PROGRAM STANDARD - PROCEDURES MANUAL STATE SAFETY AND SECURITY OVERSIGHT OF RAIL FIXED GUIDEWAY SYSTEMS

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RAIL SAFETY DIVISION
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Annual Review

Comments	Are Revisions Made	Date
2020 Annual Review as required by 49 CFR Part 674.27(b)	Y	March 16, 2020
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Version History

Revision History	Date	Summary of Changes	Author
1.0	07/13/2010	Initial Release	Anton Garabetian
2.0	12/17/2013	To comply with Federal Transit Administration Audit Findings	Noel Takahara
3.0	05/01/2018	To comply with 49 Code of Federal Regulations Section VI	Bill Lay, Rosa Muñoz, Varoujan Jinbachian, Stephen Artus, Daren Gilbert
3.1	09/14/2018	Added language in Introduction Section regarding RTAs not funding RTSB as described in Resolution L-569	Daren Gilbert, Rosa Muñoz, Varoujan Jinbachian, Bill Lay
3.2	03/16/2020	Changed all occurrences of “Safety and Enforcement Division” to “Rail Safety Division” In RTSB-1, revised Section 1.3.3 (g)(i) In RTSB-2, revised Section 2.4.2 In RTSB-8, revised Section 8.7.0 (subsections 8.7.4 through 8.7.9) Revised Attachment 10 Revised Attachment 11 Revised Attachment 16 Several minor formatting changes, such as spelling out words when first used or italicizing defined words.	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Stephen Artus, Claudia Lam
3.3	March 15, 2021	Changed all occurrences of “System Safety Program Plan” to “Public Transportation Agency Safety Plan” Changed all occurrences of “triennial on-site system safety and security review” to “triennial on-site review” Changed all occurrences of “shall” to “must” In Introduction Section, added requirement to follow General Order 33 In the “Acronym List” deleted “Staff” In the “Definitions” section deleted definition of “Public Transportation Safety Certification Program”, “Rail Transit Agency-Controlled Property”, and “Sterile Cab” In RTSB-1, added Section 1.5.7 In RTSB-1, revised Sections 1.3.7.1 and 1.4.3 In RTSB-2, added Section 2.3.2 and 2.4.2 In RTSB-4, revised Section 4.6.1, 4.7.1, 4.7.2, 4.7.3 In RTSB-4, revised Section 4.3.5 In RTSB-5, revised Section 5.3.3, 5.3.5 In RTSB-5, added Section 5.3.7 In RTSB-6, revised Section 6.2.1, 6.3.5, 6.3.7, 6.3.16 In RTSB-6, added Section 6.3.6, 6.3.10, 6.3.17 In RTSB-7, added Section 7.3.4, 7.3.5	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Stephen Artus, Claudia Lam

Revision History	Date	Summary of Changes	Author
		In RTSB-8, revised Section 8.3.6, 8.3.7, 8.3.8 In RTSB-8, added Section 8.3.9 In RTSB-10, added Section 10.3.8 Added RTSB-12 Attachment 6: revised checklist for PTASP Attachment 16: revised accident detail report Attachment 22: added Appendix A of Resolution ST-163, Specified Violations and Scheduled Penalties Table Several minor formatting changes, such as spelling out words when first used or italicizing defined words.	
3.4	March 15, 2022	Acronym List • Added ISSA and NTD • Deleted Rep Definitions – Modified definition of Corrective Action Plan. In RTSB-1, revised Section 1.3.1, 1.3.2, 1.3.3, 1.3.5, 1.3.6, 1.3.10 In RTSB-1, added Section 1.9.0 In RTSB-1, revised renumbered Sections 1.10.3, 1.10.4 In RTSB-2, revised Section 2.3.5, 2.3.6, and 2.4.7 In RTSB-3, revised Section 3.3.10 In RTSB-3, added Section 3.4.4, 3.4.5, and 3.4.6 In RTSB-4, revised Section Title In RTSB-4 revised Sections 4.6.6 and 4.7.3 In RTSB-5, revised Section 5.4.2, 5.5.3, and 5.6.3 In RTSB-6, revised Section 6.3.12, 6.3.15, and 6.3.18 In RTSB-7, revised Section 7.3.6 In RTSB-7, added Section 7.3.8 In RTSB-8, revised Section 8.3.3, 8.5.6, 8.5.7, and 8.6.4 In RTSB-9, revised Sections 9.3.1, 9.3.3, 9.3.5, and 9.4.3 In RTSB-10, revised Section 10.3.14 In RTSB-11, revised Section 11.3.7 In RTSB -12, added Section 12.2.3 and 12.4.4p In RTSB-12 revised Sections 12.4.1, 12.4.2, and 12.4.3 Attachment 10, revised Transit Accident Initial Notice Attachment 11a, added Form V Webform Attachment 16, revised Transit Accident Details Report Attachment 17, added Sample Accident Report Acceptance Letter Attachment 18, revised Minor Event Report Attachment 23, added Sample PTASP Approval Letter	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Stephen Artus, Claudia Lam
3.5	March 15, 2023	Introductions – Described differences between FTA funded and Non-FTA funded RTAs Acronyms List – Added “SCVR” In RTSB-2, revised Sections 2.1.0, 2.3.0, and 2.4.0 In RTSB-3, revised Sections 3.3.4, and 3.3.10 In RTSB-4, revised Sections 4.3.4, 4.4.2, 4.6.4, 4.6.5, and 4.6.6 In RTSB-5, revised Section 5.3.4 In RTSB-6, revised Sections 6.3.2, 6.3.5. Added 6.3.10, and 6.3.20, 6.3.21 In RTSB-8, revised Sections 8.4.7, 8.5.3, 8.5.7, 8.6.2, 8.7.5, and 8.7.6 In RTSB-9, revised Section 9.2.1 and 9.3.5. Deleted 9.3.7. Added Sections 9.3.8 and 9.6.0 Attachment 6, renamed it to 6a and modified Item H-ix, Added Item N Added Attachment 6b Attachment 9, revised item 3, added list of elements at the end Attachment 12, revised item 13 Attachment 18, made minor changes	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Stephen Artus, Claudia Lam

Revision History	Date	Summary of Changes	Author
		Attachment 19, revised items 2, 3, 5, and 6	
3.5.1	May 11, 2023	Minor edits to typos and spelling errors.	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Stephen Artus, Claudia Lam
4.5.0	March 15, 2024	Throughout the document, replaced all occurrences of “hazard management” with “safety risk management”. Made revisions to fonts and capitalization of section and attachment headings. Corrected minor typographic/spelling errors. Introduction - Added language. Definitions – Added definition of “Safety Risk Management”. RTSB-1 – Made minor changes to Section 1.3.6 RTSB-1 – Moved language from Section 1.3.7 and Section 1.3.8 to Section 1.5 RTSB-6 – Added language to Section 6.3.5. RTSB-8 – Added language in Section 8.3.6. RTSB-8 – Added language in Section 8.5.4. RTSB-8 – Added language in Section 8.5.7. RTSB-8 – Added language in Section 8.6.1. RTSB-9 – Added language in Section 9.6.2 and made several changes to Section 9.6.4. RTSB-12 – Added language to Section 12.4.4. Attachment 6a – Added language under the “Plan Requirements” column of Section D. Attachment 6a – Added language under the “Checklist Items” and “Plan Requirements” columns of Section D-5. Attachment 12 – Made changes to Item 13. Attachment 13 – Made several changes. Attachment 18 – Made changes to the form.	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Claudia Lam
4.6.0	December 18, 2024	To comply with Risk Based Inspection Program In Acronym List Table: Added RBI to list In RTSB-1 – Added language to Section 1.3.7. In RTSB-1 – Added language to Section 1.5.1. In RTSB-1 – Added new Section 1.5.6 In RTSB-1 – Added language to Section 1.5.7. In RTSB-1 – Added new Section 1.5.8. In RTSB-1 – Added new Section 1.5.9. In RTSB-1 – Added new Section 1.5.16. In RTSB-1 – Added new Section 1.5.17. In RTSB-1 – Added new Section 1.5.18. In RTSB-1 – Revised Section title from “Record Review” to “Record Reviews, Collection, and Analysis”. In RTSB-1 – Added language to Section 1.6.1. In RTSB-1 – Added new Section 1.6.2. In RTSB-1 – Added new Section 1.6.3. In RTSB-1 – Added new Section 1.6.4. In RTSB-1 – Added new Section 1.6.5. In RTSB-1 – Added language to Section 1.8.0. In RTSB-8 – Added language to Section 8.4.5 In Attachment 6a – Added new checklist item “O. Risk-Based Inspection Requirements 49 U.S.C § 5329(k)” Attachment 24 – Added new attachment for RBI Data Review Tracking Sheet	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Claudia Lam

Revision History	Date	Summary of Changes	Author
4.6.1	March 14, 2025	Corrected minor typos and other such errors. Introduction – Deleted “safety risk management”, which was inadvertently repeated. Acronym list – Added CSO and OII. Definition Section – Made it consistent with recent changes to 49 CFR Part 674 definitions. Deleted definition of “On their Person”, since this term is not used in this document. RTSB 1 - Section 1.3.2 – Deleted language that was repeated in Section 1.9.0 RTSB 1 – Added Section 1.3.12 RTSB 1 – Modified Section 1.4.1 RTSB 1 – Added language to Sections 1.5.6, 1.5.10, 1.5.11, and 1.6.4 RTSB 1 – Added language to Sections 1.10.0, 1.10.2, and 1.10.3 RTSB 1 – Modified Sections 1.10.4 RTSB 2 – Modified Section 2.3.8 RTSB 6 – Modified Sections 6.3.3, 6.3.5, and 6.3.16 (now renumbered 6.3.14) RTSB 6 – Deleted Sections 6.3.13 and 6.3.14 RTSB 6 – Added item to section 6.3.18 (now renumbered 6.3.16) RTSB 6 – Modified 6.3.19 (now renumbered 6.3.17) RTSB 8 – Deleted Section 8.7.2 RTSB 8 – Added language to Section 8.7.5 RTSB 10 – Added language to Section 10.3.6 Attachment 2 – Replaced with new form Attachment 6a – Replaced with new checklist Attachment 7 – Added new item 19 Attachments 10, 16, and 20 - Replaced with a placeholder note Attachment 11 – Replaced with new Sample Emails Attachment 11a – Deleted Attachment 13 – Added new language Attachment 18 – Made revisions to the form	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Claudia Lam
4.6.2	April 9, 2025	Corrected minor error in Table 6a	Varoujan Jinbachian, Rosa Muñoz, Bill Lay, Daren Gilbert, Claudia Lam
4.6.3	October 28, 2025	RTSB 1 – Modified Section 1.5.6, 1.5.7, 1.58, and 1.6.2 Attachment 24 – Updated Images	Daren Gilbert, Varoujan Jinbachian, Bill Lay, Claudia Lam
4.7.0	March 13, 2026	Throughout the document changed “Rail Transit Safety Section” to “Rail Transit Engineering Safety Section”. Introduction – Added reference to Section 1.5.1 Definitions Section – Modified definition for “Rail Transit Engineering Safety Section”. Added file naming convention. RTSB 1 – Modified Section 1.3.12 RTSB 1 – Modified Section 1.7.0	Daren Gilbert, Ainsley Kung, Varoujan Jinbachian, Bill Lay, Claudia Lam, Jamie Lau

Revision History	Date	Summary of Changes	Author
		RTSB 1 – Modified Section 1.10.3 RTSB 4 – Added language to Section 4.6.1 RTSB 6 – Added language Section 6.3.14 RTSB 7 – Modified Sections 7.3.2 through 7.3.7 RTSB 8 – Added language to Sections 8.3.2 and 8.3.3 RTSB 8 – Added Section 8.7.10 RTSB 9 – Added Section 9.3.8 and renumbered following section RTSB 9 – Modified now renumbered Section 9.3.9 RTSB 10 – Added Sections 10.4.1 and 10.4.2 Added new RTSB-13 Attachment 7 – Added item 31 and renumbered following items. Attachment 10 - Deleted Attachment 11 - Deleted Attachment 14 – Modified Title Attachment 15 - Deleted Attachment 16 - Deleted Attachment 17 - Deleted Attachment 19 – Modified Items 5 and 6 Attachment 20 - Deleted Attachment 21 - Deleted Attachment 23 - Deleted Attachment 25 – Added Attachment 26 – Added Attachment 27 - Added	
4.8.0	October 26, 2026	RTSB 8 – Restructured and revised in the entire part	Daren Gilbert, Ainsley Kung, Jamie Lau, Varoujan Jinbachian, Bill Lay, Claudia Lam, Jamie Lau, Noel Takahara

Introduction

In 1911, the California Public Utilities Commission (*CPUC* or Commission) was established by Constitutional Amendment as the Railroad Commission. In 1912, the Legislature passed the Public Utilities Act, expanding the Commission's regulatory authority to include natural gas, electric, telephone, and water companies as well as railroads and marine transportation companies. In 1946, the Commission was renamed the California Public Utilities Commission.

The Commission was designated as the *State Safety Oversight Agency (SSOA)* for the purposes of rail transit *safety* oversight to the Federal Transit Administration (*FTA*) by California Governor Pete Wilson on October 13, 1992.

The Commission is legally independent from the *Rail Transit Agencies* (*RTAs)* under its jurisdiction. In accordance with 49 *CFR* Part 674.13(a)(1), and as stated in Public Utilities (PU) Codes cited below, the Commission historically has never received, and currently does not receive, any funding from *RTAs*. Relative to State funding, PU Code 99315(f) specifies that the Commission's rail transit *safety* oversight activities are funded from the State's Public Transportation Account in the State Transportation Fund. The annual California Budget Act restricts funding for the Commission's *Rail Transit Safety Branch (RTSB)* to only two sources: (1) the State's Public Transportation Account, which is funded from use taxes on diesel fuel, and (2) *FTA State Safety Oversight Agency (SSOA)* Formula Grant Fund Program. Furthermore, per PU Code Section 2104 and Commission Resolution ST-163 (authorizing *RTSB*'s citation program), any fines and penalties the Commission levies on *RTAs* must be deposited in the state's General Fund, instead of the Public Transportation Account. Additionally, on September 13, 2018, the *CPUC* adopted Resolution L-569, specifying that the *CPUC* is prohibited from receiving any funds from any of the rail transit systems which are under the Commission's jurisdiction.

The *CPUC* oversees the safety of California *RTAs*, both those that receive *FTA* funding (mostly the large urban systems) and those that do not receive *FTA* funding, such as automated people movers and smaller trolley and funicular systems. The *RTA*s receiving *FTA* funding must comply with all applicable federal regulations (codified in Title 49 of Code of Federal Regulations, Chapter VI) and laws (codified in Title 49 of United States Code). In contrast, the *RTA*s that do not receive *FTA* funding are not required to comply with the above-reference federal rules, however they must comply with state rules and regulations. This manual will distinguish between the two as "FTA Funded" and "Non-FTA Funded". Unless otherwise specified, the provisions of this Manual apply to both FTA Funded and Non-FTA Funded *RTA*s.

This manual defines the Commission's program for the State *Safety* and *Security* Oversight of *RTAs* and *Rail Fixed Guideway Systems* (*RFGS*), as required by the following rules and regulations:

- *FTA* Rules in Title 49 of Code of Federal Regulations Chapter VI

- PU Code Sections 771, 778, 2104, 29047, 30646, 99152, 99315, and 100168

- *CPUC* General Order series 26, 33, 95, 118, 127, 143, 164, 172, and 175

RTSB staff are encouraged to look beyond regulations to identify safety concerns that might not rise to violations of rules/code/GOs listed above and bring them to the *RTA's* attention in writing, such as including it in inspection reports, emails, and/or sending formal letters.

The State Safety Oversight (*SSO*) regulation implements statutory mandates of 49 U.S.C. 5329(e) and (k). It also outlines requirements for developing Program Standards, notifying the *FTA* of *safety events*, and monitoring corrective actions of the *RTAs*.

The Commission, as *SSOA*, will make unannounced and announced inspections of *RTA* operations, maintenance, and facilities to ensure compliance with all areas of inspections listed in Section 1.5.1 of this Program Standard. No party or entity may provide services to both the *RTSB* and *RTA*.

This manual contains *RTSB staff* instructions and procedures for implementing all aspects of the State *Safety* and *Security* Oversight program. The *RTSB's SSO* activities are divided between the *Rail Transit Engineering Safety Section* and the *Rail Transit Operation Safety Section*. These procedures identify the persons responsible and describe the practices to be followed:

- System *Safety* and *Security* program management and oversight of the design, construction, *safety* certification, internal *safety* and *security* audits, operation and maintenance of *RFGSs*;

- Review and approval of an *RTA's Public Transportation Agency Safety Plan*, *System Security Plan*, *Safety Certification Plans*, *accident investigation* procedures, *accident investigation* reports, annual internal *safety* and *security* audit reports, and *corrective action plans* and schedules;

- Reporting and investigating *events* and *hazards*;

- Performing triennial on-site reviews;

- *Safety Risk Management*; and

- Handling formal and informal complaints.

Introduction

These procedures make it clear that the *RTA* alone is responsible for the *safety* and *security* of its system's operations. The *RTA's* executive management, particularly the *Accountable Executive*, as the lead of the *RTA*, is ultimately accountable for *safety* and *security*, because they are tasked with allocating resources to address business functions, including the management of *safety* as an organizational process. *Staff* oversight provides an added degree of confidence that the policies and procedures described in each *RTA Public Transportation Agency Safety Plan* and *System Security Plan* are implemented in actual practice.

These procedures also provide a basis for establishing effective communication and cooperation in the interest of *safety* between the *Staff* and the RTA; a basis that is essential to meeting the Commission's goal of assuring that Californians are provided with safe rail transit services.

These procedures set policies and objectives for rail *safety* for all *RTA*s throughout California. Concerns regarding this Program Standard or the implementation of the *RTSB* safety oversight program should be brought to the attention of the *RTSB* Program Manager.

Where noncompliance is identified through any means, *RTSB Staff* and management, in consult with Rail Safety Division Director, must make a determination on whether to recommend any enforcement action be taken. Enforcement actions take two possible forms: (1) an Order Instituting Investigation, where *Staff* recommends the Commission open a formal proceeding to provide the forum for *Staff* to request enforcement of specific rules, regulations, or codes; or (2) *Staff* can issue citations under the requirements of Commission Resolution ST-163, for violations of Commission General Orders or applicable PU Code Sections. Citations are subject to appeal, in accordance with the Commission's Rules of Practice and Procedure.

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Acronym List

Acronym	Meaning
AIP	Accident Investigation Procedure
ALJ	Administrative Law Judge
APTA	American Public Transportation Association
CAP	Corrective Action Plan
CFR	Code of Federal Regulations
CPUC/Commission	California Public Utilities Commission
CSO	Chief Safety Officer
FTA	Federal Transit Administration
GO	General Order
ISSA	Internal Safety and Security Audit
NTD	National Transit Database
NTSB	National Transportation Safety Board
OII	Order Instituting Investigation
OIR	Order Instituting Rulemaking
PMOC	Project Management Oversight Contractor
PTASP	Public Transportation Agency Safety Plan
RBI	Risk Based Inspection
RSSIMS	Rail Safety and Security Information Management System
RTA	Rail Transit Agency
RTOSS	Rail Transit Operations Safety Section
RTSB	Rail Transit Safety Branch
RTESS	Rail Transit Engineering Safety Section
SC Plan/SCP	Safety Certification Plan
SCVR	Safety Certification Verification Report
SOP	Standard Operating Procedure
SSCOP	Safety and Security Certification Oversight Plan
SSOA	State Safety Oversight Agency
SSO	State Safety Oversight
SSP	System Security Plan

Definitions

Accountable Executive means a single, identifiable person who has ultimate responsibility for carrying out the *Public Transportation Agency Safety Plan* of a transit agency; responsibility for carrying out the transit agency's Transit Asset Management Plan (see 49 *CFR* Part 625); and control or direction over the human and capital resources needed to develop and maintain both the transit agency's *Public Transportation Agency Safety Plan* and the transit agency's Transit Asset Management Plan.

Certifiable Elements List means a list that contains all facilities, systems, rail at-grade crossings, and other items that are subject to *safety certification* due to their *safety* functions.

Collision means any impact between *a rail transit vehicle* and any other vehicle, object, or any person.

Contractor means an entity that performs tasks on behalf of *FTA*, Commission, or *RTA* through contract or other agreement.

Corrective Action Plan (CAP) means a plan developed by an *RTA* that describes the actions the *RTA* will take to address an identified deficiency or safety concerns, the schedule for implementing those actions.

Derailment means a safety event in which one or more wheels of a *rail transit vehicle* unintentionally leaves the rails.

Designated Representative means the *individual(s)* in the *Rail Transit Engineering Safety Section*, a section within the *RTSB*, designated by *RTSB* Management as the primary point of contact to an *RTA*, responsible for coordination of the *RTSB safety* oversight activities and acts in most cases as the primary point of contact with the *RTA*.

Director means the *Director* of the Commission's division overseeing rail transit *safety*.

Disabling Damage means damage to a *rail transit vehicle* resulting from a *collision* and preventing the vehicle from operating under its own power.

Evacuation for life safety reasons means a condition that occurs when persons depart from transit vehicles or facilities for life safety reasons, including self-evacuation. A life safety reason may include a situation such as a fire, the presence of smoke or noxious fumes, a fuel leak from any source, an electrical hazard, or other hazard to any person. An evacuation of passengers into the rail right of way (not at a platform or station) for any reason is presumed to be an evacuation for life safety reasons.

Definitions

Existing Industry Standards means the currently accepted industry and professional engineering standards and/or guidelines relating to the design, construction, operation, and maintenance of *Rail Fixed Guideway Systems* such as ANSI, APTA, AREMA, ASCE, ASEE, ASME, *FRA*, *FTA*, IEEE, NFPA, and others.

Fatality means a death confirmed within 30 days of a *safety event*. Fatalities include suicides, but do not include deaths in or on transit property that are a result of drug overdose, exposure to the elements, illness, or natural causes.

FRA means the Federal Railroad Administration, an operating administration within the United States Department of Transportation.

FTA means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock or infrastructure of an *RTAs*; or damage to the environment.

Hazard Analysis means any analysis performed to identify *hazards* for the purpose of their elimination, mitigation, or control.

Individual means a *passenger*, employee, *contractor*, pedestrian, trespasser, or any person on *RTA-controlled property.*

Injury means any harm to persons as a result of a *safety event* that requires immediate medical attention away from the scene. Does not include harm resulting from a drug overdose, exposure to the elements, illness, natural causes, or occupational *safety events* occurring in administrative buildings.

Inspection means a physical observation of equipment, facilities, equipment, rolling stock, operations, personnel, or record for the purpose of gathering or analyzing facts or information.

Inspectors means the Commission's *Rail Transit Operations Safety Section* personnel who conduct onsite visits to inspect *RTA* infrastructure, vehicles, operations, maintenance practices, and other activities to identify noncompliance, *safety* concerns, and unsafe conditions.

Investigation means the process used to determine the causal and contributing factors of a *safety event* or *hazard*, for the purpose of preventing recurrence and mitigating *safety* risk.

Definitions

Mainline means all tracks used for the purpose of the movement of *passengers* on *rail transit vehicles*. *Mainline* does not include storage tracks, yard tracks or other tracks used for the purpose of storage.

Major Projects (Projects) means new rail systems or extensions, the acquisition and integration of new vehicles and *safety* critical technologies into existing service or major *safety* critical redesign *projects*, excluding functionally and technologically similar replacements.

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

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

Person means a passenger, employee, *contractor*, volunteer, official worker, pedestrian, trespasser, or any other individual on the property of a rail fixed guideway public transportation system or associated infrastructure.

Personal Electronic Device (PED) means any wireless or portable electronic device. This includes, but is not limited to, wireless phones, personal digital assistants, smart phones, two-way pagers, portable internet devices, laptop computers, DVD players, audio players, iPods, MP3 players, games, Bluetooth devices, or any headphones or earbuds. The following devices are excluded from this definition:

a. *RTA*-owned licensed radio communications equipment such as cab-mounted or portable two-way radios with channels dedicated solely for *RTA* operations.
b. Electronic or electrical devices prescribed by a licensed medical practitioner to permit an employee to meet minimum levels of hearing ability as required by the *RTA* or *contractor*.
c. Roadway worker protection devices.

Potential consequence means the effect of a hazard.

Public Transportation Agency Safety Plan (PTASP) means the documented comprehensive agency *safety* plan for an *RTA* required by 49 U.S.C. 5329 and 49 CFR Part 673.

Rail Fixed Guideway System (RFGS) means any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, cable car, automatic people mover, or automated guideway transit system used for public transit, or any such system in engineering construction, and not regulated by the *Federal*

Definitions

Railroad Administration (FRA) or not specifically exempted by statute from Commission oversight.

Rail Transit Agency (RTA) means the entity that plans, designs, constructs, and/or operates a *RFGS* and is within the jurisdiction of the Commission.

Rail Transit Safety Branch (RTSB) means the branch of the California Public Utilities Commission responsible for the State Safety Oversight of all Rail Transit Agencies in California.

Rail Transit Operations Safety Section (RTOSS) means a section within California Public Utilities Commission's RTSB responsible for inspections of all RTAs.

Rail Transit Engineering Safety Section (RTESS) means a section within the California Public Utilities Commission' RTSB responsible for all other RTSB matter that are not under RTOSS responsibilities.

Rail Transit Vehicle means an *RTA*'s rolling stock used on a rail fixed guideway public transportation system, including but not limited to *passenger* and maintenance vehicles.

Revenue vehicle means a rail transit vehicle used to provide revenue service for passengers. This includes providing fare free service.

Risk-based inspection (RBI) program means an inspection program that uses qualitative and quantitative data analysis to inform ongoing inspection activities. Risk-based inspection programs are designed to prioritize inspections to address *safety* concerns and hazards associated with the highest levels of *safety* risk.

RSSIMS means the Rail Safety and Security Information Management System, which is the centralized database system used by *RTSB*.

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

Safety Certification is the series of acts or processes that collectively verify the *safety* readiness of a *Project* for public use.

Safety Certification Plan (SC Plan) means a *Project*-specific document developed by an *RTA*, which ensures that elements critical to *safety* are planned, designed, constructed, analyzed, tested, inspected, and implemented,

and that employees are trained, and rules and procedures followed, in compliance with the *RFGS* and the regulatory *safety* requirements.

Safety Certification Verification Report (SCVR) means a *Project*-specific document that will be the final certificate of compliance verifying that the *Project* complies with all *safety* requirements identified by an *RTA's SC Plan*.

Safety Design Criteria means the organized listing of *safety* codes, regulations, rules, design procedures, *existing industry standards*, recommended practices, analyses, handbooks and manuals prepared to provide guidance to *Project* designers in development of technical specifications that meet minimum *safety* parameters.

Safety event means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Safety Management System (SMS) means the formal, top-down, organization-wide data-driven approach to managing *safety* risk and assuring the effectiveness of *safety* risk *mitigations*. *SMS* includes policies, procedures, and practices for the management of *safety* risk.

Safety risk means the composite of predicted severity and likelihood of a potential consequence of a hazard.

Safety risk mitigation means a method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.

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

Staff means the *California Public Utilities Commission's RTSB* staff responsible for the state *safety* oversight of the *RTAs*.

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(k) and the regulations set forth in 49 *CFR* Part 674. In California the *California Public Utilities Commission (CPUC*) is the *SSOA*, and the *CPUC*'s *RTSB* implements the *CPUC*'s *SSOA* program.

System Security Plan (SSP) means a document adopted by an *RTA* detailing its *security* policies, objectives, responsibilities, and procedures.

Definitions

Unintended train movement means any instance where a revenue vehicle is moving and is not under the control of a driver (whether or not the operator is physically on the vehicle at the time). This applies regardless of whether the event occurred in revenue service.

File Naming Convention

Staff should use the following file naming convention in order to have consistency and ease of finding files:

> RTA Name – Date (can be only year) – Type of Document – Version number (if applicable) - Date of document approval

For example:

- NCTD 2025 PTASP checklist approved 2025-02-23
- BART INCT 20260100034 Final Report – 2026-02-01
- LACMTA 2025 AIP – Ver 2 - 2026-01-31

Note: Avoid using special characters (such as / & *) in file names, because *RSSIMS* has problems with uploading files.

RTSB-1: RTSB System Safety and Security Program Management and Procedure for Safety and Security Oversight of Design, Construction, Operation, and Maintenance of Rail Fixed Guideway Systems

1.1.0 SCOPE

This section describes the *Rail Transit Safety Branch's (RTSB*) procedures for System *Safety* and *Security* Program management and *Safety* and *Security* oversight of the design, construction, operation, and maintenance of rail fixed guideway systems in California.

1.2.0 PURPOSE

1.2.1 The purpose of this procedure is to describe *RTSB's* System *Safety* and *Security* Program management and establish a standard set of instructions for *Staff* to follow when performing the following *Safety* and *Security* Oversight activities on a day-to-day basis:

a. Oversight of *safety* and *security*-related issues during all phases of the system design, construction, operation, and maintenance;

b. Preparation of the *Safety* and *Security* Certification Oversight Plan (*SSCOP*) for a *Major Project*;

c. Review of selected drawings and specifications during the design and construction of new rail systems, extensions, modifications, acquisition and integration of new vehicles and *safety* critical technologies into the existing service or major *safety* critical redesign *projects*;

d. Attendance at design review and other *RTA* meetings concerning *safety* related issues;

e. Observation of selected tests during start-up and pre-revenue operation of newly installed facilities and equipment;

f. Sampling and inspection of selected system components, and equipment;

g. Unannounced and announced inspections;

h. To assign the responsibility for implementation of this procedure at each *RTA* to a *RTSB Designated Representative*, who will serve as a primary point of contact for the *RTA* to process and oversee all matters, other than inspections, that concern the *RTSB's Safety* and *Security* Oversight Program;

i. To assign the responsibility for inspections of *RTAs* to *RTSB Inspectors* to ensure compliance with all relevant rules, regulations, and/or procedures applicable to *RTAs*;

j. To inform each *RTA* in advance of the Commission's requirements for:
   1. Document submittals;
   2. Inspections;
   3. Observe tests or *investigations* conducted by the *RTAs;* and
   4. Record reviews;

k. To complement the inspection, internal audit and *safety* and *security* certification programs described in the *RTA's Public Transportation Agency Safety Plan* (*PTASP*) and *System Security Plan* (*SSP*); and

l. To document *safety* and *security* concerns identified by *Staff* and bring them to the attention of the Commission and the *RTA* in a timely manner.

1.2.3 The *RTSB safety* and *security* oversight program does not take the place of the *RTA's* System *Safety* and *Security* Program, including *safety* and *security* certification of *Major Projects*. In addition, it does not relieve the *RTA* in any way from its total responsibility for the *safety* and *security* of system operations. The *RTSB safety* and *security* oversight program is designed to provide an added degree of confidence that the *safety* and *security* policies and procedures described in each *RTA's PTASP* and *SSP* are adequately implemented.

1.3.0 GENERAL REQUIREMENTS

1.3.1 System *Safety* and *Security* Program Management

a. Commission authority, policies, and roles and responsibilities for providing *safety* and *security* oversight of the *RTAs* within its jurisdiction are detailed in the California Public Utilities Code and Commission General Orders.
b. These documents, along with this *Program Standard - Procedures Manual* provide an overview of planned activities to ensure on-going *safety* and *security* information communication with each affected *RTA*.

1.3.2 Program Standard Development

a. *FTA's* 49 *CFR* Part 674.27(a) states an *SSOA* must adopt and distribute a written State Safety Oversight (*SSO*) program standard, consistent with the National Public Transportation Safety Plan and the rules for *Public Transportation Agency Safety Plan*. The *SSO* program standard must identify the processes and procedures that govern the activities of the *SSOA*. Also, the *SSO* program standard must identify the processes and procedures an *RTA* must have in place to comply with the standard.

b. *Staff* will develop, review, and adopt the Program Standard - Procedures Manual to supplement the Commission General Orders and in compliance with 49 *CFR* 674.

c. Revisions and updates of the program standard

i. The Program Standard - Procedures Manual will be reviewed on an annual basis to determine if updates are necessary. Changes will be tracked in the revision history table.

ii. *Staff* will circulate the revised documents to affected *RTAs* for a 30 calendar day comment period.

iii. Under California law and the Commission's Rules of Practice and Procedures, the Commission may make additional rules and regulations or changes to the Program Management Standard Procedures Manual, as necessary for the purpose of *safety* and *security*.

iv. Final revisions/updates to the documents will be distributed to the *RTA* and then posted on the Commission's website, and a copy will be provided to the *FTA*.

1.3.3 *FTA* Annual Submission Requirements

Before March 15 of each year, or as required by the *FTA*, *Staff* will submit the following to the *FTA*:

a. A publicly available annual report summarizing *Staff* oversight activities for the preceding calendar year, including a description of the causal factors of investigated *safety events*, status of *Corrective Actions Plans*

(CAPs), updates and modifications to the *RTA's* program documentation, and the level of efforts *Staff* used in oversight activities.

b. A report documenting and tracking findings from the three-year *safety* review activities and status of three-year *safety* review findings/recommendations completed since the previous annual report submittal.

c. Program Standard - Procedures Manual with indication of changes or revisions made during the preceding year.

d. Certification that *Staff* reviewed and approved any changes or modifications to the *RTA's PTASP, SSP, AIP, and/or ISSA*.

e. *FTA* retains the authority to periodically request/audit Program Standards - Procedures Manual information.

f. All submissions to the *FTA* required in this part must be submitted electronically using a reporting system specified by *FTA*.

g. The Certification of Compliance is as follows:

   i. Annually, *Staff* will certify to the *FTA* that it has complied with the requirements of 49 *CFR* Part 674.

   ii. *Staff* will maintain a signed copy of each annual certification to the *FTA*, subject to audit by the *FTA*.

   iii. Per Commission *GO* 164 series, annually, the *RTA* must submit to *Staff*, a formal letter of certification, signed by the *RTA's Accountable Executive*, stating that, based on the evaluation performed during the internal *safety* and *security* audit/review (*ISSA*) process during the previous year, the *RTA* is in compliance with its *PTASP* and *SSP*. *Staff* must include letters of certification in its *FTA* annual submission.

h. The annual report to the *FTA* will include evidence that each *RTSB* employee has completed the requirements of the Public Transportation Safety Certification Training Program, or if in progress, the anticipated completion date of the training.

1.3.4 At least once a year, *RTSB* will report the status of the *safety* of each *RTA* to the Governor, the *FTA*, and the board of directors, or equivalent entity, of the *RTAs*.

1.3.5 The *RTSB* Program Manager has overall responsibility for the preparation and use of this Program Standard – Procedure Manual.

1.3.6 The *RTSB's SSO* activities are divided between the *Rail Transit Engineering Safety Section* (*RTESS*) and the *Rail Transit Operation Safety Section (RTOSS)*.

A Program and Project Supervisor (PPS) oversees *RTESS,* which is further divided into northern and southern units. *RTESS* consists of the following:

a. One PPS
b. One Senior Utilities Engineer (Supervisor) for each unit
c. A number of Utilities Engineers
d. A number of Senior Utilities Engineer (Specialist)
e. Public Utilities Regulatory Analysts
f. Associate Governmental Program Analyst

The *RTSB* Program Manager will appoint a designated *RTESS Designated Representative* for each *RTA* from the Utilities Engineers. For larger agencies or those with significant capital *projects*, another *RTESS* Utilities Engineer is usually assigned to assist the primary engineer.

1.3.7 The *Rail Transit Operations Safety Section* (*RTOSS*), the *RTSB Inspector* Team, is divided into northern and southern units. Each unit consists of one or more inspectors in the following classifications:

a. Rail Safety Inspector - Supervisor
b. Rail Safety Inspector - Senior
c. Rail Safety Inspector - Operations
d. Rail Safety Inspector - Equipment
e. Rail Safety Inspector - Signal
f. Rail Safety Inspector - Track

1.3.9 The *Designated Representative* will be responsible for coordinating any non-inspection type visits of the *RTA*.

1.3.10 The *Designated Representative* will be responsible for on-going communication with the *RTA* relating to *safety* and *security* information. The *Designated Representative* will participate in the *RTA* committees and meetings including but not limited to Fire Life Safety Committee, *Safety Certification* Committee, *Safety Certification* Verification field activities, *FTA*/*FRA*/*RTA* Quarterly Meetings, *RTA* Project Management Oversight *Contractor* (*PMOC*) meetings, System Integration Meetings, Pre-revenue Meetings, internal *safety* audits, *accident* reenactments, *accident* review committees, etc.

Each *Designated Representative* is responsible for tracking non-inspection related *CAP*s and *RTSB Hazard* Reports resulting from the Triennial On-Site Reviews (*RTSB*-4), Oversight of *RTA* Internal Safety and Security Reviews (*RTSB*-5), and Investigating *Accidents* and Approving *RTA Accident Investigation* Reports (*RTSB*-8). Each *RTSB Designated Representative* is responsible for updating *Rail Safety and Security Information Management System* (*RSSIMS*) Closure of each *CAP* will be acknowledged by letter or email from the appropriate *Staff*. See 1.10.0, *Corrective Action Plan* Follow-Up, below.

Each *Designated Representative* will be responsible for documenting participation in *RTA* meetings, committees, and any field activities in an Activity Report in *RSSIMS*. If meeting minutes are prepared, they are to be attached to the Activity Report. The *Designated Representative* will maintain original reports in *RSSIMS* and furnish a copy to their immediate supervisor.

1.3.11 *RTSB Staff* will be qualified and trained in accordance with the Public Transportation *Safety Certification* Training Program (Technical Training Plan).

1.3.12 As required by 49 CFR Part 674.27(a)(7), *RTSB* will ensure *RTAs* satisfy the requirements of 49 CFR Part 672, the Public Transportation Safety Certification Training Program (PTSCTP) regulation, including *RTA* designation of personnel and identification of refresher training. Accordingly, between January 1 and January 31 of each year, each *RTA* subject to 49 CFR Part 672 (those that received federal financial assistance authorized under 49 U.S.C. Chapter 53), must provide the following to *RTSB* by emailing the information below to RTSB@cpuc.ca.gov.

a. List of PTSCTP designated *RTA* personnel, including identification to indicate if the designee is an *RTA* employee or *RTA* contractor.
b. Biennial refresher training course(s) identified by the *RTA* for their PTSCTP designees.
   - Name of each course
   - Length of each course
   - Name of training provider
c. Dates for designated personnel:
   - First enrolled in the PTSCTP program (if this date is before 2026 it is optional) *RTA* can also send to *RTSB* the "Individual Training Plan" for designated employee, which includes the enrollment date and other relevant information.
   - Completed their PTSCTP program (if this date is before 2026 it is optional)
   - Date Biennial Refreshers are due (*RTA* can find this date in the email *FTA* sends out confirming receipt of biennial refreshers)
   - Last Date of Biennial Refresher completion
   - The biennial refresher training completed by each designee
d. Name and contact information for RTA Point of Contact for PTSCTP purposes.
e. RTAs must also copy RTSB@cpuc.ca.gov on any correspondence they send to the FTA pertaining to PTSCTP certification of designated personnel (both employees and contractors).

1.3.13 *RTSB* Staff must utilize Commission issued Personal Protective Equipment as required by *RTSB* Management.

1.4.0 DOCUMENT SUBMITTAL REQUIREMENTS

1.4.1 These submittal requirements are specified in the applicable Commission *GO*s, Decisions, Resolutions, *RTSB* procedures, and as additionally agreed to by the *RTA*. Document submittal requirements for *Major Projects* must be documented by the *Designated Representative* using the *SSCOP* form (See Attachment 3). The *Designated Representative* will attach the completed *SSCOP* in *RSSIMS* DCSB module (see *RSSIMS* manual).

