)	H-4-c			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.13.9	<ul style="list-style-type: none"> ○ Description of the process used to identify and ultimately mitigate the probable cause and any contributing factors associated with the event as investigated or reported 	SSOA Specific Requirement				
4.14	<ul style="list-style-type: none"> • The RTA specifies, or references documentation that specifies, its methods or processes to develop and carry out a plan, under the direction of the Accountable Executive, to address safety deficiencies identified as part of the safety performance assessment. 	673.27(d)(2)	H-9			
4.15	<ul style="list-style-type: none"> • Commitment to promote continuous improvement of safety performance through the development of Corrective Action Plans (CAPs) in response to identified hazards, including the continuous application of SRM processes to improve safety risk control effectiveness 	SSOA Specific Requirement				
4.15.1	<ul style="list-style-type: none"> ○ Specify when the RTA must develop and carry out a CAP 	674.37(a)	J-1			
4.15.2	<ul style="list-style-type: none"> ○ Specify how the RTA will submit CAPs to the SSOA for review and approval 	674.37(a)	J-2			
4.15.3	<ul style="list-style-type: none"> ○ Specify how the RTA will manage immediate or emergency corrective actions 	674.37(a)	J-3			
4.15.4	<ul style="list-style-type: none"> ○ Specify the required contents of a CAP, including the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions. 	674.37(a)	J-4			
4.15.5	<ul style="list-style-type: none"> ○ Specify how the RTA must periodically report to the SSOA on CAP progress and status 	674.37(a)	J-5			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.15.6	<ul style="list-style-type: none"> ○ As appropriate, CAPs should address: <ul style="list-style-type: none"> – Investigations and/or documentation of reported events, and internal or external audits verifying compliance with regulatory standards – The application of current agency safety policies – Quantifiable and/or qualifiable objectives – Appropriate analysis of data to include confidential employee feedback loops and actions to eliminate the causes of non-compliance and to prevent recurrence – Process for the implementation/tracking of CAPs – Active management oversight and clear lines of authority when accepting risk mitigations 	SSOA Specific Requirement				
4.16	<ul style="list-style-type: none"> • Description of the process developed, implemented, and maintained for configuration management, including: 	SSOA Specific Requirement				
4.16.1	<ul style="list-style-type: none"> ○ Description of methods or processes to identify and assess changes that may introduce new hazards or impact safety at the RTA 	673.27(c)(1)	H-6			
4.16.2	<ul style="list-style-type: none"> ○ Description of methods or processes to evaluate changes that may introduce new hazards or impact safety at the RTA through the RTA's Safety Risk Management process 	673.27(c)(2)	H-7			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.16.3	<ul style="list-style-type: none"> ○ Description of the process for determining acceptable safety risks related to any operational changes, system design modifications, current/new procedures, and new starts 	SSOA Specific Requirement				
4.16.4	<ul style="list-style-type: none"> ○ Identification of management authority pertaining to configuration changes at the RTA 	SSOA Specific Requirement				
4.16.5	<ul style="list-style-type: none"> ○ Description of communication channels used to ensure configuration management changes are shared with all employees 	SSOA Specific Requirement				
4.17	<ul style="list-style-type: none"> • Description of the safety certification process, including thresholds at which the process is invoked and a standard for evaluation of criteria applied 	SSOA Specific Requirement				
4.17.1	<ul style="list-style-type: none"> ○ Process for ensuring hazards are adequately addressed prior to the initiation of passenger operations for new starts and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace/overhaul vehicles and equipment 	SSOA Specific Requirement				
4.18	<ul style="list-style-type: none"> • Safety performance targets, informed by the safety performance measures established by the National Public Transportation Safety Plan (NPTSP) 	SSOA Specific Requirement				
4.18.1	<ul style="list-style-type: none"> ○ Safety performance targets include: 	SSOA Specific Requirement				
4.18.1.1	<ul style="list-style-type: none"> – Fatalities (total number of reportable fatalities and rate per total vehicle revenue miles by mode) 	D-1	673.11(a)(3) and National Safety Plan			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
4.18.1.2	– Injuries (total number of reportable injuries and rate per total vehicle revenue miles by mode)	D-2	673.11(a)(3) and National Safety Plan			
4.18.1.3	– Safety events (total number of reportable events and rate per total vehicle revenue miles by mode)	D-3	673.11(a)(3) and National Safety Plan			
4.18.1.4	– System reliability (mean distance between failures by mode)	D-4	673.11(a)(3) and National Safety Plan			
4.18.2	○ Availability of safety performance targets to the State to aid in the planning process	D-5	673.15(a)			
4.18.3	○ Availability of safety performance targets to the Metropolitan Planning Organization (MPO) to aid in the planning process	D-6	673.15(a)			
4.18.4	○ Coordination with the State and MPO in the selection of State and MPO safety performance targets, to the maximum extent practicable	D-6	673.15(b)			
4.19	• Description of strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the CDC or a State health authority, minimize exposure to infectious diseases	BIL				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 5.0 Safety Promotion Description of programs used by the agency to promote a positive safety culture throughout the organization based on the development of comprehensive training programs, certification requirements for employees and contractors, and refresher training as necessary or required. Descriptions must include how training will be updated to reflect current events, trends, and any changes to existing operation conditions and/or new designs/expansions.						
5.1	<ul style="list-style-type: none"> Description of methods or processes to establish and implement a comprehensive safety training program for all personnel directly responsible for RTA safety that: 	673.29(a) BIL	I-1			
5.1.1	<ul style="list-style-type: none"> Includes employees and contractors 	673.29(a)	I-1-a			
5.1.2	<ul style="list-style-type: none"> Includes refresher training, as necessary 	673.29(a)	I-1-b			
5.2	<ul style="list-style-type: none"> List of positions requiring Transit Safety and Security Program (TSSP) certification as stipulated by 49 CFR 672 (specific classes required for this certification are detailed in Appendix A to 49 CFR 672) 	SSOA Specific Requirement				
5.3	<ul style="list-style-type: none"> Description of roadway worker protection (RWP) program, including requirements for recertification 	SSOA Specific Requirement				
5.4	<ul style="list-style-type: none"> Description of policies and procedures related to employee fitness for duty 	SSOA Specific Requirement				
5.5	<ul style="list-style-type: none"> List of safety training courses required for all newly hired agency employees 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
5.6	<ul style="list-style-type: none"> Safety department training requirements, including but not limited to: 	SSOA Specific Requirement				
5.6.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.6.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				
5.6.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.6.4	<ul style="list-style-type: none"> Process for the annual review of training requirements to reflect current events, hazards, trends, and any changes to existing operations 	SSOA Specific Requirement				
5.6.5	<ul style="list-style-type: none"> Process for conveying information on hazards and safety risks relevant to employees' roles and responsibilities 	673.29(b)	I-3			
5.7	<ul style="list-style-type: none"> Operations department training requirements, including but not limited to: 	SSOA Specific Requirement				
5.7.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.7.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
5.7.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.7.4	<ul style="list-style-type: none"> Process for the annual review of training requirements to reflect current events, hazards, trends, and any changes to existing operations 	SSOA Specific Requirement				
5.7.5	<ul style="list-style-type: none"> Process for conveying information on hazards and safety risks relevant to employees' roles and responsibilities 	673.29(b)	I-3			
5.8	<ul style="list-style-type: none"> Control Center training requirements, including but not limited to: 	SSOA Specific Requirement				
5.8.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.8.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				
5.8.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.8.4	<ul style="list-style-type: none"> Process for the annual review of training requirements to reflect current events, hazards, trends, and any changes to existing operations 	SSOA Specific Requirement				
5.8.5	<ul style="list-style-type: none"> Process for conveying information on hazards and safety risks relevant to employees' roles and responsibilities 	673.29(b)	I-3			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
5.9	<ul style="list-style-type: none"> Power & Way maintenance training requirements, including but not limited to: 	SSOA Specific Requirement				
5.9.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.9.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				
5.9.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.9.4	<ul style="list-style-type: none"> Process for the annual review of training requirements to reflect current events, hazards, trends, and any changes to existing operations 	SSOA Specific Requirement				
5.9.5	<ul style="list-style-type: none"> Process for conveying information on hazards and safety risks relevant to employees' roles and responsibilities 	673.29(b)	I-3			
5.10	<ul style="list-style-type: none"> Vehicle maintenance training requirements, including but not limited to: 	SSOA Specific Requirement				
5.10.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.10.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
5.10.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.10.4	<ul style="list-style-type: none"> Process for the annual review of training requirements to reflect current events, hazards, trends, and any changes to existing operations 	SSOA Specific Requirement				
5.10.5	<ul style="list-style-type: none"> Process for conveying information on hazards and safety risks relevant to employees' roles and responsibilities 	673.29(b)	I-3			
5.11	<ul style="list-style-type: none"> Contractor training requirements, including but not limited to: 	SSOA Specific Requirement				
5.11.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.11.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				
5.11.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.11.4	<ul style="list-style-type: none"> Process for the annual review of training requirements to reflect current events, hazards, trends, and any changes to existing operations 	SSOA Specific Requirement				
5.11.5	<ul style="list-style-type: none"> Process for conveying information on hazards and safety risks relevant to employees' roles and responsibilities 	673.29(b)	I-3			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
5.12	<ul style="list-style-type: none"> Other administrative functions requiring safety and security training and/or certification, including but not limited to: 	SSOA Specific Requirement				
5.12.1	<ul style="list-style-type: none"> Required safety training by assignment, including any identified refresher training 	SSOA Specific Requirement				
5.12.2	<ul style="list-style-type: none"> Required qualifications, training, certifications, and any identified recertifications 	SSOA Specific Requirement				
5.12.3	<ul style="list-style-type: none"> Process for maintaining compliance with initial, refresher, and certification training requirements 	SSOA Specific Requirement				
5.12.4	<ul style="list-style-type: none"> Process for an annual review of training requirements reflecting current events, hazards, trends, and changes to operations 	SSOA Specific Requirement				
5.13	<ul style="list-style-type: none"> If not covered in a Security and Emergency Preparedness Plan (SEPP), training requirements pertaining to the security/police function as outlined by §§ 5.5-5.11 	SSOA Specific Requirement				
5.14	<ul style="list-style-type: none"> Means of ensuring compliance with local, state, and federal requirements regarding health and environmental safety (e.g., occupational safety) 	SSOA Specific Requirement				
5.15	<ul style="list-style-type: none"> Description of committees established to identify and mitigate safety concerns, including details such as attendance, documentation, parties responsible for agendas, and how the committee facilitates safety improvements 	SSOA Specific Requirement				
5.16	<ul style="list-style-type: none"> Processes to ensure the communication of safety performance information throughout the organization 	673.29(b)	I-2			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
5.17	<ul style="list-style-type: none"> Process to ensure the communication of any actions taken in response to the ESR program 	673.29(b)	I-4			
5.18	<ul style="list-style-type: none"> Description of programs for the communication of agency safety messages to patrons 	SSOA Specific Requirement				
5.19	<ul style="list-style-type: none"> Description of programs for de-escalation training for safety, operations, and maintenance personnel 	BIL				
Element 6.0 Plan Development, Approval, and Updates Description of how the RTA will maintain certification of compliance through plan development, approval, and updates.						
6.1	<ul style="list-style-type: none"> Description of the process for the development and delivery of an annual report on safety and security program compliance, endorsed by the CEO or equivalent Accountable Executive 	SSOA Specific Requirement				
6.2	<ul style="list-style-type: none"> Endorsement of certification of compliance with Part 673 by the RTA's CEO or Accountable Executive (including the date of certification) 	673.13	B-3			
6.3	<ul style="list-style-type: none"> Endorsement of safety and security certification of compliance with the Program Standard by RTA's CEO or Accountable Executive (including the date of certification) 	673.13	B-4			
6.4	<ul style="list-style-type: none"> Endorsement of the PTASP by the rail transit agency's (RTA's) designated Accountable Executive (including the date signed) 	673.11(a)(1)	B-1			
6.5	<ul style="list-style-type: none"> Approval of the PTASP by Board of Directors or Equivalent Authority (including signature and date) 	673.11(a)(1) and 674.29(b)	B-2			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 7.0 Documentation, Definitions, and Acronyms Description of definitions and acronyms used throughout the RTA's PTASP, along with document maintenance and retention policies and procedures						
7.1	<ul style="list-style-type: none"> Description of how the RTA will document key processes and procedures required to carry out the SMS that are not included or referenced elsewhere in the PTASP 	673.31	K-1			
7.2	<ul style="list-style-type: none"> Description of how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than three years after they are created 	673.31	K-2			
7.3	<ul style="list-style-type: none"> Description of how the RTA will ensure that FTA, any other Federal entity, and the SSOA have access to review any SMS documentation maintained by the RTA upon request 	673.31	K-3			
7.4	<ul style="list-style-type: none"> Description of applicable definitions from Part 673, Part 674, and the <i>Program Standard</i> 	673.5 and 674.7	K-4			
7.5	<ul style="list-style-type: none"> Description of applicable acronyms from Part 673, Part 674, and the <i>Program Standard</i> 	673.5 and 674.7	K-5			