1.4.2 The *Designated Representative* is responsible for reviewing the *RTA's* document submittals and providing comments, as necessary. When appropriate, the *Designated Representative* may consult with *RTOSS*

Inspectors or other staff for additional review and comments on those documents.

1.4.3 Examples of documents that are requested and filed by the *Designated Representative* include but not limited to the following:

a. *Public Transportation Agency Safety Plan*;
b. *Safety Certification Plan*;
c. Annual internal *safety* and *security* audit reports and a formal letter of certification, signed by the *RTA's accountable executive*, stating that, based on the evaluation performed during the internal *safety* and *security* audit/review process during the previous year, the *RTA* is in compliance with its *PTASP* and *SSP*;
d. *Accident investigation* reports;
e. *Corrective Action Plans* and schedules;
f. *Hazard* Conditions Reports;
g. *Safety Certification Verification Report*s and supporting documentation for *Major Projects*, major modifications and system extensions, including new and refurbished transit vehicles;
h. *Accident Investigation* Procedure; and
i. Operating rule book.

1.4.4 Examples of documents that are requested and filed by the *RTOSS Inspectors (Inspectors)* include but not limited to the following:

a. Roadway Worker Protection Procedures;
b. Operating Rule Book including maintenance, signal, and track rules;
c. Maintenance procedures;
d. *Corrective Action Plans* and schedules subsequent to *RTOSS* inspection;
e. *Accident Investigation* Procedure; and
f. Track charts.

1.5.0 INSPECTIONS OF RAIL TRANSIT AGENCIES

1.5.1 Periodic inspections will be performed to assess whether the *RTA* is conducting operation and maintenance activities as required by federal, state, Commission regulations, and relevant RTA rules and/or procedures.

CPUC has authority per Public Utilities Code 771 to access *RTA* facilities to conduct inspections (with and without advance notice), *investigations* and observations on *RTA* properties, including infrastructure, equipment, records, personnel and data to ensure compliance with the following:

a. Federal regulations;
b. State regulations;
c. PU Code;
d. Commission General Orders;
e. Industry standards; and
f. *RTA* rules and/or procedures.

The *RTOSS Inspectors* conduct the following activities in their discipline, but are not limited to the listed activities:

1.5.2 Rail Safety Inspector - Operations

a. Inspect all operating procedures;
b. Observe operating and non-operating personnel for regulatory compliance;
c. Review training records and procedures;
d. Review qualification and certification process;
e. Observe *RTA* Operators while in the field performing service;
f. Observe *RTA* Dispatchers at the Operations Control Center while performing service;
g. Review the Agencies drug and alcohol procedure;
h. Observe and review the *RTAs* efficiency testing program;
i. Observe and review the *RTAs* roadway worker protection program;
j. Review the *RTA* discipline policy;
k. Conduct *safety event investigations*; and
l. Assist the *RTA* in compliance with and interpretation of regulations and codes.

1.5.3 Rail Safety Inspector - Equipment

a. Perform *safety* and maintenance inspection of vehicles, systems, and equipment, including maintenance or service vehicles, of the *RTA*;
b. Ensure maintenance and operation practices and documentation pertaining to defects, maintenance, repairs and training are compliant with Original Equipment Manufacturer (OEM) recommendations, *RTA* procedures, and applicable regulations;
c. Inspect maintenance and overhauls of electrical and mechanical systems of *RTA* vehicles, in accordance with schematic drawings, wiring diagrams, operations manuals, and OEM instructions;
d. Inspect shop equipment and measurement tools;

e. Inspect Rail Support Equipment (i.e. Hi-Rail Equipment, Cranes, Locomotives, etc.);
f. Conduct *safety event investigations*;
g. Inspect maintenance facility shop area; and
h. Review inspection forms and work orders.

These inspections will encompass all maintenance shops, yards, and field operations.

1.5.4 Rail Safety Inspector - Track

a. Inspect tracks for defects or regulatory violations;
b. Ensure compliance with all federal and state regulations regarding rail and track structures;
c. Inspect documentation pertaining to rail inspections and training;
d. Inspect documentation pertaining to roadway worker protection training;
e. Conduct *safety event investigations*;
f. Inspect documentation pertaining to personnel recertification, qualification, and discipline; and
g. Document defects and follow up with an additional inspection verify defects were corrected.

1.5.5 Rail Safety Inspector - Signal

a. Inspect all train control systems electrical and communication equipment;
b. Review all training, qualification, certification, discipline, and defect documentation;
c. Conduct *safety event investigations*;
d. Inspect all wayside equipment; and
e. Ensure compliance with all federal and state, and/or *RTA* rules and procedures.

1.5.6 Risk-based inspections (*RBI*) will be commensurate with the complexity of each *RTA*. The complexity of the *RTA* will be based on factors including but not limited to: revenue miles travelled, the number of different type(s) of transit vehicles operated by the *RTA*, size and age of the system.

In some circumstances, increased *RBI* will be performed on *RTAs* based on additional factors. For example, *RTAs* with ageing rail transit vehicles

will have increased *RBI* related to the vehicle maintenance compared to *RTAs* with newer rail transit vehicles. This same methodology will apply to other factors, e.g. track miles, size and age of system.

As required by 49 CFR Part 674.27(a)(13), *RTSB inspectors* will review the *RTA's* rail transit vehicle maintenance program in an ongoing manner. As part of the *RBI* data review, *RTSB inspectors* will acquire *RTA* data on periodic servicing and functionality checks of braking systems and overhauls to braking systems of rail transit vehicles.

RBI shall be continuous and ongoing with a minimum of 4 per calendar year prioritized based on analysis from safety program, maintenance and inspection data received from *RTAs*. Historical inspection counts have exceeded several hundred inspections annually.

Typically, *RTSB inspectors* conduct inspections involving initial records review and follow-up field work, which can identify findings missed by *RTA* inspection personnel during their inspections. *RTSB Inspectors* may also observe *RTA* inspection personnel conducting their inspections. If *RTSB inspectors* identify deficiencies by *RTA* inspection personnel in either following inspection procedure or preparing inspection reports, *RTSB inspectors* may provide comments to *RTA* supervisors and managers regarding their oversight of the *RTA's* inspection personnel or inspection process. This would not otherwise be identified in the inspection data submission or records. In this way *RTSB* management trains *RTSB* inspectors to make sure *RTA* inspection personnel know how to properly identify and/or report findings (defects or hazards), and to make sure *RTA* supervisors for inspectors are properly training and overseeing the *RTA* inspection personnel.

Same as above for observing RTA personnel conducting maintenance activities.

RTSB is sufficiently staffed and structured to allow for routine and risk-based inspections of all RTAs in all inspection disciplines so that no gaps of inspection types for each RTA exist. If resource constraints are encountered, the *inspector* will consult with the Rail Safety Inspector - Senior or Rail Safety Inspector - Supervisor for guidance on which is a priority.

1.5.7 *Inspectors* will conduct both announced and unannounced inspections of operations and facilities to assess compliance with federal, state, Commission, and relevant *RTA* rules and/or procedures. Inspections may include but not limited to the following:

a. Observation of *RTA* employees and *contractors* for compliance with *RTA's* rules and procedures;
b. Review of training records and procedures;
c. Observation and review of *RTA* efficiency testing program (rules compliance testing program);
d. *Safety* and maintenance inspection of track, vehicles, and signal and train control systems; and
e. Review of *RTA* inspection, maintenance, and repair records of track, signal system, and equipment.

For announced inspections, the *Inspector* will provide a minimum of 24-hour notice to the *Designated Representative*, and the *RTA Safety* Manager. Notifications for announced inspections will be by e-mail. Although the *Inspector* may make discretionary schedule arrangements based on the *RTA's* request, at no time will the *Inspector* be required to arrange dates to satisfy schedule conflicts of the additional parties. All parties may arrange to meet at a specific location and at an agreeable time, however the determined location and time will be the responsibility of the *Inspector* in charge of the inspection.

Inspectors will conduct unannounced inspections. For unannounced inspections, the *Inspector* in charge will notify the *RTA* onsite personnel upon arrival and contact the *RTA*'s highest ranking supervisor at the facility. The *Inspector* is not required to notify any additional personnel but may do so if desired or requested. For unannounced inspections which involve areas restricted to only *RTA* personnel, e.g. Right-of-Way, the *RTA* shall provide an escort during the inspection. With the exception of during an operational or other system emergency that requires the engagement of the relevant *RTA* personnel, or where no qualified escort is present at the site when Staff arrives, the inspection shall commence within an hour of the *inspector* notifying *RTA* onsite personnel. If there is a need to wait for an escort, one will be provided as soon as possible. Upon completion of the inspection, the *Inspector* in charge of an unannounced inspection will notify the *RTA* whether the *Inspector* identified any findings.

In cases where the inspection is conducted in locations that the general

public has access to (such as at stations), *RTA* notification of the inspection is not required. However, the *Inspector* will notify the *RTA* when the inspection is complete, and whether the *Inspector* identified any findings.
Operating Cab—When the *Inspector* rides in the operating cab to perform an operating practices, track, signals & communications, or mechanical Inspection, the *Inspector* will not distract the *RTV* operator and comply with the following:

1. Prior to entering an operating cab, the *Inspector* will ensure that their *Personal Electronic Device (PED)* is turned off and properly *Stowed* in a grip, backpack, etc. and not *On Their Person*, in compliance with Commission *GO* 172 series. The *PED* on vibrate or airplane mode and in their clothing pocket is not acceptable.
2. Prior to the *RTV* Operator moving the train, the *Inspector* will perform a job briefing, advising the *RTV* Operator that this will be a *Sterile Cab*. This is to ensure that there is no conversation between the *Inspectors* and the *RTV* Operator while the train is in operation. Conversation should only occur if it does not impede the *RTV* Operator's duties.
3. Before leaving the operating cab, the *Inspector* will debrief the *RTV* Operator and relay observations regarding the in-cab ride pertaining to the inspection.

1.5.8 Prioritization of Inspections

The RBI Data Review Tracking Sheet will be updated with the date RBI data was received from *RTAs* per Section 1.6.2 and analyzed by *Inspectors* per Section 1.6.4 using the risk ranking method shown in Attachment 24 and copied below.

Risk Probability		Risk Ranking			
		Catastrophic A	Critical B	Marginal C	Negligible D
Frequent	1	1A	1B	1C	1D
Probable	2	2A	2B	2C	2D
Occasional	3	3A	3B	3C	3D
Remote	4	4A	4B	4C	4D
Improbable	5	5A	5B	5C	5D

RBI shall be prioritized based on frequency and category ratings of defects identified during analysis. See Sections 1.6.2 and 1.6.3 for frequency of data collection and analysis, which will determine the frequency of data prioritization.

Even though CPUC has sufficient *inspector* resources to complete follow-up *risk-based inspections,* they will be prioritized based on the risk ranking given by the reviewing *inspectors*. If multiple findings of the same risk ranking are identified during any data submittal period, the prioritization will be commensurate with the complexity of each RTA.

1.5.9 *Safety Event* Verification

Safety Events shall be reported and investigated, and associated investigation reports will be evaluated, approved, and CAPs tracked in accordance with Section RTSB-8 of this Program Standard.

When *Inspectors* conduct *safety event* or other investigations, *Inspectors* will verify - the scene is successfully repaired as part of the investigation. Probable causes shall be collected/analyzed to support the identification of *hazards* including other similarly configured locations. *Inspectors* will assess whether the *RTA* is leveraging data and information collected through investigation activity to determine probable cause and to support the identification of any hazards. For *safety events* where *inspectors* conduct field inspections, the data collected is considered during the close-out process. For all *safety events* investigated, findings and recommendations are not considered in a vacuum and similarly configured

locations are considered in CAPs developed as a result of the review of the *safety event*.

1.5.10 Following each inspection, the *Inspector* will complete a *Rail Transit Safety Branch Inspection Form* (see Attachment 2) using objective language and referencing factual objective data and submit it within three (3) business days to the Rail Safety Inspector - Supervisor or Rail Safety Inspector - Senior. The *Inspector* will upload to *RSSIMS* all relevant documents pertaining to the inspection. *RTOSS Inspectors* will document *RTA* issues of non-compliances, exceptions, or findings from unannounced or announced inspections and transmit findings to the Rail Safety Inspector - Senior / Rail Safety Inspector - Supervisor for review and issuing to the *RTA*.

Inspection reports will generally be separated by inspection discipline, and they will not be combined reports of several inspection activities, such as all inspections that occurred on a single day.

1.5.11 The *RTOSS* Rail Safety Inspector - Supervisor or Rail Safety Inspector - Senior will provide the *RTA* designated *Safety* Department the CPUC inspection report and any additional information or documentation provided by the *Inspectors*, to ensure all inspection activities are communicated properly, and may consult the *Inspectors* for clarification as needed. The inspection report will be issued within 3 weeks from the inspection date unless findings indicate more urgency is appropriate.

If the inspection report notes findings of non-compliance, the *RTA* must provide a written CAP to *RTSB* within 30 days of receiving the inspection report.

The *Designated Representative* may also prepare an Activity Report for any or all activities related to such inspections.

1.5.12 The Supervisors of *RTOSS* have overall responsibility for *RTOSS* inspections and *Corrective Action Plans (CAPs)* from inspection findings of non-compliance with federal, state and/or RTA rules and procedures.

1.5.13 The Rail Safety Inspector - Senior will track all inspections and *CAPs* to ensure the documented findings of non-compliance, or exceptions, are completed per federal, state and Commission regulations.

1.5.14 If the *RTA* disagrees with the finding(s) of an inspection report, the *RTA* can submit to the Rail Safety Inspector - Supervisor or Rail Safety Inspector - Senior documentation and other information to justify their position. The Rail Safety Inspector - Supervisor and Rail Safety Inspector - Senior will review the *RTA's* request, and as appropriate discuss with the *RTSB* Program Manager and other *Staff*. If *RTSB* Management agrees with *RTA's* request, the Rail Safety Inspector - Supervisor will instruct the Rail Safety Inspector - Senior to send to the *RTA* a follow-up inspection report closing out the original inspection report. The Rail Safety Inspector - Senior will also update the inspection tracking, as appropriate. If *RTSB* Management disagrees with the *RTA*, the Rail Safety Inspector - Supervisor or Rail Safety Inspector - Senior will inform the *RTA* along with its reasons.

1.5.15 Immediate Safety Concerns

When immediate safety concerns, at the discretion of the *Inspector*, are identified during the inspection, the *Inspector* shall stop the inspection process and go to a safe location. The *Inspector* shall notify the *RTA* representative (or when necessary, contact emergency responders) and Rail Safety Inspector - Senior */RTSB* management of the safety concern(s). Example safety concerns may include but not limited to:

a. Security concerns such as criminal activity, suspicious person and/or package, creating an unsafe location;
b. Inclement weather or threat of inclement weather;
c. *RTA* personnel unsafe behavior, including disregard for safety procedures, suspected fatigue or impairment; or
d. Equipment or infrastructure related conditions including but not limited to:
    i. Hi-Rail Defects, serious track damage, or obstructions;
    ii. Overhead catenary damage, malfunction, or other observed safety concern;
    iii. Signal related damage or malfunction;
    iv. Vehicle damage or component malfunction; or
    v. Facility Safety concerns such as fire, electrical or other life/safety concerns.

If the immediate safety concerns can be abated within a reasonable time, the inspection may continue. If the safety concerns cannot be abated within a reasonable time period, the inspection will be postponed.

Findings identified as a result of the safety concern shall be tracked accordingly.

1.5.16 Defects and Corrective or Remedial Actions:

Defects identified through data analysis will be categorized by severity based on safety impacts to the *RFGS* and/or general public. *RBI* performed as a result of the identified defects and findings identified through *RBI* shall be tracked using *RSSIMS* database and/or spreadsheets. Defects, corrective actions and remedial actions will adhere to Commission General Order 164 (series) and Program Standard *CAP* documentation and approval mechanisms for *CAPs* contained herein.

1.5.17 Certification of Training

Inspectors are verified annually to have knowledge of the *RTA* safety protocols, demonstrated by completing the Technical Training Documentation form. Items verified include but not limited to:

a. Knowledge of Roadway Worker Protection rules;
b. Operating Procedures;
c. *RTA PTASP*; and
d. Safety Rules and Vehicle/Track maintenance programs.

1.6.0 RECORD REVIEWS, COLLECTION, AND ANALYSIS

1.6.1 Records that *Staff* review include but are not limited to the following:

a. Construction turnover inspection records for completed work on system extensions and other new facilities;
b. Verification and validation records for vital software and hardware;
c. Automatic train control, block signaling, track circuit and interlocking test records;
d. Test records for grade crossing warning devices;
e. Event recorder records;
f. Final design and as-built construction documents;
g. Start-up test records;
h. *Hazard analyses* records including how the *RTA* identified, assessed and mitigated identified safety risks;
i. Training and certification records;
j. Internal *safety* and *security* audit reports;
k. *Accident investigation* records;

l. *Other* Event *records;*
m. Maintenance records;
n. Hours of service records;
o. Operational evaluation records;
p. Drugs and alcohol test results;
q. *Security* video surveillance records; and
r. *Corrective Action Plans*.

1.6.2 The *RTAs* must provide CPUC the data the RTA collects when identifying hazards and assessing and mitigating safety risk with a frequency of at least every 6 months, unless otherwise shown on the RBI Data Review Tracking Sheet (Attachment 24). Records that *Staff* have identified for routine collection for each *RTA* are reflected on the RBI Data Review Tracking Sheet for each RTA. Since each RTA is different, the data *RTAs* must provide vary as shown on Attachment 24. That data includes but is not limited to the following:

Safety Program Data
a. Records of Events;
b. *Hazard* Records;
c. Safety Risk Mitigation Records;
d. Correction Action Plans; and
e. Records of near misses.

Maintenance Data
a. Inspection and maintenance records and report forms;
b. Work Orders;
c. Records of Failures and Defects;
d. Records of revenue vehicles out of service, including causal information;
e. Major maintenance activity schedule and progress; and
f. Adherence to maintenance schedules, including reports and documentation.

Inspection Data
a. Inspection records and report forms;
b. Records of failures and defects;
c. Records of speed restrictions;
d. *Event* and Safety Risk Mitigation verification;
e. Adherence to inspection schedules including reports and documentation of inspections not performed; and

f. Capital projects schedules and progress.

When *Staff* plans to modify the RBI Data Review Tracking Sheet document, prior to implementing the modification *Staff* will provide the proposed revision to the RBI Data Review Tracking Sheet document to affected *RTAs* for a 30-calendar day comment period.

1.6.3 Data Collected

Data shall be submitted to *Staff* based on format and time frames agreed upon by *RTOSS* management and the *RTAs* to RBIData@cpuc.ca.gov no later than 10 business days after the close of the reporting period. I*nspectors* will analyze data on the same frequency as the submission of that data, as they receive it. If unable to provide within the time frames requested, *RTA* must send to RBIData@cpuc.ca.gov justification for the delay and request additional time to meet the requirement. *RTOSS* management will review the time extension request and notify the *RTA* of their decision to approve or reject the time extension request.

If *RTA* fails to comply with submitting requested data based on format and time frames agreed upon, *Staff* may issue findings and recommend enforcement actions based on non-compliance with *CPUC* General Orders, *FTA* regulations, and *RTA's PTASP*.

1.6.4 Data Analysis

RTSB management will assign *staff* to review data received from *RTAs* for *RBI* analysis purposes. The Senior Utilities Engineer Specialist, *Inspectors* in their respective crafts (Operations, Equipment, Signal, and Track), Rail Safety Inspector - Seniors, Rail Safety Inspector - Supervisors and/or other *staff* assigned to review *RBI* data will assist *RTOSS* management to ensure complete review of data received. *Staff* will use spreadsheets, *RSSIMS* database, or other appropriate tools to analyze data collected from *RTAs* to identify any trends that the data may reflect that should be further investigated.

Staff will complete their *RBI* data review within 30 days after the *RTAs* submit them or 30 days after the *RTAs* are required to provide them, whichever date comes later.

Reviewers of the data will at a minimum evaluate the data to identify trends in *RTA* inspection and maintenance data based on location, frequency, severity, type of trend, individuals or departments involved, and

continual or repeat findings. The data analysis and prioritization will be supplemented by CPUC's own data from all safety oversight activities and inspection findings for that *RTA.* Data for all California and other *RTA*s shall also be considered.

The data analysis review of *RTA* transmitted data shall be documented on the RBI Data Review Tracking Sheet for that period (see Attachment 24 - RBI Data Review Tracking Sheet) which shall be uploaded and stored in Content Server along with the data for that *RTA* for that time period.

1.6.5 Data Management System
Data collected will be accurately stored on the Commission's Content Server document management system, which requires a login and a password, limiting access.

Data collected will be:
a. Used for analysis;
b. Organized by *RTAs* in Content Server; and
c. Kept for a minimum of 5 years. Each year *Staff* will review files and determine which ones need to be purged.

Documents that contain Sensitive Security Information (SSI) will be kept electronically on the Commission's Content Server, as indicated by *RTSB* Management (see Procedures Manual Section 8.8.2), which requires a login and a password, limiting access. In general, *Inspectors* will review SSI data at *RTA* facilities, in order to avoid having a need to take a copy of and safeguard the document with SSI. In cases where *Inspectors* need to keep a copy of the document that contains SSI, *Inspectors* will request a redacted copy from the *RTA*, if the redacted document still provides information necessary for *RBI* analysis.

Staff will use *RSSIMS* and Content Server to store and maintain documentation relating to its inspections, review and storage of RBI data from *RTAs*. Both are maintained by the Commission's Information Technology Services Division and have the capacity to store records according to RBI data management system policies and procedures herein.

1.6.6 The *Designated Representative* will document *safety certification* records for *Major Projects* that are selected for review in a *project SSCOP* Records Review (see Attachment 4).

1.6.7 *Staff* will prepare an Activity Report following each records review. *Staff* will discuss with *RTA* and note any *safety* concerns in these reports. The *Designated Representative* will notify their immediate supervisor of all reports noting *safety* concerns.

1.7.0 ACTIVITY REPORTS

A *TACT* record must be created by *staff* for any field activity or meeting not otherwise documented (such as an inspection report). The *Designated Representative* or *inspector* must document *Staff* participation in *RTA* meetings and committees, field, and other activities in *RSSIMS*. If this is a joint activity with *RTESS* and *RTOSS*, the *Inspector* must provide to the *Designated Representative* the *Inspector's* notes, photos, and other comments for inclusion in *RSSIMS TACT* record.

1.8.0 COMMISSION FILING REQUIREMENTS

Whenever necessary to bring matters before the Commission in a Resolution or other formal filing, the *Designated Representative* will prepare a notice of the filing of the *RTA* documents requiring Commission consideration and ensure it is published in the Commission Daily Calendar (see Attachment 5) by generating a Calendar Notice and submitting it to the Docket office. The *Designated Representative* will prepare and track the draft Commission Resolution as required in the *CPUC*'s Rules of Practices and Procedures. See *RSSIMS* Procedures Manual for instructions on preparing and tracking resolutions.

1.9.0 GENERAL ORDER EXEMPTIONS/WAIVERS

Any exemption/waiver issued by the Commission must achieve a level of safety equivalent to, or greater than, the level that would be achieved by compliance with the current regulation. This procedure outlines the options for *RTAs* seeking an exemption/waiver from a Commission General Order requirement and for Staff to process the request.

If an *RTA* wishes to receive an exemption/waiver from a Commission General Order, the *RTA* may discuss the exemption request with *Staff*. If *Staff* agrees safety would not be reduced and is in support of the exemption/waiver request, Staff will discuss with *RTSB* Management, and if they agree, *RTSB* will start the staff-initiated formal approval process. *Staff* will bring the matter before the

Commission via a Commission Resolution recommending Staff approval.

If *Staff* does not support the *RTA* request, the *RTA* may file a formal *CPUC* Application to request approval of the exemption/waiver from a Commission General Order requirement.

1.9.1 The *RTA* should informally discuss with the *Designated Representative* their reasons to substantiate why the Commission General Order requirement cannot be met and must demonstrate that safety will not be reduced by the proposed exemption/ waiver. The *Designated Representative* will share the informal request with *RTSB* Management.

1.9.2 After discussion and approval of *RTSB* Management to proceed with the exemption/waiver request, the *Designated Representative* will inform the *RTA* to formally submit the request in writing addressed to the Program Manager with the signature from their *Accountable Executive*. The written request must contain a full statement for the reason(s) justifying the exemption/waiver and must demonstrate that safety will not be reduced.

1.9.3 *Staff* will then process the exemption/waiver request, by generating a draft Resolution recommending the Commission's approval.

1.9.4 The *Designated Representative* will prepare and track the Commission Resolution as required in the *CPUC's* Rules of Practice and Procedure, the *RSSIMS* Procedures Manual, and this program standard. The exemption/waiver granted shall be limited to the particular case and Commission General Order requirement covered by the request.

1.9.5 *Staff* shall create a new resolution record in *RSSIMS*, uploading relevant documents and updating all the required data and follow-through to completion when the final Resolution is issued by the Commission, so the *RSSIMS* record can be closed.

1.10.0 CORRECTIVE ACTION PLAN FOLLOW-UP

Since Commission *GO* 164 series requires the *RTA* to develop *CAP*s for all *safety* and *security* findings of noncompliance, *Staff* will review and approve *CAP*s. For inspection findings corrected within 30 days, *staff* will document the finding closure by creating a TCAP record in *RSSIMS*.

1.10.1 Where immediate or emergency corrective actions are required to ensure

safety, the *RTA* may implement the corrective action prior to *RTSB Staff* approval. *RTA* must provide the *CAP* to *RTSB Staff* within 48 hours.

1.10.2 Each *RTA* must submit each *CAP* to *Staff* with a request for review and approval. If the *CAP* is acceptable to *Staff*, Staff must notify the *RTA* approving the *CAP* as consistent with General Order 164 series, Sections 9.1 through 9.5 inclusive, best industry practices, and in furtherance of the public's interest in system *safety* and *security*. If *Staff* rejects the *CAP*, *Staff* must identify the areas in the plan that, in its determination, require correction, and communicate that information to the *RTA*.

If the *RTA* does not agree with the rejection, *RTA* must meet and confer with *Staff* in an effort to resolve this disagreement. If no resolution is achieved through negotiation, the *RTA* must apply to the Commission for approval pursuant to the application procedure under the Commission's Rules of Practice and Procedure.

1.10.3 The *Designated Representative* must create a record for all *CAP*s, except for inspection *CAPs*, in the TCAP module in *RSSIMS* to document the *CAP* and its status.

*CAP*s must include the following three elements:

a. Identification of the action to be taken by the *RTA*;
b. An implementation schedule; and
c. *Individual* and department responsible for the implementation.

The *Designated Representative* will enter into *RSSIMS* the monthly updates the *RTAs* provide on their progress in completing the *CAP*s. *Staff* can verify progress by conducting unannounced or announced inspection.

a. When an *RTA* requests a time extension to complete a *CAP,* if *Staff* approves the time extension request, *Staff* will make the following changes to the TCAP record*:*
   1. *Staff* will update the "Issues Preventing Implementation/Withdrawal Reason" field by adding to the previous implementation date(s) the new requested date, without deleting previous extension request dates, and *RTA's* reason(s) for extension request(s);
      Example:
      Original CAP: Original Implementation Date [dd/mm/yyyy]

First Extension Request: Extension Request Date [dd/mm/yyyy], Proposed New Implementation Date [dd/mm/yyyy], Reason for extension

Second Extension Request: Extension Request Date [dd/mm/yyyy], Proposed New Implementation Date [dd/mm/yyyy], Reason for extension

Add lines for additional extension requests.

2. Update the "Proposed Implementation Date" field; and
3. Attach *RTA's* request document and *Staff's* reply as attachments to the TCAP record.

b. When an *RTA* requests a time extension to complete a *CAP,* if *Staff* rejects the time extension request, *Staff* will make the following changes to the TCAP record*:*
   1. *Staff* will update the "Issues Preventing Implementation/Withdrawal Reason" field to document the extension request and *Staff's* reason for rejection; and
   2. Attach *RTA's* request document and *Staff's* reply as attachments to the TCAP record.

c. *Staff will notify RTA* of their decision to approve or reject the *CAP* approval.

d. The *Designated Representative* will conduct their own reviews to verify *CAP* completion as *RTAs* close them over time and request *CAP* closure approval. The *Designated Representative* will document closure and verification method by completing the TCAP module in *RSSIMS*. The *Designated Representative* will attach any *RTA's* verification documentation, along with any other associated documentation, to the appropriate *RSSIMS* record.

e. If the *Designated Representative* is satisfied with the completion of the *CAP*, the *Designated Representative* will document the approval method – email (date) or letter (date) to the *RTA* in the appropriate *RSSIMS* TCAP record. The *Designated Representative* will utilize the *RSSIMS* review cycle to notify their supervisor and ask them to review and approve.

1.10.4 *RTSB Inspectors* will adhere to the following *CAP* documentation and approval mechanisms for completion of *CAP*s (resulting from inspections) using *RSSIMS*:

a. When *CAPs* for inspection findings are submitted the *inspector* will inform the *RTA* by sending an email confirming the *CAP* is acceptable for each finding.

b. The *Inspector* will use *RSSIMS* to track their outstanding inspection *CAPs* and open inspection reports.

c. If the *Inspector* is satisfied with the *RTA*'s completed *CAP(*s), the *Inspector* will inform the *RTA* and follow *RSSIMS* procedures for closing out the TCAP record. When all *CAPs* for inspection findings are completed, a final inspection report with the close-out information (closure dates) will be issued to the *RTA*.

d. If the *Inspector* is not satisfied, the *Inspector* will discuss the inspection report and proposed *CAP* with the Rail Safety Inspector - Supervisor and Rail Safety Inspector – Senior, and if they agree, will reject the proposed *RTA* cap via e-mail. The *CAP*(s) will remain open and shown on the tracking spreadsheet.

e. The Rail Safety Inspector - Supervisor or Rail Safety Inspector – Senior will close out the TTIN record in *RSSIMS* after the last *CAP* from an inspection report has been closed.

RTSB-2: Procedure for Reviewing, Approving, and Filing a Rail Transit Agency's Prepared Public Transportation Agency Safety Plan

2.1.0 SCOPE

This section describes the *RTSB* procedures for reviewing, approving and filing a *Public Transportation Agency Safety Plan* (*PTASP*) prepared by the *RTA's* operating *Rail Fixed Guideway System*s in California. There are distinctions between *FTA* funded and non-*FTA* funded *RTA*s.

2.2.0 PURPOSE

2.2.1 The purpose of this procedure is to:

a. Establish a standard set of instructions for *Staff* to follow when reviewing, approving, and filing *PTASP* submittals; and
b. Establish a set of guidelines for the *RTAs* to use in preparation and/or revision of their *PTASP*.

2.3.0 GENERAL REQUIREMENTS

2.3.1 The *RTSB* Program Manager has overall responsibility for the application and use of this procedure, including approval of the "*CPUC* Checklist for Review of *Public Transportation Agency Safety Plan*" (see Attachment 6a) and "*CPUC* Checklist for Review of Non-*FTA* Funded Rail Transit Agency Public Transportation Agency Safety Plan" (see Attachment 6b).

2.3.2 Whenever *RTSB* management revises one or both checklists described in this Section, it will be provided to *RTSB Staff* and the *RTA*s.

2.3.3 The *Designated Representative* will review each *PTASP*, including any subsequent revisions, for conformance to the appropriate checklist described in this Section.

2.3.4 The *Designated Representative* will review each *PTASP* in cooperation with the *RTA* to resolve any checklist item(s) not adequately addressed in the *PTASP*.

2.3.5 The *RTSB* Management will review and approve the checklists described in this Section for the submittal of the *RTA's PTASP*. The *Designated Representative* will prepare and process a draft letter of approval for *RTSB* Senior Utilities Engineer (Supervisor) with accompanying appropriate checklist described in this Section for Review. In case of rejection of the *RTA*'s *PTASP*, the *Designated*

Representative will provide the Checklist for Review and reasons for non-approval.

2.3.6 Commission *GO* 164 series requires *RTAs,* before February 15th of each year, to review their *PTASP*, in order to determine whether the plan should be revised, and notify *Staff* if no revisions to the *PTASP* are deemed necessary.

2.3.7 In the event *Staff* disagrees with the *RTA*, *Staff* must provide written explanation of the reasons for its rejection to the *RTA*, and the *RTA* must file a formal application seeking approval by the Commission.

2.3.8 *Staff* may periodically require additional review of the *PTASP* to address specific issues based on revisions of the following documents, if applicable:

a. Program Standard - Procedures Manual; and
b. 49 *CFR* Chapter VI.
c. *FTA safety* advisory;
d. *FTA safety* directives;
e. On-site reviews;
f. *Investigations*; or
g. Changing trends in *events data*.

2.3.9 *RTA* may initiate review and/or revision to the *PTASP* outside of the annual review cycle.

2.3.10 Revisions to the initial Commission approved *PTASP* will be reviewed by *Staff* for conformance to the applicable sections of the "*CPUC* Checklist for Review of *Public Transportation Agency Safety Plan*", using the same methodology as in the initial *PTASP* submission.

2.4.0 REVIEW OF PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

2.4.1 To ensure statewide compliance and consistency, *Staff* will review the initial *PTASP* and, subsequently, any revised *PTASPs* using the appropriate checklist described in this Section *Staff's* evaluation of the *RTA's* submittal will verify the following elements are addressed in the *PTASP*, if applicable:

a. Endorsement of the *PTASP* by the *RTA's accountable executive*;

b. Establish the *safety* goals and objectives (based on the ***National Public Transportation Safety Plan***) of the *RTA*;
c. Identify the *safety* roles and responsibilities of all *RTA* departments/functions;
d. Identify the *safety risk management* process, including reporting thresholds, to be used by the *RTA*;
e. Identify the internal *safety* review process to be performed by the *RTA* and *Staff* involvement in the process;
f. Identify *events* notification, *investigation* and reporting procedures to be used jointly by the *RTA* and the *SSOA* in managing *events*, meeting the thresholds specified by *FTA's* rule;
g. Require communication and coordination with *Staff* in all Commission program provisions, and document the actual mechanisms in place for communication and coordination between the *RTA* and *Staff*; and
h. Provide a schedule for the implementation and revision of the *PTASP*.

2.4.2 *RTA*'s Board of Directors does not need to approve the *RTA*'s annual review of their *PTASP* if no changes are made to the document. The *RTA*s simply need to provide a letter informing *Staff* they reviewed their *PTASP* and have no changes for this year.

2.4.3 The *Designated Representative* will verify all 23 elements prescribed in Commission General Orders series 164, 172, and 175, as well as *CPUC*'s Checklist for Review of *Public Transportation Agency Safety Plan* are addressed in the *RTA's PTASP*.

2.4.4 The *Designated Representative* will review all referenced materials in conjunction with the *PTASP*.

2.4.5 The *Designated Representative* will complete the appropriate checklist described in this Section, and brief *RTSB* Management on any findings. The *RTSB* Management will review the checklist for thoroughness and, if necessary, assign additional *Staff* to conduct peer review of the *PTASP* and the completed checklist.

2.4.5 If the revised *PTASP* is not acceptable based on the Commission General Order 164 series requirements, the *Designated Representative* will draft a formal letter of review for *RTSB* Management signature with a copy of the *Staff's* completed

checklist. The *RTA* will be given instructions on how to revise and resubmit the revised *PTASP* in the letter.

2.4.6 The *Designated Representative* will draft an approval letter for *RTSB* Management review. *RTSB* Management will send a formal letter of review and approval of the *PTASP* to the *RTA*, with a copy of *Staff's* completed checklist.

2.4.7 The *Designated Representative* will maintain the completed checklists, *RTSB* letters of approval/disapproval with accompanying reasons for rejection, any other correspondence and the approved *PTASP*, including the original and any revisions, for each *RTA* and file a copy in *RSSIMS*.

RTSB-3: Procedure for Reviewing, Approving, and Filing a Rail Transit Agency's Prepared System Security Plan

3.1.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedures for reviewing, approving and filing *System Security Plan (SSP)* prepared by the *RTA* operating *Rail Fixed Guideway Transportation Systems* in California.

3.2.0 PURPOSE

3.2.1 The purpose of this procedure is to:

a. Establish a standard set of instructions for *Staff* to follow when reviewing, approving, and filing *SSP* submittals; and
b. Establish a set of guidelines for the *RTA* to use when they prepare or revise an *SSP*.

3.3.0 GENERAL REQUIREMENTS

3.3.1 The *RTSB* Program Manager has overall responsibility for the application and use of this procedure, including approval of the "*CPUC* Checklist for Reviewing the *System Security Plan*" (see Attachment 7).

3.3.2 *Staff* will review each *SSP*, including any subsequent revisions, for conformance to the "*CPUC* Checklist for Reviewing the *System Security Plan*" (see Attachment 7).

3.3.3 *Staff* will review each *SSP* in consultation with the *RTA* to resolve any checklist item(s) not adequately addressed in the *SSP*.

3.3.4 *RTSB* Management will approve the *CPUC* Checklist for reviewing the *SSP* for the initial submittal of each *RTA's SSP*.

3.3.5 As required by *GO* 164 series, an *RTA* must annually review the *SSP* to determine whether the plan should be revised. *RTA* will be responsible for formally advising *Staff* prior to February 15 of each year if no revisions to *SSP* are deemed necessary. In the event *Staff* disagrees with *RTA* decision, *Staff* will formally notify the *RTA* that further review and revisions are necessary.

3.3.6 *Staff* may periodically require additional review of the *SSP* to address specific issues based on revisions of the following documents:

a. Program Standard - Procedures Manual; and
b. 49 *CFR* Chapter VI.

Including but not limited to the following:

a. *FTA Safety* Advisory;
b. *FTA Safety* Directives;
c. On-site reviews;
d. *Investigations*;
e. Changes in homeland *security* trends; and
f. Recommendations or requirements from Department of Homeland Security or Transportation Security Administration.

3.3.7 The *RTA* may initiate review and/or revision to the *SSP* outside of the annual review cycle.

3.3.8 In the event *SSP* revisions are made, the *RTA* must submit the revised *SSP* to *Staff* no later than February 15 of each year. Revised Commission approved *SSP* will be reviewed by *Staff* for conformance to the applicable sections of the attached *CPUC* Checklist for review of *SSP*, using the same methodology as in the initial *SSP* submission.

3.3.9 *RTSB* Management will approve the *CPUC* Checklist for reviewing the *SSP* for a revised *SSP*; the *Designated Representative* will prepare and transmit a letter of approval to the *RTA*.

3.3.10 The *Designated Representative* will maintain a file containing the completed checklists, and *RTSB* letters of approval/disapproval for each *RTA* and file a copy in *RSSIMS*. *Staff* will maintain confidentiality of *SSP*.

3.4.0 REVIEW OF SYSTEM SECURITY PLAN

3.4.1 To ensure statewide compliance and consistency, *Staff* will review the initial *SSP* and revised *SSP* using the *CPUC* Checklist for review of *SSP*. (see Attachment 7). Evaluation of the *RTA* submittal verifies the following elements are addressed in the *SSP*:

a. Identify the policies, goals, and objectives for the *security* program endorsed by the *RTA's accountable executive*;

b. Document the *RTA's* process for managing threats and vulnerabilities during operations, and for *Major Projects*, including integration with the *safety certification* process;

c. Identify controls in place that address the personal *security* of *passengers* and employees;

d. Document the *RTA's* process for conducting internal *security* reviews to evaluate compliance and measures the effectiveness of the *SSP*; and

e. Document the *RTA's* process for making its *SSP* and accompanying procedures available to the *SSOA* for review and approval.

3.4.2 The *RTA* must make available to *Staff* for review all documents referenced in *SSP* along with the *SSP*. The *Designated Representative* will review all referenced materials in conjunction with the *SSP* review.

3.4.3 The *Designated Representative* will complete *CPUC* Checklist for review of *SSP*, and brief *RTSB* Management on findings. *RTSB* Management will review checklist for thoroughness and, if necessary, assign additional *Staff* to conduct peer review of *SSP* and completed checklist.

3.4.4 If the revised *SSP* is not acceptable based on the Commission General Order 164 series requirements, the *Designated Representative* will draft a formal letter of review for *RTSB* Management signature with a copy of the *Staff's* completed checklist. The *RTA* will be given instructions on how to revise and resubmit the revised *SSP* in the letter.

3.4.5 The *Designated Representative* will send a formal letter of review and approval of the *SSP* to the *RTA*, with a copy of *Staff's* completed checklist.

3.4.6 The *Designated Representative* will maintain the completed checklists, *RTSB* letters of approval/disapproval with accompanying reasons for rejection, any other correspondence and the approved *SSP*, including the original and any revisions, for each *RTA* and file a copy in *RSSIMS*.

RTSB-4: Procedure for Performing Triennial On-Site Review of a Rail Transit Agency

4.1.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedures for performing triennial on-site reviews of the *rail transit agencies* (*RTAs*) operating *Rail Fixed Guideway Systems* in California.

4.2.0 PURPOSE

4.2.1 The purpose of this procedure is to:

a. Provide the *RTSB staff* (*Staff*) with a standard set of instructions for performing triennial, on-site, reviews by auditing the application and use of the *RTA's Public Transportation Agency Safety Plan* (*PTASP*) and *System Security Plan* (*SSP*); and

b. Provide the *RTA* a complete description of the triennial on-site, review program.

4.3.0 GENERAL REQUIREMENTS

4.3.1 The *RTSB* Program Manager has overall responsibility for the preparation and use of this procedure.

4.3.2 Each *RTA* operating a *Rail Fixed Guideway System* in California is required by Commission General Order 164 series to have a Commission approved *PTASP* and *SSP*.

4.3.3 *Staff* will review each *RTA's* implementation of its *PTASP* and *SSP* in accordance with this procedure within a 3-year period, and every 3-year period thereafter. For a new start *RTA*, *Staff* will review the *RTA's* implementation of its *PTASP* and *SSP*, in accordance with this procedure, after one year of revenue service, and every 3-year period thereafter.

4.3.4 *Staff* will conduct each review in accordance with a set of checklists prepared in advance. The checklists are prepared from the 23 elements found in Attachment 9, *CPUC Checklist for Reviewing and Approving a Rail Transit Agency's Annual Internal Safety and Security Review Report*. *Staff* may reference checklists, found in Content Server's "Triennial On-Site *PTASP* Review Docs" folder or on prior *RSSIMS* TRRV records.

4.3.5 *Staff* will document the results of each review in a final triennial on-site review report containing the *Staff's* findings and recommendations (see Attachment 8). *Designated Representative* will prepare separate Draft Reports with findings and recommendations for the *Safety* and *Security* audit. *Staff* will file all Triennial On-Site Review documents on *RSSIMS* and which will be approved by *RTSB* Management.

The *Designated Representative* will create and track the Triennial audit on *RSSIMS* TRRV module including the Resolution on a separate *RSSIMS* RSL module record, the checklists, *Staff* Reports with their findings and recommendations and the resulting *CAP*s.

4.4.0 REVIEW PREPARATIONS

4.4.1 The *RTSB* Management will assign a *Designated Representative* and *Staff* to conduct each scheduled triennial on-site review. Also, *RTSB* Management will assign a *Designated Representative* to oversee the review process.

4.4.2 In addition to the *RTA's PTASP* and *SSP*, *Staff* will use the *RTA's* procedures and other pertinent documents as a basis for preparing a set of checklists before beginning the on-site review. As stated before, the checklists are prepared from the 23 elements found in Attachment 9, *CPUC Checklist for Reviewing and Approving a Rail Transit Agency's Annual Internal Safety and Security Review Report*. Examples of these procedures include but not limited to:

a. The *RTA's* operating rule book, bulletins, notices, and standard operating procedures (*SOP*'s);

b. The *RTA's* manuals and procedures for preventive maintenance of *safety* related systems, equipment, and facilities;

c. The *RTA's* procedures for documenting and investigating *safety events* and *hazards*;

d. The *RTA's Safety Design Criteria* and project engineering and construction procedures for configuration management and control of extensions and modifications;

e. The *RTA's* annual internal audit reports for the previous three years;

f. The *RTA's* open and closed *CAPs* for *safety events* and *hazards* reported to the Commission during the previous three years;
g. Any *FTA safety* regulations;
h. Previously prepared Commission triennial audit reports; and
i. Applicable Commission General Orders, Resolutions and Decisions.

4.4.3 Utilizing the materials referred to in Section 4.4.2, the *Designated Representative* and *Staff* will prepare checklists that identify the *safety* and *security* requirements to be reviewed, the applicable reference documents that establish the acceptance criteria for those requirements, and the method of verification. Space will also be provided on the checklists to record review findings, comments, and recommendations. See Attachment 6a for an example of a checklist.

4.4.4 When preparing the checklists, *Staff* will concentrate on requirements that affect the *safety* and *security* of train operations and are known or believed to be important to *hazard* reduction and the prevention of *events*.

4.4.5 *Staff* will notify the *RTA's accountable executive* by letter at least 30 days in advance of each review. Concurrently, *Staff* will notify the *RTA's safety* and *security* department management and will include the planned scope of the review and the checklists.

4.5.0 THE TRIENNIAL ON-SITE REVIEW

4.5.1 Each triennial on-site review (Review) will be preceded by an on-site meeting attended by *RTSB's* Program Manager, the *RTA's Accountable Executive*, and personnel in charge of each department to be reviewed.

4.5.2 The *Designated Representative* will prepare a meeting agenda that includes the scope of the Review, a brief review of the checklists, a proposed schedule of daily activities, protocol for communications between *Staff* and the *RTA's* personnel, the treatment of the Review findings, the time and date for holding a post review meeting, and the procedure for drafting, reviewing, and issuing a final report.

4.5.3 *Staff* will conduct the Review by using the checklists to verify the *RTA's* conformance with the requirements contained in the listed reference criteria. *Staff* will accomplish verification by:

a. Discussions with *RTA's* personnel;

b. Review of procedures and records;

c. Observations of operations and maintenance activities; and

d. Visual examinations and measurements.

4.5.4 The checklists will identify the method of verification. However, the checklists will not restrict *Staff* from performing additional *investigations* when initial findings appear to warrant further inquiry to verify conformance with *safety* requirements specified in *RTA's PTASP* and *SSP*.

4.5.5 *Staff* will record findings and comments on the checklists. *Staff* will immediately communicate the *safety* and *security* critical findings to the *RTA*.

4.5.6 *Staff's* recommendations for correcting findings of non-compliance may also be included on the *individual* checklists, and/or combined and presented in a separate section of the final report. At the conclusion of each checklist review, *Staff* will communicate preliminary findings to the *RTA*.

4.5.7 Each review will be concluded by an on-site meeting attended by *RTSB* Program Manager, the *RTA's accountable executive*, and personnel in charge of each department reviewed to discuss the preliminary findings and recommendations. During this meeting, the *Designated Representative* will offer the *RTA* personnel an opportunity to comment and provide any additional information that may affect the preliminary findings and recommendations.

4.6.0 THE FINAL TRIENNIAL ON-SITE REVIEW REPORTS

4.6.1 Following the completion of the on-site review, the *Designated Representative* will prepare a draft report with *Staff's* findings, conclusions, and recommendations. The report will be based on triennial review activities, including but not limited to activities observed, documents reviewed, field inspections, and issues discussed with *RTSB* Management. Nothing prevents *Staff* from

referring to previous violations or addressing other safety concerns relating to the checklist items. The *Designated Representative* will include the completed checklists in the draft Review report as attachments. In order to protect the privacy of *RTA* personnel, the draft and final reports should only include names of *RTA* personnel who participated in the audit, but the names of *RTA* employees or contractors should not be included when describing Activities, Findings, Comments, or Recommendations.

4.6.2 The *Designated Representative* will submit the draft report to the *RTSB* Management for approval.

4.6.3 The *Designated Representative* will submit the approved draft report to the *RTA* for review and comments.

4.6.3 The *Designated Representative* will allow the *RTA* 30 days to review and comment on the findings and recommendations contained in the draft Review report.

4.6.4 The *Designated Representative* and *RTSB* management will make every effort to reach full agreement and concurrence with the *RTA* on the review findings and recommendations.

4.6.5 The *Designated Representative* will prepare and process the final Review report and draft a Commission Resolution in compliance with the Commission Rules of Practice and Procedure.

4.6.6 The *Designated Representative* will upload all relevant documents pertaining to triennial audits to *RSSIMS*, with a copy of the completed checklists attached. The *Designated Representative* will create an association between the RESL and TRRV records in *RSSIMS*.

4.7.0 CORRECTIVE ACTION PLAN FOLLOW-UP FOR TRIENNIAL REVIEW

4.7.1 The Commission Resolution approving the *Staff*'s Triennial Review Report provides a time period for the *RTA* to formally respond. The *RTA* must develop *CAP*s to address the Report's findings of non-compliance.

The *RTA* will complete and implement all recommended corrective actions contained in the reports, in accordance with the plans and

schedules submitted to *RTSB*.

RTSB will review and approve the *CAPs*. The *Designated Representative* will create one *TCAP* record in *RSSIMS* for each *CAP*. In the *RSSIMS TCAP* record the "Source of CAP" field should be associated with the appropriate Triennial Review (*TTRV)* record in *RSSIMS*.

CAPs must include the following three elements:

a. Identify the action to be taken by the *RTA* to minimize, control, correct or eliminate the risks and *hazards* identified by the *CAP*.
b. An implementation schedule; and
c. Indicate the *individual* and department responsible for the implementation.

4.7.2 The *Designated Representative* will monitor the *RTA's* implementation of the *CAP*s that result from each triennial on-site review by requesting monthly progress reports according to the corresponding Commission adopted Resolution, until all recommended corrective actions are implemented and completed. The *RTA* will provide to the *Designated Representative* a monthly status report detailing information on the implementation of all remaining corrective actions.

4.7.3 The *Designated Representative* will file the Triennial Review *CAP* progress in the *RSSIMS TCAP* record (along with attaching supporting documentation) and associate the *CAP* to the triennial record.

RTSB-5: Procedure for Oversight of the Rail Transit Agency's Internal Safety and Security Review

5.1.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedures for oversight of the *RTA's* Internal *Safety* and *Security* reviews that each *RTA* must perform and *RTSB staff (Staff)* will participate in the review process.

5.2.0 PURPOSE

5.2.1 The purpose of this procedure is to:

a. Establish a standard set of instructions for *Staff* to follow when overseeing the *RTA's* Internal *Safety* and *Security* reviews; and

b. Provide the *RTAs* with guidelines that they may use to perform Internal *Safety* and *Security* reviews and prepare an annual Internal *Safety* and *Security* review report.

5.3.0 GENERAL REQUIREMENTS

5.3.1 The *RTSB* Program Manager has overall responsibility for the application and use of this procedure.

5.3.2 The *RTA* operating a *Rail Fixed Guideway System* in California is required by Commission General Order 164 series to annually perform planned and scheduled Internal *Safety* and *Security* reviews to evaluate compliance and measure the effectiveness of its *Public Transportation Agency Safety Plan* (*PTASP*) and *System Security Plan* (*SSP*).

5.3.3 In its Internal *Safety* and *Security Audit* the *RTA* must audit all the same elements that *Staff* audits during the Triennial On-Site Review. The *RTA* must include all 23 elements of the *PTASP* and the *SSP*, described in Commission General Orders 164, 172, and 175 series. As required by Commission *GO* 164 series, the *RTA* will identify the scope of activities to be reviewed. *Staff* must ensure that the *RTA* reviews all 23 elements of the *PTASP* and *SSP* in an on-going manner and completes reviewing them over a 3-year period.

5.3.4 The *RTA* must prepare a schedule of Internal *Safety* and *Security* reviews to be performed during each calendar year. The *RTA* must submit this schedule and checklists, including any subsequent changes to the *Designated Representative* at least thirty (30) days before any scheduled review begins. The Designated

Representative will upload *RTA*'s notification (including the proposed schedule) in *RSSIMS*. Rescheduling need not meet the 30-day advance notice requirement, provided that the *RTA* and Designated Representative agree. The agreement to make changes must be documented in writing and Designated Representative must also upload it on *RSSIMS*.

5.3.5 The *RTA* must perform an Internal *Safety* and *Security* review in accordance with the written checklists by personnel technically qualified to verify compliance and judge the effectiveness of the activity being reviewed. The reviewers may be *RTA* assigned to the unit responsible for management of the activity being reviewed, but they must be independent from the first line of supervision responsible for performance of the activity being reviewed. *RTA* must demonstrate to *Staff* that the reviewers are qualified to participate in the review.

5.3.6 The *RTA* must document the Internal *Safety* and *Security* review in an annual report that covers the reviews performed during each calendar year. The annual report must state the results of each review in terms of the adequacy and effectiveness of the *RTA's PTASP* and *SSP*.

5.3.7 The *RTA* must retain the following supporting documentation for a minimum of four years:

a. The completed checklist;
b. Reference criteria;
c. Supporting documents; and
d. Documentation that the checklist was provided to the *Designated Representative* at least 30 days in advance of the audit.

5.3.8 In addition to the *RTA's* annual report, the *RTA* must submit a formal letter of certification, signed by the *RTA's accountable executive*, stating that, based on the evaluation performed during the Internal *Safety* and *Security* review process during the previous year, the *RTA* is in compliance with its *PTASP* and *SSP*. The *RTA* must submit the report to the *Designated Representative* prior to the 15th of February each year.

5.4.0 OVERSEEING THE RAIL TRANSIT AGENCY'S PERFORMANCE OF INTERNAL SAFETY AND SECURITY REVIEWS

5.4.1 Upon notification that the *RTA's* plans to conduct an Internal *Safety* and *Security* review, the *Designated Representative* will oversee the review activity to assure that the *RTA* perform the following:

a. Complies with its own schedule of annual Internal *Safety* and *Security* reviews;
b. Performs Internal *Safety* and *Security* reviews in accordance with a written checklist prepared in advance;
c. Reviewers are technically qualified;
d. Reviewers are independent from the first line of supervision responsible for the activity being reviewed; and
e. Conducts a thorough and objective Internal *Safety* and *Security* review.

5.4.2 The *Designated Representative* will document each observed Internal *Safety* and *Security* review in an activity report in *RSSIMS,* upload correspondence, reports and approval letter and checklists.

5.5.0 REVIEWING AND APPROVING THE RAIL TRANSIT AGENCY'S ANNUAL INTERNAL SAFETY AND SECURITY REVIEW REPORTS

5.5.1 The *Designated Representative* is responsible for reviewing and approving the annual Internal *Safety* and *Security* review reports for conformance to the guidelines in the attached checklist (see Attachment 9).

5.5.2 *Staff* will review the annual Internal *Safety* and *Security* review report in accordance with the Commission General Order 164 series requirements.

5.5.3 *Staff* will send a letter of approval/disapproval with reasons for rejection to the *RTA*.

5.5.4 *Staff* will submit all the *RTA's* internal review reports to the *FTA* alongside the Annual Submission documents on or before March 15 of each year.

5.5.5 *Staff* will maintain the approved annual Internal *Safety* and *Security* review report, checklist and copy of the approval letter and file documents in *RSSIMS*.

5.6.0 CORRECTIVE ACTION PLAN FOLLOW UP FOR ANNUAL INTERNAL SAFETY AND SECURITY REVIEW

5.6.1 *Staff* will require the *RTA* to develop *CAP*s for all the internal *safety* and *security* review noncompliant findings and recommendations. *Staff* will review and approve *CAPs*. *CAPs* must include the following three elements:

a. Identify the action to be taken by the *RTA*;
b. An implementation schedule; and
c. *Individual* and department responsible for the implementation.

5.6.2 The *Designated Representative* will monitor the *RTA's* implementation of the *CAPs* that result from each annual on-site System *Safety* and *Security* review by requesting periodic progress reports.

5.6.3 The *Designated Representative* will document the *CAP* in *RSSIMS* and provide monthly updates to *RTSB* Management until completed and associate the *CAP* record to the *RSSIMS Internal Safety and Security* review (*ISSA*) record.

RTSB-6: Procedure for Receiving Notification of Events and Hazards

6.1.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedures for receiving notifications of *Safety Events* and/or *hazards* from *RTAs*.

6.2.0 PURPOSE

6.2.1 The purpose of this procedure is to:

a. Identify thresholds for *Events:*

b. Establish a standard set of instructions for *RTSB staff (Staff)* to follow when an *RTA* notifies *RTSB* of an *Event* and/or *hazard*; and

c. Prescribed forms and instructions for receiving notices of *Events* and/or *hazards*.

6.3.0 GENERAL REQUIREMENTS

6.3.1 The *RTSB* Program Manager has overall responsibility for the preparation and use of this procedure.

6.3.2 Each *RTA* must notify *Staff* or designee of immediately reportable *safety events* in accordance with 49 *CFR* 674.33 and Commission General Order 164 series within two hours. If the *RTA* fails to report within two hours, the *RTA* must include a cause or explanation in their final Accident Report. See Attachment 10 for required information for the *RTA's* Initial *Accident* Report.

6.3.3 An immediately reportable *safety event* is one, which meets or exceeds the following thresholds:

a. A *fatality*;

b. Two or more injuries;

c. A *derailment*;

d. A *collision* resulting in one or more injuries;

e. *Collision* resulting in *disabling damage* to a *rail transit vehicle*;

f. A *collision* involving a *rail transit vehicle* and any other vehicle or individual not resulting in one or more injuries or *disabling*

damage to a *rail transit vehicle*;

g. An *evacuation for life safety* reasons; or

h. An *unintended train movement*.

6.3.4 As required by Commission *GO* 164 series, the *RTA* shall provide as part of the notification:

a. The time and date of the *safety event*;
b. The location of the *safety event*, including Commission highway-rail grade crossing number if applicable;
c. The number of fatalities or injuries;
d. The *rail transit vehicles* involved in the *safety event*, if any;
e. The factor from Section 6.3.3 that makes the *safety event* immediately reportable;
f. Narrative description of the *safety event*; and
g. The first responders at the scene of the *safety event*.

6.3.5 *RTSB* maintains a web-based *accident* reporting tool. *RTA*s are encouraged to use the web-based *accident* reporting tool to report:

- Any immediately reportable *safety events* (see Section 6.3.3 above);
- A collision involving a *rail transit vehicle* and any other vehicle or individual not resulting in one or more injuries or *disabling damage* to a *rail transit vehicle* ;
- A Hazardous condition, for immediately reportable *hazards* per the *RTA*'s *PTASP*; or
- A Courtesy Notice for a *safety event* that does not meet the required *CPUC* reporting criteria, however may generate attention from the media/elected officials, including the following:
  - Evacuation NOT for life-safety reasons.
  - Service Impacts due to Natural Events.
  - All impacts on service due to heavy rains, high heat events (including electric outage due to high heat), earthquakes, flooding, etc., EXCLUDING cautionary speed restrictions.
- The web-based *accident* reporting tool automatically sends to the *RTA* a confirmation email, which includes the information entered on the form;
- A *CPUC* email distribution list an email (that includes all *RTSB*

staff) the information that was entered on the form; and

- If the *safety event* meets the *FTA* immediately reportable criteria, an email to the *CPUC* email distribution list which includes a cc to the U.S. Department of Transportation's Transportation Operations Center (TOC), which *FTA* requires *RTA*s to report their immediately reportable *safety event* reports.

6.3.6 The *RTA* can use the web-based *accident* reporting tool to revise information they had previously provided.

6.3.7 The *RTA* can also "Reply to All" on the confirmation email they received from the *RTSB's* web-based *accident* reporting tool to send attachments, such as photos, to everyone on the *CPUC* email distribution list.

6.3.8 Concurrent notification to the *FTA* is required for all immediately reportable *safety events* within two (2) hours. If the *RTA* does not use the *RTSB's* web-based *accident* reporting tool, the *RTA* must copy the *Designated Representative* on their notification email to the *FTA.*

6.3.9 *Events* which require *FRA* notification, the *RTA* must notify the *Designated Representative* within two (2) hours of the *event*.

6.3.10 *RTA*s must comply with *NTSB* reporting requirements per 49 *CFR* Part 840.3 (cited below) and notify the Designated Representative whenever *NTSB* notification is made.

49 *CFR* Part 840.3 – Notification of rail accidents to the *NTSB*

The operator of a railroad shall notify the Board by telephoning the National Response Center at telephone 800-424-0201 at the earliest practicable time after the occurrence of any one of the following railroad accidents:

(a) No later than 2 hours after an accident which results in:
- *(1) A passenger or employee fatality or serious injury to two or more crewmembers or passengers requiring admission to a hospital;*
- *(2) The evacuation of a passenger train;*
- *(3) Damage to a tank car or container resulting in release of hazardous materials or involving evacuation of the general public; or*
- *(4) A fatality at a grade crossing.*

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

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

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

6.3.11 *Staff* will prepare an Initial *Accidents* Report through *RSSIMS* for reportable *events* and/or *hazards*. Instructions for preparing and processing Initial *Accident* Reports (see Attachment 10).

6.3.12 If an *RTA* determines that a *safety event* they had previously reported does not meet the threshold of an immediately reportable *safety event*, the *RTA* must notify the *Designated Representative* to withdraw the *accident* report.

If the *RTA* used *RTSB's* web-based *accident* reporting tool, the *RTA* can use the "reply to all" option on the *accident* report confirmation email to provide additional information for their determination to withdraw the original *accident* report. Upon receipt of information to withdraw an *accident* report, if *Staff* is satisfied with the determination, they can update the *RSSIMS* record for that *accident* by changing the status to "withdrawn" and entering the justification for withdrawal.

If *Staff* disagrees with the *RTA's* determination, *Staff* will discuss with *RTSB* management, and contact the *RTA* to resolve the issue, and then accordingly update the *RSSIMS incident* record.

6.3.13 *Staff* will maintain a file/record of all Initial *Accident* Reports in *RSSIMS INCT* module.

6.3.14 Each *RTA* must report *safety events* to *FTA* within 30 days via the

National Transit Database (*NTD*) and record for analysis. Entries/deletions made to *NTD* are subsequently reviewed and updated to the State Safety Oversight Reporting (SSOR) online system maintained by *FTA*.

When *Staff* are made aware of changes made to the SSOR record for a *safety event*, *Staff* should do the following:

1. Confirm with the *RTA's* Safety Department that the changes shown in SSOR are accurate. Many RTAs have different personnel making entries in NTD in addition to those who submit Safety Event reports to *RTSB*.
2. Revise the INCT record, if necessary.
3. Send an email to others involved in reviewing the correction to describe what actions were taken, including actions taken by the *RTA* personnel they contacted. If no action was taken, explain the reason.
4. Save the above-described email and other relevant correspondence as a pdf.
5. Upload the pdf file as an attachment to the INCT record.

If an *RTA* or *Staff* later determines that a *safety event* meets the requirements of an immediately reportable (within 2 hours) *safety event*, that *safety event* must be reported as set forth in Section 6.3.3 through 6.3.10.

6.3.15 As required by Commission *GO* 164 series, each *RTA* must collect, track and analyze data on *safety events* to reduce the likelihood of recurrence and make available for *Staff* and/or *FTA* review. *Safety Events* include the following:

a. No injury
b. Close calls or near misses;
c. *Safety* rule violations;
b. Violations of *safety* policies;
c. Damage to catenary or third–rail equipment that do not disrupt operations; and
d. Vandalism or theft.

6.3.16 A reportable *hazard* is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock or infrastructure of a *RFGS* or damage to the environment. A *hazard* is different than "hazardous material spill", which the *RTA* must report to the National Transit Database within 30 days. The *RTA* does not need to report a *hazard* to the *FTA*. Examples of *hazards* reportable to *RTSB* include but not limited to the following:

a. Red signal violations;
b. Signal device failures;
c. Near misses with other rail vehicles, employees, automobiles, or pedestrians;
d. Door faults including wrong-side door openings or door openings during train movements;
e. Equipment failure causing service disruption;
f. Emergency brake application due to equipment failure, unintended aspect or track occupancy; and
g. Emergency tabletop exercise/drill findings resulting from after action reports.

6.3.17 *RTAs* may use the *RTSB's* Accident Reporting Webform to report immediately reportable *hazards* per their PTASP. *Staff* must create a record of a reported *hazard* in the HAZT module of *RSSIMS,* which includes the Hazard category, identification method, hazard analysis data entries, and track the *hazard* to closure.

RTAs must maintain a record of identified *hazards*, including description of the *hazard*, date and time of occurrence, involved *RTA* personnel, any analysis done, and actions the *RTA* has taken, or plans to be take, to address them.

Staff will hold periodic meetings (monthly, quarterly, or some other frequency) with *RTAs*, during which the *RTA* will report their list of *hazards* and discuss them with *Staff.*

6.3.18 *Courtesy Notice* for a *safety event* that does not meet the required *CPUC* reporting criteria, however may generate attention from the media/elected officials.

Examples, includes but not limited to:

- Medical events not involving *RTA* operations;
- Security events, such as station closures due to law enforcement activity;
- Event that occurs off transit property where affected person(s), vehicle(s), or object(s) come to rest on transit property;
- Event that occurs off transit property that otherwise disrupts transit operations (such as a fire nearby);
- Evacuation NOT due to life safety reason;
- Natural disasters or weather events disrupting service;
- Loss of power disrupting service (including preemptive power shutoffs).

Staff must create a record of a reported Courtesy Notice in the INCT module of *RSSIMS*. Staff must forward the INCT notification as usual.

The report is for information only and staff should close out the record without additional follow-up.

6.3.19 A reportable evacuation is a condition that occurs when persons depart from transit vehicles or facilities for life-safety reasons.

Causes of evacuations that constitute an imminent danger (life-safety) to passengers, employees, contractors, or other persons may include:

- fires,
- presence of smoke or noxious fumes,
- hazardous material spills,
- vehicle fuel leaks,
- weapon fired on a vehicle,
- electrical hazards,
- bomb threats,
- suspicious items,
- security,
- power failure (if there is imminent danger to passengers), or
- mechanical failure (if there is imminent danger to passengers)

Evacuations of vehicles or facilities are reportable even if the event is off property. For example, if there is a called-in bomb threat, gas leak, or fire on adjacent property that causes an agency to evacuate a nearby station, then the *RTA* must report the evacuation.
Staff must create a record of a reported Evacuation for Life Safety Reasons in the INCT module of *RSSIMS* and forward the INCT notification as usual.

Evacuations to a station platform or a rescue train are not reported unless there was an imminent danger to passengers.

For Evacuations for Life Safety Reasons that are Security Event, *RTA*s are only required to conduct reviews or investigations per their own procedures. Staff is not required to review and adopt investigation reports on these types of events, instead only review the evacuation for compliance with *RTA* procedures. Staff must document the review of *RTA*'s evacuation procedures in the "Investigation Comments" field of the INCT record.

RTSB-7: Procedure for Reviewing and Approving a Rail Transit Agency's Accident Investigation Procedures

7.1.0 SCOPE

This section describes the *Rail Transit Safety Branch's (RTSB)* procedures for reviewing and approving *Accident Investigation* Procedures (*AIP*) prepared by the *RTA*.

7.2.0 PURPOSE

7.2.1 The purpose of this procedure is to:

a. Establish a standard set of instructions for *RTSB staff* (*Staff*) to follow for reviewing and approving *RTA's AIP* submittals; and

b. Provide each *RTA* with a set of guidelines that they may use to prepare *AIP*s for submittal to *Staff*.

7.3.0 GENERAL REQUIREMENTS

7.3.1 The *RTSB* Program Manager has overall responsibility for the application and the use of this procedure.

7.3.2 The *Designated Representative* is responsible for reviewing and approving the *RTA's AIP*, including revisions, utilizing the attached "*CPUC Checklist for Reviewing and Approving Rail Transit Agency's Accident Investigation Procedures*" (see Attachment 12).

7.3.3 The *Designated Representative* will review the *RTA's AIP* in cooperation with the *RTA* to resolve any checklist items that are not adequately covered in the *AIP*. If the *AIP* is included in the *RTA*'s *PTASP*, the *Designated Representative* must use the "*CPUC Checklist for Reviewing and Approving Rail Transit Agency's Accident Investigation Procedures*", in addition to the *PTASP* checklist, to review the *RTA's AIP* included in the *PTASP.*

7.3.4 The *Designated Representative* will enter their name, signature and date the completed checklist and provide it to their immediate supervisor (Senior Utilities Engineer – Supervisor) for their review. The immediate supervisor will add their name, signature and date the form after they review and approve it.

7.3.5 The *Designated Representative* will draft a letter for the signature of *RTESS* Program and Project Supervisor informing the *RTA* their *AIP* has been approved.

7.3.6 The *Designated Representative* will send a letter of approval/disapproval with reasons for rejection to the *RTA* with a copy of the completed checklist attached.

7.3.7 The *Designated Representative* will maintain the approved *AIP*, completed checklist, and a copy of the approval letter and file a copy in *RSSIMS*, as indicated by *RTSB* Management.

7.3.8 *Staff* will submit the *RTA's AIP* and approval letter with the completed checklist to the *FTA* alongside the Annual Submission documents on or before March 15 of each year.

RTSB-8: Procedure for Investigating *Safety Events* and Approving Rail Transit Agency's *Safety Event* Investigation Reports

8.1.0 SCOPE

This section describes the *Rail Transit Safety Branch's (RTSB)* procedures for investigating *Safety Events* and approving *Rail Transit Agency* (*RTA*) *Safety Event investigation* reports. Although the Commission is ultimately responsible for the sufficiency and thoroughness of all *Safety Event investigations*, each *RTA* must investigate, on behalf of the Commission, all reportable *Safety Events* involving a *rail transit vehicle* or taking place on rail transit agency-controlled property. Per Commission *GO* 164 series Section 8, *Staff* may also perform a separate, independent *investigation* of any *Safety Event*.

8.2.0 PURPOSE

8.2.1 The purpose of this procedure is to:

a. Establish a standard set of instructions for *Staff* to follow when investigating *Safety Events* and approving *Safety Event investigation* reports submitted by *RTA*;
b. Establish a set of guidelines for the *RTA* to follow when conducting *Safety Event investigations*, and preparing *investigation* reports on behalf of the Commission; and
c. Provide a set of procedures for protecting the confidentiality of the *investigation* reports.

8.3.0 GENERAL REQUIREMENTS

8.3.1 The *RTSB* Program Manager is responsible for the overall application and use of this procedure.

8.3.2 Notification of a reportable *Safety Event* shall be in accordance with Commission *GO* 164 series. *Staff* will review all initial and revised *Safety Event* notifications for compliance with Commission GO 164 series, *RTSB* Program Standard, and *CPUC Staff Guidance on Reporting Events.* If *Staff* finds errors or insufficient information, they will notify the *RTA* and request them to correct the error(s) and/or provide more information. At a minimum *Staff* will check the *Safety Event* notification has used the correct "Reason for Reporting" criteria, and in the "Brief Narrative of Accident" field it provides sufficient information to determine what occurred and without using acronyms, codes, or other abbreviations that are not commonly used nationally by rail transit *safety* professionals. If the *RTA* submits a revised *Safety Event* notification, the *RTA* should clearly indicate what information was revised in the appropriate field.

8.3.3 *Staff* will prepare a Transit *Accident* Initial Notice (*RSSIMS* Report 113 titled "Transit *Accident* Initial Notice") for every immediately reportable *Safety Event*. If the *Safety Event* occurs at a rail crossing, *Staff* will ensure the *accident* history going back only 10 years for that rail crossing is included in the email sending the *RSSIMS* Report 113 to the INCT email distribution list. If the *Safety Event* occurred at an *RTA* rail crossing, and the *RTA* provides updates to their initial *accident* notification, *Staff* must also distribute the updated information to the Rail Crossings & Engineering Branch Area Engineer and their supervisor. In order to protect the privacy of Train Operators, *INCT* records and any documents uploaded to *RSSIMS* should not include names of train operators. If an operator number is provided, then that number should be recorded.

8.3.4 *Staff* may also perform a separate, independent *investigation* of any such *Safety Event*.

8.3.5 *Staff* will ensure the *RTA*:

a. Investigates *Safety Events* in accordance with *Staff* approved *RTA's Accident Investigation* Procedures (See Section *RTSB* – 7) and conducts a thorough and objective *investigation*;
b. Submits its *Safety Event investigation* report within 60 calendar days of the *Safety Event* or requests extensions when the final *Safety Event investigation* report cannot be completed within the required 60-day time period*;*
c. *Safety Event investigation* report:
    1. Includes the *RSSIMS INCT* record number, which *Staff* will provide to the *RTA;*
    2. Includes photos, when available;
    3. Includes sketches, if appropriate;
    4. Draws accurate and substantiated conclusions from the available evidence;
    5. Includes *RTA* activities and/or *CAP*s pertaining to scene restoration involving damage to RTA fixed infrastructure;
    6. Identifies the most probable primary causes;
    7. Identifies the most probable secondary, underlying, and contributing causes;
    8. Includes recommendations, if applicable, that address the most probable primary and secondary causes;
d. If *Staff* finds it appropriate and in accordance with the *RTA's* AIP*, Staff* may accept the Minor Event Report (see Attachment 18), according to Commission General Order 164 series. The Minor Event Report cannot be used for a *safety event* involving a *fatality* or *injury.*

e. Prepares and implements a *CAP* and schedule to carry out the recommendations contained in the final *Safety Event investigation* report.
f. Submits an interim status report every 30 calendar days, if the *investigation* takes longer than 60 calendar days to complete. The status report can be an email, spreadsheet, or letter providing valid justification, acceptable to *Staff*, for not closing the final *Safety Event investigation* report. The interim status report cannot simply say the final *Safety Event investigation* report is not ready yet, and/or the *RTA* is still working on it. If the *RTA* does not provide a report within 90 calendar days, *Staff* must enter into the *RSSIMS* INCT record reasons for the delay and/or issues preventing closure.
g. If the *RTA* determines the most probable cause is "suicide" or "suicide attempt", the coroner's report confirming the suicide finding must be attached to the final *Safety Event* investigation report, or in cases where a delay in receiving the coroner's report impacts the RTA's 60-day schedule for submitting their report, the coroner's report must be submitted once it becomes available. However, if four months after the *Safety Event* the *RTA* has still not received the coroner's report, then the *RTA* must complete its *Safety Event investigation* report based on the information it has at the time. In the absence of the coroner's report, the *RTA* may only conclude based on available evidence whether a *fatality* appeared to be an intentional act or not. When the coroner eventually issues its report, the *RTA* must send a copy to *Staff* within 10 business days of receiving it. If the coroner's report has a finding different than in the final *Safety Event investigation* report, the *RTA* had submitted to *Staff,* the *RTA* must update its final *Safety Event investigation* report accordingly and resubmit it to *Staff.* RTA/Staff cannot conclude the probable cause of the accident as "Suicide" if the coroner report is not included.

8.3.6 *Staff* will review the *RTA's* final *Safety Event investigation* report to ensure compliance with the *RTA's accident investigation* procedure.

8.3.7 *Staff* will review the *RTA's* final *Safety Event investigation* report, findings, and recommendations for accuracy and completeness, and to determine if the causal and contributory factors that are identified and are properly addressed.

8.3.8 *Staff* will review and approve the *RTA's* final *Safety Event investigation* report, which must include any *CAPs,* their schedule for implementation,

and the *individual(s)* and department responsible for taking those actions. There should be only one responsible department/individual per CAP.

8.3.9 *Staff* will document the results of their review of the *RTA's* final *Safety Event investigation* report, *CAP(s)* and their implementation schedule in *RSSIMS* INCT module record. *Staff* will associate the *RSSIMS* INCT record with related *RSSIMS* TCAP record(s), TACT record(s), and/or other related *RSSIMS* record(s).

8.3.10 If *Staff* finds the *RTA's* final *Safety Event investigation* report acceptable, *Staff* will ensure the following documents are attached to the INCT record:

1. Initial webform notifications (including original and revised) from the *RTA*;
2. All relevant correspondence between the *RTA* and *Staff*, including emails;
3. Photos, coroner's reports, and/or law enforcement agency reports; and/or
4. *RTA's* final *Safety Event investigation* report.

Staff will then route through *RSSIMS* the *INCT* record to their immediate supervisor (and/or other reviewers as applicable) for review and approval.

The immediate supervisor will review the report and make sure the *Staff* completed the following tasks (if necessary):

1. Conduct an on-site visit;
2. Interview the operator/controller/etc.;
3. Witness a reenactment, if one was done;
4. Attend meeting(s) with consultants/investigators/others;
5. Review following records for involved *RTA* personnel:
    a. Drug and alcohol test results;
    b. Training and certification;
    c. Performance evaluations;
    d. Hours of Service;
6. Review the following:
    a. Any available video or audio recordings;
    b. SOPs, rules, bulletins, notices, etc;
    c. Maintenance records;
    d. Police records;
    e. Coroner report;
7. Create TCAP record(s).

The supervisor will also:

1. Review the final *Safety Event investigation* report prepared by the *RTA*;
2. Make sure the INCT record has the following attachments that include, if available:
    a. The final *Safety Event investigation* report;
    b. Email or other written correspondence, including any time extension requests for submitting the report and *Staff*'s approval of those time extensions;
    c. Police reports;
    d. If "suicide/attempted suicide" is selected as the probable cause, a coroner report must be attached making that determination;
    e. Any photos of site *inspections*;
    f. Other relevant records.
3. Make sure the probable cause is acceptable based on the above records.

If the *Staff*'s immediate supervisor determines the *RTA*'s *Safety Event investigation* report and the INCT record meets the requirements listed above, then the supervisor (or the *Designated Representative*) will:

1. Notify the *RTA* in writing that their final *Safety Event investigation* report is acceptable and has been adopted;
2. Attach the above-described email to the INCT record;

The immediate supervisor will close the INCT record upon completion of items 1 and 2 above.

8.3.11 In cases where *Staff* does not accept the *RTA's* final *Safety Event investigation* report, *Staff* will follow the procedures outlined in GO 164 series.

8.3.12 If the *RTA* does not agree with *Staff,* the *RTA* shall formally file with the Commission for approval of the *RTA*'s final *Safety Event investigation* report along with *Staff*'s rejection, pursuant to GO 164 series, Section 8.

8.3.13 In cases where *Staff* conducts its own *Safety Event investigation*, *Staff* will notify the *RTA* accordingly and formally transmit its final *Safety Event investigation* report to the *RTA*.

8.3.14 If the *RTA* disagrees with the findings of *Staff*'s independent *investigation*, the *RTA* may submit a written dissent to the report, which may be included in the *RTSB* report at the discretion of *Staff*.

8.4.0 *SAFETY EVENT* INVESTIGATION REQUIREMENTS

8.4.1 If determined necessary by *Staff*, as soon as practicable, *Staff* will perform an on-site *inspection* of the *Safety Event* scene.

8.4.2 *Staff* will participate, to the fullest extent possible, in *RTA*'s *investigation* of the *Safety Event* (per Commission GO 164 series, Section.

8.4.3 When investigating *Safety Events* that require immediate notification per Commission GO 164 series, Section 7, *Staff* will, as applicable and practicable, be present and participate with *RTA* in:

a. Interviewing of *persons* involved in the *Safety Event*;
b. Visual examinations, measurements and tests of vehicles, tracks, switches, signals, and other similar items;
c. Operational reenactments;
d. Meetings with investigators, consultants, review boards, etc. to review and analyze *Safety Event*-related information;
e. Guidelines for site visits are in Attachment 13;
   Guidelines for conducting interviews are in Attachment 14; and
   If during the course of the *investigation* additional information is needed, *Staff* can use a "Data Request."