Element	Implementation Measure	Citation	FTA Cross-Ref	Section & Page #	Complete?	Comments
Element 8.0 SSOA Compliance Assessment						
8.1	<ul style="list-style-type: none"> Is consistent with FTA's regulations for implementing such plans and the National Public Transportation Safety Plan 	674.29(a)	L-1			
8.2	<ul style="list-style-type: none"> In compliance with the SSOA's Program Standard 	674.29(a)	L-2			
8.3	<ul style="list-style-type: none"> Is approved by the RTA's Board of Directors or equivalent entity 	674.29(b)	L-3			
8.4	<ul style="list-style-type: none"> Sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the rail transit system 	674.29(b)	L-4			
8.5	<ul style="list-style-type: none"> Includes a process and timeline for annually reviewing and updating the PTASP 	674.29(b)	L-5			
8.6	<ul style="list-style-type: none"> Includes a comprehensive staff training program for the operations personnel directly responsible for the safety of the RTA 	674.29(b)	L-6			
8.7	<ul style="list-style-type: none"> Identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA 	674.29(b)	L-7			
8.8	<ul style="list-style-type: none"> Includes adequate methods to support the execution of the PTASP by all employees, agents, and contractors for the rail transit system 	674.29(b)	L-8			
8.9	<ul style="list-style-type: none"> Sufficiently addresses other requirements under the regulations at 49 C.F.R. Part 673 	674.29(b)	L-9			