8.4.4 When not practicable to directly participate in a particular *investigation* activity, *Staff* will review the applicable reports, records, transcripts, meeting minutes, etc.

8.4.5 *Staff* will complete the *RSSIMS* INCT module record with the data collected to each reportable *Safety Event* to document *Safety Event investigation* activities.

8.4.6 In accordance with 49 CFR Part 831, the National Transportation Safety Board (NTSB) may investigate a reportable *Safety Event* (see Section 6.3.10 for NTSB reporting requirements). In such cases, the NTSB is responsible for leading the *investigation*; the determination of facts, conditions, and circumstances; the cause or probable causes; and recommendations to reduce the likelihood of recurrence. *Staff* will support the NTSB as a member of its Party System. *Staff* will assist the NTSB by providing information requested about the *RTA* critical practices on other matters as appropriate. NTSB will control the distribution of information relating to its *investigation*.

8.4.7 If NTSB investigates a *Safety Event* involving an *RTA*, *Staff* and the *RTA* will meet to address NTSB's recommendations and determine the

appropriate corrective actions to be taken based on those recommendations and all other information available on the *Safety Event*.

8.4.8 At *RTSB* management's direction, *Staff* will develop their own *Safety Event investigation* report to expand on the NTSB's *investigation* report, or to investigate certain aspects of the *Safety Event* that were not covered by the NTSB *investigation*. The CPUC *Safety Event* report will not be issued before the NTSB *investigation* report, without direct permission from the NTSB Investigator-In-Charge.

8.4.9 *FTA* may investigate a *Safety Event* at its discretion. In such situations, *Staff* will support them in the same manner as NTSB in accordance with section 8.4.6, 8.4.7, and 8.4.8.

8.4.10 In accordance with PU Code Section 765, the Commission will provide NTSB with a formal written response to each recommendation no later than 90 days after receiving any recommendation letter for a *Safety Event* they investigated. Also see PU Code Section 765 for additional requirements in Attachment 1.

8.4.11 *Staff* will monitor NTSB *investigations* and recommendations for *RFGS* events occurring outside of California to evaluate if they are pertinent to California's *RFGS*.

8.5.0 CORRECTIVE ACTION PLAN FOLLOW-UP FOR *SAFETY EVENT* INVESTIGATION FINDINGS

8.5.1 *Staff* will require the *RTA* to develop *CAP*s for all *Safety Event investigation* findings. *RSSIMS* will serve as the central filing for *CAP*s in the TCAP Module. *Staff* will also associate any resulting *RSSIMS* TCAP record(s) with the *RSSIMS* INCT record. Relevant information includes the "*CAP* Approved Date," [the date *Staff* notified the *RTA* we agree with their proposed *CAP*] and "Date Implementation Verified" [the date *Staff* confirmed the *RTA* completed the corrective action indicated on their *CAP*] along with "*RTSB Staff* who Verified the *CAP* Implementation" for *RSSIMS* TCAP record closure.

8.5.2 *Staff* will review and approve *CAP*s, which must include the following three elements:

a. Identify the action to be taken by the *RTA* to minimize, control, correct or eliminate the risks and *hazards* identified by the *CAP*;
b. An implementation schedule; and,

c. Indicate which *individual* and department are responsible for the implementation.

8.5.3 The *Designated Representative* will monitor the *RTA*'s implementation of the *CAP*s that result from each *Safety Event investigation* by requesting periodic progress reports. *Staff* can verify progress by conducting unannounced or announced *inspections*.

8.5.4 The *Designated Representative* will maintain the *CAP* document and file it in *RSSIMS* and every 30 calendar days enter updates from the *RTA* as required by Commission GO 164 series, Section 9 unless a greater extension period is granted. If a greater extension is granted, *Staff* shall follow-up on that timeline. *Staff* will associate the *CAP* record(s) to the *Safety Event* record in *RSSIMS*.

8.5.5 *Staff* and the *RTA* will meet to address NTSB's recommendations and determine the appropriate corrective actions based on the findings or recommendations of an *investigation* conducted by NTSB. *Staff* will enter and track *CAP*s in *RSSIMS*, in accordance with Section 8.6.4 above.

8.6.0 CONFIDENTIALITY REQUIREMENTS

8.6.1 No *investigation* report or recommendation of *RTSB*, nor any *investigation* report of an *RTA* filed with the Commission, must be admissible as evidence in any action for damages based on or arising out of matters covered therein, pursuant to Public Utilities Code Section 315, (see Attachment 1).

8.6.2 *Staff* will secure *investigation* documents that are classified confidential by keeping documents locked and secure while not being reviewed and keeping electronic copies on the Commission's Content Server, as indicated by *RTSB* Management, which requires a login and a password, limiting access.

RTSB-9: Procedure for Safety Certification Plans of Major Projects

9.1.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedures for reviewing, approving, and filing *Safety Certification Plan (SC Plan)* of *Major Projects* pursuant to Commission General Order 164 series, of all *projects* that initiate preliminary engineering.

9.2.0 PURPOSE

9.2.1 The purposes of this procedure are:

a. Establish a standard set of instructions for *RTSB staff* (*Staff*) to follow when reviewing, approving, and filing of a *Rail Transit Agency*'s (*RTA*) *SC Plan* submittals;

b. Establish a set of guidelines for the *RTA* to use when it is preparing or revising a *SC Plan* for a *project*;

c. Establish the *Safety* and *Security* Certification Oversight Plan (*SSCOP*), using the *Certifiable Elements List* and other elements of the *SC Plan*; and

d. Approving the *Safety Certification Verification Report* (*SCVR*) in accordance with Commission *GO* 164 series and notifying the *RTA* the Project can be placed in revenue service. Each *RTA* submitting a *SCVR* will verify the Project complies with the *SC Plan*.

9.3.0 GENERAL REQUIREMENTS

9.3.1 The *RTSB* Program Manager has overall responsibility for the application and use of this procedure, including approval of the *CPUC* Checklist for Review of *Safety Certification Plans* (see Attachment 19).

9.3.2 As required by Commission *GO* 164 series, the *RTA* will prepare a *Project* specific *SC Plan* for each of its *Major Projects*.

9.3.3 *Staff* will review each new *SC Plan*, including any subsequent revisions, for conformance (see Attachment 19).

9.3.4 *Staff* will perform the review of each *SC Plan* in consultation with the *RTA* to resolve any questions regarding the content, and to assure checklist requirements are fully addressed.

9.3.5 When *Staff* and *RTA* are in agreement, with the completed *SC Plan*, based on the approved "CPUC Checklist for Review of A *Safety Certification Plan*" (see Attachment 19), after the supervisor approves the *SC Plan* checklist *Staff* will prepare a Resolution approving the *SC Plan* for Commission consideration.

9.3.6 *Staff* will attach the required information (*SC Plan*, checklist, Resolution, Calendar Notice, cover letter, service list, and Final signed Resolution) on *RSSIMS*.

9.3.7 *Staff* will review and approve any subsequent revisions to the *SC Plan*, and document changes by attaching revision requests and approvals to the original *RSSIMS* RESL module record approving the *SC Plan* (see 9.4.0 PROCEDURES FOR REVIEWING REVISED SAFETY CERTIFICATION PLAN).

9.3.8 *The Designated Rep* will require the *RTA* to submit a revised *SC Plan* when there are significant changes (such as project scope change, project delivery timing, project gets split into different phases, etc.) to the *SC Plan*. *The Designated Rep* shall review this *SC Plan* at least annually, or more frequently as needed, to review for above listed changes.

9.3.9 Staff is encouraged to develop relationships, interact, and confer with any *FTA* Regional Project Manager and any Project Management Oversight Contractor (*PMOC*).

9.4.0 PROCEDURES FOR REVIEWING REVISED SAFETY CERTIFICATION PLAN

9.4.1 As required by Commission *GO* 164 series, the *RTA* must revise and expand the *SC Plan* as the *Project* progresses, as necessary. *Staff* will review and approve the revisions.

9.4.2 As required by Commission *GO* 164 series, the *RTA* must file any revision of the *SC Plan* with *Staff*.

9.4.3 Within 45 calendar days, *Staff* will review the revised *SC Plan* (see Attachment 19 – *CPUC* Checklist for Review of A Safety Certification Plan) and either approve or reject the proposed revisions, or request additional justification.

9.4.4 *Staff* will route the revised *SC Plan* and the approval letter to *RTSB* Management for review and signature. *Staff* will send the signed approval or rejection letter to the *RTA*.

9.4.5 *Staff* will attach all correspondence and documents relating to a revised *SC Plan* in *RSSIMS*, attached to the original RESL module record approving the *SC Plan*.

9.5.0 MAJOR PROJECTS AND SAFETY AND SECURITY CERTIFICATION OVERSIGHT PLANS

9.5.1 For *Major Projects* requiring *Safety Certification*, *Staff* in a *SSCOP* will indicate to the *RTA* tests and other activities that may be selected for observations. Examples of tests and other activities that may be selected are, but not limited to:

a. Tests of newly installed automatic train control, block signaling and interlocking equipment;
b. Initial testing of grade crossing warning devices;
c. Simulation testing of automatic train control software and hardware elements;
d. Brake rate testing and commissioning of new or refurbished transit vehicles;
e. Emergency response drills;
f. *Safety* training classes for certification / recertification;
g. Internal *safety* and *security* audits; and
h. Start-up testing and pre revenue operations prior to opening a new extension or major system modification.

9.5.2 *Staff* will become familiar with the requirements contained in the governing specifications and procedures before observing any testing activities.

9.5.3 Following the completion of each test, if there are any *safety* concerns, *Staff* will discuss them in the field with the *RTA* and document in the Activity Report and upload it on the *RSSIMS* TACT module. *Staff* will also create an association between the TACT record and the RESL module record approving the *SC Plan*. Any

safety concerns will be noted in these reports. *Staff* will notify their immediate supervisor of all reports noting *safety* concerns.

9.6.0 SAFETY CERTIFICATION VERIFICATION REPORTS

9.6.1 Each *RTA* shall submit a Safety Certification Verification Report (*SCVR*) to verify Project compliance with the *SC Plan*.

9.6.2 Each *RTA* shall submit the *SCVR* to Staff at least 21 calendar days prior to the start of service. The *SCVR* shall certify that:

a) all requirements of the *SC Plan* have been completed except for listed open items, if any;
   i. The open items list should be separated by safety-critical and non-safety critical items and include target closure date(s);
   ii. Safety critical items must be completed before the project can be placed in service;
b) that all safety hazards have been adequately mitigated; and
c) adequate restrictions/workarounds are in place to ensure the safety of operations until open items are closed.

9.6.3 Staff shall respond to the *SCVR* within 14 calendar days of filing by indicating that it approves the *SCVR*, or identifying areas that are not acceptable to Staff. Staff shall give its approval of the *SCVR* by issuing a formal letter to the *RTA* from RSD Director. The Staff's approval letter will not bind the Commission, but it will constitute provisional Commission approval. The Project shall not be placed in service until the *SCVR* is provisionally approved by Staff in this manner.

9.6.4 SCVR must:

- Include the following:
  - Letter of Intent to Operate;
  - Data and records demonstrating Final Project Verification of Safety, such as certificates of occupancy, certificates of operational readiness from various department, etc.; and
- Be an electronic document in standard searchable format acceptable, easily navigable, and usable by the *CPUC* staff;
- Include links that allows *CPUC* Staff to easily access and review documents and testing, supporting the conformance checklist in the SCVR;

- Include lists of open safety-critical and open non-safety critical items, with proposed target closure dates.
  - Safety critical items must be completed, and submitted with supporting documents for *CPUC* staff review and approval, at least 7 days before the revenue service date.
  - After revenue service date, the *RTA* must provide updates at least every thirty-days on the status of non-safety critical open items.

9.6.5 Designated Reps must attach to the DCSB record for the *SCVR*:
- subsequent submittals and *CPUC* approval thereof; and
- non-safety critical items updates.

9.6.6 *RTA*s must report to Staff, using RTSB's Accident Reporting webform, any service disruptions or system anomalies that occur during the first 60 days of revenue service regardless of whether the matter rises to a reportable event under *CPUC* General Orders.

RTSB-10: Procedure for Safety Risk Management

10.1.0 SCOPE

This procedure describes the *Rail Transit Safety Branch (RTSB)* program for *Rail Transit Agency* (*RTA*) *safety risk management*.

10.2.0 PURPOSE

10.2.1 The purpose of this section is to:

a. Establish a procedure for *RTSB staff* (*Staff*) to follow when evaluating the *RTAs' safety risk management* program in their *Public Transportation Agency Safety Plan* (*PTASP*) and the *RTAs'* reporting and tracking of *hazards*; and

b. Provide the *RTAs* an overview of the *safety risk management* program requirements.

10.3.0 GENERAL REQUIREMENTS

10.3.1 The *RTSB* Program Manager has overall responsibility for the preparation and use of this procedure.

10.3.2 As required by Commission *GO* 164 series, each *RTA* must develop and document in its *PTASP* a process to identify, record, and resolve *hazards* during its operation, including any *hazards* resulting from subsequent system extensions or modifications, operational changes, or other changes within the rail transit environment.

10.3.3 The *RTA safety risk management* process section of the *PTASP* must, at a minimum:

a. Define the *RTA's* approach to *safety risk management* and the implementation of an integrated system-wide *hazard* resolution process;
b. Specify the sources of, and the mechanisms to support, the on-going identification of *hazards*;
c. Define the process by which identified *hazards* will be evaluated and prioritized for elimination or control;
d. Identify the mechanism used to track through resolution the identified *hazard(s)*;
e. Define minimum thresholds for the notification and reporting of *hazard(s)* to *RTSB*;

f. Specify the process by which the *RTA* will provide on-going reporting of *hazard* resolution activities to the oversight agency; and
g. The *RTA* will also submit any *Corrective Action Plan (CAP)* developed to minimize, mitigate, control, correct, or eliminate the identified risks and *hazards*. The *CAP*s will include the proposed actions, the responsible *individual* and department, and the schedule for implementing those actions for the identified *hazard*, in accordance with Commission *GO* 164 series, Section 9.

10.3.4 *Hazard* Identification:
As required by 49 *CFR* Part 674 and Commission *GO* 164 series, each *RTA* must describe the processes used to identify and record *hazards* in this section of the *PTASP*. This section must describe any *hazard* identification programs associated with capital *projects*, operational changes or other changes within the rail transit environment including mechanisms for soliciting *hazard* reports and input from employees, any committees where the scope includes *safety* issues, etc. *Hazard* identification can be formal or informal, and each *RTA* must describe all methodologies used.

10.3.5 *Hazard Investigation*, Evaluation, and Analysis:
As required by Commission *GO* 164 series, each *RTA* must describe the processes used to investigate, evaluate, and analyze *hazards* in this section of the *PTASP*. All *hazard investigation*, evaluation, and analysis procedures, including those associated with the *safety* department and any committees that may have *safety* responsibility, must be detailed in this section. The analysis component of this section must detail the methodology used to categorize and prioritize identified *hazards*. In this section, the *RTA* should define a primary quantitative/qualitative methodology for *hazard analysis*.

10.3.6 *Hazard* Mitigation, Control and Elimination:
As required by Commission *GO* 164 series, each *RTA* must describe the process for *hazard* mitigation, control, and elimination in this section. *RTA* may place an emphasis on certain classifications of high frequency, high-severity *hazards* and describe a consistent methodology for minimizing *hazards* within its resources. *Hazard* control and elimination may require separate discussions and descriptions relative to large *projects* and system modifications versus ongoing operations and maintenance.

As required by 49 CFR Part 674.27(a)(6), the *RTSB's* role in overseeing the development, implementation, and monitoring of safety

risk mitigations of *RTAs* includes reviewing and approving the Public Transportation Agency Safety Plan (PTASP) for each *RTA*, collecting and reviewing information from *RTAs* on the status and effectiveness of *RTA* safety risk mitigations, conducting triennial audits of *RTA's* compliance with their PTASP and requiring *CAPs* for findings of non-conformance, and providing guidance or direction when necessary.

Staff will participate in quarterly meetings with each *RTA* receiving federal financial assistance authorized under 49 U.S.C. Chapter 53, either in person or virtually, during which the *RTA* will share the following information with *Staff:*

- Tools used for collecting, tracking, and analyzing Safety Risk Mitigation(s), such as database, spreadsheet, etc.
- Description of the Safety Risk Mitigation(s)
- A description of the potential consequence intended to address with the Safety Risk Mitigation(s), and their risk rating (likelihood and severity)
- Source(s) for identifying and developing the Safety Risk Mitigation(s), such as safety risk assessments, safety data analyses, safety investigations, and who has conducted them, such as Safety Committee, Safety Department, etc.
- Status of the identified Safety Risk Mitigation(s), such as new during this reporting period, open from previous reporting period, closed during this reporting period, etc.
- Level of approval needed for the Safety Risk Mitigation plan, and who has approved it so far and whose approval is pending.
- Monitoring plan for addressing the Safety Risk Mitigation(s), including the following:
  - Monitoring Means of potential consequences to see if they are occurring or not
  - Identification of safety performance indicators used for monitoring
  - Timeframe (Project start and end dates, and actual start and end dates).
  - Department Responsible
  - Individual Responsible
- If implemented, estimated progress and effectiveness of the Safety Risk Mitigation(s). Describe how effectiveness is measured, such as change in risk rating.

10.3.7 *Hazard* Tracking:
As required by Commission *GO* 164 series, each *RTA* must establish

an appropriate means for tracking all *hazards*, including, but not limited to, information such as the following:

a. *Hazard* description;
b. Immediate mitigation (if needed);
c. Origin of *hazard* (e.g., *accident investigation*, capital *project hazard analysis*, employee *safety* committee, etc.);
d. Date *hazard* was identified;
e. *Hazard analysis* results (frequency and severity, *hazard* score, etc., depending on analysis method);
f. Proposed permanent *hazard* resolution, and any temporary mitigation, if necessary;
g. Proposed *CAP*(s);
h. *Hazard* resolution verification/follow-up activities;
i. Date *hazard* closed;
j. Responsible investigator or committee leader; or
k. Other relevant information.

Hazard logs may be kept in separate files for separate *projects*, ongoing operations/maintenance, etc. It is important, however, that all *hazard* logs, including open and closed items, must be accessible for review by *Staff* upon request.

10.3.8 *RTAs* must develop criteria and appropriate training for their employees assigned to perform *Hazard analysis* and retain documentation of training provided.

10.3.9 *RTAs* should invite *Staff* to their Fire Life Safety Committee, *Safety Certification*, *Hazard* Resolution, and any other meetings where *safety risk management* is discussed.

10.3.10 Requirements for ongoing reporting of *hazards* management activities and status are detailed in *RTSB*-6, Procedure for Receiving Notification of *Events* and *Hazards*.

10.3.11 *Staff* will review and approve the *RTA's safety risk management* process as an integral part of the *RTA's PTASP* review and approval process.

10.3.12 *Staff* will review and approve the *RTA's* developed reporting thresholds, as defined in the *PTASP*. The notification and reporting thresholds may be reevaluated by the *RTA* and *Staff*, as necessary, during the annual revision process.

10.3.13 The *Designated Representative* will monitor the *RTA's safety risk management* process.

10.3.14 The *Designated Representative* will document and track immediately reportable *hazard*s in *RSSIMS* HAZT module (see Attachment 20) and upload corresponding correspondence and note its closure.

10.4.0 Corrective Action Plans for Inspections of Capital Projects

10.4.1 During implementation of capital projects if an *RTSB Inspectors* makes a finding of non-compliance, the *RTA* must provide a *CAP* to address the finding.

10.4.2 The *RTSB Inspector* must create a *TCAP* record in *RSSIMS* to track the *CAP.* The *Inspector* should ask the *RTA* Safety Department whose name should be entered as the "Individual Responsible for Implementation" and "Department Responsible". If the contractor may no longer be involved in the project by the time the *CAP* is completed, consideration should be given to include the name of an *RTA* personnel as the "Individual Responsible".

RTSB-11: Procedure for Handling Formal and Informal Complaints

11.1 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedure for handling formal and informal complaints.

11.2 PURPOSE

The purpose of this procedure is to establish a standard set of instructions for *RTSB staff* (*Staff*) to follow when handling formal and informal complaints.

11.3 GENERAL REQUIREMENTS

11.3.1 The *RTSB* Program Manager has overall responsibility for the preparation and use of this procedure.

11.3.2 There are two types of complaints: formal complaints and informal complaints.

11.3.3 If the complainant wishes to remain anonymous the informal complaint process is the best approach. However, if the complainant is not satisfied with the informal complaint process or wants to appeal *Staff*'s determination made at the end of the informal complaint process, the complainant may wish to file a formal complaint with the Commission. Complainant may file a formal complaint without first filing an informal complaint.

11.3.4 Formal complaints are those filed with the Commission's Docket Office. They receive a formal Commission proceeding number that begins with the letter "C" and are assigned to an Administrative Law Judge (*ALJ*). An example would be the complaint filed against Los Angeles County Transportation Metropolitan Authority's (LACMTA) Gold Line Foothill Extension Project by Pasadena Avenue Monterey Road Committee (PAMRC), C-06-10-015.

a. A formal complaint may be filed in paper form or electronically. Formal Complaints filed with the *CPUC* become a public record and may be posted on the *CPUC*'s website.

b. Any information the complainant provides in the Formal Complaint, including, but not limited to, complainant's name, address, city, state, zip code, telephone number, e-mail address, and the facts of their case may be available online for later public viewing.

c. More Commission Formal Complaint information can be found at: http://www.cpuc.ca.gov/formalcomplaintinfo/. Additional information can be found on the Commission's Public Advisor's webpage www.cpuc.ca.gov/pao.

11.3.5 Informal complaints are those received by *Staff* that have not been submitted to the Commission. Examples include complaints received from transit employee labor organization and *individual* complaints received from patrons, the public or transit employees.

a. These complaints are to be entered in *RSSIMS* CMPT module and tracked to conclusion.

11.3.6 Complaints are received in a variety of forms, including written complaints, electronic, and/or from the *CPUC*'s Consumer Affairs Branch or the *CPUC*'s Public Advisor's Office.

11.3.7 Each informal complaint, regardless of submission form, is to be processed uniformly as outlined below and given priority in resolution. *Staff* should include all complaints and complaint activity in their monthly reports.

As general information, the process for handling incoming informal complaints is as follows:

a. *RTSB* Management will assign the complaint to a *Staff* member.

b. Assigned *Staff* will enter the informal complaint information into *RSSIMS* for tracking and ID purposes (complaint number to be included in "subject" line of all correspondence).

c. The assigned *Staff* will contact the complainant to acknowledge receipt of their complaint, and provide them the assigned complaint number and an estimate for when we will contact them again.

d. The assigned *Staff* will send out the acknowledgement letter (see Attachment 22 for example) or email to the complainant and copy *RTSB* Management.

e. The assigned *Staff* will investigate the complaint and determine if a hazardous condition exists. *Staff* should use in-person

observation, rather than the transit agency's support, to determine the accuracy of alleged facts in the complaint.

f. Upon resolution, the assigned *Staff* will draft formal letter of findings/solutions to the complainant for the Senior UE supervisor's signature.

g. The assigned *Staff* will attach copies of all correspondence to the *RSSIMS* CMPT module records.

h. The assigned *Staff* should complete entire process within 30 days, or, if not possible, then assigned *Staff* will contact the complainant periodically (not to exceed 90 days) with updates.

i. Assigned *Staff* member will be responsible for tracking all recommended *corrective actions plans (CAPs*) through to completion, making entries into *RSSIMS* TCAP module.

NOTES:

a. *Staff* will not reveal a complainant's name(s) to the *RTA* without first obtaining specific authority from complainant.

b. *Staff* should investigate and draw their own conclusions rather than adopting agency support/information.

c. *Staff* will determine if a *hazard* exists and if mitigation is required. If *Staff* requires additional information, this should be collected from the agency on the *hazard* and any past mitigation efforts.

d. If *Staff*'s *investigation* reveals that no hazardous condition exists or the *CPUC* has no jurisdiction over the matter, the complaint will be dismissed. The assigned *Staff* will send a formal letter to the complainant, providing reasons for the complaint's dismissal and providing other options to file a formal complaint.

RTSB-12: Procedure for Enforcement Actions

12.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedure for handling enforcement actions.

12.1 PURPOSE

The purpose of this procedure is to establish a standard set of instructions for *RTSB staff* (*Staff*) to follow when handling enforcement actions.

12.2 GENERAL REQUIREMENT

12.2.1 The *RTSB* Program Manager has overall responsibility for the preparation and use of this procedure.

12.2.2 There are two primary methods of taking enforcement actions.

a. Open a formal proceeding before the Commission referred to as an Order Instituting *Investigation* (OII); or
b. *Staff* issues a citation.

12.2.3 Assigned *Staff* will document and track reported enforcement action in *RSSIMS* TCIT module and upload corresponding correspondence and note its closure.

12.3 ORDER INSTITUTING INVESTIGATION

12.3.1 An OII may be opened by the Commission of its own volition for any reason it determines is necessary and appropriate, or *Staff* may propose and recommend that the Commission open such a proceeding for a specific purpose.

12.3.2 If the Commission issues an OII, a formal proceeding is initiated where an Administrative Law Judge (*ALJ*) is assigned to preside.

12.3.3 In an OII the *RTA* and *Staff* are both represented by legal counsel and the proceeding scope and schedule are determined by the assigned *ALJ* and Commissioner. Proceedings will typically require witness testimony and/or hearing.

12.4 RAIL TRANSIT CITATION PROGRAM

12.4.1 On December 22, 2014, the Commission issued Resolution ST-163, which approved a citation program under the administration of the Commission's *Director* of the Safety and Enforcement Division (SED) for enforcing compliance with certain *GO*s, 49 *CFR* 659 et seq, and other requirements for *RTA*s operating in California. ST-163 can be found at the following link: Resolution ST-163.

Note: *RTSB* and two other Commission branches involved in rail *safety* were formally part of SED. In 2019, Commission formed the Rail Safety Division (RSD) by separating the three rail *safety* branches from SED. Therefore, the authority delegated to the SED *Director* in Resolution ST-163, now is delegated to the RSD *Director*.

12.4.2 The *Rail Transit Citation Program* will aid in ensuring compliance with the requirements for walkways, clearances, roadway worker protections and certain *rail fixed guideway system* operating rules. *RTSB Staff* is delegated authority to draft and issue citations for specific violations and levy penalties in specified amounts as set forth in Resolution ST-163, Appendix A (see attachment 22). *RTSB* works with the Legal Division to generate and issue the Citation. The *Rail Transit Citation Program* includes an appeal process.

12.4.3 Citations will also be considered for repeat violations that were previously corrected, but which have re-occurred, or for particularly egregious or willful violations. Currently *RTSB Staff* uses on-site visits to identify noncompliance, *safety* concerns, and reported unsafe conditions. Following those visits, *Staff* notifies the *rail fixed guideway system* of the need for corrective action. Generally, *Staff* and *RTA* agree to a timeframe for remediation informally. However, if the *RTA* fails to meet its commitments, *RTSB Inspectors* must make repeated site visits, or contacts with the *RTA*, in an effort to achieve and verify compliance. Alternatively, *Staff* may recommend to *RTSB* management to consider a formal proceeding (Order Instituting Investigation) process. The citation process allows *Staff* to document persistent conditions that fail to comply with applicable Commission rules, orders, and regulations, and provides a more certain timeframe for remediation.

12.4.4 *Rail Transit Citation Program* Process

a. *Staff* reviews appropriate records in *RSSIMS* listed below to prepare justifications for a citation and recommendation to *RTSB* Management to consider a citation, including but not limited to the following:
   1. *Inspections (TTIN)*;
   2. *Incident (INCT);*
   3. *Corrective Action Plan (TCAP);*
   4. *Activity Reports (TACT);*
   5. *Hazard, (HAZT);*
   6. *Triennial Review (TRRV)*;
   7. *Citation (TCIT)*;
   8. *Document Submittal (DCSB);* and
   9. *Internal Safety and Security Review Annual Reports*

b. *Staff* prepares documentation describing each alleged violation.

c. *RTSB* management determines if a citation should be recommended to the *RSD Director*.

d. *RTSB* management discusses the matter with the *RSD Director* before going to the *CPUC*'s *Legal Division*. *RSD Director* may consult with the *CPUC* executive leadership and/or Commissioner Offices.

e. After *RSD Director* approves pursuing a citation, *RTSB* Management contacts *CPUC*'s *Legal Division* for their advice and assistance on the matter.

f. *RTSB* Management informs *Staff* to create a *Citation (TCIT)* record in *RSSIMS* and assist in preparing and/or reviewing appropriate documents.

g. *RTSB* Management directs *Staff* to serve the citation to the *RTA.*

h. The citation must inform the *RTA* they have 30 calendar days from being served to take one of the following actions:

   1. Remit payment of the full amount of the fine to the *CPUC*'s Fiscal Office, and agree with RSD on conditions of payment; or
   2. Contest the citation by filing an appeal, pursuant to Commission Resolution ALJ-299.

i. *RTSB* Management notifies *CPUC*'s Accounts Receivable Section of Admin Services Division that *RSD* has issued a citation, the name of the *RTA*, the amount of the citation, citation number, and name of *RTSB* contact they should notify when they receive payment from the *RTA.* Otherwise, the Accounts Receivable Office may not know how to handle the *RTA*'s payment of the fine.

j. *RSD Director* will notify *CPUC* executive leadership, Commissioner Officers, Offices of Governmental Affairs, and News and Public Information Office (NPIO) that the citation has been issued.

k. *RTSB* Management provides NPIO information they may need (such as description of the alleged violations in terms the general public will understand, and explanation of how the *RTA*'s alleged violations compromise public *safety*), in order to help NPIO prepare a press release (if they think this may be newsworthy) and/or reply to questions from reporters.

l. *Staff* will monitor the citation's progress, provide *RTSB* management updates and reminders of approaching deadlines.

m. If the *RTA* pays the full amount of the fine within the specified time, the citation will become closed. *Staff* must accordingly update the *Citation (TCIT)* record in *RSSIMS.*

    1. *Staff* will continue monitoring *RTA*'s actions required in the citation and provide monthly updates to *RTSB* Management until all required actions are completed.

    2. *Staff* will document the closure of all linked *TCAP* record(s) in *RSSIMS*.

n. If the *RTA* appeals the citation, the matter is assigned to the *ALJ* Division, where an *ALJ* is assigned to hear the case.

    1. *Staff* may be asked to provide expert witness testimony at hearings, where they will be represented by Legal Division attorney.

    2. Citations that are appealed, are given a docket case number starting with the letter K. *Staff* must update the *TCIT* record in

RSSIMS to indicate the *RTA* appealed the citation, the docket number of the case, and other relevant information.

3. If the final outcome of the case results in the *RTA* being directed to take certain action(s), *Staff* will monitor and provide monthly updates to *RTSB* Management. *Staff* will also document *RTA* action and update *TCAP* record(s) in *RSSIMS* as appropriate.
4.

5. If the *RTA* is successful in its appeal, the *ALJ* will clarify the case disposition in their final decision.

o. *Staff* should update the *RTSB* webpage on citations.

p. Until the closure of the case, the Assigned *Staff* will document activities and upload relevant documents in TCIT module of *RSSIMS*. Upon closure of the case, assigned *Staff* make appropriate entries in TCIT Module and change the record status to closed.

RTSB-13: Procedures for Roadway Worker Protection Programs

13.1.0 SCOPE

This section describes the *Rail Transit Safety Branch (RTSB)* procedures for *Roadway Worker Protection* programs.

13.2.0 PURPOSE

13.2.1 The purposes of this procedure are:

e. Establish a standard set of instructions for *Staff* to follow when reviewing and approving *Roadway Worker Protection (RWP)* plan submittals and other activities related to *RWP*.

13.3.0 Applicability

13.3.1 Commission General Order 175 series provides rules and regulations governing *RWP* provided by all *RTAs* and *RFGSs* under *CPUC* jurisdiction.

13.3.2 49 CFR Part 671, titled "Rail Transit Roadway Worker Protection" provides federal regulations which applies only to *RTAs* that receive federal financial assistance authorized under 49 U.S.C. chapter 53, and to *SSOAs* that oversee the safety of rail fixed guideway public transportation systems.

49 CFR Part 671 does not apply to non-FTA funded *RTAs* under *CPUC* jurisdiction.

13.4.0 GENERAL REQUIREMENTS for FTA-Funded RTAs

13.4.1 The *RTSB* Program Manager has overall responsibility for the application and use of this procedure, including approval of the following:

- *CPUC Checklist for Review of FTA-Funded Roadway Worker Protection Plan* (see Attachment 25)

- *CPUC Checklist for Review of Non-FTA-Funded Roadway Worker Protection Plan* (see Attachment 26).

13.4.2 The *Designated Representative* will create a new Document Submittal (DCSB) module record in *RSSIMS* for each initial and subsequent submittal of an *RWP* plan by each FTA-funded RTA.

13.4.3 The *Designated Representative*, in consultation with *RTOSS Inspectors* will review the initial and subsequent updates (within a 2-year period) to *RWP* plan submitted by each FTA FTA-funded *RTA* using the *CPUC Checklist for Review of FTA-Funded Roadway Worker Protection Plan*.

13.4.4 If the *Designated Representative* does not find the plan acceptable, after discussing with *RTSB* management and receiving their approval, the *Designated Representative* will discuss with the FTA-funded RTA the identified deficiencies with the *RWP* plan, and work towards resolving them.

13.4.5 If the *Designated Representative* finds the plan acceptable, they will provide the completed checklist to *RTSB* Management along with recommendations to approve the FTA-funded *RTA's RWP* plan (initial or subsequent submission). If *RTSB* Management approves, the *Designated Representative* will inform the FTA-funded *RTA* that their plan is approved and upload all relevant records and accordingly update the *DCSB* record in *RSSIMS.*

13.5.0 Annual Audit of RWP Plans for FTA-Funded RTAs

13.5.1 As required by 49 CFR Part 671, *Staff* will conduct an annual audit of each FTA-funded RTA's compliance with its *RWP* program and issue a report with any findings and recommendations arising from the audit.

13.5.2 The *RTOSS* management will co-ordinate and facilitate annual audit of *RWP* program.

13.5.3 The *Inspector(s)* assigned to work on the annual review, will utilize *CPUC Checklist for Annual Audit of FTA-Funded RTA's Roadway Worker Protection Program* (Attachment 27) for the annual audit of *RWP Plans* for FTA-funded RTAs, which, at a minimum, must include:

j. Analysis of the effectiveness of the *RWP* program, including, at a minimum, a review of:

i. All *RWP*-related events over the period covered by the audit;
ii. All *RWP*-related reports made to the Transit Worker Safety Reporting Program over the period covered by the audit;
iii. All documentation of instances where a transit worker(s) challenged and refused in good faith any assignment based on on-track safety concerns and documentation of the resolution of any such instance during the period covered by the audit;
iv. An assessment of the adequacy of the track access guide,

including whether the guide reflects current track geometry and conditions;

v. A review of training and qualification records for transit workers who must enter a track zone to perform work;

vi. A representative sample of written job safety briefing confirmations as described in 49 CFR Part 671.33; and

vii. The compliance monitoring program described in 49 CFR Part 671.43.

k. Recommendation for improvements, if necessary or appropriate.

l. *CAP(s)*, if necessary or appropriate, must be developed and executed.

13.5.4 The assigned *Inspector* will track all activities related to the annual review of RWP plans using process selected by *RTOSS* management.

13.5.5 Following the completion of the annual audit of *RWP* program for an FTA-funded *RTA*, the assigned *Inspector* will prepare a draft report with findings, conclusions, and recommendations. The report will be based on audit observations, documents reviews, discussions with *RTA* personnel, and issues discussed with *RTSB* management. The assigned *Inspector* will include the completed checklist in the draft report as attachments.

13.5.6 The assigned *Inspector* will submit the draft report to the *RTOS* management for approval.

13.5.7 After *RTOSS* Management approves the draft for submittal to the *RTA*, the *Senior Inspector* will submit via email the approved draft report for 30 calendar days *RTA* review and comments.

13.5.8 After receiving the *RTA*'s response to the Annual *RWP* program audit draft report, the assigned *Inspector* will discuss any comments with *RTOSS* Management, and follow any direction given by *RTOSS* Management to address those comments, and then prepare the final annual audit report of *RWP* program for the FTA-funded *RTA.* The *Senior Inspector* will send the final report of the annual audit of RWP Program to the *RTA.*

13.6.0 Corrective Action Plan Follow-up for Annual Audit of RWP Program for FTA-Funded RTAs

13.6.1 The *RTA* must develop *CAP*s to address findings from the Annual Audit of *RWP* program for an FTA-funded RTA.

13.6.2 The assigned *Inspector* will review and approve the *CAP*(s), and will create a *TCAP* record in *RSSIMS* for each *CAP.*

13.6.3 The assigned *Inspector* will monitor the *RTA's* implementation of the *CAP*s until all recommended corrective actions are implemented and completed.

13.7.0 Near-Miss Reporting

13.7.1 As required by Commission General Order 175 series, each *RTA* (both FTA-funded and non-FTA funded) shall develop and implement a program for reporting and recording near-misses regarding *RWP.* Commission General Order 175 series defines a "near miss" as " … *an incident infringing on the safety of a roadway worker on or near the tracks, but without contact or injury*".

13.7.2 The *Designated Representative* will create a *Transit Hazard (HAZT)* record in *RSSIMS* for each reported near miss regarding *RWP.*

ATTACHMENTS

Attachment 1: Public Utilities Code - PUC

California Code, Public Utilities Code - PUC §211:

"Common carrier" means every person and corporation providing transportation for compensation to or for the public or any portion thereof, except as otherwise provided in this part.
"Common carrier" includes:
(a) Every railroad corporation; street railroad corporation; dispatch, sleeping car, dining car, drawing-room car, freight, freightline, refrigerator, oil, stock, fruit, car-loaning, car-renting, car-loading, and every other car corporation or person operating for compensation within this state.
(b) Every corporation or person, owning, controlling, operating, or managing any vessel used in the transportation of persons or property for compensation between points upon the inland waters of this state or upon the high seas between points within this state, except as provided in Section 212. "Inland waters" as used in this section includes all navigable waters within this state other than the high seas.
(c) Every "*passenger* stage corporation" operating within this state.

California Code, Public Utilities Code - PUC §216:

(a) "Public utility" includes every common carrier, toll bridge corporation, pipeline corporation, gas corporation, electrical corporation, telephone corporation, telegraph corporation, water corporation, sewer system corporation, and heat corporation, where the service is performed for, or the commodity is delivered to, the public or any portion thereof.

California Code, Public Utilities Code - PUC §315:

The commission shall investigate the cause of all *accidents* occurring within this State upon the property of any public utility or directly or indirectly arising from or connected with its maintenance or operation, resulting in loss of life or injury to person or property and requiring, in the judgment of the commission, *investigation* by it, and may make such order or recommendation with respect thereto as in its judgment seems just and reasonable. Neither the order or recommendation of the commission nor any *accident* report filed with the commission shall be admitted as evidence in any action for damages based on or arising out of such loss of life, or injury to person or property. Every public utility shall file with the commission, under such rules as the commission prescribes, a report of each *accident* so occurring of such kinds or classes as the commission from time to time designates.

California Code, Public Utilities Code - PUC §771:

The commissioners and their officers and employees may enter upon any premises occupied by any public utility, for the purpose of making the examinations and tests and

exercising any of the other powers provided for in this part, and may set up and use on such premises any apparatus and appliances necessary therefor. The agents and employees of the public utility may be present at the making of such examinations and tests.