Appendix D: SEPP Approval Checklist

Transit System:		Date or Revision of Plan:	
The SEPP Is:			
Reviewed by:		Dates of Review:	

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
1	Develop a policy statement describing the authority that establishes the SEPP, including: Statutory requirements and the transit agency's relationship with the oversight agency Signature and endorsement of the General Manager			
1a	The transit agency's process for document control and keeping the SEPP confidential. The description should include procedures for: Identifying the SEPP as Sensitive Security Information (SSI) with limited distribution			

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
1b	<p>Use Protective Marking on the plan that states SSI</p> <p>Determination of authorization and types of access to the SEPP</p> <p>Proper handling of SSI information</p> <p>Training on how to identify, handle, and protect SSI Tracking of SEPP distribution</p> <p>A list of acronyms and important terms used in the SEPP, including the definition for system security and emergency preparedness.</p>			
1c	Identify the goals and objectives for the security program endorsed by the transit agency's General Manager			
1d	Describe the scope of the SEPP and Program			
1e	Describe the security and law enforcement functions that manage and support implementation of the SEPP			
1f	Describe the authority which oversees the operation and management of the transit agency, including its security/police function			
1g	Describe how the SEPP interfaces with local, state, and federal authorities to ensure security and emergency preparedness for the system			

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
2	Describe the transit system, general overview, a brief history, operating environment, scope of service, ridership, and other important aspects of the system			
2a	Provide organizational charts showing the lines of authority and responsibility as they relate to security and emergency preparedness			
2c	Provide a categorization and break-down of all employees and contractors who work for/on the transit agency			
2d	Describe how the SEPP integrates with other plans and programs maintained by the transit agency			
2e	Describe current security conditions and the types of security incidents experienced and frequency of occurrence			
2f	Provide a summary description of methods and procedures, devices, and systems utilized to prevent or minimize security breaches, including passenger education, campaigns, delay, detection, and assessment devices, and others that may be applicable			
3	Identification of the person(s) or job title responsible for managing the transit agency's security and emergency preparedness program and for developing and approving the SEPP			
3a	The person(s) with overall responsibility for transit security and emergency preparedness, including: Day-to-day operations			

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP)	Yes/No	Sec. § of SEPP	Comments
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	Content			
	<p>SEPP-related internal communications</p> <p>Liaison with external organizations</p> <p>Training and Awareness of employees</p> <p>Mechanism for identifying and resolving security and emergency preparedness concerns to management</p> <p>Identifying and resolving SEPP-related concerns</p>			
3b	<p>Security and Police Function Responsibilities, including:</p> <p>A list of SEPP-related responsibilities of the personnel who work within the transit agency security/police function</p> <p>SEPP-related responsibilities of other departments/functions, including their relationship to the security/police function</p> <p>List security-related responsibilities for other (non-security/police) transit agency employees, including their relationship to the employee's other duties</p> <p>Develop a SEPP Program Roles and Responsibilities Matrix showing interfaces with other transit agency departments/functions and the key reports or actions required</p> <p>Identify the responsibilities of external agencies for supporting SEPP development and implementation</p> <p>Identify the committees developed by the transit agency to address security issues</p>			

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
3c	Describe any mutual aid agreements, memoranda of understanding, or other agreements with external agencies that provide significant security or emergency response help to the transit agency. Also describe any important ongoing interactions with external agencies, working groups, etc., such as the FBI, joint terrorism task forces, municipal and county advisory groups, etc.			
3d	A narrative or matrix shall be used to show the security responsibilities and functions other departments; narrative description of how security responsibilities and information are disseminated to those without access to confidential SEPP documents shall also be included			
3e	Describe training requirements and programs for security personnel, as well as security-related training for non-security (e.g., operating, maintenance, etc.) personnel, emergency responder agencies, and other concerned parties			
3f	Describe the transit agency's policy for employee and contractor background checks and security screenings			
3g	Describe any security outreach, education, community involvement, or similar programs that involve passengers or the public			
Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments

4	<p>Identification of the approach to manage the SEPP, and specified SEPP-related responsibilities using planning, organization, equipment, training and emergency exercises and evaluation (POETE) mechanism, including:</p> <p>Activities and programs in place to support planning for system security and emergency preparedness</p> <p>Organization of SEPP-related activities and programs and the ability to coordinate with external response agencies</p> <p>Description of the equipment used to support implementation of the SEPP program</p> <p>Description of SEPP-related training and procedures available to ensure employee proficiency</p> <p>Description of SEPP-related activities to ensure the conduct of emergency exercises and evaluation</p>			
4a	Describe security exercise/drill program and participation in exercises and drills organized by other agencies. Show or reference schedule for upcoming drills and exercises.			
4b	Description of incident management/command system			
4c	Provide an overview of the transit system's emergency operations or emergency preparedness plan.			

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
5	Document the transit agency's process for identifying, assessing, and managing threats and vulnerabilities during ongoing operations, and for major projects, extensions, new vehicles and equipment, including integration with the safety certification process.			
5a	Description of how response strategies (both short- or long-term strategies) are developed for prioritized vulnerabilities, including the decision process used to determine whether to eliminate, mitigate, or accept security problems			
6	Identify tasks to be performed to implement goals and supporting objectives required to implement the SEPP.			
6a	Identify controls in place that address the personal security of passengers and employees.			
6b	Provide a general schedule with specific milestones for implementation of the security program, threat and vulnerability analyses, staff security training, and regular program reviews during the implementation process.			
6c	Document the transit agency's process for conducting internal security audits to evaluate compliance and measure the effectiveness of the SEPP.			
6d	Describe the types of internal reviews and audits that will be used to evaluate the SEPP, the frequencies of the reviews, and the person(s) responsible.			

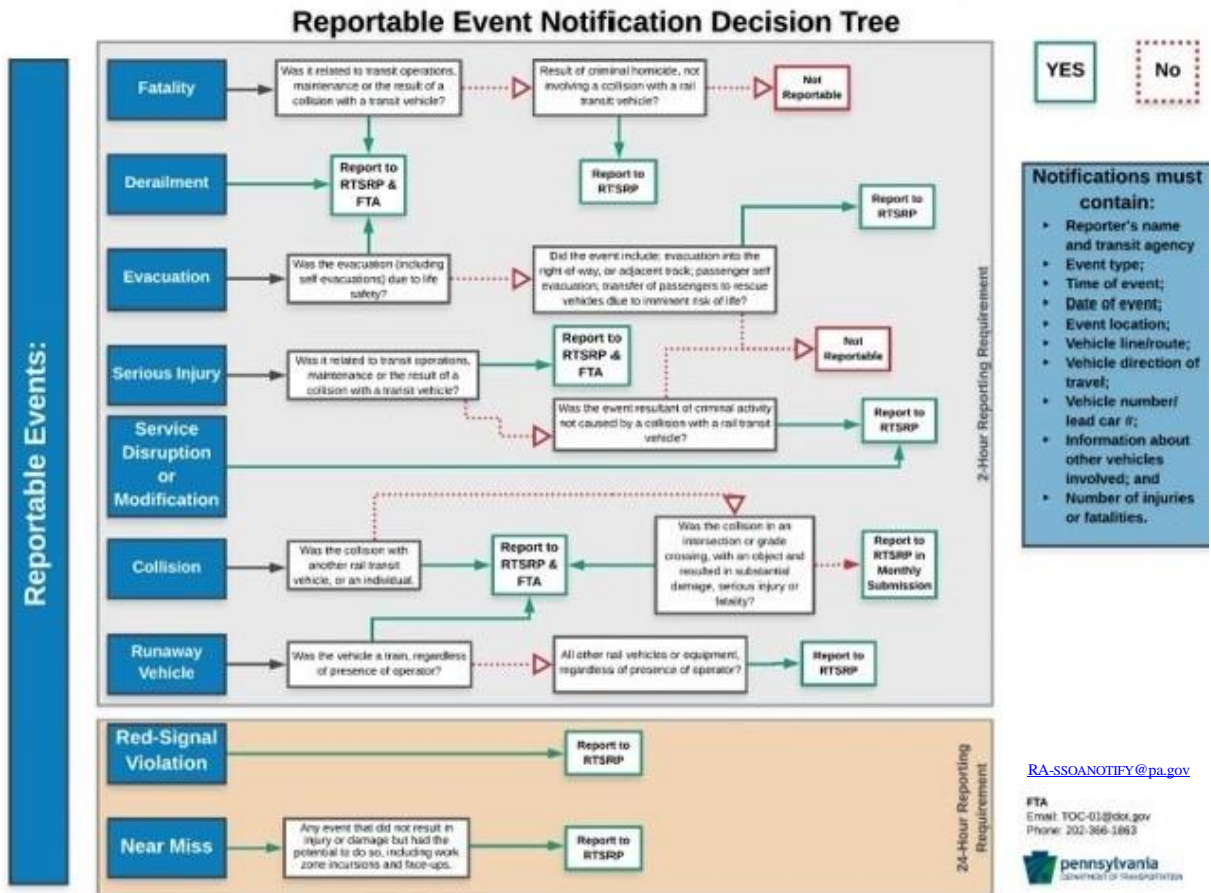
Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
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6e	List the departments and/or functions that are subject to internal security audits.			
6f	Describe the process that ensures that internal security auditors are independent from the first line of supervision for the activity being reviewed.			
6g	For internal security audits, written checklists must be used.			
7	Document the transit agency's process for making its SEPP and accompanying procedures available to the oversight agency for review and approval.			
7a	The transit agency must submit its SEPP to the PennDOT SSOA annually for review and approval.			
7b	Describe the process used to initiate revisions to the SEPP, gather input for the revisions, procedures for updating the SEPP, and identification of responsible person(s).			
7c	Describe the method, including management review and approval, for updating, correcting, and modifying the SEPP plan on an as-needed and scheduled basis.			
7d	Description of the process used to review and revise the security plan as necessary, including frequency of reviews, and responsible person(s)			
7e	Describe the process used to communicate and disseminate new and revised procedures and other elements of the SEPP to appropriate transit agency staff.			

Element	PennDOT SSOA's Required Security and Emergency Preparedness Program Plan (SEPP) Content	Yes/No	Sec. § of SEPP	Comments
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8	A description of the Corrective Action Plan (CAP) process that describes the identification, tracking, submittal, and management of security corrective action plans, including all components identified in the PennDOT SSOA <i>Program Standard</i>			
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Appendix E: PennDOT SSOA Reportable Event Decision Tree



Appendix F: Contractor Integrity Provisions

It is essential that those who seek to contract with the Commonwealth of Pennsylvania (“Commonwealth”) observe high standards of honesty and integrity. They must conduct themselves in a manner that fosters public confidence in the integrity of the Commonwealth procurement process.

1. **DEFINITIONS.** For purposes of these Contractor Integrity Provisions, the following terms shall have the meanings found in this Section:
 - a. **“Affiliate”** means two or more entities where (a) a parent entity owns more than fifty percent of the voting stock of each of the entities; or (b) a common shareholder or group of shareholders owns more than fifty percent of the voting stock of each of the entities; or (c) the entities have a common proprietor or general partner.
 - b. **“Consent”** means written permission signed by a duly authorized officer or employee of the Commonwealth, provided that where the material facts have been disclosed, in writing, by prequalification, bid, proposal, or contractual terms, the Commonwealth shall be deemed to have consented by virtue of the execution of this contract.
 - c. **“Contractor”** means the individual or entity that has entered into this contract with the Commonwealth.
 - d. **“Contractor Related Parties”** means any affiliates of the Contractor and the Contractor’s executive officers, Pennsylvania officers and directors, or owners of five percent or more interest in the Contractor.
 - e. **“Financial Interest”** means either:
 - (1) Ownership of more than a five percent interest in any business; or
 - (2) Holding a position as an officer, director, trustee, partner, employee, or holding any position of management.
 - f. **“Gratuity”** means tendering, giving, or providing anything of more than nominal monetary value including, but not limited to, cash, travel, entertainment, gifts, meals, lodging, loans, subscriptions, advances, deposits of money, services, employment, or contracts of any kind. The exceptions set forth in the Governor’s Code of Conduct, Executive Order 1980-18, the 4 Pa. Code §7.153(b), shall apply.
 - g. **“Non-bid Basis”** means a contract awarded or executed by the Commonwealth with Contractor without seeking bids or proposals from any other potential bidder or offeror.
2. In furtherance of this policy, Contractor agrees to the following:
 - a. Contractor shall maintain the highest standards of honesty and integrity during the performance of this contract and shall take no action in violation of state or federal laws or regulations or any other applicable laws or regulations or other requirements applicable to Contractor or that govern contracting or procurement with the Commonwealth.