California Code, Public Utilities Code - PUC §778:

The commission shall adopt rules and regulations, which shall become effective on July 1, 1977, relating to *safety* appliances and procedures for rail transit services operated at grade and in vehicular traffic. The rules and regulations shall include, but not be limited to, provisions on grade crossing protection devices, headways, and maximum operating speeds with respect to the speed and volume of vehicular traffic within which the transit service is operated.
The commission shall submit the proposed rules and regulations to the Legislature not later than April 1, 1977.
(Added by Stats. 1976, Ch. 924.)

California Code, Public Utilities Code - PUC § 29047:

The district (SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT) shall be subject to regulations of the Public Utilities Commission relating to *safety* appliances and procedures, and the commission shall inspect all work done pursuant to this part and may make such further additions or changes necessary for the purpose of *safety* to employees and the general public.
The commission shall enforce the provisions of this section.
The district shall reimburse the commission for any cost incurred by the commission in regulating pursuant to this section when such regulating is performed (a) by persons not on the staff of the commission or (b) by the staff of the commission but not funded by a Budget Act appropriation. The reimbursement shall be in the amount as agreed upon by the district and the commission and approved by the Director of Finance. If the district and the commission are unable to agree as to the amount of the cost, the Director of Finance shall determine the amount.

California Code, Public Utilities Code - PUC §30646:

The district (SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT, predecessor to Los Angeles County Metropolitan Transportation Authority) shall be subject to regulations of the Public Utilities Commission relating to *safety* appliances and procedures, and the commission shall inspect all work done pursuant to this part and may make such further additions or changes necessary for the purpose of *safety* to employees and the general public.

The district shall be subject to the jurisdiction of the Public Utilities Commission with respect to *safety* rules and other regulations governing the operation of street railways.

The commission shall enforce the provisions of this section.

California Code, Public Utilities Code - PUC § 99152:

Any public transit guideway planned, acquired, or constructed, on or after January 1, 1979, is subject to regulations of the Public Utilities Commission relating to *safety* appliances and procedures.

The commission shall inspect all work done on those guideways and may make further additions or changes necessary for the purpose of *safety* to employees and the general public.

The commission shall develop an oversight program employing *safety* planning criteria, guidelines, *safety* standards, and *safety* procedures to be met by operators in the design, construction, and operation of those guideways. *Existing industry standards* shall be used where applicable.

The commission shall enforce the provisions of this section.

California Code, Public Utilities Code – PUC § 100168:

The VTA shall be subject to the regulations of the Public Utilities Commission relating to *safety* appliances and procedures, and the commission shall inspect all work done pursuant to this part and may make further additions or changes necessary for the purpose of *safety* to employees and the general public. The commission shall enforce the provisions of this section.

(Amended by Stats. 2016, Ch. 381, Sec. 62. Effective January 1, 2017.)

https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC

California Code, Public Utilities Code – PUC §765

(a) When the federal National Transportation Safety Board (NTSB) submits a *safety* recommendation letter concerning rail *safety* to the commission, the commission shall provide the NTSB with a formal written response to each recommendation no later than 90 days after receiving the letter. The response shall state one of the following:

> (1) The commission's intent to implement the recommendations in full, with a proposed timetable for implementation of the recommendations.

(2) The commission's intent to implement part of the recommendations, with a proposed timetable for implementation of those recommendations, and detailed reasons for the commission's refusal to implement those recommendations that the commission does not intend to implement.
(3) The commission's refusal to implement the recommendations, with detailed reasons for the commission's refusal to implement the recommendations.

(b) If the NTSB issues a *safety* recommendation letter concerning any commission-regulated rail facility to the United States Department of Transportation, the Federal Transit Administration, to a commission-regulated rail operator, or to the commission, or if the Federal Transit Administration issues a *safety* advisory concerning any commission-regulated rail facility, the commission shall determine if implementation of the recommendation or advisory is appropriate. The basis for the commission's determination shall be detailed in writing and shall be approved by a majority vote of the commission.

(c) If the commission determines that a *safety* recommendation made by the NTSB is appropriate, or that action concerning a *safety* advisory is necessary, the commission shall issue orders or adopt rules to implement the *safety* recommendations or advisory as soon as practicable. In implementing the *safety* recommendation or advisory, the commission shall consider whether a more effective, or equally effective and less costly, alternative exists to address the *safety* issue that the recommendation or advisory addresses.

(d) Any action taken by the commission on a *safety* recommendation letter or *safety* advisory shall be reported annually, in detail, to the Legislature with the report required by Section 321.6. Any correspondence from the NTSB indicating that a recommendation has been closed following an action that the NTSB finds unacceptable shall be noted in the report required by Section 321.6.

Attachment 2: Rail Transit Safety Branch Inspection Form

Inspection Basic Details			
Report ID			
RTA			
Inspection Start Date		**Inspection Start Time**	
Type of Inspection		**Announced/ Unannounced**	
Joint Inspection			

Contacts and Inspector Information			
RTSB Lead Inspector			
CPUC Personnel Present at Inspection			
RTA Personnel Present at Inspection			
First Name	**Last Name**	**Job Title**	**Email Address**

Inspection Location			
Inspection Location			
Milepost		**Records Review Only?**	
Switch Number		**Signal Number**	
Latitude		**Longitude**	
CPUC Crossing Number(s)			

Attachment 3: State Safety and Security Certification Oversight Plan Document Submittals

Transit Agency:		Project:			Designated RTSB Rep:
No.	Contract No.	Document Description	Date Received	Date Accepted	Comments

SAFETY AND SECURITY CERTIFICATION OVERSIGHT PLAN TEST OBSERVATIONS

Transit Agency:		Project:			Designated RTSB Rep:
No.	Contract No.	Test Procedure	Description of Test or other Activity to be Observed	Date Completed	Comments

Attachment 4: Safety and Security Certification Oversight Plan Records Review

SAFETY AND SECURITY CERTIFICATION OVERSIGHT PLAN RECORD REVIEWS						
Transit Agency:			Project:			Designated RTSB Rep:
No.	Contract No.	Record ID Number	Description of the Record	Date Received	Date Accepted	Comments

Attachment 5: Sample of Daily Calendar Notice

NOTICE OF DRAFT RESOLUTIONS
(Pursuant to PU Code § 311(g))

NOTE: (Body of text should be in 10 pt Times New Roman Font Normal with the following Text)

The Name of Division has prepared Resolution xxxx for the Commission Meeting Date. Summary of Resolution.

Any questions or comments should be directed to name at email address

The web link is:
web link to the published document

Sample 1

The Rail Safety Division has prepared Resolution ST-206 for October 26, 2017. This Resolution grants the San Francisco Bay Area Rapid Transit District's request for approval of its *Safety* and *Security* Certification Plan for its Communications-Based Train Control project.

Any questions or comments should be directed to Jamie Lau at Jamie.Lau@cpuc.ca.gov

The web link is: http://docs.cpuc.ca.gov/SearchRes.aspx?DaySearch=1

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
A. Transit Agency Information				
A-1: §673.11(a) The RTA specifies transit agency name. Plan Requirements: A transit agency must establish a Public Transportation Agency Safety Plan (PTASP) that meets the requirements of this part. Additional Guidance: The RTA may want to explain that its PTASP responds to both FTA's requirements at 49 C.F.R. Part 673 and the State Safety Oversight (SSO) program standard.				
A-2: §673.11(b) The RTA specifies mode(s) of transit service covered by the PTASP. Plan Requirements: A transit agency may develop one PTASP for all modes of service or may develop a PTASP for each mode of service not subject to safety regulation by another federal entity.				
A-3: §673.13(a) The RTA must certify that it has established a PTASP meeting the requirements of Part 673. Plan Requirements: A SSOA must review and approve a PTASP developed by a RTA as authorized in 49 U.S.C. 5329(e) and its implementing regulations at 49 CFR Part 674.				
A-4: §673.23(d)(1) The RTA identifies an Accountable Executive that is: Plan Requirements: The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. Additional Guidance: • An Accountable Executive should be a transit operator's chief executive; this person is often the president, chief executive officer, or general manager;				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
• Accountable Executive must sign the PTASP; • Board of Directors or an Equivalent Authority must approve the PTASP;				

A-4-a: §673.23(d)(1)
Accountable Executive is responsible for ensuring that the agency's Safety Management System (SMS) is effectively implemented throughout the agency's public transportation system.
 	
Additional Guidance:
FTA defers to those systems in their designation of an Accountable Executive, so long as that single individual has the ultimate responsibility and accountability for:
• Implementation and maintenance of the SMS of the public transportation agency;
• Responsibility for carrying out the agency's transit asset management plan; and
• Has control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP and the agency's Transit Asset Management (TAM) plan.
• For municipal government agencies, that individual could be:
  o A county executive or a mayor;
  o Head of a city's department of transportation;
  o Head of a city's department of public works; or
  o City manager.
And while many individuals within a transit agency may be responsible for "implementing" SMS, the Accountable Executive is the individual with the ultimately responsibility for SMS implementation at the agency.
FTA understands that at many smaller transit operators, roles and responsibilities are more fluid. However, FTA believes that, even in circumstances where responsibilities are either shared or delegated, there must be one primary decision-maker who is ultimately responsible for both safety and transit asset management.				

A-4-b: §673.23(d)(1) Accountable Executive is responsible for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS.				
A-5-a: §673.23(d)(2) The RTA identifies a Chief Safety Officer (or SMS Executive) who is designated by the Accountable Executive. Additional Guidance: • see FTA CSO/SMS Executive Fact Sheet dated May 2019.				
A-5-b: §673.23(d)(2) The CSO (SMS Executive) holds a direct line of reporting to the Accountable Executive.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Plan Requirements: The Chief Safety Officer (SMS Executive) must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer (SMS Executive). Additional Guidance: • FTA is deferring to each RTA and SSOA to determine the appropriate direct reporting relationship with the Accountable Executive.				
A-5-c: §673.5, 673.23(d)(2) The CSO (SMS Executive) is adequately trained as defined by agency. Plan Requirements: • The PTASP identifies an adequately trained CSO (SMS Executive) who reports directly to the Accountable Executive. • Training shall comply with 49 CFR 672.13(a) and (c) requirements. Additional Guidance: • FTA defers to the RTA and SSOA to determine the level of training that is adequate for the Chief Safety Officer. • Staff shall look for references to Part 672.13				
A-5-d: §673.23(d)(2) CSO (SMS Executive) has the authority and responsibility for day-to-day implementation and operations of the agency's SMS.				
A-5-e: §673.5 A Chief Safety Officer may not serve in other operational or maintenance capacities. Additional Guidance: • FTA will not allow the Chief Safety Officers for rail transit agencies to have additional operational and maintenance responsibilities; FTA believes that this role should be a full-time responsibility at rail transit agencies, unless a rail transit agency petitions FTA to allow its Chief Safety Officer to serve multiple roles given administrative and financial hardships with having a single, dedicated, and full-time Chief Safety Officer.				
B. Plan Development, Approval, and Updates				
B-1: §673.11(a)(1) The RTA provides the Accountable Executive's signature of the PTASP and date of signature. Plan Requirements: The Plan and subsequent updates must be signed by the Accountable Executive.				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Additional Guidance: The RTA may amend or prepare signature blocks and any formal adoption memorandum or other documents that may need to be attached to the PTASP to demonstrate the required signature from the Accountable Executive.				
B-2i: §673.11(a)(1) The Safety Committee established pursuant to Part 673.19 approval of the PTASP and date of approval. Plan Requirements: The Plan and subsequent updates must be approved by the agency's Safety Committee. Additional Guidance: The RTA may provide documents that may need to be attached to the PTASP to demonstrate the required approval from the Safety Committee.				
B-2ii: §673.11(a)(1) The RTA provides the Board of Directors or Equivalent Entity's approval of the PTASP and date of approval. Plan Requirements: After approval by the RTA's Safety Committee, the PTASP and subsequent updates must be approved by the agency's Board of Directors or an equivalent entity. Additional Guidance: The RTA may amend or prepare signature blocks and any formal adoption memorandum or other documents that may need to be attached to the PTASP to demonstrate the required approval from the Board of Directors or an Equivalent Entity.				
B-3: §673.13, and §674.29(a) The RTA provides certification of compliance with Part 673, including the name of the individual or entity that certifies the PTASP and date of certification. Plan Requirements: The Safety Plan must address all applicable requirements and standards as set forth the SSOA's Program Standard and the National Public Transportation Safety Plan. Additional Guidance: If the RTA chooses to address this requirement explicitly in the PTASP, the RTA may consider briefly describing the National Public Transportation Safety Plan This section can also identify any reviews or assessments the RTA may conduct independently or jointly with the SSOA to ensure compliance with FTA's regulations and the SSOA program standard.				
B-4: §674.29(a) and Procedures Manual				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
The RTA provides certification of compliance with the Program Standard established by the SSOA, including the name of the individual or entity that certifies compliance with the SSOA's Program Standard and date of certification. Plan Requirements: In determining whether to approve a PTASP for a rail fixed guideway public transportation system, an SSOA must evaluate whether the PTASP is in compliance with the program standard set by the SSOA.				
B-5: §673.11(a)(5) The RTA provides a process and timeline for conducting an annual review and update of the PTASP, including the PTASP version number and other relevant information. An annual assessment of whether the PTASP should be updated is specified. Plan Requirements: Each RTA must establish a process and timeline for conducting an annual review and update of its PTASP.				
C. Emergency Preparedness and Response Plan				
C-1-a: §673.11(a)(6)(i) The RTA provides or references an emergency preparedness and response plan or procedures that, at a minimum address the assignment of transit worker responsibilities during an emergency. Additional Guidance: • To address this section, the RTA may consider including as an appendix, or incorporating by reference, its emergency preparedness and response plan, which, at a minimum, defines employee roles and responsibilities during emergencies and documents coordination with Federal, State, regional and local officials. • The RTA also should review the SSOA's Program Standard to identify any other requirements regarding how the PTASP should address the emergency preparedness and response plan or procedures, and also review its internal policies to identify any specific considerations that should be in place to manage Sensitive Security Information (SSI), as defined by Federal Regulation 49 C.F.R. Part 1520.				
C-1-b: §673.11(a)(6)(i) Coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the transit agency's service area.				
C-1-c-i: §673.11(a)(6)(i) PTASP must include or incorporate by reference an emergency preparedness and response plan or procedures.				
C-1-c-ii: §673.11(a)(6)(i) The assignment of transit worker responsibilities during an emergency.				
C-1-d: §673.11(a)(6)(ii) Any policies and procedures regarding rail transit workers on the roadway the RTA has issued.				
D. Annual Safety Performance Targets				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
D-1: PTASP includes a safety risk reduction program for transit operations to improve safety performance by reducing the below: Plan Requirements: • The PTASP must include annual safety performance targets based on the safety performance measures established under the current National Public Transportation Safety Plan. • PTASP must provide specific and measurable performance measures and targets. General annual year-to-year reduction of previous year's numbers or percentages are NOT acceptable. Additional Guidance: • Pursuant to§673.11(a)(7)(iii), a PTASP must include safety performance targets based on the safety performance measures in the National Safety Plan. • The safety performance measures (fatalities, injuries, safety events and system reliability) selected by FTA are intended to provide "state of the industry" high-level measures and help focus individual agencies on the development of specific performance indicators and measurable targets relevant to their operations. • These measures should also inform agencies as they identify actions they would take to improve their own safety outcomes. • Agencies should select performance targets that are appropriate to their operations and environment. • Successful safety performance targets are specific, measurable, attainable, relevant, and time-bound (SMART). As part of the annual review of a PTASP, each RTA should reevaluate its safety performance measures and determine how the measures should be refined, sub-measures developed, and performance targets selected. • FTA recognizes that each transit agency has its own operating policies that impact how performance is reported to the NTD. However, bringing greater attention to safety and reliability metrics will encourage more robust, consistent data reporting in the future.				
D-1-a: §673.11(a)(7) Number and rate of safety events.				
D-1-b: §673.11(a)(7) Number and rate of injuries.				
D-1-c: §673.11(a)(7) Number and rate of assaults on transit workers.				
D-1-d: §673.11(a)(7)(i) Address the reduction and mitigation of vehicular and pedestrian safety events involving transit vehicles, including mitigations to reduce visibility impairments for transit vehicle operators that contribute to accidents, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments.				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
D-2: The RTA specifies safety performance targets for injuries (total number of reportable injuries and rate per total vehicle revenue miles, by rail transit mode).				
D-3: The RTA specifies annual safety performance targets for safety events (total number of reportable events and rate per total vehicle revenue miles, by rail transit mode).				
D-4: The RTA specifies annual safety performance targets for system reliability (mean or average) distance between major mechanical failures, by rail transit mode.				
D-4a: The RTA describes the methodology for developing annual safety performance targets and how the targets were calculated. Plan Requirements: PTASP must describe the methodology for developing annual safety performance targets and how the targets were calculated.				
D-4b: Stated management responsibilities are identified for the safety program to ensure that the goals and objectives are achieved.				
D-5: §673.15(a) The RTA specifies, or references documentation that specifies, annual safety performance targets are made available to the **State** to aid in the planning process. Plan Requirements: Additional Guidance: • In addressing this activity in the PTASP, the RTA may wish to document the process through which the transit agency shares its safety performance and state of good repair targets with its State and Metropolitan Planning Organizations. • The RTA should consider indicating if it has representation on the Metropolitan Planning Organization Board, either directly or indirectly (i.e., elected officials serving on both the Metropolitan Planning Organization board and the transit agency board), and briefly describing how this representation can support the agency's process for making safety performance target available to the Metropolitan Planning Organization and State. • The RTA also could reference relevant transportation planning documentation or legislation.				
D-6-a: §673.15(a) The RTA specifies, or references documentation that specifies, annual safety performance targets are made available to the **Metropolitan Planning Organization(s) (MPO)** to aid in the planning process. Plan Requirements: A State or RTA must make its annual safety performance targets available to States and Metropolitan Planning Organizations to aid in the planning process.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
D-6-b: §673.15(b) The RTA specifies, or references documentation that specifies, that the RTA coordinates with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets, to the maximum extent practicable. Plan Requirements: To the maximum extent practicable, a State or RTA must coordinate with States and Metropolitan Planning Organizations in the selection of State and Metropolitan Planning Organization safety performance targets.				
E. Development and Implementation of SMS				
E-1: §673.11(a)(2) and §673.21 The RTA specifies, or references documentation that specifies, its establishment and implementation of a Safety Management System (SMS). Plan Requirements: Each transit agency must establish and implement a Safety Management System under Part 673. A transit agency Safety Management System must be appropriately scaled to the size, scope and complexity of the transit agency and include the following elements: (a) Safety Management Policy as described in § 673.23; (b) Safety Risk Management as described in § 673.25; (c) Safety Assurance as described in § 673.27; and (d) Safety Promotion as described in § 673.29. Additional Guidance: This requirement will be assessed through evaluation of the Safety Management Policy, Safety Risk Management, Safety Assurance and Safety Promotion sections below.				
E-2: §673.21, §673.23, §673.25, §673.27, and §673.29 The RTA specifies, or references documentation that specifies, that its 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.				
F. Safety Management Policy				
F-1: §673.5, §673.21(a), and §673.23(a) The RTA specifies, or references documentation that specifies, a written statement of safety management policy, including the agency's safety objectives. Additional Guidance:				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
• The safety management policy statement clearly states the organization's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. • It clearly delineates management and employee responsibilities for safety throughout the organization. • Ensures that management is actively engaged in the oversight of the organization's safety performance by requiring regular review of the safety policy by a designated Accountable Executive (general manager, president, or other person with similar authority). • Within the context of the PTASP, an organization's safety objectives will be articulated through the setting of performance targets based on, at a minimum, the safety performance targets based on, at a minimum, the safety performance measures established in the National Public Transportation Safety Plan. See 49 U.S.C. 5329(d)(1)(E).				
F-2-a: §673.23(b) The RTA specifies, or references documentation that specifies, an Employee Safety Reporting Program that includes: A process that allows transit workers to report safety conditions to senior management. Additional Guidance: • Each RTA will need to review its current employee reporting systems and ensure that they meet FTA's employee safety reporting expectations, including comprehensiveness and accessibility, and address protections for employees who report safety conditions as well as identify behaviors that would result in disciplinary action. • In addition, the RTA will need to address any gaps related to the documentation and storage of the data, its retrieval and analysis, and any practices for communicating back to reporting employee. • In addressing any identified gaps, the RTA will want to establish and communicate criteria and procedures for employee safety reporting across the organization. • Each RTA will need to specify in documentation the new or modified employee reporting program as a fundamental source for safety concerns and hazard identification. • Internal safety reporting programs include the Employee Safety Reporting Program and other internal reporting programs that may provide safety data or information to support the SMS. • The number and types of internal safety reporting systems will vary based on the size and complexity of the agency. Most agencies likely have several relevant programs, although they may not currently term these programs as "safety reporting" programs. • These programs could include drug and alcohol testing programs, fitness for duty programs, hours of service programs, customer complaints, or operations or maintenance compliance or inspection programs				
F-2-b: §673.23(b) PTASP describes protections for transit workers who report safety conditions to senior management.				
F-2-c: §673.23(b) PTASP includes a description of transit worker behaviors that may result in disciplinary action.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
F-3: §673.23(c) The RTA specifies, or references documentation that specifies, communication of the safety management policy throughout the organization. Additional Guidance: Each RTA will need to implement the necessary provisions for ensuring that the Safety Management Policy Statement is communicated to all employees, with explicit support from senior management, including the means as well as the criteria establishing when the statement should be updated or revised.				
F-4: §673.23(a) and §673.23(d) 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: Plan Requirements: A transit agency must establish its organizational accountabilities and responsibilities and have a written statement of Safety Management Policy that includes the RTA's safety objectives and a description of the RTA's Safety Committee or approach to cooperation with frontline transit worker representatives. Additional Guidance: As a general action, each RTA will need to review and discuss authorities, accountabilities and responsibilities as they relate to the development and management (or operation) of the SMS, in addition to established safety responsibilities. Each RTA will need to revise current PTASP text based on those meetings for inclusion in the PTASP. The Accountable Executive is ultimately responsible for ensuring these authorities, accountabilities and responsibilities are established.				
F-4-a: §673.5, §673.23(d)(1) Accountable Executive. Plan Requirements: • The transit agency must identify an Accountable Executive. • The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. • The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented, throughout the agency's public transportation system. • The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS. • The Accountable Executive must implement safety risk mitigations for the safety risk reduction program included in the PTASP.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		

• The Accountable Executive must consider all other safety risk mitigations recommended by the Safety Committee; and
• Responsibility for carrying out the agency's transit asset management plan.
 	
Additional Guidance:
• Each RTA must identify an Accountable Executive within its organization who ultimately is responsible for carrying out and implementing its safety plan and asset management plan.
• An Accountable Executive should be a transit operator's chief executive; this person is often the president, chief executive officer, or general manager.
• Given the varying sizes and natures of transit systems, FTA defers to those systems in their designation of an Accountable Executive, so long as that single individual has:
  • Responsibility for carrying out the agency's transit asset management plan; and
  • Control or direction over the human and capital resources needed to develop and maintain both the agency's public transportation agency safety plan and the agency's transit asset management plan.				

F-4-a-i: §673.23(d)(1) Accountable Executive. Plan Requirements: The Accountable Executive must implement safety risk mitigations for the safety risk reduction program included in the PTASP.				
F-4-a-ii: §673.23(d)(1) Accountable Executive. Plan Requirements: The Accountable Executive must consider all other safety risk mitigations recommended by the Safety Committee.				
F-4-b: §673.23(d)(2) Chief Safety Officer (or SMS Executive) Plan Requirements: • The Accountable Executive must designate a Chief Safety Officer (SMS Executive). • The Chief Safety Officer (SMS Executive) must hold a direct line of reporting to the Accountable Executive.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
• The Chief Safety Officer who has the authority and responsibility for day-to- day implementation and operation of an agency's SMS. • The Safety Plan identifies an adequately trained safety officer who reports directly to the general manager, president, or equivalent officer of the RTA. Additional Guidance: • Given the different sizes of transit operators and given the varying operating environments of transit systems across the nation, FTA is deferring to each RTA and SSOA to determine the appropriate direct reporting relationship with the Accountable Executive. • FTA also defers to the RTA and SSOA to determine the level of training that is adequate for the Chief Safety Officer. • Given the more complex operating environments of rail transit systems and the increased safety risks in these environments, FTA will not allow the Chief Safety Officers for rail transit agencies to have additional operational and maintenance responsibilities; it is necessary to have a single individual wholly dedicated to ensuring safety. • FTA believes that this role should be a full-time responsibility at rail transit agencies.				
F-4-c: §673.23(d)(4) Agency Leadership and Executive Management Plan Requirements: A transit agency must identify those members of its leadership or executive management, other than an Accountable Executive or Chief Safety Officer (SMS Executive), who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.				
F-4-d: §673.23(d)(5) A transit agency may designate key staff, groups of staff, or committees to support the Accountable Executive or Chief Safety Officer, Safety Committee, or SMS Executive in developing, implementing, and operating the agency's SMS. Additional Guidance: Each RTA may identify key staff, groups of staff, or committees who would support development, implementation and operation of the RTA's SMS. This is optional.				
F-4-d-i: GO164-F Section 3.2(c) The RTA provides an Organizational chart reflecting the management structure of the RTA.				
F-4-d-ii: GO164-F Section 3.2(c) A description of how the safety function is integrated into the rest of the RTA organization is provided.				
F-4-d-iii: GO164-F Section 3.2(c) Clear identification of the lines of authority used by the RTA to manage safety issues is provided.				
F-5: §673.29(b)				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
The RTA specifies, or references documentation that specifies, adequate methods to ensure implementation of the PTASP by all transit workers, agents, and contractors. Additional Guidance: The SSOA must ensure that the RTA's PTASP is sufficiently detailed and provides adequate methods to be carried out by employees, agents and contractors.				
G. Safety Risk Management				
G-1: §673.21(b), §673.25 The RTA specifies, or references documentation that specifies, a Safety Risk Management process for all system elements. Plan Requirements: • The Safety Risk Management process must be comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation. Additional Guidance: • In addressing these requirements, the RTA can include language describing its hazard management process to reflect safety risk management, including definitions and criteria related to safety risk management terms and activities (to be consistent with SMS concepts and terms under 673.5). • The PTASP language can include the organizational and reporting structure for safety risk management, the tools used to support safety risk analysis and evaluation, the roles of the adequately trained and staffed safety or SMS department in supporting and conducting safety risk analysis, and any requirements for coordinating with and reporting to the SSOA regarding the implementation and results of the safety risk management process.				
G-2: §673.5, §673.25(a), §673.25(b)(1) The RTA specifies, or references documentation that specifies, a process for hazard identification including identifying consequences of hazards. Additional Guidance: • Pursuant to § 673.25(b)(1), each transit agency must establish a process for safety hazard identification, including the identification of the sources, both proactive and reactive, for identifying hazards and their associated consequences. • Activities for hazard identification could include formalized processes where a transit agency identifies hazards throughout its entire system, logs them into a database, performs risk analyses, and identifies mitigation measures. • These activities also could include safety focus groups (for example Safety Committees or Fire-life safety committees), reviews of safety reporting trends, meetings with employees, scenario-based assessments, and What If? Analysis. • A transit agency must apply its process for safety hazard identification to all elements of its system, including but not limited to its operational activities, system expansions, vehicles, and state of good repair activities.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
• FTA encourages transit agencies to take into account bicycle and pedestrian safety concerns, along with other factors, as agencies are conducting Safety Risk Management. • A transit agency also should consider the results of its asset condition assessments when performing safety hazard identification activities within its SMS. The results of the condition assessments, and subsequent SMS analysis, will inform a transit agency's determination as to whether an asset meets the state of good repair standards under 49 C.F.R. part 625.				
G-3: §673.25(b)(2) and SSOA Program Standard The RTA specifies, or references documentation that specifies, a process to include FTA, the SSOA, and other oversight authorities as sources for hazard information. Plan Requirements: A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority, including but not limited to the FTA and SSOA; data and information regarding exposure to infectious disease provided by the CDC or a State health authority; and Safety concerns identified through Safety Assurance activities. Additional Guidance: The RTA should explain how information from the SSOA or FTA will be received and assessed by the RTA, and how the RTA may report back to the SSOA and/or FTA if requested/required regarding the results of any activities or analysis performed. It should describe key interfaces and processes for reviewing and assessing this information and reporting back if required or requested.				
G-4: §673.7, §673.25(c) The RTA specifies, or references documentation that specifies, a process for assessing the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations. Additional Guidance: • The RTA may include the activities, roles, and participation of different agency departments, used in the assessment and prioritization of safety risks. This includes the identification of when Subject Matter Experts, the Safety Committee, etc. will be involved in the safety risk assessment process. • May reference or explain the levels of management that have authority to make decisions as a function of the level of safety risk(s) evaluated, including when decisions should be elevated. • In § 673.25(c)(2), each transit agency must assess safety risks in terms of probability (the likelihood of the hazard producing the potential consequences) and severity (the damage, or the potential consequences of a hazard, that may be				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		

caused if the hazard is not eliminated or its consequences are not successfully mitigated), and must assess existing mitigations, to support the prioritization of hazards based on safety risks.
• The RTA ensures:
  • Potential consequences for hazards are identified;
  • Existing mitigations are identified and assessed for the current effectiveness in addressing the potential consequences (since it is possible that existing mitigations may not be working as intended); and
  • Both the likelihood and severity of the potential consequences of the hazard are established (with current mitigations included).				

G-5: §673.25(c)(2) The RTA specifies, or references documentation that specifies, a process to prioritize hazards based on the safety risk.				

G-6: §673.25(a) and §673.25(d)
An RTA must establish methods or processes to identify safety risk mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the potential consequences. These methods or processes must address the role of the RTA's Safety Committee.
 	
Additional Guidance:
• The RTA may decide that the criteria for developing safety risk mitigations could be the identification of a safety risk, benefit-cost analysis, a system level change (such as the addition of new technology on a vehicle), a change to operational procedures, or the expansion of service.
• In addition, the RTA should ensure that the PTASP documents how mitigations will be implemented and monitored, including:
  • Mitigation to be implemented;
  • Responsible party (individual and/or department);
  • Timeframe for implementation;
  • Safety performance indicator; and
  • Safety performance target.
• This information will directly support mitigation monitoring for effectiveness under 673.27(b)(2).				

G-7: §673.25 and §673.29(b) The RTA specifies, or references documentation that specifies, a process for safety risk management with adequate means of safety risk mitigation. Additional Guidance: The SSOA must ensure that the safety risk management process laid out in the RTA's PTASP is sufficiently detailed and provides adequate methods to identify, assess and mitigate safety risks.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
G-8-i: GO 164 Series and §673.25(c) Requirements for on-going reporting to the oversight agency relating to *safety risk management* activities and status are specified.				
G-8-ii: GO 164 Series and §673.29(b) RTA will also submit any CAPs developed to minimize, mitigate, control, correct, or eliminate the identified safety risks and hazards. The CAPs will include description, immediate mitigation (if needed), origin of hazard, the proposed actions, permanent hazard resolution, or temporary mitigation if necessary, the responsible individual or department, and the schedule for implementing those actions for the identified hazard, including date the hazard was identified and closed, and hazard resolution verification/follow-up activities, all in accordance with Commission GO 164 series, Section 9.				
G-8-iii: GO 164-F Section 3.2(h) and 673.27(c) Safety Certification Process: A description of the safety certification process required by the RTA to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for Major Projects and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment.				
H. Safety Assurance				
H-1: §673.27 The RTA specifies, or references documentation that specifies, its methods or processes to develop and implement a safety assurance process covering Safety Performance Monitoring and Measurement, Management of Change, and Continuous Improvement. Additional Guidance: • Each RTA's safety assurance activities should be scaled to the size and complexity of its operations. Through these activities, each transit agency should accurately determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing its SMS. • The Public Transportation Agency Safety Plan must include annual safety performance targets based on the safety performance measures established under the National Public Transportation Safety Plan • The PTASP annual safety performance targets for the safety risk reduction program must be based on improvements over a 3-year rolling average of NTD data for the RTA. • Finally, each RTA will need to establish activities and criteria for analyzing data regarding remedial action for shortcomings in meeting safety performance targets involving its Safety Committee, such that safety performance indicators and targets can be revised, as necessary.				
H-2: §673.27(b)(1) The RTA specifies, or references documentation that specifies, its methods or processes to monitor system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance. Additional Guidance:				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
PTASP must addresses the following items related to monitoring compliance with and sufficiency of established procedures for operations and maintenance: • Identification of all safety standards and requirements, both internal to the agency as well as in recognition of any SSOA or FTA safety standards and requirements that must be complied with and assessed for sufficiency; • Activities for reviewing safety standards and requirements to ensure they are current; • Activities the RTA will implement to monitor compliance with documented safety standards and requirements; • Activities to monitor compliance with its safety policies, procedures and protocols related to service delivery; • Methods for collecting and compiling information regarding compliance monitoring activities; • Criteria for documenting and reporting non-compliance; and • Criteria for when non-compliance findings would be evaluated through the Safety Risk Management process				
H-2-i: §673.27(b)(1) and GO164-F Section 3.2(m) Operating and maintenance rules and procedures that affect safety are identified.				
H-2-ii: §673.27(b)(1) and GO164-F Section 3.2(m) Operating and maintenance rules and procedures that affect safety are reviewed for their effectiveness and determinations are made regarding their need to be updated.				
H-2-iii: GO164-F Section 3.2 (m) and §673.27 (b) Description of process for developing, maintaining, and ensuring compliance with operating and maintenance rules and procedures.				
H-2-iv: GO164-F Section 3.2 (m) and §673.27 (b) Techniques used to assess the implementation of operating and maintenance rules and procedures by transit workers, such as performance testing/compliance checks.				
H-2-v: GO164-F Section 3.2(m) and §673.27 (b) Techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules.				
H-3: §673.27(b)(2) The RTA must establish activities to monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. These activities must address the role of the transit agency's Safety Committee. Additional Guidance: Safety Data Acquisition • The process used to collect, maintain, analyze, and distribute safety data is clearly defined. • The management process for ensuring that the safety function within the RTA organization receives the necessary information to support implementation of the system safety program is clarified.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
H-4: §673.27(c)(1) The RTA must establish a process for identifying and assessing changes that may introduce new hazards or impact the RTA's safety performance. Additional Guidance: RTAs must develop processes for identifying and assessing changes that may introduce new hazards or impact safety performance. If an RTA determines that a change might impact safety, then the transit agency would need to evaluate the change using Safety Risk Management activities established under § 673.25. These changes would include changes to operations or maintenance procedures, changes to service, the design and construction of major capital projects (such as New Starts and Small Starts projects and associated certifications), organizational changes, and any other changes to a transit agency's system that may impact safety performance. Each rail transit agency should include a description of the safety certification process that it uses to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for News Starts and other major capital projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment. Revisions will typically include: • Identification of internal and external sources of change; • Documentation of communication and coordination activities to ensure appropriate departments and/or individuals receive notifications of change; • Use of documented field activities to help identify changes in the operational environment that may not have been planned; • Development and use of criteria to identify and determine the extent of changes in the operational environment that would trigger the initiation of management of change activities; • Use of documented criteria to ensure that information regarding management of change activity is distributed to all relevant service delivery functions. Each RTA will need to review, and revise as necessary, language to address the use of documented criteria for determining when changes must be assessed through the Safety Risk Management process, prior to implementation, to ensure that accepted levels of safety performance are not jeopardized or diminished. This includes the development of criteria such that in principle, no operations under changed conditions that may pose a safety impact may continue until a safety risk evaluation is conducted. In addition, each RTA will need to identify and document how monitoring activities will be updated, as necessary, to address changes that do not go through the Safety Risk Management process, thus ensuring the change and related mitigations perform as intended so as not to negatively impact safety performance.				
H-5i: GO 164-F Section 3.2(u) and §673.25 (d)				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Procurement: A description of the measures, controls, and assurances in place to ensure that safety principles are considered. Additional Guidance: • The Designated Representatives may be included in the RTA procurement process, if appropriate, if it's relevant to RTSB's oversight of the RTA, the Designate Rep may be involved.				
H-5ii: GO 164-F Section 3.2(g) and §673.27 (c) System Modifications: The process used by the RTA to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal safety certification, but which may have safety impacts, is described.				
H-6: §673.27(c)(2) The RTA determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through the RTA's Safety Risk Management process.				
H-6i: GO 164-F Section 3.2(q) and §673.27 (c) Authority to make configuration changes is described and assurances are provided for formal notification of all involved departments.				
H-7: §673.27(d)(1) The RTA must establish a process to assess its safety performance annually. Additional Guidance: • The safety performance assessment can be completed in conjunction with the annual review and update to its overall safety plan as required by §673.11(a)(5). • FTA does not prescribe the format or content of the annual assessment and leaves it up to the RTA to design an approach that is appropriate for its size and complexity. • The RTA can assess the performance of an SMS through audits, reviews, assessments, and other verification and follow-up actions. • To document activities to address this requirement in the PTASP, the RTA will need to update its internal safety review process and associated procedures and criteria to ensure consistency with PTASP SMS requirements and the comprehensive review of safety management processes and activities, as well as those safety programs established to deliver on outputs of SMS activities. • The RTA must notify the RTSB Staff 30 days in advance of the internal audit review.				
H-7i: §673.27(d)(1)(i) Identification of deficiencies				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Plan Requirements: This process must include the identification of deficiencies in the RTA's SMS and deficiencies in the RTA's performance against safety performance targets required in § 673.11(a)(3).				
H-7ii: §673.27(d)(1)(ii) Role of Safety Committee in identifying deficiencies Plan Requirements: Address the role of the RTA's Safety Committee and include the identification of deficiencies in the RTA's performance against annual safety performance targets set by the Safety Committee under § 673.19(d)(2) for the safety risk reduction program required in § 673.11(a)(7).				
H-7iii: §673.27(d)(1)(iii) and 673.27(b) Internal safety review requirements Plan Requirements: Address any specific internal safety review requirements established by the SSOA.				
H-7-a: §674.27(a)(5), 673.27(b), and GO 164-F Section 5.4 and Program Standard Notifying the SSOA before conducting any internal safety review, following the process specified in the SSOA's Program Standard.				
H-7-b: §674.27(a)(5), 673.27(b), and GO 164-F Section 5.6 and Program Standard Submitting materials regarding the conduct and results of internal safety reviews to the SSOA under the Accountable Executive's signature.				
H-7-b-i: §673.27(d)(2) Monitoring safety performance against targets Plan Requirements: RTA must monitor safety performance against annual safety performance targets set by the Safety Committee under § 673.19(d)(2) for the safety risk reduction program in § 673.11(a)(7).				
H-7-b-ii: §673.27(d)(3)(i) If not meeting annual targets – Assess safety risks Plan Requirements: If the RTA does not meet an established annual safety performance target set by the Safety Committee under §673.19(d)(2) for the safety risk reduction program in §673.11(a)(7) must: Assess associated safety risk using the methods or processes established under §673.25(c).				
H-7-b-iii: §673.27(d)(3)(ii) If not meeting annual targets – Mitigate safety risk				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Plan Requirements: Mitigate associated safety risk based on the results of a safety risk assessment using the methods or processes established under §673.25(d). The RTA must include these mitigations in the plan described at §673.27(d)(4) and in the PTASP as described in §673.25(d)(5).				
H-7-b-iv: §673.27(d)(3)(iii) If not meeting annual targets – Allocate safety set-aside Plan Requirements: Allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to assist the RTA in meeting the safety performance target in the future.				
H-8: §673.27(d)(4) The RTA must develop and carry out, under the direction of the Accountable Executive, a plan to address any deficiencies identified through the safety performance assessment as described in this section. Plan Requirements: RTA must provide RTSB annually documentation that demonstrates they conducted a safety performance assessment and its findings.				
I. Safety Promotion				
I-1: §673.29(a), 672.13, §GO 164-F Section 3.2(p), GO 172 Section 5.3 and GO 175-A Section 9 The RTA must establish and implement a comprehensive safety training program for all agency transit workers and contractors directly responsible for safety in the agency's public transportation system. The training program must include refresher training, as necessary. Additional Guidance: • FTA's requirements for a comprehensive safety training program address a statutory requirement under 49 U.S.C. 5329(d)(1)(G), which requires each operator of a public transportation system to establish "a comprehensive staff training program for the operations personnel and personnel directly responsible for safety" and includes "completion of a safety training program" and "continuing safety education and training." • Each transit agency should determine for themselves the classes of employees who are directly responsible for safety in that unique system. • These employees could include vehicle operators, maintenance staff, dispatchers, the Chief Safety Officer, the Accountable Executive, and other agency staff and management who have direct responsibility for safety. • The training program should cover all levels of employees and contractors.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
• Through the safety training program, each transit agency must require each employee and contractor, as applicable, to complete training to enable the individual to meet his or her role and responsibilities for safety, and to complete refresher training, as necessary, to stay current with the agency's safety practices and procedures. • To address this requirement, each RTA will need to review PTASP requirements, including its development of SMS processes and activities to identify where it needs new training developed or where current training must be revised and updated. • Each RTA will need to develop a plan for updating job descriptions and training requirements appropriate for each employee, for example, Safety Committee, front line employees, managers and supervisors and senior managers. • For each, the RTA will need to establish a plan to deliver the training as well as identify and deliver on refresher training requirements. • Each RTA will also need to address training requirements, including updates to current training, for contractors. • In addition, each RTA will need to ensure compliance with FTA safety training provisions. As necessary, the RTA will need to integrate SMS responsibilities training into skills-based training for appropriate operational personnel.				
I-i: Drug and Alcohol Program A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with the program requirements is provided.				
I-ii: §673.29 (a) Training and Certification Program A description of the training and certification program for transit workers and contractors is provided, including complying with the Public Transportation Safety Certification Training Program.				
I-iii: GO 164-F Section 3.2(p), GO 172 Section 5.3 and GO 175-A Section 9 Categories of safety-related work requiring training and certification are identified, including Roadway Worker Protection Training, per Commission GO 175 series.				
I-iv: §673.29 (a) Description of the training and certification program for transit workers and contractors in safety-related positions is provided.				
I-v: §673.29 (a) The process used to maintain and access transit worker and contractor training records is described.				
I-vi: §673.29 (a) The process used to assess compliance with training and certification requirements is described.				
I-1-a: §673.29(a) Includes transit workers and contractors.				
I-1-b: §673.29(a)				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Includes refresher training, as necessary. Plan Requirements: For each, the RTA will need to establish a plan to deliver the training as well as identify and deliver on refresher training requirements.				