Contractor shall establish and implement a written business integrity policy, which includes, at a minimum, the requirements of these provisions as they relate to the Contractor activity with the Commonwealth and Commonwealth employees and which is made known to all Contractor employees. Posting these Contractor Integrity Provisions conspicuously in easily-accessible and well-lighted places customarily frequented by employees and at or near where the contract services are performed shall satisfy this requirement.
 - b. Contractor, its affiliates, agents, employees, and anyone in privity with Contractor shall not accept, agree to give, offer, confer, or agree to confer, or promise to confer, directly or indirectly, any gratuity or pecuniary benefit to any person, or to influence or attempt to influence any person in violation of any

federal or state law, regulation, executive order of the Governor of Pennsylvania, statement of policy, management directive or any other published standard of the Commonwealth in connection with performance of work under this contract, except as provided in this contract.

- c. Contractor shall not have a financial interest in any other contractor, subcontractor, or supplier providing services, labor, or material under this contract, unless the financial interest is disclosed to the Commonwealth in writing and the Commonwealth consents to Contractor's financial interest prior to Commonwealth execution of the contract. Contractor shall disclose the financial interest to the Commonwealth at the time of bid or proposal submission, or if no bids or proposals are solicited, no later than Contractor's submission of the contract signed by Contractor.
- d. Contractor certifies to the best of its knowledge and belief that within the last five (5) years Contractor or Contractor Related Parties have not:
 - (1) been indicted or convicted of a crime involving moral turpitude or business honesty or integrity in any jurisdiction;
 - (2) been suspended, debarred or otherwise disqualified from entering into any contract with any governmental agency;
 - (3) had any business license or professional license suspended or revoked;
 - (4) had any sanction or finding of fact imposed as a result of a judicial or administrative proceeding related to fraud, extortion, bribery, bid rigging, embezzlement, misrepresentation or anti-trust; and
 - (5) been, and is not currently, the subject of a criminal investigation by any federal, state, or local prosecuting or investigative agency and/or civil anti-trust investigation by any federal, state, or local prosecuting or investigative agency.

If Contractor cannot so certify to the above, then it must submit along with its bid, proposal, or contract a written explanation of why such certification cannot be made, and the Commonwealth will determine whether a contract may be entered into with the Contractor. The Contractor's obligation pursuant to this certification is ongoing from and after the effective date of the contract through the termination date thereof. Accordingly, the Contractor shall have an obligation to immediately notify the Commonwealth in writing if at any time during the term of the contract it becomes aware of any event which would cause the Contractor's certification or explanation to change. Contractor acknowledges that the Commonwealth may, in its sole discretion, terminate the contract for cause if it learns that any of the certifications made herein are currently false due to intervening factual circumstances or were false or should have been known to be false when entering into the contract.

- e. Contractor shall comply with the requirements of the *Lobbying Disclosure Act (65 Pa.C.S. § 13A01 et seq.)* regardless of the method of award. If this contract was awarded on a Non-bid Basis, Contractor must also comply with the requirements of the *Section 1641 of the Pennsylvania Election Code (25 P.S. §3260a)*.
- f. When Contractor has reason to believe that any breach of ethical standards as set forth in law, the Governor's Code of Conduct, or these Contractor Integrity Provisions has occurred or may occur, including but not limited to contact by a Commonwealth officer or employee which, if acted upon, would violate such ethical standards, Contractor shall immediately notify the Commonwealth contracting officer or the Office of the State Inspector General in writing.
- g. Contractor, by submission of its bid or proposal and/or execution of this contract and by the submission of any bills, invoices, or requests for payment pursuant to the contract, certifies and represents that it has not violated any of these Contractor Integrity Provisions in connection with the submission of the bid or proposal, during any contract negotiations or during the term of the contract, to include any extensions thereof. Contractor shall immediately notify the Commonwealth in writing of any actions for occurrences that would result in a violation of these Contractor Integrity Provisions. Contractor agrees to reimburse the Commonwealth for the reasonable costs of investigation incurred by the Office of the State Inspector General for investigations of the Contractor's compliance with the terms of this or any other agreement between the Contractor and the Commonwealth that results in the suspension or debarment of the Contractor. Contractor shall not be responsible for investigative costs for investigations that do not result in the Contractor's suspension or debarment.
- h. Contractor shall cooperate with the Office of the State Inspector General in its investigation of any alleged Commonwealth agency or employee breach of ethical standards and any alleged Contractor non-compliance with these Contractor Integrity Provisions. Contractor agrees to make identified Contractor employees available for interviews at reasonable times and places. Contractor, upon the inquiry or request of an Inspector General, shall provide, or if appropriate, make promptly available for inspection or copying, any information of any type or form deemed relevant by the Office of the State Inspector General to Contractor's integrity and compliance with these provisions. Such information may include, but shall not be limited to, Contractor's business or financial records or documents or files of any type or form that refer to or concern this contract. Contractor shall incorporate this paragraph in any agreement, contract, or subcontract it enters into in the course of the performance of this contract/agreement solely for the purpose of obtaining subcontractor compliance with this provision. The incorporation of this provision in a subcontract shall not create privity of contract between the Commonwealth and any such subcontractor, and no third-party beneficiaries shall be created thereby.
- i. For violation of any of these Contractor Integrity Provisions, the Commonwealth may terminate this and any other contract with Contractor, claim liquidated damages in an amount equal to the value of anything received in breach of these Provisions, claim damages for all additional costs and expenses incurred in obtaining another contractor to complete performance under this contract, and debar and suspend Contractor from doing business with the Commonwealth. These rights and remedies are cumulative, and the use or non-use of any one shall not preclude the use of all or any other. These rights and remedies are in addition to those the Commonwealth may have under law, statute, regulation, or otherwise.