I-2: §673.29(b)
The RTA specifies, or references documentation that specifies, its methods or processes to communicate safety and safety performance information throughout the agency's organization.
 	
Additional Guidance:
• To address § 673.29(b), each RTA must ensure that all employees are aware of any policies, activities, and procedures that are related to their safety-related roles and responsibilities.
• Safety communications may include information on hazards and safety risks that are relevant to the employee's role and responsibilities
• FTA expects that each transit agency would define the means and mechanisms for effective safety communication based on its organization, structure, and size of operations.
• Therefore, to address this requirement in the PTASP, each RTA will need to document its approach to safety communication.
• Each RTA may consider the following as it documents its safety communication policies and activities:
  • Documentation of how safety and safety performance information will be communicated throughout the organization.
  • Documented criteria to trigger the communication of safety and safety performance information throughout the organization.
  • Documented policies and/or procedures to communicate information related to SMS activities to appropriate personnel throughout the agency.
  • Employees are made aware of safety management priorities and safety concerns at the organizational level and as they relate to their own duties and responsibilities.
  • Communication of safety concerns and hazards to appropriate groups and individuals as it relates to their responsibilities.
  • Communication of actions taken by the RTA to address safety concerns and hazards reported by employees through the employee safety reporting program.
  • Communication of safety concerns, safety risks and safety performance to executive management.
  • Documented policies and/or procedures for communicating safety performance and SMS information to FTA and the SSOA.
  • How to ensure communication, and the means, are effective.				

I-3: §673.29(b)				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
The RTA specifies, or references documentation that specifies, its methods or processes to convey information on hazards and safety risks relevant to transit workers' roles and responsibilities. Plan Requirements: A transit agency must convey information on hazards and safety risks relevant to transit workers' roles and responsibilities.				
I-4: §673.29(b) The RTA must inform transit workers of safety actions taken in response to reports submitted through an employee safety reporting program.				
I-5: §673.17(b) and §673.19 A transit agency must include a description of how frontline transit worker representatives cooperate in the development and update of the PTASP.				
J. Corrective Action Plans				
J-1: §674.37(b) and GO 164-F Section 9 The RTA specifies, or references documentation that specifies, when the RTA must develop and carry out a CAP. Additional Guidance: As specified in Part 674, a CAP is "a plan developed by an RTA that describes the actions the RTA will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either an SSOA, FTA or an RTA may require that RTA to develop and carry out a CAP."				
J-2: §674.37(b) and GO 164-F Section 9.6 The RTA specifies, or references documentation that specifies, how the RTA will submit CAPs to the SSOA for review and approval. Additional Guidance: The CAP process must be documented and implemented by the RTA and overseen by the SSOA.				
J-3: §674.37(b) and GO 164-F Section 9.7 The RTA specifies, or references documentation that specifies, how the RTA will manage immediate or emergency corrective actions.				
J-4: §674.37(b), GO 164-F Section 9.9 and Program Standard The RTA specifies, or references documentation that specifies, the required contents of a CAP, including describing the actions the RTA will take to minimize, control, correct, or eliminate the safety risks and hazards identified by the CAP, the schedule for taking those actions, and the individuals responsible for taking those actions.				
J-5: §674.37(b) and GO 164-F Section 9.2 The RTA must periodically report to the SSOA on its progress in carrying out the CAP every 30 calendar days if implementation takes longer than 60 calendar days.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Additional Guidance: The SSOA may monitor the RTA's progress in carrying out the CAP through unannounced, on-site inspections, or any other means the SSOA deems necessary or appropriate.				
K. Documentation, Definitions and Acronyms				
K-1: §673.31 The RTA specifies, or references documentation that specifies, 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. Plan Requirements: At all times, a transit agency must maintain documents that set forth its Public Transportation Agency Safety Plan, including those related to the implementation of its SMS, and results from SMS processes and activities.				
K-2: §673.31 The RTA specifies, or references documentation that specifies, how the RTA will maintain SMS documentation and ensure that all SMS documentation will be maintained for a period of no less than four years after they are created. Plan Requirements: A transit agency must maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that the agency uses to carry out its Public Transportation Agency Safety Plan. A transit agency must maintain these documents for a minimum of four years after they are created (to be consistent with GO requirements for record retention).				
K-3: §673.31 The RTA specifies, or references documentation that specifies, 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. Plan Requirements: These documents must be made available upon request by the Federal Transit Administration or other Federal entity, or a State Safety Oversight Agency having jurisdiction.				
K-4: The RTA specifies, or references documentation that specifies, applicable **definitions** from §673.5, §674.7 and/or the SSOA Program Standard. Additional Guidance: Acceptable as long as the PTASP does not include definitions or acronyms in conflict with §673.5, §674.7, and/or SSOA Program Standard.				
K-5: The RTA specifies, or references documentation that specifies, applicable **acronyms** from §673.5, §674.7, and/or the SSOA				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Program Standard. Additional Guidance: Acceptable as long as the PTASP does not include definitions or acronyms in conflict with §673.5, §674.7, and/or SSOA Program Standard.				
L: Commission General Orders				
L-1: Personal Electronic Devices - GO 172 series - 673.29 (b) A description of the process used to ensure transit worker knowledge of and compliance with the program requirements governing the use of personal electronic devices (PED) is provided, as governed by Commission General Order 172 series. Plan Requirements: • Look for some statement that the RTA has a GO 172 series compliant program. • Must include a statement or reference to a specific policy (document or procedure). • Content of the RTA PED prohibition policy will be evaluated outside of this PTASP review process.				
L-2: Roadway Worker Protection - GO 175 series - §673.29 (a); A description of the program and policy in the PTASP regarding the assurance of a safe working environment for RTA roadway workers in compliance with the rules and regulations in Commission General Order 175 series. Plan Requirements: • Look for some statement that the RTA has a GO 175 series compliant program. • Must include a statement or reference to a specific policy (document or procedure). • Content of the RTA RWP program will be evaluated outside of this PTASP review process.				
M: Safety Committees				
M-1: § 673.19(a) For an RTA serving an urbanized area with a population of 200,000 or more, the RTA has established a Safety Committee. Plan Requirements: Does the RTA have a Safety Committee? Additional Guidance: Safety Committee must be appropriately scaled to the size, scope, and complexity of the RTA, and convened by a joint labor-management process.				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
M-1-a-i: §673.19(b) The Safety Committee must consist of an equal number of frontline transit worker representatives and management representatives. Plan Requirements: Equal number of frontline transit workers and management representatives. Additional Guidance: • To the extent practicable, the Safety Committee must include frontline transit worker representatives from major transit service functions, such as operations and maintenance, across the transit system. • Safety Committees may have alternate members, but they should strive for consistent participation by the core members. • Non-members should be discouraged unless they are Subject Matter Experts requested by the Committee.				
M-1-a-ii: §673.19(b)(1) The labor organization that represents the plurality of the RTA's frontline transit workers must select frontline transit worker representatives for the Safety Committee.				
M-1-a-iii: §673.19(b)(2) If the RTA's frontline transit workers are not represented by a labor organization, the RTA must adopt a mechanism for frontline transit workers to select frontline transit worker representatives for the Safety Committee.				
M-1-a-iv: §673.19(c) Safety Committee procedures Plan Requirements: PTASP must include procedures regarding the composition, responsibilities, and operations of the Safety Committee which, at a minimum, must address:				
M-1-a-v-1: §673.19(c)(1) Safety Committee structure Plan Requirements: The organizational structure, size, and composition of the Safety Committee and how it will be chaired.				
M-1-a-v-2: §673.19(c)(2) Safety Committee meetings Plan Requirements: How meeting agendas and notices will be developed and shared, and how meeting minutes will be recorded and maintained.				
M-1-a-v-3: §673.19(c)(3) Safety Committee required training				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Plan Requirements: Any required training for Safety Committee members related to PTASP and the processes, activities, and tools used to support the transit agency's SMS.				
M-1-a-i-4: §673.19(c)(4) Safety Committee compensation Plan Requirements: The compensation policy established by the RTA for participation in Safety Committee meetings. Guidance: FTA is not requiring transit agencies to compensate members of the Safety Committee; rather, it is requiring the transit agency to adopt a policy regarding Safety Committee compensation and that the Safety Committee procedures include the policy the transit agency has adopted.				
M-1-a-i-5: §673.19(c)(5) Safety Committee access to technical experts Plan Requirements: How the Safety Committee will access technical experts, including other transit workers, to serve in an advisory capacity as needed; RTA information, resources, and tools; and submissions to the transit worker safety reporting program to support its deliberations.				
M-1-a-i-6: §673.19(c)(6) Safety Committee decisions Plan Requirements: How the Safety Committee will reach and record decisions.				
M-1-a-i-7: §673.19(c)(7) Safety Committee communications with Board of Directors and Accountable Executive Plan Requirements: How the Safety Committee will coordinate and communicate with the RTA's Board of Directors, or equivalent entity, and the Accountable Executive				
M-1-a-i-8: §673.19(c)(8) Safety Committee disputes				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Plan Requirements: How the Safety Committee will manage disputes to ensure it carries out its operations. The Safety Committee may use the dispute resolution or arbitration process from the RTA's Collective Bargaining Agreement, or a different process that the Safety Committee develops and agrees upon, but the Accountable Executive may not be designated to resolve any disputes within the Safety Committee.				
M-1-a-i-9: §673.19(c)(9) Safety Committee carrying out its responsibilities. Plan Requirements: How the Safety Committee will carry out its responsibilities identified in §673.19(d).				
M-1-a-ii: §673.19(d) Safety Committee responsibilities Plan Requirements: The Safety Committee must conduct the following activities to oversee the RTA's safety performance				
M-1-a-ii-1: §673.19(d)(1) Safety Committee Approve PTASP Plan Requirements: Safety Committee review and approve the RTA's PTASP.				
M-1-a-ii-2: §673.19(d)(2) Set Performance Targets Plan Requirements: Safety Committee to set annual safety performance targets for the safety risk reduction program.				
M-1-a-ii-3: §673.19(d)(3) Support RTA's SMS Plan Requirements: Safety Committee to support operation of the RTA's SMS:				
M-1-a-ii-3-i: §673.19(d)(3)(i) Reduce likelihood and severity of potential consequences Plan Requirements: Safety Committee identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
consequences identified through the RTA's safety risk assessment, including safety risk mitigations associated with any instance where the RTA did not meet an annual safety performance target in the safety risk reduction program.				
M-1-a-ii-3-ii: §673.19(d)(3)(ii) Ineffective mitigations Plan Requirements: Safety Committee identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the RTA did not meet an annual safety performance target in the safety risk reduction program.				
M-1-a-ii-3-iii: §673.19(d)(3)(iii) Continuous improvement Plan Requirements: Safety Committee identifying safety deficiencies for purposes of continuous improvement as required at § 673.27(d), including any instance where the RTA did not meet an annual safety performance target in the safety risk reduction program.				
M-1-a-iii: §673.25(d)(6) Accountable Executive rejects Safety Committee Recommendation Plan Requirements: When a Safety Committee recommends a safety risk mitigation unrelated to the safety risk reduction program, and the Accountable Executive decides not to implement the safety risk mitigation, the Accountable Executive must prepare a written statement explaining their decision, pursuant to recordkeeping requirements at §673.31. The Accountable Executive must submit and present this explanation to the transit agency's Safety Committee and Board of Directors or equivalent entity.				
M-1-b-i: Date of Safety Committee PTASP Approval:				
M-1-b-ii: Page, section or Appendix with Safety Committee approval documentation.				
M-2: 673.25(d)(2)(ii) Strategies consistent with guidelines of the Centers for Disease Control and Prevention or a State health authority to minimize exposure to infectious diseases. Plan Requirements: Strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the Centers for Disease Control and Prevention or a State health authority, minimize exposure to infectious diseases.				
M-3-a:				

Attachment 6a: CPUC Checklist for Review of FTA Funded Public Transportation Agency Safety Plan

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Annual Safety performance targets based on improvements over a 3-year rolling average of NTD data for the RTA				
M-3-a-i: §673.11(a)(7) (iii)(B) Includes all modes of public transportation for the RTA.				
M-3-a-ii: §673.11(a)(7) (iii)(C) Plan Requirements: Based on the level of detail the RTA is required to report to the NTD. The Safety Committee is not required to set a target for a performance measure until the large urbanized area provider has been required to report three years of data to the NTD corresponding to such performance measure.				
M-3-a-iii: §673.11(a)(7)(iv) Plan Requirements: Include or incorporate by reference the safety risk mitigations identified and recommended by the Safety Committee.				
N. Risk-Based Inspection (RBI) Requirements				
N-1: FTA Special Directive 22-25 on RBI Program Development and §673.11(a)(6)(iii) Plan Requirements: The PTASP contains language acknowledging that the RTA complies with the CPUC's Risk-Based Inspection policies and procedures. Additional Guidance: If the PTASP contains the RTSB-provided RBI PTASP language, it is acceptable.				

Checklist Section	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		

The Public Transportation Agency Safety Plan is:

☐ **Acceptable**

☐ **Unacceptable. Revise and Resubmit**

Reviewed by: *Signature* _____ **Date:** _____
Name and Title

Approved by: *Signature* _____ **Date:** _____
Name and Title

Attachment 6b: CPUC Checklist for Review of Non-FTA Funded Public Transportation Safety Plan

Attachment 6b: CPUC Checklist for Review of Non-FTA Funded Public Transportation Agency Safety Plan

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
1	Policy Statement • A policy statement is included in the Public Transportation Agency Safety Plan (PTASP).					
	• The policy statement describes the authority that establishes the PTASP.					
	• The policy statement is signed and endorsed by the rail transit agency's Accountable Executive. ○ Accountable Executive is someone who has control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP and the agency's facilities.					
2	Purpose, Goals, and Objectives • The purpose of the PTASP is defined.					
	• Goals are identified to ensure that the PTASP fulfills its purpose.					
	• Objectives are identified to monitor and assess the achievement of goals.					
	• Stated management responsibilities are identified for the safety program to ensure that the goals and objectives are achieved.					
	• Specify performance targets based on the safety performance measures established by the Rail Transit Agency (RTA).					
	• Describe how safety and safety performance information is communicated throughout the RTA.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
3	RTA Management Structure • An overview of the management structure of the RTA is provided including an organization chart. Organizational structure is clearly defined and includes: • History and scope of service, • Physical characteristics, and • Operations and Maintenance.					
	• A description of how the safety function is integrated into the rest of the RTA organization is provided.					
	• Clear identification of the lines of authority used by the RTA to manage safety issues is provided.					
4	Plan Review and Modification • An annual assessment of whether the PTASP should be updated is specified.					
	• The process used to control changes to the PTASP is described.					
	• Specific departments and persons responsible for initiating, developing, approving, and issuing changes to the PTASP are identified.					
	• Required coordination with the RTSB regarding plan modification, including timeframes for submission, revision, and approval, is addressed.					
	• Provides record of the complete history of successive versions of this plan.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
5	Plan Implementation • A description of the specific activities required to implement the PTASP is included.					
	• Tasks to be performed by the RTA Safety function, by position and management accountability, are identified and described.					
	• A description of the methodologies used by the system safety function to achieve their safety responsibilities is provided.					
	• Safety-related tasks to be performed by other rail transit departments, by position and management accountability, are identified and described.					
	• A task matrix (or an equivalent narrative description) showing all identified safety responsibilities, interfaces among all rail transit units responsible for each task, and the key reports or actions required is provided.					
6	Safety Risk Management Process • The process used by the RTA to implement its system-wide *safety risk management* program to identify, record, and resolve hazards during its operation, including any hazards resulting from subsequent system extensions or modifications, operational changes, or other changes within the rail transit environment, including the role of the RTSB in providing on-going monitoring and on-going accessibility for Staff review upon request, is described.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• The *safety risk management* process includes activities for: sources and mechanism to support the on-going identification of hazards, hazard identification and prioritization, hazard investigation, evaluation, and analysis, hazard control and elimination, hazard tracking, and reporting thresholds.					
	• Requirements for on-going reporting to RTSB relating to *safety risk management* activities and status are specified.					
	• The RTA will also submit any CAPs developed to minimize, mitigate, control, correct, or eliminate the identified risks and hazards. The CAPs will include description, immediate mitigation (if needed), origin of hazard, the proposed actions, permanent hazard resolution, or temporary mitigation, if necessary, the responsible individual or department, and the schedule for implementing those actions for the identified hazard, including date the hazard was identified and closed, and hazard resolution verification/follow-up activities, all in accordance with Commission General Order 164-F, Section 9.					
	• Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.					
7	<u>Safety Certification Process</u> • A description of the safety certification process required by the RTA to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for Major Projects and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
8	System Modifications • The process used by the RTA to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal safety certification, but which may have safety impacts, is described.					
9	Safety Data Acquisition • The process used to collect, maintain, analyze, and distribute safety data is clearly defined.					
	• The management process for ensuring that the Safety function within the RTA organization receives the necessary information to support implementation of the PTASP is clarified.					
	• Describe activities to monitor information reported through internal safety reporting programs.					
10	Safety Event and Hazard Notification, Accident Investigation • A description is provided regarding the process used by the RTA to perform event notification, accident investigation and reporting.					
	• Criteria for determining what Safety Events require investigation, and who is responsible to conduct the specific investigations is developed.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• A description of the procedures for performing investigations, including proper documentation, and reporting of findings, conclusions reached, use of hazard resolution process to develop Corrective Action Plan (CAPs) recommendations, and follow-up to verify CAP(s) implementation is provided.					
	• Notification thresholds for internal departments/functions are defined.					
	• Criteria is specified for notifying external agencies (NTSB, CPUC, local government agencies, etc.) of events such as *safety events* and hazards.					
	• Procedures are established for documenting and reporting of accident investigations.					
	• Process used to develop, implement, and track CAPs that address investigation findings is specified.					
	• Coordination with the RTSB is specified.					
11	<u>Emergency Management Program</u> • The RTA's emergency planning responsibilities and requirements are identified.					
	• A description of the process used by the RTA to develop an approved, coordinated schedule for emergency management program activities is provided.					
	• Required meetings with external agencies regarding the emergency management program are specified.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• The process used to evaluate emergency preparedness, such as annual emergency field exercises, is documented.					
	• After action reports and implementation of CAPs addressing findings of the exercise are required.					
	• The process to be used by the RTA for the revision and distribution of emergency response procedures is explained.					
	• The RTA's responsibilities for providing employee training are identified.					
	• The RTA's responsibilities for providing familiarization training to local public safety organizations are identified.					
12	Internal Safety Review Program (ISRP) • A description of the process used by the RTA to ensure that planned and scheduled internal safety reviews are performed to evaluate compliance with the PTASP is included.					
	• Identification of departments and functions subject to review is performed.					
	• Reviewers must be independent from the first line of supervision responsible for the activity being reviewed.					
	• A three-year review schedule must be developed, reviewed, maintained, and updated to ensure that all 23 PTASP elements are reviewed during the review cycle. (GO 164-F, Section 3.2, GO 172, GO 175-A)					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• The process for conducting reviews, including the development of checklists, and procedures for conducting reviews and issuing of findings is described.					
	• The PTASP must describe the requirement of an annual internal review report that summarizes the results of individual reviews performed during the previous year and includes the status of required CAPs. This report must be submitted to the RTSB for review and approval, per GO 164-F, Section 5.6.					
	• The process for resolving problems and disagreements, report distribution, and follow-up on CAPs procedures is described.					
	• The ISRP process and reporting must be coordinated with the RTSB by providing to the CPUC designated representative a written 30-day advance notice scheduling the ISRP checklists.					
13	<u>Rules Compliance</u> • Operating and maintenance rules and procedures that affect safety are identified					
	• Operating and maintenance rules and procedures that affect safety are reviewed for their effectiveness and determinations are made regarding their need to be updated.					
	• Description of process for developing, maintaining, and ensuring compliance with operating and maintenance rules and procedures.					
	• Techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing/compliance checks.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• Techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules.					
	• Process for documenting results and incorporating them into the *safety risk management* program.					
	• Describe activities to monitor the system for compliance with procedures for operations and maintenance.					
14	Facilities and Equipment Inspections • Identification of the facilities and equipment that are subject to regular safety-related inspection and testing is provided.					
	• A description of how safety-related equipment and facilities are included in a regular inspection and testing program is provided.					
	• Use of a written checklist for conducting facility inspections.					
	• Descriptions of how identified hazardous conditions are entered into the Hazard Resolution Process.					
15	Maintenance Review and Inspection Program • A list of systems and facilities subject to a maintenance program, along with established maintenance cycle and required documentation of maintenance performed for each item, is provided.					
	• A description of the process for tracking and resolving problems identified during inspections is provided.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• Use of a written checklist for conducting maintenance reviews is required.					
	• Include or reference documentation used to implement and carry out the PTASP that are not included elsewhere in the PTASP.					
16	<u>Training and Certification Program</u> • A description of the training and certification program for employees and contractors is provided.					
	• Categories of safety-related work requiring training and certification are identified, including Roadway Worker Protection Training, per Commission General Order 175-A.					
	• Description of the training and certification program for employees and contractors in safety-related positions is provided.					
	• Description of the training and certification program for contractors is provided.					
	• The process used to maintain and access employee and contractor training records is described.					
	• The process used to assess compliance with training and certification requirements is described.					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
17	Configuration Management Process • A description of the configuration management control process is provided and appropriate references are made to other RTA documents governing this process.					
	• A process for making changes is described.					
	• Authority to make configuration changes is described and assurances are provided for formal notification of all involved departments					
18	Compliance with Local, State and Federal Requirements: Employee Safety Program • A description of the safety program for employees and contractors that incorporates all applicable local, state, and federal requirements is provided.					
	• Safety requirements that employees and contractors must follow when working on, or in close proximity to, RTA controlled property are identified.					
	• Processes for ensuring the employees and contractors know and follow the requirements are described.					
	• Employee Safety Reporting Program: Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and, therefore, are excluded from protection).					

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
	• Information communicating on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency.					
	• A description of how employees are informed of safety actions taken in response to reports submitted through the Employee Safety Reporting Program.					
19	Hazardous Materials Program • A description of the hazardous materials program, including the process used to ensure knowledge of and compliance with program requirements is provided.					
20	Drug and Alcohol Program • A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with the program requirements is provided.					
21	Procurement • A description of the measures, controls, and assurances in place to ensure that safety principles, requirements, and the Designated Representatives are included in the RTA procurement process.					
22	Personal Electronic Devices • A description of the process used to ensure knowledge of and compliance with the program requirements governing the use of Personal Electronic Devices (PED) is provided, as governed by Commission General Order 172, including prohibited use of a PED by people operating or controlling rail transit and other on-track vehicles (see GO 172, Section 3).					

Attachment 6b: CPUC Checklist for Review of Non-FTA Funded Public Transportation Agency Safety Plan

No.	PTASP Requirements Does the PTASP contain or provide for the following:	Included			Page Ref.	Comments
		Y	N	N/A		
23	Roadway Worker Protection • A description of the program and policy in the PTASP regarding the assurance of a safe working environment for RTA roadway workers in compliance with the rules and regulations in Commission General Order 175-A which contains specific rules for protecting these workers from the danger of being struck by trains or other on-track equipment, with inclusion of a near-miss program, and a Roadway Worker Protection training.					

The Public Transportation Agency Safety Plan is:

☐ **Acceptable**

☐ **Unacceptable. Revise and Resubmit**

Reviewed by:_____ **Date:** _____

Approved by:_____ **Date:** _____

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:		INCLUDED Y	INCLUDED N	PAGE REF.	COMMENTS
1	Policy Statement	a.	A policy statement should be developed for the System Security and Emergency Preparedness Plan.				
		b.	The policy statement should describe the authority that establishes the SSP, including statutory requirements. Recognition of the CPUC Staff's authority and responsibility for overseeing implementation of the security and emergency preparedness program.				
		c.	The policy statement is signed and endorsed by the RTA's accountable executive.				
2	Purpose	a.	The SSP should identify the purpose of the security program endorsed by the RTA's accountable executive.				
		b.	The SSP should introduce the concept of "system security."				
		c.	The SSP introduces the concept of "emergency preparedness."				
3	Goals and Objectives	a.	The SSP should identify the goals of the SSP program endorsed by the RTA's accountable executive.				
		b.	The SSP should identify the objectives of the SSP program endorsed by the RTA's accountable executive.				
4	Scope		Describe the scope of the SSP.				
5	Security and Law Enforcement		Describe the security and law enforcement agency functions that manage and support implementation of the SSP.				

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:	INCLUDED Y	INCLUDED N	PAGE REF.	COMMENTS
6	Management Authority and Legal Aspects	Describe the authority, which oversees the operation and management of the RTA, including its security/police function.				
7	Government Involvement	Describe how the SSP interfaces with local, state and federal authorities to ensure security and emergency preparedness for the system.				
8	Security Acronyms and Definitions	Provide a listing of acronyms and definitions used in the SSP.				
9	Background and History	A description of the RTA including general overview, a brief history and scope of rail transit services provided.				
10	Organizational Structure	Organizational charts showing the lines of authority and responsibility as they relate to security and emergency preparedness.				
11	Human Resources	Provide a categorization and breakdown of all employees and contractors who work for/on the rail transit agency.				
12	Passengers	Provide a description of the RTA's ridership.				
13	Services and Operations	Describe the RTA's operations and services.				
14	Operating Environment	Describe the RTA's operating environment.				
15	Integration with Other Plans	Describe how the SSP integrates with other plans and programs maintained by the RTA.				

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:	INCLUDED Y	INCLUDED N	PAGE REF.	COMMENTS
16	Integration with Safety Certification Process	Description of how security related issues such as the threat and vulnerability assessment process is integrated with the safety certification process.				
17	Current Security Conditions	Description of the current security conditions at the RTA and the types of security incidents experienced by the transit system and their frequency of occurrence.				
18	Capabilities and Practices	Summary description of methods and procedures, devices, and systems utilized to prevent or minimize security breaches, including passenger education, campaigns, and delay, detection, and assessment devices.				
19	Security Breaches	Process for notifying (internally), investigating, and reporting security breaches.				
20	Responsibility for Mission Statement	Identification of the person(s) responsible for establishing transit system security and emergency preparedness policy and for developing and approving the SSP.				
21	Management of the SSP Program	Identification of the person(s) with overall responsibility for transit security and emergency preparedness, including day-to-day operations, SSP-related internal communications, liaison with external organizations, and identifying and resolving SSP-related concerns.				
22	Division of Security	a. Listing of SSP related responsibilities of the personnel who work within the RTA security/police function.				

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:		INCLUDED Y	INCLUDED N	PAGE REF.	COMMENTS
	Responsibility	b.	Listing of SSP related responsibilities of other departments/functions, including their relationship to the security/police function.				
		c.	Listing of security-related responsibilities for other (non-security/police) RTA employees, including their relationship to the employee's other duties.				
		d.	A SSP Program Roles and Responsibilities Matrix should be developed showing interfaces with other transit system departments/functions and the key reports or actions required.				
		e.	The responsibilities of external agencies for supporting SSP development and implementation should be identified.				
		f.	The committees developed by the RTA to address security issues should be identified.				
23	Planning		Identification of SSP activities and programs in place at the RTA to support planning for system security and emergency preparedness.				
24	Organization		Identification of the organization of SSP related activities and programs and the ability to coordinate with external response agencies.				
25	Equipment		Description of the equipment used to support implementation of the SSP program.				

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:	INCLUDED Y	INCLUDED N	PAGE REF.	COMMENTS
26	Training and Procedures	Description of SSP related training and procedures available to ensure employee proficiency.				
27	Exercises and Evaluation	Description of SSP related activities to ensure the conduct of emergency exercises and evaluation.				
28	Threat and Vulnerability Identification	Description of the RTA's activities to identify security and terrorism related threats and vulnerabilities.				
29	Threat and Vulnerability Assessment	Description of the RTA's activities to assess the likely impacts of identified threats and vulnerabilities on the system and to identify particular vulnerabilities which require resolution.				
30	Threat and Vulnerability Resolution	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.				
31	Cybersecurity Plan	The plan is implemented.				
		The plan is certified by *RTA*'s head of information technology, transit security, and/or *Accountable Executive*.				
		There is a process for revising and updating the Plan and any related procedures.				
		There is a process to track all *CAPs* for the plan.				
		Description of cybersecurity related training and procedures available to ensure employee proficiency.				

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:	INCLUDED Y	INCLUDED N	PAGE REF.	COMMENTS
32	Required Tasks for Goals and Objectives	Identification of tasks to be performed to implement the goals and supporting objectives required to implement the SSP.				
33	Task Schedule	General schedule with specific milestones for implementation of the security program, threat and vulnerability analyses, RTA staff security training, and regular program reviews during the implementation process.				
34	Evaluation	Description of the types of internal management reviews to be conducted, the frequencies of the reviews, and the person(s) responsible.				
35	Initiation of SSP Revisions	Description of process used to initiate revisions to the security plan, gather input for the revisions, procedures for updating the security plan, and identification of responsible person(s).				
36	Review Process	Description of the process used to review and revise the security plan as necessary, including frequency of reviews, and responsible person(s).				
37	Implement Modifications	Description of process used to communicate and disseminate new and revised procedures and other elements of the security plan to appropriate RTA staff.				

Attachment 7: CPUC Checklist for Reviewing the System Security Plan

CPUC Checklist for Reviewing the System Security Plan

Rail Transit Agency: _____ Rev. No.: _____

Plan Title: _____ Plan Date: _____

No.	CHECKLIST ITEM	PLAN REQUIREMENTS Does the plan contain or provide for the following:	INCLUDED		PAGE REF.	COMMENTS
			Y	N		

The System Security Plan is

☐ Acceptable

☐ Unacceptable. Revise and resubmit.

Reviewed by _____ Date: _____
Signature
Name and Title

Approved by _____ Date: _____
Signature
Name and Title

Attachment 8: CPUC System Safety and Security Review Checklist for RTA

(SAMPLE)

CPUC SYSTEM SAFETY AND SECURITY REVIEW CHECKLIST FOR ** RTA**

Checklist No.		Element	
Date of Audit		**Department(s)**	
Auditors/ Inspectors		Persons Contacted	

REFERENCE CRITERIA

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

FINDINGS AND RECOMMENDATIONS

Activities:

Findings:

Comments:

Recommendations:

Attachment 9: CPUC Checklist for Reviewing and Approving a Rail Transit Agency's Annual Internal Safety and Security Review Report

CPUC CHECKLIST FOR REVIEWING AND APPROVING A RAIL TRANSIT AGENCY'S ANNUAL INTERNAL SAFETY AND SECURITY REVIEW REPORTS

Rail Transit Agency	**Title of Report**	**Dated**

No.	DOES THE REPORT:	S	U	REMARKS
1	The report is accompanied by a formal letter of certification signed by the RTA's accountable executive, or designee, indicating that the RTA is in compliance with its PTASP and SSP.			
2	Indicate that the required elements scheduled to be reviewed during the past year were reviewed?			
3	Show that the RTA is on schedule to review the full scope of required 23 safety elements and 6 security elements (see next page for lists) within a 3-year period?			
4	Show that the persons who conducted the review were independent from the department being reviewed?			
5	State the results of the reviews in terms of evaluating the adequacy and effectiveness of the system safety and security program plan?			
6	Include completed review checklists that show the activity reviewed, the method of verification, review findings, and recommendations for appropriate corrective action?			
7	Include corrective action plans and schedules that are responsive to the review findings?			
8	Identify the person / department responsible for performing the required corrective action?			
9	Describe the follow-up controls that will be used to track implementation of all findings, recommendations, and corrective actions developed as a result of the internal safety and security review process?			

Column Definitions:

S: Satisfactory

U: Unacceptable. Procedure must be corrected and resubmitted.

The Rail Transit Agency's Annual Internal Safety and Security Review Report is:

☐ Acceptable

☐ Unacceptable, Revise and Resubmit

Reviewed by: *Signature* _____ Date: _____

Name and Title

Approved by: *Signature* _____ Date: _____

Name and Title

Attachment 9: CPUC Checklist for Reviewing and Approving a Rail Transit Agency's Annual Internal Safety and Security Review Report

Internal Safety and Security Audit Elements

Safety Elements

GO 164-F Section 3:

1. A policy statement signed by the RTA's accountable executive that endorses the safety program and describes the authority that establishes the PTASP (GO 164-F, Section 3.2a)
2. A clear definition of the goals and objectives for the safety program and stated management responsibilities to ensure they are achieved (GO 164-F, Section 3.2b)
3. An overview of the RTA's management structure (GO 164-F, Section 3.2c)
4. The process used to control changes to the PTASP (GO 164-F, Section 3.2d)
5. A description of the specific activities required to implement the system safety program (GO 164-F, Section 3.2e)
6. A description of the process used by the RTA to implement its hazard management (safety risk management) program (GO 164-F, Section 3.2f)
7. A description of the process used by the RTA to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment that do not require formal safety certification (GO 164-F, Section 3.2g)
8. A description of the safety certification process used to ensure that safety concerns and hazards are adequately addressed prior to initiation of Projects and subsequent Projects to extend, rehabilitate, or modify an existing system, or to replace vehicle and equipment (GO 164-F, Section 3.2h)
9. A description of the process used to collect, maintain, analyze, and distribute safety data within the RTA, to ensure the safety function receives the necessary information to support implementation of the system safety program. (GO 164-F, Section 3.2i)
10. A description of the process used to perform accident notification, investigation, and reporting, (GO 164-F, Section 3.2j)
11. A description of the process used to develop an approved, coordinated schedule for all emergency management program activities (GO 164-F, Section 3.2k)
12. A description of the process used to ensure that planned and scheduled internal safety reviews are performed to evaluate compliance with the PTASP (GO 164-F, Section 3.2l)
13. A description of the process used to develop, maintain, and ensure compliance with rules and procedures having a safety impact (GO 164-F, Section 3.2m)
14. A description of the process used for facilities and equipment safety inspections (GO 164-F, Section 3.2n)
15. A description of the maintenance audits and inspections program, including identification of the affected facilities and equipment, maintenance cycles, documentation required, and the process for integrating identified problems into the hazard management (safety risk management) process (GO 164-F, Section 3.2o)
16. description of the training and certification program for employees and contractors (GO 164-F, Section 3.2p)
17. A description of the configuration management control process, (GO 164-F, Section 3.2q)
18. A description of the safety program for employees and contractors that incorporates the applicable local, state and federal requirements (GO 164-F, Section 3.2r)
19. A description of the hazardous materials program, including the process used to ensure knowledge of and compliance with program requirements (GO 164-F, Section 3.2s)
20. A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements (GO 164-F, Section 3.2t)
21. A description of the measures, controls, and assurances in place to ensure that safety principles, requirements and representatives are included in the procurement process (GO 164-F, Section 3.2u)

22. **GO 172** - A description of the process used to ensure knowledge of and compliance with the program requirements governing the use of personal electronic devices (PED) is provided, as governed by Commission General Order 172, including prohibited use of a PED; in-cab cameras and other technology; requirements to implement and include in their PTASP, a Zero-Tolerance Policy And

Attachment 9: CPUC Checklist for Reviewing and Approving a Rail Transit Agency's Annual Internal Safety and Security Review Report

Program, regarding prohibited PED usage; requirements for monitoring and enforcement; and requirements for emergency contact procedures (Program Standard Section 5.3.3)

23. **GO 175-A** - A description of the program and policy in the PTASP regarding the assurance of a safe working environment for RTA roadway workers in compliance with the rules and regulations in Commission General Order 175 which contains specific rules for protecting these workers from the danger of being struck by trains or other on-track equipment, with inclusion of a near-miss program, and a Roadway Worker Protection training. (Program Standard Section 5.3.3)

<u>Security Elements</u>

GO 164 series Section 4:

1. Identify the policies, goals, and objectives for the security program endorsed by the RTA's accountable executive (GO 164-F, Section 4.3a)
2. The process for managing threats and vulnerabilities during operations, and for Projects, extensions, new vehicles and equipment, including integration with the safety certification process (GO 164-F, Section 4.3b)
3. The controls in place that address the personal security of passengers and employees (GO 164-F, Section 4.3c)
4. The process for conducting internal security reviews to evaluate compliance and measure the effectiveness of the Security Plan (GO 164-F, Section 4.3d)
5. The process for making the Security Plan and accompanying procedures available to the CPUC for review and approval (GO 164-F, Section 4.3e)
6. The process for notifying, investigating, and reporting security breaches (GO 164-F, Section 4.3f)

Attachment 10:

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Attachment 11:

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Attachment 12: CPUC Checklist for Reviewing and Approving Rail Transit Agency's Accident Investigation Procedures

CPUC CHECKLIST FOR REVIEWING AND APPROVING

RAIL TRANSIT AGENCY'S ACCIDENT INVESTIGATION PROCEDURES

Rail Transit Agency	Title of Procedure	Rev. No.	Dated

No.	DOES THE PROCEDURE:	Y	N	REMARKS
1	Include signature approval by the person with management authority over all departments involved in accident investigations?			
2	Have an "effective" or "issued for use" date and revision number?			
3	Establish threshold values for conducting investigations that are consistent with the requirements of CPUC GO 164-F, Section 7.2?			
4	Recognize that accident investigations are conducted by the RTA on behalf of the Commission?			
5	Contain provisions to facilitate RTSB Staff participation to the fullest extent possible in all aspects of the investigation?			
6	Designate a single person or department with overall management responsibility for conducting investigations and preparing investigation reports?			
7	Identify the division of responsibility between different departments engaged in accident investigations?			
8	Describe the role of the safety department in conducting or overseeing accident investigations?			
9	Name the rail transit agency's principal investigators and require that they be notified of accidents within a given time period?			
10	Describe the process for requiring the training and qualifications of the accident investigation team, including subject matter experts and personnel qualified to access the relevant RTA facilities?			
11	Do personnel and contractors that oversee investigation on behalf of the RTA have training to perform their function in accordance with the Public Transportation Safety Certification Program?			

Attachment 12: CPUC Checklist for Reviewing and Approving Rail Transit Agency's Accident Investigation Procedures

CPUC CHECKLIST FOR REVIEWING AND APPROVING

RAIL TRANSIT AGENCY'S ACCIDENT INVESTIGATION PROCEDURES

Rail Transit Agency	Title of Procedure	Rev. No.	Dated

No.	DOES THE PROCEDURE:	Y	N	REMARKS
12	Address aspects or considerations that may be included in an accident investigation, as appropriate, including: a. Prompt preservation of evidence? b. Documenting the accident scene (position and status of vehicles, cab controls, brakes, signals, cutout switches, annunciators, rail, weather conditions, and other pertinent elements)? c. Interviews of witnesses and others with technical or operational expertise relevant to the investigation? d. Review of relevant rules and procedures, maintenance records, training records and certifications, data/event recorder logs, and other pertinent files and records? e. Review of reports by external agencies (for example: law enforcement, fire department, coroner, etc.)? f. Conducting follow-up inspections, tests, and reenactments? g. Evaluating possible contributing factors such as fatigue, work schedule and hours of service, and drug and alcohol effects? h. Identifying underlying risks associated with the accident type or location? i. Formation of an accident investigation team or review board? j. Acquisition of outside experts or specialists? k. Security considerations?			

Attachment 12: CPUC Checklist for Reviewing and Approving Rail Transit Agency's Accident Investigation Procedures

CPUC CHECKLIST FOR REVIEWING AND APPROVING

RAIL TRANSIT AGENCY'S ACCIDENT INVESTIGATION PROCEDURES

Rail Transit Agency	Title of Procedure	Rev. No.	Dated

No.	DOES THE PROCEDURE:	Y	N	REMARKS
13	Require the preparation of an accident investigation report that includes the following: a. A description of the accident, with applicable photographs and sketches. b. Number and severity of injuries/fatalities, if any. c. Damage assessment, if any. d. Relevant steps taken to investigate the accident. e. Results/findings of the investigation. f. Identification of the most probable cause. g. Identification of contributing factors. h. Recommendations, if appropriate, to prevent reoccurrence. i. If the *RTA* failed to provide initial notice within two hours, a cause or explanation.			
14	Require preparation of a corrective action plan and schedule to implement investigation report recommendations, if any?			
15	Require approval of the accident investigation report by appropriate authority, and require identification of the RTA department responsible for each corrective action plan and implementation schedule?			
16	Require submittal of: a. Final accident investigation report, corrective action plan and implementation schedule to RTSB Staff within 60 days of the occurrence of the safety event? The corrective action plan may			

Attachment 12: CPUC Checklist for Reviewing and Approving Rail Transit Agency's Accident Investigation Procedures

CPUC CHECKLIST FOR REVIEWING AND APPROVING

RAIL TRANSIT AGENCY'S ACCIDENT INVESTIGATION PROCEDURES

Rail Transit Agency	Title of Procedure	Rev. No.	Dated

No.	DOES THE PROCEDURE:	Y	N	REMARKS
	be part of the accident investigation report or submitted separately. b. Interim status reports every 30 calendar days if the investigation takes longer than 60 calendar days to complete? c. Include process for revisions based on Commission comments/requests?			

The Rail Transit Agency Accident Investigation Procedure is:

☐ Acceptable

☐ Unacceptable, Revise and Resubmit

Reviewed by: *Signature* _____ Date: _____

Name and Title

Approved by: *Signature* _____ Date: _____

Senior Utilities Engineer (Supervisor)

Attachment 13: Accident Scene Guidelines

Based on the scope and extent of the accident, *Staff* may go to the accident scene as soon as possible in order to preserve perishable evidence (physical and non-physical evidence that may not exist or be available at a later time.) Upon arrival at the scene, contact the *RTA* supervisor/safety personnel on scene. Investigation, documentation, and preservation of perishable evidence will include:

1. A master field sketch or chart with positions of witnesses and the direction they were facing; position of victim if applicable; proximity of nearby structures and any nearby hazards.

2. If the accident occurred at a crossing, the Rail Crossing and Engineering Branch should be informed.

3. Weather conditions.

4. Take photographs including any wheel marks, other markings caused by the accident, position of vehicle, position of debris, fluids, road signs, and signals.

5. Photograph interior of operator cab and operator viewpoint out front and side windows. Note and photograph operator's personal belongings including any personal electronic devices.

6. Take photographs showing overall relationship between multiple objects such as crosswalk in relation to vehicle.

7. Take photographs of sight lines.

8. Do not take pictures of any critically injured person or a fatality.

9. Note and photograph lighting and visibility conditions. Note time of day, glare on windshield, night street lighting.

10. Photograph mechanical system damage.

11. If mechanical failure is a possible factor, arrange with RTA to hold vehicle in evidence until CPUC mechanical inspector can inspect the vehicle.

12. Document the accident scene activities undertaken at the site, including arrival time, CPUC *Staff* and *RTA* personnel contacted and involved, notes regarding findings, decisions reached regarding evidence or reestablishing rail service with *RTA* personnel, and other pertinent information.

If there is suspected cell phone usage in the case subpoena cell phone records. The cell phone number and provider (Verizon, AT&T, etc.) will be needed and can be sent to Legal for processing. Cell phone records may also be required for *accident investigation* reports generated by *Staff*.

Attachment 14: Safety Event Investigation Best Practices

1. Arrange Operator Interview to take place as soon as possible, optimally within 48 hours.

2. Inform Accident Investigation team members of date and time of interview.

3. Conduct the interview at the earliest possible time. Testimony is perishable.

4. Prepare and review questions. Know what information you are trying to obtain. For example the NTSB investigators often start the interview by asking "what happened." Let the interviewee do most of the talking. To subpoena cell phone records ask for cell phone number and provider (Verizon, AT&T, etc..,). Send this information to legal in order to subpoena the records.

5. No more than two (2) RTSB representatives should be present at the interviews.

6. Conduct the interview in a mutually agreeable area.

7. Try to sit next to interviewee without barriers such as desks and tables between you.

8. Be non-adversarial and define your role as a fact-finder. Do not interrogate or browbeat a witness.

9. Do not argue with the witness regarding moral responsibility of the rail transit agency, the operator, or the crew.

10. It is best not to allow the RTA representative to be present. A union representative is acceptable at an interview.

11. Avoid "yes" and "no" type questions.

12. Take notes even if taping the interview.

13. Tape the interview only with the consent of the witness.

14. If taping the interview, at the beginning of the tape, state the names of all present at the interview, the date, the time, and the reason for the interview. Also, at the beginning of the tape, obtain verbal permission from the interviewee to tape the interview.

15. Obtain the names, phone numbers, and email addresses of all present. A sign-in sheet works well for this.

16. If necessary, use explanatory sketches to help the witness explain facts.

17. After the witness finishes telling their story, ask questions regarding areas that may need

further explanation.

18. Use open ended questions: “What else could you add about that?”

Attempt to have the witnesses confine their statements to their actual observations, not hearsay or areas of which they have no personal knowledge.

Attachment 15:

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Attachment 16:

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Attachment 17:

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Attachment 18: Minor Event Report

Minor Event Report
(3-14-2025)

CALIFORNIA PUBLIC UTILITIES COMMISSION
MINOR EVENT REPORT
(Not to be used for Fatalities or Injuries[1])

REPORTED TO FTA (Yes ☐ / No ☐) **REPORTED TO NTD (Yes ☐ / No ☐)(NTD #_____)**

RAIL TRANSIT AGENCY:					
LOCATION:				TRAIN/CARS #:	TRAIN DIRECTION OF TRAVEL:
LIGHTING (DAY/NIGHT/DUSK/DAWN):	WEATHER:	DATE:	TIME:	DESIGN SPEED:	ESTIMATED SPEED AT TIME OF EVENTS:
CPUC HIGHWAY-RAIL GRADE CROSSING NUMBER (IF APPLICABLE):	CPUC INTERNAL INCT RECORD NUMBER:			RTA INTERNAL REFERENCE NUMBER:	

COLLISION WITH A MOTOR VEHICLE	YES ☐	NO ☐	N/A ☐
COLLISION WITH AN OBJECT	YES ☐	NO ☐	N/A ☐
COLLISION WITH A PERSON	YES ☐	NO ☐	N/A ☐
YARD DERAILMENT	YES ☐	NO ☐	N/A ☐
OPERATOR'S REPORT AVAILABLE	YES ☐	NO ☐	N/A ☐
SUPERVISOR'S REPORT AVAILABLE	YES ☐	NO ☐	N/A ☐
GRADE CROSSING COLLISION	YES ☐	NO ☐	N/A ☐
GATED CROSSING	YES ☐	NO ☐	N/A ☐
TRAFFIC SIGNAL CONTROLLED CROSSING	YES ☐	NO ☐	N/A ☐
UNCONTROLLED CROSSING	YES ☐	NO ☐	N/A ☐
PEDESTRIAN CROSSING	YES ☐	NO ☐	N/A ☐
OPERATOR TESTED FOR D&A	YES ☐	NO ☐	N/A ☐
RTV DISABLING DAMAGE	YES ☐	NO ☐	N/A ☐
VIDEO/AUDIO AVAILABLE FOR REVIEW	YES ☐	NO ☐	N/A ☐
RULE(S) VIOLATION	YES ☐	NO ☐	N/A ☐
PRIVATELY OWNED VEHCILE (POV) TOW AWAY	YES ☐	NO ☐	N/A ☐

[1] Injury means any harm to persons as a result of a safety event that requires immediate medical attention away from the scene. Does not include harm resulting from a drug overdose, exposure to the elements, illness, natural causes, or occupational safety events occurring in administrative buildings

Attachment 18: Minor Event Report

DESCRIPTION OF INVESTIGATION FINDINGS:

PROBABLE CAUSE:

CONTRIBUTING FACTORS:

RECOMMENDATIONS:

PHOTOGRAPHS AND MAPS/SKETCHES:

CORRECTIVE ACTION PLAN: **(YES ☐ NO ☐)** **RTA's CAP #:**	IDENTIFIED ACTION(S):	PROPOSED IMPLEMENTATION DATE:	DEPARTMENT AND INDIVIDUAL RESPONSIBLE:

PERSON COMPLETING REPORT (NAME AND TITLE):	DATE SUBMITTED:	EMAIL:

Attachment 19: CPUC Checklist for Review of a Safety Certification Plan

CPUC CHECKLIST FOR REVIEW OF A SAFETY CERTIFICATION PLAN

Transit Agency: _____ **Submittal Date:** _____

Plan Title: _____ **Version No. / Effective Plan Date:** _____

No.	SC Plan Requirements Does the PLAN contain or provide for the following:	Included		Page Ref.	Comments
		Y	N		
1	<u>SC Plan Submittal</u> • A Project specific SC Plan is submitted to Staff for review and Commission approval during the preliminary engineering phase.				
	• Any significant revisions to the SC Plan have been made since initial submission.				
	• A revised SC Plan has been submitted.				
2	<u>Project Scope</u> • Project Description • Project Alignment Map, if applicable • Project Budget				
3	<u>Safety Certification Management and Responsibilities</u> Does the SC Plan identify the safety certification management and responsibilities including:				
	- Organizational authority and responsibilities				
	- Project organization chart				
	- Reporting requirements				
	- Safety certification activities				
	- Security certification activities				
	- Processes				
	- Procedures				
	- Documentation requirements and responsibilities				
	- Onboarding and periodic refresher training for project personnel every two years				

Attachment 19: CPUC Checklist for Review of a Safety Certification Plan

CPUC CHECKLIST FOR REVIEW OF A SAFETY CERTIFICATION PLAN

Transit Agency: _____ **Submittal Date:** _____

Plan Title: _____ **Version No. / Effective Plan Date:** _____

No.	SC Plan Requirements Does the PLAN contain or provide for the following:	Included		Page Ref.	Comments
		Y	N		
4	Communication Control with RTSB Staff • Controls and procedures used to maintain effective communications and liaison with Staff throughout the life of the project				
	• Procedures to obtain and adequately address Staff's written comments on safety and security design reviews conducted throughout the Project development cycle				
5	Process for Verification and Documentation • The process used to verify conformance with safety and security requirements during design, construction, testing and operational readiness				
	• The process used to document conformance with safety and security requirements during design, construction, testing and operational readiness				
	• A *safety risk management* process to conduct safety hazard analyses and safety hazard resolution, which includes: o List of hazard analyses to be performed. o Hazard Descriptions. o Hazard Category. o RTA Responsible Individual Assigned (information should be completed when available). o Hazard Tracking. o Date Closed (information should be completed when available). o Language indicating the RTA will submit the hazard analyses to Staff upon request.				
	• A list of all safety and security design criteria that will be used in the planning, design, and construction of Projects				
	• A list of certifiable elements and sub-elements				
	• The process for conducting safety certification audits to verify compliance and judge the effectiveness of the SC Plan				

Attachment 19: CPUC Checklist for Review of a Safety Certification Plan

CPUC CHECKLIST FOR REVIEW OF A SAFETY CERTIFICATION PLAN

Transit Agency: _____ **Submittal Date:** _____

Plan Title: _____ **Version No. / Effective Plan Date:** _____

No.	SC Plan Requirements Does the PLAN contain or provide for the following:	Included Y	Included N	Page Ref.	Comments
	- The written checklists used for the safety certification audits				
	• A format of Conformance checklists				
	- A list of the Conformance checklist actually used				
	- The actual checklists will be submitted upon Staff's request or upon completion				
	• Safety Certification milestones				
	• A procedure for updating the SC Plan A process outlining how the RTA will submit a revised SC Plan when there are significant changes (such as project scope change, project delivery timing, project gets split into different phases, etc.) to the SC Plan.				
6	Safety Certification Verification Report (SCVR) must: • Be an electronic document in standard searchable format acceptable, easily navigable, and usable by the CPUC staff.				Designated Reps must attach subsequent submittals and CPUC approval thereof to the DCSB record for the SCVR. Designated Reps must attach the non-safety critical items updates to the DCSB record for the SCVR.
	• Include links that allow CPUC Staff to easily access and review documents and testing, supporting the conformance checklist in the SCVR.				
	• Identify any remaining safety-critical open items which must be completed, and submitted with supporting documents for CPUC staff review and approval, at least 7 days before the revenue service date; and				
	• Include a non-safety critical open items list, with target closure dates and provide updates at least every thirty days after revenue service date until all non-safety critical items are closed.				

The Safety Certification Plan is:

☐ **Acceptable**

☐ **Unacceptable. Revise and Resubmit**

Reviewed by: *Signature* _____ **Date:** _____

Name and Title

Attachment 19: CPUC Checklist for Review of a Safety Certification Plan

CPUC CHECKLIST FOR REVIEW OF A SAFETY CERTIFICATION PLAN

Transit Agency: _____ **Submittal Date:** _____

Plan Title: _____ **Version No. / Effective Plan Date:** _____

No.	SC Plan Requirements Does the PLAN contain or provide for the following:	Included		Page Ref.	Comments
		Y	N		

Approved by: *Signature* _____ **Date:** _____

Name and Title

Attachment 20:

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Attachment 21:

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Attachment 22: Appendix A of Resolution ST-163, Specified Violations and Scheduled Penalties (See Section 12 of this Document)

Specified Violation	Scheduled Penalty
Failure to comply with G.O. 26-D - Regulations governing clearances with reference to side and overhead structures, parallel tracks, crossings of public roads, highways and streets, where, for example, the rail fixed guideway system shares clearances with a temporally or physically separate railroad operation.	$2,000 per incident.
Failure to comply with G.O. 33-B - Requirements for the approval, construction and operation of rail fixed guideway systems' interlocking plants, where, for example, the rail fixed guideway system shares an interlocking with a railroad operation.	$4,000 per incident.
Failure to comply with G.O. 72-B - Uniform standards for grade crossing construction and maintenance.	$4,000 per incident.
Failure to comply with G.O. 75-D - Standards for warning devices for railroad and rail fixed guideway system at-grade highway-rail crossings.	$4,000 per incident.
Failure to comply with G.O. 95 - Standards for the construction of rail fixed guideway systems' electric feeder conductors, span wires, electric poles and towers, etc., communication lines, vertical clearances for wires, and signal systems.	$5,000 per incident.
Failure to comply with G.O. 118 (except as to vegetation control requirements) - Walkways shall provide a reasonable regular surface with gradual slope not to exceed approximately one inch to eight inches (1/8 or 12.5%), where, for example, the rail fixed guideway system shares walkways with a temporally or physically separation railroad operation.	$3,000 per incident.

Attachment 22: Appendix A Of Resolution ST-163, Specified Violations and Scheduled Penalties (See Section 12 of this Document)

Failure to comply with G.O. 127 - Regulations for the construction, reconstruction, maintenance and operation of automatic train control systems employed by rail fixed guideway systems.	$7,500 per incident.
Failure to comply with G.O. 128 - Rules for the construction of rail fixed guideway systems' underground electric supply and communication systems.	$5,000 per incident.
Failure to comply with G.O. 143-B - Regulations governing the design, construction, operation, and maintenance of rail fixed guideway systems.	$5,000 per incident plus $250/day.
Failure to comply with G.O. 164-D - Rules for the safety oversight of rail fixed guideway systems as required under Title 49 of the Code of Federal Regulations, Part 659.	$5,000 per incident plus $250/day.
Failure to comply with G.O. 172 - Rules and regulations governing the use of personal electronic devices by employees of Rail Transit Agencies and Rail Fixed Guideway Systems.	$7,500 per incident.
Failure to comply with G.O. 175 - Rules and regulations for roadway worker protections on California Rail Transit Agencies.	$5,000 per incident plus $250/day.
Failure to comply with Public Utilities Code § 309.7 - Interference with or obstruction of a Safety and Enforcement Division ("SED") investigation of the rights-of-way, facilities, equipment, and operations of Rail Transit Agencies and/or interference with or obstruction of SED's enforcement of state and federal laws, regulations, orders, and directives concerning RTAs.	$10,000 per incident plus $250/day.

Attachment 22: Appendix A Of Resolution ST-163, Specified Violations and Scheduled Penalties (See Section 12 of this Document)

Failure to comply with Public Utilities Code § 315 - Interference with or obstruction of an SED accident investigation occurring on the property of an RTA or directly or indirectly arising from or connected with its maintenance or operation, resulting in loss of life or injury to person or property and requiring, in the judgment of the Commission, and/or the failure of an RTA to comply with a Commission order or recommendations with respect thereto.	$10,000 per incident plus $250/day.
Failure to comply with Public Utilities Code § 451 - Every Rail Transit Agency shall furnish and maintain such adequate and efficient instrumentalities, equipment, and facilities, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public. This would apply to a defect that has no specific CPUC regulation, but does have a safety standard that should be followed, such as a manufacturer's wear limits for brakes.	$5,000 per incident.
Failure to comply with Public Utilities Code § 771 - The commissioners and their officers and employees may enter upon any premises occupied by any public utility, for the purpose of making the examinations and tests and exercising any of the other powers provided for in this part, and may set up and use on such premises any apparatus and appliances necessary therefor. The agents and employees of the public utility may be present at the making of such examinations and tests. This would apply if any RTA prevented CPUC staff from exercising these duties.	$10,000 per incident plus $250/day.
Failure to comply with 49 C.F.R. § 659 et seq.	$5,000 per incident.

Attachment 23:

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Attachment 24: RBI Data Review Tracking Sheet

	[RTA Initials] - RBI Data Review Tracking Sheet												
	Period Covered: [Begin Date] - [End Date]												
	RECORDS REQUESTED	Frequency	Source of Data	Due Date	Date Received	Date Reviewed	Reviewed By	Task Status	Follow up Required	Follow Up RBI Record	Risk Rating	Reviewer Comments/Recommendations	Management Comments/recommendations
Mechanical	LRV Open Work Orders & Defect	6 months	Review of RTA						☐		N/A		
	Bogie Overhaul Schedule/Status	6 months	Spreadsheet						☐		N/A		
	LRV PM cycles and schedules	6 months	Spreadsheet						☐		N/A		
Track	Geometry Vehicle Inspection Report	6 months	Summary Report						☐		N/A		
	Ultra-Sonic Rail Inspection Report	6 months	Summary Report						☐		N/A		
Signal/Traction Power	Signal PM schedule (30 days look ahead)	6 months	Spreadsheet						☐		N/A		
	SAP Wayside Trouble Reports	6 months	Spreadsheet						☐		N/A		
	Substation PM schedule (30 days look ahead)	6 months	Spreadsheet						☐		N/A		
Operations	Red Signal Violations	6 months	Summary Report						☐		N/A		
	PED Violations	6 months	Summary Report						☐		N/A		
	Wrong Side Door Opening	6 months	Summary Report						☐		N/A		
	Reviewer comments to include any information relating to missing or deficient from expectations records, problems accessing or viewing records, or other issues with the submittal. Reviewer and Management Comments to include any trends or specific items identified that the inspector believes should be followed-up on and include an esstimate of the relative risk.												

Risk Probability		Risk Ranking			
		Catastrophic A	Critical B	Marginal C	Negligible D
Frequent	1	1A	1B	1C	1D
Probable	2	2A	2B	2C	2D
Occasional	3	3A	3B	3C	3D
Remote	4	4A	4B	4C	4D
Improbable	5	5A	5B	5C	5D

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
RTA NAME, Version Number xx.x, dated XXXXXX

State or Federal Code Cite Plan Requirements Guidance	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
A. General				
§GO 175-A 1.1, 671.1(a) Purpose and Applicability Plan Requirements: Authority. These rules and regulations are authorized by and implement the provisions of 49 U.S.C. § 5330; 49 C.F.R. § 6591; and California Public Utilities Code Sections 778 and 99152, as well as the California Public Utilities Code sections establishing each individual rail transit agency within California. The purpose of this part is to set forth the applicability of the rail transit Roadway Worker Protection (RWP) regulation. Additional Guidance: General Order 175-A applies to all RTAs in California.				
§ GO 175-A 1.3, 671.1(b) Purpose and Applicability Plan Requirements: Applicability. These rules and regulations are applicable to all RTAs in California. This part applies to rail transit agencies (RTA) that receive Federal financial assistance authorized under 49 U.S.C. chapter 53; and to State Safety Oversight Agencies (SSOA) that oversee the safety of rail fixed guideway public transportation systems. This part does not apply to rail systems that are subject to the safety oversight of the Federal Railroad Administration (FRA). Additional Guidance: General Order 175-A applies to all RTAs in California.				
§ GO 175-A 1.2, 671.1(c) Purpose and Applicability Plan Requirements: Purpose. The purpose of these rules and regulations is to provide a safe working environment for RTA roadway workers. This part applies to transit workers who access any rail fixed guideway public transportation systems in the performance of work.				

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
RTA NAME, Version Number xx.x, dated XXXXXX

State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
Additional Guidance: General Order 175-A applies to any employee who performs work on the right-of-way.				
§671.1(d) Purpose and Applicability Plan Requirements: An RTA must coordinate with an SSOA to establish an SSOA-approved RWP program that meets the requirements of this part, within one calendar year from the effective date of this rule. Additional Guidance: RTAs will submit the RWP program to the SSOA that meets the requirements of this part, including compliance General Order 175-A.				
§ GO 175-A 1 (1.1-1.5), 671.3(a)-(d) Policy Plan Requirements: Authority. These rules and regulations are authorized by and implement the provisions of 49 U.S.C. § 5330; 49 C.F.R. § 6591; and California Public Utilities Code Sections 778 and 99152, as well as the California Public Utilities Code sections establishing each individual *rail transit agency* within California. Purpose. The purpose of these rules and regulations is to provide a safe working environment for *RTA roadway workers*. These rules and regulations are intended to ensure that each *RTA* adopts a program for *roadway workers* containing specific rules for protecting these workers from the danger of being struck by trains or other *on-track equipment*. Applicability. These rules and regulations are applicable to all *RTAs* in California. These rules and regulations do not prohibit *RTAs* from implementing rules that provide greater safety. These rules and regulations do not apply to: a. Fire protection and law enforcement personnel. b. *Employees* responding to a life-threatening emergency. c. Track that is being constructed until any *RTA* vehicles or *employees* occupy the construction area, except for *RTA employees* who must occupy the area to perform inspections needed during construction, and who will do so under the construction *contractor*'s				

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
RTA NAME, Version Number xx.x, dated XXXXXX

State or Federal Code Cite Plan Requirements Guidance	Included Y	 N	Page Ref.	RTSB Questions/ Comments
protections and regulatory obligations. d. Work being performed on a platform outside of the platform edge warning strip where an *employee* or any tool does not infringe on the warning strip. Additional Rules. The Commission may make such additional rules and regulations or changes to these rules and regulations as necessary for the purpose of safety. Exemptions and Modifications. Requests for exemptions or modifications from these rules and regulations shall contain a full statement of the reasons justifying the request. A request must demonstrate that safety would not be reduced by the proposed exemption or modification. Any exemption or modification so granted shall be limited to the particular matter covered by the request and shall require Commission approval. Additional Guidance: General Order 175-A applies to any employee who performs work on the right-of-way and applies to all RTAs in California.				
§671.3(b) Policy Plan Requirements: The Federal Transit Administration (FTA) has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation in the United States. Activities conducted to carry out these RWP safety standards must be integrated into the RTA's SMS, including the Safety Risk Management (SRM) process, specified in § 673.25 of this chapter, and the Safety Assurance process, specified in § 673.27 of this chapter. Additional Guidance: Verify that the RTA's PTASP references SMS and the RWP program. Verify that the RWP program either refers to the PTASP or includes reference to SMS.				
§671.5 Definitions Plan Requirements: As used in this part: Additional Guidance: The RTA will determine definitions to be used per 671 and GO 175. RTA shall include definitions for terms				

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
RTA NAME, Version Number xx.x, dated XXXXXX

State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
that are used by the RWP program. RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§671.5 Definitions Plan Requirements: *Accountable Executive* means a single identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a transit agency; responsibility for carrying out the transit agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the transit agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326. Additional Guidance: If a term is used in the RWP program, RTA may use 671 and/or GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Director* means the Director of the Commission's division overseeing rail transit safety, or the Deputy Director overseeing rail transit safety. Additional Guidance: If a term is used in the RWP program, RTA may use the GO definition.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Fifteen-second rule*, or *15-second rule*, means a rule that requires a roadway worker to be clear of the track zone or in a place of safety 15 seconds before a rail transit vehicle moving at the maximum authorizable speed on that track could arrive at the location of the roadway worker.				

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
RTA NAME, Version Number xx.x, dated XXXXXX

State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
Ample time means the time necessary for a roadway worker to be clear of the track zone or in a place of safety 15 seconds before a rail transit vehicle moving at the maximum authorized speed on that track could arrive at the location of the roadway worker. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§671.5 Definitions Plan Requirements: *Equivalent entity* means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan. Additional Guidance: If a term is used in the RWP program, RTA may use the 671 definition, or term used in PTASP.				
§671.5 Definitions Plan Requirements: *Equivalent protection* means alternative designs, materials, or methods that the RTA can demonstrate to the SSOA will provide equal or greater safety for roadway workers than the means specified in this part. Additional Guidance: If a term is used in the RWP program, RTA may use the 671 definition.				
§671.5 Definitions Plan Requirements: *Flag person* means a roadway worker designated to direct or restrict the movement of rail transit vehicles or equipment past a point on a track to provide on-track safety for roadway workers, while engaged solely in performing that function.				

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
RTA NAME, Version Number xx.x, dated XXXXXX

State or Federal Code Cite Plan Requirements Guidance	Included Y	 N	Page Ref.	RTSB Questions/ Comments
Additional Guidance: If a term is used in the RWP program, RTA may use the 671 definition. If used, the RTA shall have Flag protection rules and procedures and how they are applied to RWP. The EIC must authorize movements before the flag person directs movement.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Confirmed Hold* means a specific procedure that can be used as specified in this General Order to hold rail transit vehicles, including on-track equipment, out of a work location as follows: The rail operations control center will instruct a rail transit vehicle operator of the next vehicle in line to arrive at the work zone to stop at a designated location, and the rail transit vehicle operator will confirm to the rail operations control center that the vehicle is actually stopped at the designated location. Roadway workers will not be permitted to enter the work zone until the Employee in Charge (EIC) receives notification from the rail operations control center that a Confirmed Hold has been verified for each approaching rail transit vehicle. The Confirmed Hold will not be lifted until the EIC has determined all roadway workers are clear of the track zone, or in a place of safety as applicable, and confirms the release of the work location to the rail operations control center. A confirmed hold can be established by a rail transit vehicle operator when the operator is the person performing the authorized minor task. In this instance, the operator acts as both the EIC and the train operator and can establish the required communication with the rail operations control center. *Foul time protection* is a method of establishing working limits in which a roadway worker is notified by the control center that no rail transit vehicles will be authorized to operate within a specific segment of track until the roadway worker reports clear of the track. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Track Zone* means an area within six (6) feet of the outside rail on both sides of any track. a. The track zone definition is intended to provide a threshold that can be identified by workers as an area where a person or equipment could be struck, or has the potential to be struck, by the widest equipment that could occupy the track. The zone				

Attachment 25: CPUC Checklist for Review of FTA-Funded RTA's Roadway Worker Protection Plan
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provides additional space away from the widest revenue rail transit vehicle that could occupy the track to address the potential for inadvertent movement into the area where a person or roadway working equipment could be struck. b. This zone should be widened, or extra safety provisions put in place, to safely accommodate any movement that might be anticipated into the area. Examples include equipment placed just outside the zone that has a bucket or swing boom that could extend far enough to be struck, or have the potential to be struck, or on-track equipment that might be wider than revenue rail transit vehicles..2 Fouling a track means placing oneself, or any equipment or appurtenance in an area where it could be struck by the widest equipment that could occupy the track. *Fouling a track* means the placement of an individual or an item of equipment in such proximity to a track that the individual or equipment could be struck by a moving rail transit vehicle or on-track equipment, typically within four feet of the outside rail on both sides of any track. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§671.5 Definitions Plan Requirements: *Individual rail transit vehicle detection* means a process by which a lone worker acquires on-track safety by visually detecting approaching rail transit vehicles or equipment and leaving the track in ample time. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. If used, verify that the RTA RWP program complies with GO 175-A, specifically sections 2.8, 5.3, 6.1, 6.2, & 9.5.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Job safety briefing* means a meeting conducted at the job site by the EIC of the work that focuses on the hazards of the work to be performed and the provisions to eliminate or protect against those hazards. The term is further defined through the requirements for a job safety briefing provided in this General Order.				

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Job safety briefing means a meeting addressing the requirements of this part that is conducted prior to commencing work by the Roadway Worker in Charge, typically at the job site, to notify roadway workers or other transit workers about the hazards related to the work to be performed and the protections to eliminate or protect against those hazards. Alternatively, briefings can be conducted virtually for those individuals who are working remotely on the job site. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§671.5 Definitions Plan Requirements: *Lone worker* means an individual roadway worker who is not afforded on-track safety by another roadway worker, who is not a member of a roadway work group, and who is not engaged in a common task with another roadway worker. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. If used, verify that the RTA RWP program complies with GO 175-A, specifically sections 2.8, 5.3, 6.1, 6.2, & 9.5.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Maximum authorizable speed* is defined only for the purpose of calculating the 15-second rule distance and is defined as the maximum allowable speed under all conditions on that track, unless a lower speed restriction is enforced by automatic train controls that also control speeds [of] trains operating in manual mode. If a lower speed is enforced by automatic train controls, then the maximum authorizable speed on that track is the automatic train control-enforced speed. *Maximum authorized speed* means the highest speed permitted for the movement of rail transit vehicles established by the rail transit vehicle control system, service schedule, and operating rules. This speed is used when calculating ample time. Additional Guidance:				

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RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Minor tasks* are defined as those tasks without tools unless specified herein where an individual can continue to look out at least every five (5) seconds for approaching rail transit vehicles and where they can be performed without violating the 15-second rule. Minor tasks are limited to the following: a. Retrieving or removing an item from the track zone. b. Lining manual or electric-lock track switches, including the use of a switch bar. c. Placing or removing flags. d. Taking photographs of an actual or suspected safety hazard or an actual or suspected violation of a rail safety law, regulation, order, or standard using a stand-alone camera that cannot be used for electronic communications; the only exception to the stand-alone requirement is that a camera may have a send-only feature that can send photos. After each time pressing the camera shutter release to take one photo or a one-second burst of photos, the employee must step out of the track zone to check the surroundings for any hazards, and only when it is safe step back into the track zone to take additional photos. Sending photos is not a minor task and must be done either outside the track zone or under higher levels of protection. e. A visual inspection at one specific fixed location, deemed an immediate need. *Minor tasks* mean those tasks performed without the use of tools during the execution of which a roadway worker or other transit worker can hear and visually assess their surroundings at least every five (5) seconds for approaching rail transit vehicles and that can be performed without violating ample time. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Near-miss* means an incident infringing on the safety of a roadway worker on or near the tracks, but without contact or injury.				

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Near-miss means a narrowly avoided safety event. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§671.5 Definitions Plan Requirements: *On-track safety* means a state of freedom from the danger of being struck by a moving rail transit vehicle or other equipment, and other on-track hazards, as provided by operating and safety rules that govern track occupancy by roadway workers, other transit workers, rail transit vehicles, and on-track equipment. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Place of Safety* means a space where a person or persons can safely get sufficiently clear of any rail transit vehicle, including any on-track equipment, moving on any track. *Place of safety* means a space an individual or individuals can safely occupy outside the track zone, sufficiently clear of any rail transit vehicle, including any on-track equipment, moving on any track. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§671.5 Definitions Plan Requirements: *Qualified* means a status attained by a roadway worker or other transit worker who has successfully completed required training				

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(including refresher training) for, has demonstrated proficiency in, and is authorized by the RTA to perform the duties of a particular position or function. Additional Guidance: RTA shall use 671 definition.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Rail Fixed Guideway System* (RFGS) means any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, cable car, automatic people mover, or automated guideway transit system used for public transit and not regulated by the Federal Railroad Administration or not specifically exempted by statute from Commission oversight. *Rail fixed guideway public transportation system* means any fixed guideway system, or any such system in engineering or construction, that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration. These include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Rail Transit Agency* (RTA) means the entity that plans, designs, constructs, and/or operates a RFGS. *Rail transit agency* (RTA) means any entity that provides services on a rail fixed guideway public transportation system. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				

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§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Rail Transit Vehicle* means an *RTA*'s rolling stock, including but not limited to passenger and maintenance vehicles. *Rail transit vehicle* means any rolling stock used on a rail fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles. Additional Guidance: If a term is used in the RWP program, RTA may use GO definition.				
§671.5 Definitions Plan Requirements: *Rail transit vehicle approach warning* means a method of establishing on-track safety by warning roadway workers of the approach of rail transit vehicles in ample time for them to move to or remain in a place of safety in accordance with the requirements of this part. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. If used, verify that the RTA RWP program complies with GO 175-A, specifically sections 5 & 9.				
§671.5 Definitions Plan Requirements: *Redundant protection* means at least one additional protection beyond individual rail transit vehicle detection to ensure on-track safety for roadway workers. Redundant protection may be procedural, physical, or both. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. If used, verify that the RTA RWP program complies with GO 175-A.				

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§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Right-of-way* means a strip of land that is granted, through an easement or other mechanism, for transportation purposes which includes the RTA's rails; track; crossties; ballast; bridges; underpasses; tunnels; wayside signals; communication, overhead catenary system, and substation facilities adjacent to or extending into the track zone; and station areas in or adjacent to the track zone, excluding station platforms. *Roadway* means land on which rail transit tracks and support infrastructure have been constructed to support the movement of rail transit vehicles. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *On-track Equipment* is a subset of the comprehensive rail transit vehicle definition herein and means any rolling equipment besides revenue vehicles used for any purpose, including but not limited to testing, inspection, and maintenance. The definition is included to avoid possible confusion in subsections herein where a rail transit vehicle mistakenly might be assumed to be only a vehicle in revenue passenger service. *Roadway maintenance machine* means a device which is used on or near rail transit track for maintenance, repair, construction or inspection of track, bridges, roadway, signal, communications, or electric traction systems. Roadway maintenance machines may have road or rail wheels or may be stationary. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§GO 175-A 2. Definitions, 671.5 Definitions				

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Plan Requirements: *Roadway Worker* means any employee who performs any work on the right-of-way. *Roadway worker* means a transit worker whose duties involve inspection, construction, maintenance, repairs, or providing on-track safety such as flag persons and watchpersons on or near the roadway or right-of-way or with the potential of fouling track. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§671.5 Definitions Plan Requirements: *Roadway work group* means two or more roadway workers organized to work together on a common task. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Employee in Charge* (EIC) means the RTA employee with responsibility for supervising and ensuring safety, including use of roadway worker protections, at a right-of-way worksite. In the case of a minor task, the EIC would be the roadway worker performing the minor task if alone. *Roadway worker in charge* means a roadway worker who is qualified under this part to establish on-track safety. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. The EIC/RWIC may perform flagging or watchperson duties, and must not perform unrelated job functions.				
§671.5 Definitions				

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Plan Requirements: *Roadway Worker Protection* (RWP) means the polices, processes, and procedures implemented by an RTA to prevent safety events for transit workers who must access the roadway in the performance of their work. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. GO 175-A 2.18 defines RWP to mean Roadway Worker Protection.				
§671.5 Definitions Plan Requirements: *RWP manual* means the entire set of the RTA's on-track safety rules and instructions maintained together, including operating rules and other procedures concerning on-track safety protection and on-track safety measures, designed to prevent roadway workers from being struck by rail transit vehicles or other on-track equipment. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. GO requires that each RTA adopt a program for roadway workers containing specific rules for protecting these workers from the danger of being struck by trains or other on-track equipment. Also, GO requires that each *RTA* shall create and maintain a separate dedicated manual excerpting all necessary *roadway worker* safety procedures and rules from its rule book(s), make it freely available to *roadway workers*, and ensure that *roadway workers* have easy access to the manual when performing job functions.				
§671.5 Definitions Plan Requirements: *Safety event* means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. Additional Guidance: If a term is used in the RWP program, RTA may use 671 and/or GO 164 definition.				

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§671.5 Definitions Plan Requirements: *Sight distance* means the length of roadway visible ahead for a roadway worker. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition.				
§671.5 Definitions Plan Requirements: *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 (k) and 49 CFR part 674. Additional Guidance: If a term is used in the RWP program, RTA may use 671 and/or CPUC RTSB Program Standard definition.				
§GO 175-A 2. Definitions Plan Requirements: *Station Platform* means the portion of a transit facility directly adjacent to the tracks at a station where a transit vehicle stops to load and unload passengers, and where passengers are allowed to be when trains are moving. Additional Guidance: If a term is used in the RWP program, RTA may use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Stopping Point* means the specific location where trains must stop according to the provisions herein.				