Appendix G: Program Approval and Certification: MAP-21



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

Administrator

1200 New Jersey Avenue, SE
Washington, DC 20590

APR 23 2018

The Honorable Tom Wolf
Governor of Pennsylvania
Office of the Governor
508 Main Capitol Building
Harrisburg, PA 17120

Dear Governor Wolf:

This letter is to inform you that Pennsylvania's State Safety Oversight (SSO) Program has been approved and certified by the Federal Transit Administration (FTA) in accordance with the requirements of Federal public transportation safety law (49 U.S.C. § 5329(e)) and FTA's SSO regulation (49 CFR Part 674).

Certification is an important achievement and promotes the safety of our Nation's rail transit systems. Pennsylvania's diligence in fulfilling these requirements and devoting necessary resources will make public transportation safer for the passengers who ride rail transit in Pennsylvania.

If you have any questions, please feel free to contact me or Henrika Buchanan, FTA's Acting Associate Administrator for Transit Safety and Oversight at (202) 366-5080 or Henrika.Buchanan@dot.gov.

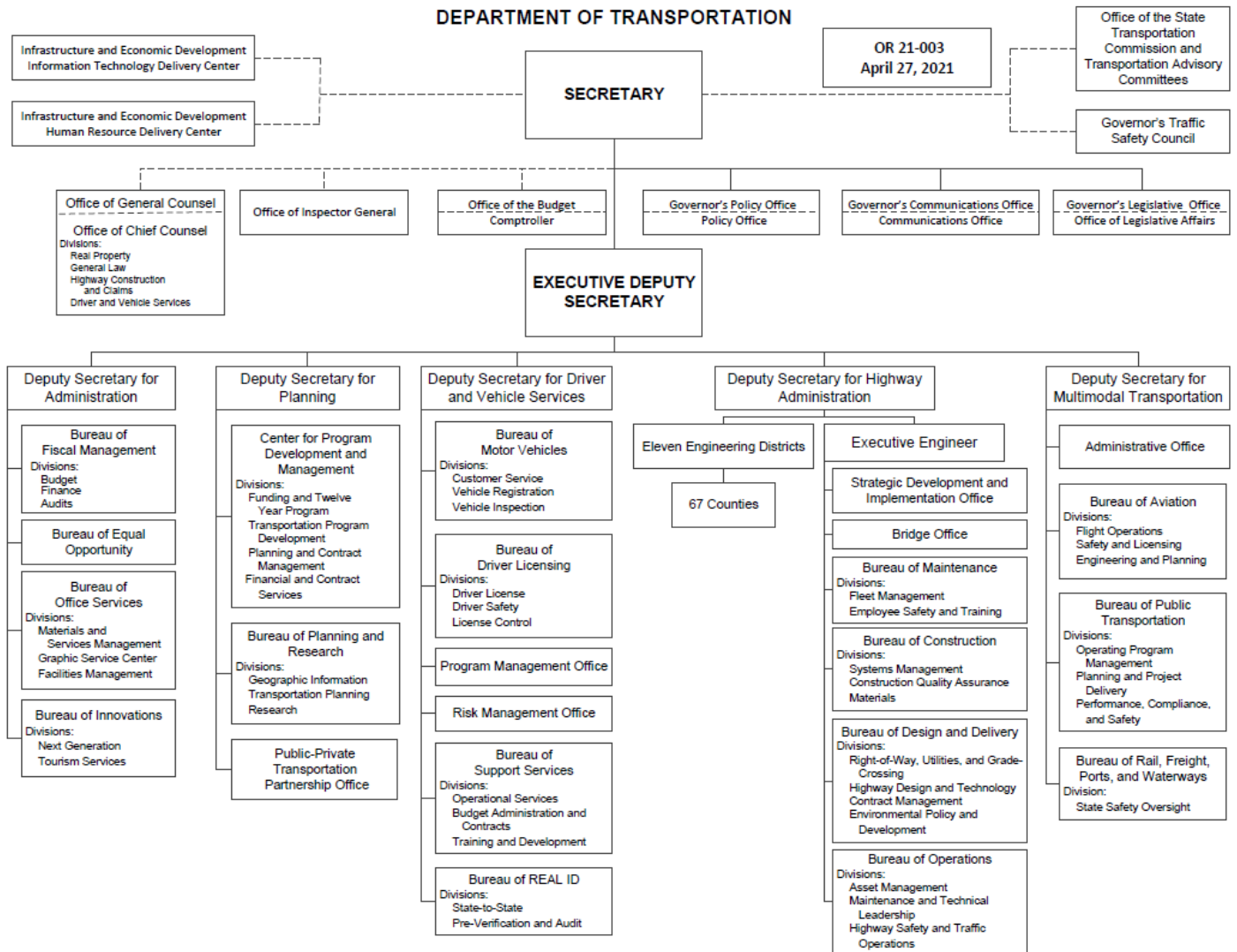
Sincerely,

A handwritten signature in black ink, appearing to read "K. Jane Williams".

K. Jane Williams
Acting Administrator

cc: Mr. Leslie Richards, Secretary, Pennsylvania Department of Transportation (PennDOT)
Mr. Toby Fauver, Deputy Secretary, PennDOT Multimodal Transportation
Ms. Elizabeth Bonini, SSO Program Manager, PennDOT

Appendix H: Pennsylvania Department of Transportation Organizational Chart



Appendix I: PennDOT SSOA Review Checklist of RTA Annual Safety and Security Report

Pennsylvania Department of Transportation (PennDOT) State Safety Oversight Agency (SSOA)
Rail Transit Agency (RTA) Annual Safety Report Review Checklist

Part I. General Information

RTA:	
Document Title:	
Date of Submittal:	
PennDOT SSOA Reviewer:	
Date of Review:	

Part II. PennDOT SSOA Review

RTA Annual Safety Report Checklist				
#	Requirement	Included? (Y/N)	PennDOT SSOA Comments	PennDOT SSOA Status (Open/Closed)
1	Submitted by February 1			
2	Submitted by accountable executive or accountable executive copied on the electronic submission			
3	*A summary of corrective actions generated by each internal audit			
4	The status of each corrective action plan generated in the given year			

RTA Annual Safety Report Checklist				
#	Requirement	Included? (Y/N)	PennDOT SSOA Comments	PennDOT SSOA Status (Open/Closed)
5	*A list of all internal audits included in the original schedule, which was submitted by December 1 of the previous year, indicating dates each internal audit was completed or identifying if the internal was moved or incomplete			
6	*Checklists used for internal audits			
7	A summary of significant internal audit findings			
8	A statement by the RTA's accountable executive certifying compliance with the Public Transportation Agency Safety Plan or identifying areas of noncompliance and activities the RTA will undertake to achieve compliance			

*Individual internal audit reports/checklists that were previously submitted either as completed or on a monthly basis need not be resubmitted but should be referenced in the RTA's annual audit report as being reviewed as a part of the internal audit process.

Pennsylvania Department of Transportation (PennDOT) State Safety Oversight Agency (SSOA)
Rail Transit Agency (RTA) Annual Security Report Review Checklist

Part I. General Information

RTA:	
Document Title:	
Date of Submittal:	
PennDOT SSOA Reviewer:	
Date of Review:	

Part II. PennDOT SSOA Review

RTA Annual Security Report Checklist				
#	Requirement	Included? (Y/N)	PennDOT SSOA Comments	PennDOT SSOA Status (Open/Closed)
1	Submitted by February 1			
2	Submitted by accountable executive or accountable executive copied on the electronic submission			
3	*A summary of corrective actions generated by each internal audit			

RTA Annual Security Report Checklist				
#	Requirement	Included? (Y/N)	PennDOT SSOA Comments	PennDOT SSOA Status (Open/Closed)
4	The status of each corrective action plan generated in the given year			
5	*A list of all internal audits included in the original schedule, which was submitted by December 1 of the previous year, indicating dates each internal audit was completed or identifying if the internal was moved or incomplete			
6	*Checklists used for internal audits			
7	A summary of significant internal audit findings			
8	A statement by the RTA's accountable executive certifying compliance with the Security and Emergency Preparedness Plan or identifying areas of noncompliance and activities the RTA will undertake to achieve compliance			

*Individual internal audit reports/checklists that were previously submitted either as completed or on a monthly basis need not be resubmitted but should be referenced in the RTA's annual audit report as being reviewed as a part of the internal audit process.

Appendix J: Safety and Security Certification Evaluation Form

RTA Safety and Security Certification (SSC) Project Review Checklist

PART I. GENERAL INFORMATION

Rail Transit Agency (RTA):	
Document Title:	
Project No.:	
Project Name:	
RTA Review Date	
Reviewer(s)	

PART II. REVIEW COMMENTS

SSC Project Process Requirements	(Yes/No)	RTA Review Comments	PennDOT SSOA Comments
Does the Project meet any of the following categories: <ul style="list-style-type: none"> • New Start project or system expansion; • Major reconstruction of existing lines; • Major redesign and installation of system components; • New or significantly reconstructed maintenance and operating facilities; • New vehicle procurements or mid-life overhauls; and • Other project deemed to have significant safety implications, including projects implemented by others that have a direct impact on the operations of the covered RTA 			
Does the Project impact any of the following: <ul style="list-style-type: none"> • Planning studies; • Design criteria and standards manual; • Design documents; • Safety assurance; • Project management plans • Configuration management; • Construction plan and schedules; 			

<ul style="list-style-type: none"> • Operating changes and plans during project construction; • Transportation and maintenance operating procedures; • Training programs and procedures; • Integrated test program; • Emergency Procedures; • System safety audits and reviews; • Security plans; • Safety certification verification review; and • Exercise documents and results 			
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Additional Comments

PART III. RTA Decision on SSC to be performed:

This SSC for the Project is:

<input type="checkbox"/>	REQUIRED
<input type="checkbox"/>	NOT REQUIRED
<input type="checkbox"/>	UNDETERMINED, DISCUSSION REQUIRED
<input type="checkbox"/>	

RTA Representative Signature

Date

PART IV. PennDOT SSOA Decision on SSC to be performed:

This SSC for the Project is:

<input type="checkbox"/>	REQUIRED
<input type="checkbox"/>	NOT REQUIRED
<input type="checkbox"/>	UNDETERMINED, DISCUSSION REQUIRED

PennDOT SSOA Representative Signature

Date