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Additional Guidance: If a term is used in the RWP program, RTA may use GO definition.				
§671.5 Definitions Plan Requirements: *Track access guide* means a document that describes the physical characteristics of the RTA's track system, including track areas with close or no clearance, curves with blind spots or restricted sight lines, areas with loud noise, and potential environmental conditions that require additional consideration in establishing on-track safety. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. If used, verify that the RTA RWP program complies with GO 175-A, specifically section 3.6.				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Track Zone* means an area within six (6) feet of the outside rail on both sides of any track. a. The track zone definition is intended to provide a threshold that can be identified by workers as an area where a person or equipment could be struck, or has the potential to be struck, by the widest equipment that could occupy the track. The zone provides additional space away from the widest revenue rail transit vehicle that could occupy the track to address the potential for inadvertent movement into the area where a person or roadway working equipment could be struck. b. This zone should be widened, or extra safety provisions put in place, to safely accommodate any movement that might be anticipated into the area. Examples include equipment placed just outside the zone that has a bucket or swing boom that could extend far enough to be struck, or have the potential to be struck, or on-track equipment that might be wider than revenue rail transit vehicles. *Track zone* means an area identified by the RTA where a person or equipment could be struck by the widest equipment that could occupy the track.				

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Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§GO 175-A 2. Definitions, 671.5 Definitions Plan Requirements: *Employee* means a person employed by a rail transit agency (RTA) in California, an employee of a utility providing services to the RTA or accessing the RTA's right-of-way to maintain their facilities who could occupy the track zone, or a contractor working on behalf of such RTA. *Contractor* means an entity that performs tasks on behalf of the *RTA.* *Transit worker* means any employee, contractor, or volunteer working on behalf of the RTA or SSOA. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used. .				
§671.5 Definitions Plan Requirements: *Transit Worker Safety Reporting Program* means the process required under § 673.23(b) that allows transit workers to report safety concerns, including transit worker assaults, near-misses, and unsafe acts and conditions to senior management, provides protections for transit workers who report safety conditions to senior management, and describes transit worker behaviors that may result in disciplinary action. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition. If used, verify that the RTA RWP program complies with GO 175-A, specifically section 4.3.				
§GO 175-A 2. Definitions, 671.5 Definitions				

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Plan Requirements: *Watchperson*, sometimes called a lookout, means an employee who has been trained and qualified on RWP rules and procedures, whose sole duty is to provide effective warning in compliance with the 15-second rule to roadway workers of approaching rail transit vehicles, including trains or any on-track equipment, who does not perform or assist in any other work aside from the watchperson duty, and who remains clear of the track zone, or when clearance is unavailable, remains in a place of safety. *Watchperson* means a roadway worker qualified to provide warning to roadway workers of approaching rail transit vehicles or track equipment whose sole duty is to look out for approaching rail transit vehicles and track equipment and provide at least 15 seconds advanced warning plus time to clear based on the maximum authorized track speed for the work location to transit workers before the arrival of rail transit vehicles. Additional Guidance: RTA shall comply with the GO and CFR definition, regardless of which term is used.				
§671.5 Definitions Plan Requirements: *Working limits* means a segment of track with explicit boundaries upon which rail transit vehicles and on-track equipment may move only as authorized by the roadway worker having control over that defined segment of track. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition.				
§671.5 Definitions Plan Requirements: *Work zone* means the immediate area where work is being performed within the track zone. Additional Guidance: If a term is used in the RWP program, RTA may use 671 definition.				

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B. Roadway Worker Protection (RWP) Program and Manual				
§GO 175-A 1.2, 671.11(a) RWP program Plan Requirements: Purpose. The purpose of these rules and regulations is to provide a safe working environment for RTA roadway workers. These rules and regulations are intended to ensure that each RTA adopts a program for roadway workers containing specific rules for protecting these workers from the danger of being struck by trains or other on-track equipment. Each RTA must adopt and implement an approved RWP program to improve transit worker safety that is consistent with Federal and State safety requirements and meets the minimum requirements of this part. Additional Guidance: General Order 175-A applies to any employee who performs work on the right-of-way.				
§GO 175-A 3.5, 671.11(b)(1) RWP program, 671.13(a) RWP manual Plan Requirements: Each RTA shall create and maintain a separate dedicated manual excerpting all necessary roadway worker safety procedures and rules from its rule book(s), make it freely available to roadway workers, and ensure that roadway workers have easy access to the manual when performing job functions. The RWP program must include: An RWP manual as described in § 671.13. Each RTA must establish and maintain a separate, dedicated manual documenting its RWP program. Additional Guidance: General Order 175-A requires a separate dedicated manual.				
§671.11(b)(2) RWP program, 671.13(c)(1) RWP manual Plan Requirements:				

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The RWP program must include: All the RWP program elements described in Subpart D of this part. The RWP manual must document: All elements of the RWP program in Subpart D of this part. Additional Guidance: Verify that all elements of Subpart D are included.				
§671.11(c) RWP program Plan Requirements: Each RTA must submit its RWP manual and subsequent updates to its SSOA for review and approval as described in § 671.25. Additional Guidance: RTA shall submit RWP program and manual to CPUC for review and approval for compliance with part 671 and GO 175.				
§671.13(b) RWP manual Plan Requirements: The RWP manual must include the terminology, abbreviations, and acronyms used to describe the RWP program activities and requirements. Additional Guidance: RTA RWP manual must include described contents.				
§671.13(c)(2) RWP manual Plan Requirements: The RWP manual must document: A definition of RTA and transit worker responsibilities as described in Subpart C—Responsibilities. Additional Guidance:				

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Verify that all elements of Subpart C – Responsibilities are included in the RWP manual.				
§GO 175-A 3.5 & 9, 671.13(c)(3) RWP manual Plan Requirements: The RWP manual must document: Training, qualification, and supervision required for transit workers to access the track zone, by labor category or type of work performed. Additional Guidance: RTA RWP manual must describe the training, qualification, and supervision required for employees to access the track zone.				
§GO 175-A 6, GO 143-B 14.01, CPUC RTSB Program Standard 1.5.0, 671.13(c)(4) RWP manual Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. System Access by Commission Representatives: Representatives of the Commission shall be allowed to enter upon the property and onto any LRV or streetcar for the purpose of determining compliance with Commission rules, making tests, and inspecting records. The RWP manual must document: Processes and procedures, including any use of roadway workers to provide adequate on-track safety, for all transit workers who may access the track zone in the performance of their work, including safety and oversight personnel. Procedures for SSOA personnel to access the roadway must conform with the SSOA's risk-based inspection program. Additional Guidance: RTA RWP manual must describe the training, qualification, and supervision required for employees to access the track zone. RWP manual shall include how the RTA will provide right of way access to CPUC representatives.				
§671.13(d) RWP manual				

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Plan Requirements: The RWP manual must include or incorporate by reference a track access guide to support on-track safety. The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Additional Guidance: RTA RWP manual must include the below described elements. GO 175-A 3.6 a. uses an example of a track survey.				
§671.13(d)(1) RWP manual Plan Requirements: The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Locations with limited, close, or no clearance, including locations (such as alcoves, recessed spaces, other designated places or areas of refuge or safety) with size or access limitations. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(d)(2) RWP manual Plan Requirements: The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Locations subject to increased rail vehicle or on-track equipment braking requirements or reduced rail transit vehicle operator visibility due to precipitation or other weather conditions. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(d)(3) RWP manual				

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Plan Requirements: The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Curves with no or limited visibility. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(d)(4) RWP manual Plan Requirements: The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Locations with limited or no visibility due to obstructions or topography. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(d)(5) RWP manual Plan Requirements: The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: All portals with restricted views. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(d)(6) RWP manual Plan Requirements:				

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The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Locations with heavy outside noise or other environmental conditions that impact on-track safety. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(d)(7) RWP manual Plan Requirements: The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include, at a minimum: Any other locations with access considerations. Additional Guidance: RTA RWP manual must include the described elements. GO 175-A 3.6 a. & b. provides examples.				
§671.13(e) RWP manual Plan Requirements: Following initial approval of the RWP manual by its SSOA, not less than every two years, the RTA must review and update its RWP manual to reflect current conditions and lessons learned in implementing the RWP program and information provided by the SSOA and FTA. Additional Guidance: RTA RWP manual must include the described items and comply with GO 175-A 3.5.				
§671.13(f) RWP manual Plan Requirements:				

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	Y	**N**		
The RTA must update its RWP manual and track access guide as necessary and as soon as practicable upon any change to the system that conflicts with any element of either document. Additional Guidance: RTA RWP manual must include the described items and comply with GO 175-A 3.5.				
§GO 175-A 3.5, 671.13(g) RWP manual Plan Requirements: Each RTA shall create and maintain a separate dedicated manual excerpting all necessary roadway worker safety procedures and rules from its rule book(s), make it freely available to roadway workers, and ensure that roadway workers have easy access to the manual when performing job functions. The RWP manual must be distributed to all transit workers who access the roadway and redistributed after each revision. Additional Guidance: RTA RWP manual must include the described items and comply with GO 175-A 3.5.				
C. Responsibilities				
§671.21(a) Rail transit agency Plan Requirements: In General. Each RTA must establish procedures to: Additional Guidance: RTA must establish procedures.				
§GO 175-A 3.6, 671.21 (a)(1) Rail transit agency				

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Plan Requirements: Each RTA shall specify one or more objective method(s) to determine appropriate sight distance for 15-second rule compliance as part of their training program. The information shall be provided to all employees who are involved in operations requiring the 15-second rule. Appropriate use of the rule shall be included in each RTA's training program. Each RTA must establish procedures to: Provide ample time and determine the appropriate sight distance based on maximum authorized track speeds. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§671.21(a)(2) Rail transit agency Plan Requirements: Each RTA must establish procedures to: Ensure that individual rail transit vehicle detection is never used as the only form of protection in the track zone. Additional Guidance: RTA must establish procedures.				
§GO 175-A 4.1, 671.21 (a)(3) Rail transit agency Plan Requirements: Right to a job safety briefing. Each RTA shall require that a job safety briefing be performed prior to the performance of any job duty that may occur on the right-of-way and shall require that all roadway workers at the job participate. Each RTA must establish procedures to: Provide job safety briefings to all transit workers who must enter a track zone to perform work. Additional Guidance:				

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RTA RWP program shall provide procedures in compliance with GO 175-A.				
§671.21(a)(4) Rail transit agency Plan Requirements: Each RTA must establish procedures to: Provide job safety briefings to all transit workers whenever a rule violation is observed. Additional Guidance: RTA must establish procedures.				
§GO 175-A 4.3, 671.21 (a)(5) Rail transit agency Plan Requirements: Right to challenge. Each RTA shall provide every roadway worker the right to challenge, and/or refuse, in good faith, any RWP assignment he or she has reason to believe is unsafe or would violate any RWP rule or procedure. The roadway worker must describe the safety or rule concern and remain clear of the track zone until the challenge is resolved. Each RTA must establish procedures to: Provide transit workers with the right to challenge and refuse in good faith any assignment based on on-track safety concerns and resolve such challenges and refusals promptly and equitably. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§GO 175-A 4.4 & 10, 671.21 (a)(6) Rail transit agency Plan Requirements: Right and responsibility to report unsafe acts or conditions. Each RTA shall provide opportunities for roadway workers to report to the RTA any unsafe acts or conditions that could result in an accident or incident and shall not discourage such reporting. Each *RTA* shall develop and implement a program for reporting and recording *near-misses* regarding *RWPs*.				

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RWP near-miss records shall be retained by the *RTA* for a period of four (4) years and shall be made available to CPUC staff on demand. The *near-miss* program shall include: a. A policy statement supporting the *near-miss* program signed by the *RTA*'s Chief Executive Officer, and b. A process to encourage and allow *roadway workers* to report *nearmisses*, and c. Methods to store, easily access, and track *near-misses* and corrective actions, and d. Analyses to identify primary and contributory causal factors including root causes, and to implement corrective actions. Each *RTA* shall submit a copy of its *near-miss* program to staff within 90 days of the effective date of this order and within 30 days of any subsequent modifications. Each *RTA* shall reference their *near-miss* program in their *SSPP*. Each *RTA* shall periodically review the effectiveness of its *near-miss* program taking into consideration industry practices and make adjustments if needed for increased effectiveness to achieve program goals. Each RTA must establish procedures to: Require the reporting of unsafe acts, unsafe conditions, and near-misses on the roadway as part of the Transit Worker Safety Reporting Program and described in § 673.23(b) of this chapter. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A and require reporting of safety concerns.				
§GO 175-A 3.10 & 9.4, 671.21 (a)(7) Rail transit agency Plan Requirements: Anyone allowed access to the track zone, by request, easement, or other form of permission, shall either complete the required RWP training or be escorted by an RWP-trained employee. No RTA shall assign an employee to perform the duties of a roadway worker unless that employee has received training in the RWP procedures associated with the work assignment to be performed. Any person who is escorted and provided RWP safety by an RWP trained employee is exempt from these training provision. a. Each *RTA* at least once every 24 months shall retrain all *roadway workers* and *employees* with *RWP* responsibilities on the *RWP* training program for *roadway workers*. b. Records showing compliance with the requirement in subsection a. above shall be maintained for a minimum of three (3) years.				

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c. Each *RTA* shall provide an opportunity in its training program for *roadway workers* to raise and discuss issues regarding the effectiveness of the training program. Each RTA must establish procedures to: Ensure all transit workers who must enter a track zone to perform work understand, are qualified in, and comply with the RWP program. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§GO 175-A 3.10 & 9.4, 671.21 (a)(8) Rail transit agency Plan Requirements: Anyone allowed access to the track zone, by request, easement, or other form of permission, shall either complete the required RWP training or be escorted by an RWP-trained employee. Each RTA must establish procedures to: Provide an escort, as needed, to support individuals that are not RWP certified and do not fall into the categories of roadway worker, transit worker, or emergency personnel if they must enter a track zone. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§671.21(b) Rail transit agency Plan Requirements: Equipment and protections. Each RTA must establish the requirements for on-track safety, including: Additional Guidance: RTA must establish requirement for on-track safety.				
§GO 175-A 3.9, 671.21 (b)(1) Rail transit agency				

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Plan Requirements: Each RTA shall establish what safety equipment a person accessing the track zone is required to use consistent with applicable standards such as federal, state, American Public Transportation Association or other industry rules and/or guidelines. Each RTA must establish the requirements for on-track safety, including: Equipment that transit workers must have to access the roadway or a track zone by labor category, including personal protective equipment such as high-reflection vests, safety shoes, and hard hats. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A and 671.				
§671.21(b)(2) Rail transit agency Plan Requirements: Each RTA must establish the requirements for on-track safety, including: Credentials (e.g., badge, wristband, RWP card) for transit workers to enter the roadway or track zone by labor category and how to display them so they are visible. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with 671.				
§GO 175-A 8, 671.21 (b)(3) Rail transit agency Plan Requirements: Protections for Emergency Response Personnel. The *RWP* plan of each *RTA* shall include provisions for protection of non-*RTA* emergency response personnel. The provisions shall include consideration of movements on adjacent tracks. The *RWP* plan provisions shall include provisions for the *RTA* to offer coordination of emergency response activities with all fire protection and law enforcement agencies in their service territory, including emergency training drills with emergency response agencies. Notwithstanding the foregoing, when it is beyond their control, *RTA*s are not responsible for ensuring that other agencies participate in or comply with response coordination or training drills. *RTAs* shall offer training to non-*RTA* emergency response personnel in their service territory either: 1) no less than every two years,				

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or 2) regularly and accommodating all requests for training. Under either option, records of training must be available for three years for Commission inspectors' review. An *RTA's SSPP[PTASP]* must include provisions for training of *employees* who may occupy the *track zone* during response to emergencies. Each RTA must establish the requirements for on-track safety, including: Protections for emergency response personnel who must access the roadway or the track zone. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A.				
§671.21(b)(4) Rail transit agency Plan Requirements: Each RTA must establish the requirements for on-track safety, including: Protections for multiple roadway work groups within a common work area in a track zone. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with 671.				
§GO 175-A 3 (3.1, 3.2, 3.3, 3.8) RTA Responsibilities Plan Requirements: Each *RTA* shall adopt and implement a program that will afford safety to all its *roadway workers*. Each *RTA* shall adopt *RWP* rules that satisfy the requirements of this General Order. Each *RTA* shall adopt a training program in accordance with Section 9. If an *RTA* uses flag protection to provide *roadway worker* safety, it shall establish written flag protection procedures and rules and include those rules in the manual described in Section 3.5.				

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Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A.				
§671.23(a) Transit worker Plan Requirements: RWP program. Each transit worker must follow the requirements of the RTA's RWP program by position and labor category. Additional Guidance: RTA must establish requirements for the RWP program.				
§GO 175-A 6 & 7, 671.23 (b) Transit worker Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. Minimum controls/limitations for employees performing different categories of work when in the track zone on yard and end-of-line storage tracks. Fouling the track. A transit worker may only foul the track once they have received appropriate permissions and redundant protections have been established as specified in the RWP manual. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A and 671.				
§GO 175-A 5 & 5.1 i., 671.23 (c) Transit worker Plan Requirements: Job Safety Briefing - Acknowledgement by each employee that they understand the rules to be used.				

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Acknowledgement of protections providing on-track safety. A transit worker must understand and acknowledge in writing the protections providing on-track safety measures for their specific task before accessing the roadway or track zone. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A and 671.				
§GO 175-A 4.3, 671.23 (d) Transit worker Plan Requirements: Right to challenge. Each RTA shall provide every roadway worker the right to challenge, and/or refuse, in good faith, any RWP assignment he or she has reason to believe is unsafe or would violate any RWP rule or procedure. The roadway worker must describe the safety or rule concern and remain clear of the track zone until the challenge is resolved. Refusal to foul the track. A transit worker may refuse to foul the track if the transit worker makes a good faith determination that they believe any assignment is unsafe or would violate the RTA's RWP program. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A and 671.				
§GO 175-A 4.4, 671.23 (e) Transit worker Plan Requirements: Right and responsibility to report unsafe acts or conditions. Each RTA shall provide opportunities for roadway workers to report to the RTA any unsafe acts or conditions that could result in an accident or incident and shall not discourage such reporting. Reporting. A transit worker must report unsafe acts and conditions and near-misses related to the RWP program as part of the RTA's Transit Worker Safety Reporting Program. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A and 671.				

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§GO 175-A 10 (10.1-10.6) Near-Miss reporting programs and records. Plan Requirements: Each *RTA* shall develop and implement a program for reporting and recording *near-misses* regarding *RWPs*. *RWP near-miss* records shall be retained by the *RTA* for a period of four (4) years and shall be made available to CPUC staff on demand. The *near-miss* program shall include: a. A policy statement supporting the *near-miss* program signed by the *RTA*'s Chief Executive Officer, and b. A process to encourage and allow *roadway workers* to report *nearmisses*, and c. Methods to store, easily access, and track *near-misses* and corrective actions, and d. Analyses to identify primary and contributory causal factors including root causes, and to implement corrective actions. Each *RTA* shall submit a copy of its *near-miss* program to staff within 90 days of the effective date of this order and within 30 days of any subsequent modifications. Each *RTA* shall reference their *near-miss* program in their *SSPP (PTASP).* Each RTA shall periodically review the effectiveness of its near-miss program taking into consideration industry practices and make adjustments if needed for increased effectiveness to achieve program goals. Additional Guidance: RTA RWP program shall include near-miss requirements in compliance with GO 175-A and 671.				
§671.25 State safety oversight agency Plan Requirements: Review and approve RWP program elements.				

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RWP program oversight. Annual RWP program audit. Additional Guidance: SSOA requirements.				
D. Required RWP Program Elements				
§671.31(a) Roadway worker in charge requirements. Plan Requirements: On-track safety and supervision. The RTA must designate one roadway worker in charge for each roadway work group whose duties require fouling a track. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§671.31(a)(1) On-track safety and supervision. Plan Requirements: The roadway worker in charge must be qualified under the RTA's training and qualification program as specified in §671.41. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§671.31(a)(2) On-track safety and supervision. Plan Requirements: The roadway worker in charge may be designated generally or may be designated specifically for a particular work situation.				

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Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§671.31(a)(3) On-track safety and supervision. Plan Requirements: The roadway worker in charge is responsible for the on-track safety for all members of the roadway work group. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§671.31(a)(4) On-track safety and supervision. Plan Requirements: The roadway worker in charge must serve only the function of maintaining on-track safety for all members of the roadway work group and perform no other unrelated job function while designated for duty. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671. The RWIC/EIC may ONLY serve the function of maintaining on track safety, this is a change now requiring a stand-alone employee whose only function is to monitor safety of the worksite. The EIC/RWIC may perform flagging or watchperson duties and must not perform unrelated job functions.				
§671.31(a)(5) On-track safety and supervision. Plan Requirements: For multiple roadway work groups within common working limits, the RTA may designate a single roadway worker in charge for				

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the entire working limit. If a single roadway worker in charge is designated over multiple roadway work groups within a working limit, each work group must be accompanied by an employee qualified to the level of a roadway worker in charge, as specified in §671.41, who shall be responsible for direct communication with the roadway worker in charge. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§671.31(b) Roadway worker in charge requirements. Plan Requirements: Communication. The RTA must ensure that the roadway worker in charge provides a job safety briefing to all roadway workers before any member of a roadway work group fouls a track, following the requirements specified in § 671.33. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4, 2.6, & 5) and 671.				
§671.31(b)(1) Communication. Plan Requirements: The roadway worker in charge must provide a job safety briefing to all members of the roadway work group before any on-track safety procedures change during the work period, whenever on-track safety conditions change, or immediately following an observed violation of on-track safety procedures, before work in the track zone may continue. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§671.31(b)(2) Communication.				

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Plan Requirements: In the event of an emergency, the roadway worker in charge must warn each roadway worker to immediately leave the roadway and not return until on-track safety is re-established, and a job safety briefing is completed. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (sections 2.4 & 5.1(d)) and 671.				
§GO 175-A 5.1 & 5.2, 671.33(a) Job safety briefing policies. Plan Requirements: Each RTA shall require that an EIC provide a job safety briefing prior to any roadway work within the RTA right-of-way. The job safety briefing for each roadway worker must include a discussion and explanation of the job function, rules, and procedures for carrying out job duties. If there is any change in the scope of work or crew after the initial job safety briefing, a follow-up job safety briefing shall be conducted. General. The RTA must ensure the roadway worker in charge provides any roadway worker who must foul a track with a job safety briefing prior to fouling the track, every time the roadway worker fouls the track. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(b) Job safety briefing policies. Plan Requirements: Elements. The job safety briefing must include, at a minimum, the following, as appropriate:				

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Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 a., 671.33(b)(1) Elements. Plan Requirements: The general work plan for a crew; or for each crew when there are multiple crews, each with a different general work plan. The job safety briefing must include, at a minimum, the following, as appropriate: A discussion of the nature of the work to be performed and the characteristics of the work, including work plans for multiple roadway worker groups within a single work area. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(b)(2) Elements. Plan Requirements: The job safety briefing must include, at a minimum, the following, as appropriate: Working limits. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 b., 671.33(b)(3) Elements. Plan Requirements: The hazards involved and the means by which safety is to be provided to the roadway workers through compliance with these roadway worker safety rules and procedures. Special attention shall be given to the presence of on-track equipment, to the presence of any adjacent tracks, and to any need to widen the track zone according to the provisions of the track zone definition.				

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The job safety briefing must include, at a minimum, the following, as appropriate: The hazards involved in performing the work. For RTAs with electrified systems, this discussion must include the status of power and hazards explicitly related to the electrified system. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671. Note: GO 175-A does not require discussing the status of power and hazards.				
§GO 175-A 5.1 b., 671.33(b)(4) Elements. Plan Requirements: The hazards involved and the means by which safety is to be provided to the roadway workers through compliance with these roadway worker safety rules and procedures. Special attention shall be given to the presence of on-track equipment, to the presence of any adjacent tracks, and to any need to widen the track zone according to the provisions of the track zone definition. The job safety briefing must include, at a minimum, the following, as appropriate: Information on how on-track safety is to be provided for each track identified to be fouled. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 d. & j., 671.33(b)(4) Elements. Plan Requirements: Identification and location of key personnel such as a watchperson and an EIC. If a *watchperson* is being used, each *employee*, including the *watchperson*, must receive a review of the *watchperson*'s duties, at a minimum to include the information in the definition herein of a *watchperson*, as follows: The *watchperson*'s sole duty is to				

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provide effective warning in compliance with the *15-second rule* to *roadway workers* of approaching *rail transit vehicles*, including trains or any *on-track equipment*. The *watchperson* does not perform or assist in any other work aside from the *watchperson* duty and remains clear of the *track zone*. If clearance is unavailable, the *watchperson* remains in a place of safety. The job safety briefing must include, at a minimum, the following, as appropriate: identification and location of key personnel, such as a watchperson and the roadway worker in charge. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(b)(4) Elements. Plan Requirements: The job safety briefing must include, at a minimum, the following, as appropriate: information on what should be done in the event of an emergency. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 e., 671.33(b)(5) Elements. Plan Requirements: Appropriate flags and proper flag placement. The job safety briefing must include, at a minimum, the following, as appropriate: Instructions for each on-track safety procedure to be followed, including appropriate flags and proper flag placement. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671. Note: GO 175-A does not state "instructions for				

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each on-track safety procedure to be followed".				
§GO 175-A 5.1 h., 671.33(b)(6) Elements. Plan Requirements: The means of communication among the roadway workers to be used in the job performance, including communication with any roadway maintenance machine operators. The job safety briefing must include, at a minimum, the following, as appropriate: Communication roles and responsibilities for all transit workers involved in the work. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 b., 671.33(b)(7) Elements. Plan Requirements: The hazards involved and the means by which safety is to be provided to the roadway workers through compliance with these roadway worker safety rules and procedures. Special attention shall be given to the presence of on-track equipment, to the presence of any adjacent tracks, and to any need to widen the track zone according to the provisions of the track zone definition. The job safety briefing must include, at a minimum, the following, as appropriate: Safety information about any adjacent track, defined as track next to or adjoining the track zone where on-track safety has been established, and identification of roadway maintenance machines or on-track equipment that will foul such tracks. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(b)(8) Elements.				

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Plan Requirements: The job safety briefing must include, at a minimum, the following, as appropriate: Information on the accessibility of the roadway worker in charge, including emergency contact information, and alternative procedures in the event the roadway worker in charge is no longer accessible to members of the roadway work group. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 c., 671.33(b)(9) Elements. Plan Requirements: Personal Protective Equipment. The job safety briefing must include, at a minimum, the following, as appropriate: Required personal protective equipment. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 5.1 f., 671.33(b)(10) Elements. Plan Requirements: A place of safety shall be predetermined that will allow workers to move to the safe area at least 15 seconds before any approaching rail transit vehicle moving at the maximum authorizable speed on that track can pass the location of the roadway worker. The job safety briefing must include, at a minimum, the following, as appropriate: Designated place(s) of safety of a sufficient size to accommodate all roadway workers within the work area.				

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Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671. Note: GO 175-A does not state "sufficient size" for the designated place of safety.				
§GO 175-A 5.1 g., 671.33(b)(11) Elements. Plan Requirements: The means for determining if and how the 15-second rule will be met shall be discussed including: i. Determination of sight distance. ii. Visibility conditions. iii. Ambient noise interference. iv. Maximum authorizable speed. v. Time needed to disengage from the work. vi. Location of places of safety. vii. Time to get to the place of safety. viii. Adjacent tracks, the hazards associated, and provisions to address those hazards. The job safety briefing must include, at a minimum, the following, as appropriate: The means for determining ample time. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(c) Job safety briefing policies. Plan Requirements: Confirmation and written acknowledgement. A job safety briefing is complete only after roadway workers document it was received: Additional Guidance:				

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RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(c)(1) Confirmation and written acknowledgement. Plan Requirements: A job safety briefing is complete only after: The roadway worker in charge confirms that each roadway worker understands the on-track safety procedures and instructions. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(c)(2) Confirmation and written acknowledgement. Plan Requirements: A job safety briefing is complete only after: Each roadway worker acknowledges in writing the briefing and the requirement to use the required personal protective equipment. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§671.33(c)(3) Confirmation and written acknowledgement. Plan Requirements: A job safety briefing is complete only after: The roadway worker in charge confirms in writing that they have received written acknowledgement of the briefing from each worker. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				

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§GO 175-A 5.2, 671.33(d) Follow-up briefings. Plan Requirements: If there is any change in the scope of work or crew after the initial *job safety briefing*, a follow-up *job safety briefing* shall be conducted. If after the initial job safety briefing there is any change in the scope of work or roadway work group, or on-track safety conditions change, or a violation of on-track safety is observed, a follow-up job safety briefing must be conducted. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A and 671.				
§GO 175-A 2.8, 6.1, & 6.2; 671.35(a) Lone Worker. Plan Requirements: Minor tasks definition. Moving from one location to another with full attention on surroundings. The requirements in this section, a, b, and c below, do not apply to moving from one location to another on semiexclusive and non-exclusive alignments (as defined in the General Order 143 series), with full attention to surroundings. a. *Roadway worker*/crew must establish authorization for the identified area, and b. *Roadway worker(s)* must be able to comply with the *15-second rule*. c. *Roadway workers* may occupy General Order 143 series compliant emergency walkways in tunnels and on elevated structures where there is insufficient clearance to remain clear of the *track zone*. Trains must be slowed to 25 miles per hour or less before *roadway workers* may occupy the *track zone* on the emergency walkway. d. *Roadway workers* may occupy an area outside a fence installed as a physical barrier between the *roadway worker* and the track, where the fence is within the *track zone*. Performing *minor tasks* with sufficient attention to surroundings.				

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a. *Roadway worker* must establish authorization for identified work area, and b. Notification must be given to train operators, and c. Notification of reverse direction and other abnormal train movement must be provided to roadway worker, and d. *Roadway worker* must be able to comply with the *15-second rule*, and e. One of the following, i or ii: i. Trains must stop short of the work location unless the *roadway worker* communicates by radio or hand signals to the train operator that the train may proceed. Trains approaching the work location must sound an audible warning until it is acknowledged by the *roadway worker*. Upon radio communication between the train operator and *roadway worker*, or upon visual confirmation by the *roadway worker*, that the train is stopped, the *roadway worker* may enter the *track zone*. Upon radio communication or hand signals from the *roadway worker* that he or she is clear of the *track zone* or on a walkway under the provisions of Section 6.1.c, the train may proceed. ii. Trains are held outside the work location under a *Confirmed Hold*. On-track safety and supervision. The RTA may authorize lone workers to perform limited duties that require fouling a track. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A is more restrictive than 671, if the roadway worker is performing a minor task, they are authorized to perform limited duties, that require fouling a track.				
§GO 175-A 9.5 c. & e., 671.35(a)(1) Lone Worker - On-track safety and supervision. Plan Requirements: The training of all *roadway workers* at a minimum shall include: c. The *RTA's RWP* rules and procedures; e. The functions and responsibilities of various persons involved with *RWP* procedures. The lone worker must be qualified as a roadway worker in charge and lone worker under the RTA's training and qualification program as specified in § 671.41. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: Roadway worker must also be				

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trained as an EIC and able to perform minor tasks.				
§GO 175-A 2.8, 6.1, & 6.2; 671.35(a)(2) Lone Worker - On-track safety and supervision. Plan Requirements: Minor tasks definition. Moving from one location to another with full attention on surroundings. The requirements in this section, a, b, and c below, do not apply to moving from one location to another on semiexclusive and non-exclusive alignments (as defined in the General Order 143 series), with full attention to surroundings. a. *Roadway worker*/crew must establish authorization for the identified area, and b. *Roadway worker(s)* must be able to comply with the *15-second rule*. c. *Roadway workers* may occupy General Order 143 series compliant emergency walkways in tunnels and on elevated structures where there is insufficient clearance to remain clear of the *track zone*. Trains must be slowed to 25 miles per hour or less before *roadway workers* may occupy the *track zone* on the emergency walkway. d. *Roadway workers* may occupy an area outside a fence installed as a physical barrier between the *roadway worker* and the track, where the fence is within the *track zone*. Performing *minor tasks* with sufficient attention to surroundings. a. *Roadway worker* must establish authorization for identified work area, and b. Notification must be given to train operators, and c. Notification of reverse direction and other abnormal train movement must be provided to roadway worker, and d. *Roadway worker* must be able to comply with the *15-second rule*, and e. One of the following, i or ii: i. Trains must stop short of the work location unless the *roadway worker* communicates by radio or hand signals to the train operator that the train may proceed. Trains approaching the work location must sound an audible warning until it is acknowledged by the *roadway worker*. Upon radio communication between the train operator and *roadway worker*, or upon visual confirmation by the *roadway worker*, that the train is stopped, the *roadway worker* may enter the *track zone*. Upon radio communication or hand signals from the *roadway worker* that he or she is clear of the *track zone* or on a walkway under the provisions of Section 6.1.c, the train may proceed.				

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ii. Trains are held outside the work location under a *Confirmed Hold*. The lone worker may perform routine inspection or minor tasks and move from one location to another. The lone worker may not use power tools and may only access locations have defined in the track access guide as appropriate for lone workers, i.e., no loud noises, no restricted clearances, etc. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A is more restrictive than 671, if the roadway worker is performing a minor task, they are authorized to perform limited duties, that require fouling a track.				
§GO 175-A 2.8, 6.1, & 6.2; 671.35(a)(3) Lone Worker - On-track safety and supervision. Plan Requirements: Minor tasks definition. Moving from one location to another with full attention on surroundings. The requirements in this section, a, b, and c below, do not apply to moving from one location to another on semiexclusive and non-exclusive alignments (as defined in the General Order 143 series), with full attention to surroundings. a. *Roadway worker*/crew must establish authorization for the identified area, and b. *Roadway worker(s)* must be able to comply with the *15-second rule*. c. *Roadway workers* may occupy General Order 143 series compliant emergency walkways in tunnels and on elevated structures where there is insufficient clearance to remain clear of the *track zone*. Trains must be slowed to 25 miles per hour or less before *roadway workers* may occupy the *track zone* on the emergency walkway. d. *Roadway workers* may occupy an area outside a fence installed as a physical barrier between the *roadway worker* and the track, where the fence is within the *track zone*. Performing *minor tasks* with sufficient attention to surroundings. a. *Roadway worker* must establish authorization for identified work area, and b. Notification must be given to train operators, and c. Notification of reverse direction and other abnormal train movement must be provided to roadway worker, and d. *Roadway worker* must be able to comply with the *15-second rule*, and				

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e. One of the following, i or ii: i. Trains must stop short of the work location unless the *roadway worker* communicates by radio or hand signals to the train operator that the train may proceed. Trains approaching the work location must sound an audible warning until it is acknowledged by the *roadway worker*. Upon radio communication between the train operator and *roadway worker*, or upon visual confirmation by the *roadway worker*, that the train is stopped, the *roadway worker* may enter the *track zone*. Upon radio communication or hand signals from the *roadway worker* that he or she is clear of the *track zone* or on a walkway under the provisions of Section 6.1.c, the train may proceed. ii. Trains are held outside the work location under a *Confirmed Hold*. The lone worker may not use individual rail transit vehicle detection, where the lone worker is solely responsible for seeing approaching trains and clearing the track before the trains arrive, as the only form of on-track safety. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A (specifically section 6.1) and 671. Note: GO 175-A is more restrictive than 671, if the roadway worker is performing a minor task, they are authorized to perform limited duties, that require fouling a track.				
§GO 175-A 5.3, 671.35(b) Lone Worker. Plan Requirements: In the case of an individual roadway worker moving from one location to another (Section 6.1) or performing a minor task (Section 6.2), the job safety briefing will be a discussion, between the roadway worker and the employee providing the authorization to enter the right-of-way, of the protection to be used. Communication. Each lone worker must communicate prior to fouling the track with a supervisor or another designated employee to receive an on-track safety job briefing consisting of the elements in § 671.33(b), including a discussion of their planned work activities and the procedures that they intend to use to establish on-track safety. The lone worker must acknowledge and document the job safety briefing in writing consistent with § 671.33(c). Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671.				

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§GO 175-A 4.3, 671.37(a) Good faith safety challenge. Plan Requirements: Right to challenge. Each *RTA* shall provide every *roadway worker* the right to challenge, and/or refuse, in good faith, any *RWP* assignment he or she has reason to believe is unsafe or would violate any *RWP* rule or procedure. The *roadway worker* must describe the safety or rule concern and remain clear of the *track zone* until the challenge is resolved. Written procedure. Each RTA must document its procedures that provide every roadway worker the right to challenge and refuse in good faith any assignment they believe is unsafe or would violate the RTA's RWP program. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671.				
§GO 175-A 4.3, 671.37(b) Good faith safety challenge. Plan Requirements: Right to challenge. Each *RTA* shall provide every *roadway worker* the right to challenge, and/or refuse, in good faith, any *RWP* assignment he or she has reason to believe is unsafe or would violate any *RWP* rule or procedure. The *roadway worker* must describe the safety or rule concern and remain clear of the *track zone* until the challenge is resolved. Prompt and equitable resolution. The written procedure must include methods or processes to achieve prompt and equitable resolution of any challenges and refusals made. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671.				
§GO 175-A 4.3, 671.37(c) Good faith safety challenge. Plan Requirements: Right to challenge. Each *RTA* shall provide every *roadway worker* the right to challenge, and/or refuse, in good faith, any *RWP*				

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assignment he or she has reason to believe is unsafe or would violate any *RWP* rule or procedure. The *roadway worker* must describe the safety or rule concern and remain clear of the *track zone* until the challenge is resolved. Requirements. The written procedure must include a requirement that the roadway worker provide a description of the safety concern regarding on-track safety and that the roadway work group must remain clear of the roadway or track zone until the challenge and refusal is resolved. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671.				
§GO 175-A 6.3 f., 671.39(a)(1) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. General requirements. Each RTA must identify and provide redundant protections for each category of work roadway workers perform on the roadway or track. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6.3 f., 671.39(a)(2) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. General requirements. Each RTA must establish redundant protections to ensure on-track safety for multiple roadway work groups within a common work area.				

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Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6.3 f., 671.39(b) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. Safety risk assessment to determine redundant protections. Each RTA must assess the risk associated with transit workers accessing the roadway using the methods and processes established under § 673.25(c) of this chapter. The RTA must use the methods and processes established under § 673.25(d) of this chapter to establish redundant protections for each category of work performed by roadway workers on the rail transit system and must include lone workers. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6.3 f., 671.39(b)(1) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. Safety risk assessment to determine redundant protections. The safety risk assessment must be consistent with the RTA's Agency Safety Plan (ASP) and the SSOA's program standard. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a				

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section devoted to risk-based redundant protections. Also, RTA must include a statement that they follow their PTASP and our Program Standard, specifically in regard to safety risk assessment.				
§GO 175-A 6.3 f., 671.39(b)(2) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. Safety risk assessment to determine redundant protections. The safety risk assessment may be supplemented by engineering assessments, inputs from the safety assurance process established under § 673.27 of this chapter, the results of safety event investigations, and other SRM strategies or approaches. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6.3 f., 671.39(b)(3) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. Safety risk assessment to determine redundant protections. The RTA must review and update the safety risk assessment at least every two years to include current conditions and lessons learned from safety events, actions taken to address reports of unsafe acts and conditions, and near-misses, and results from compliance monitoring regarding the effectiveness of the redundant protections. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				

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§GO 175-A 6.3 f., 671.39(b)(4) Risk-based redundant protections. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. Safety risk assessment to determine redundant protections. The SSOA may also identify and require the RTA to implement alternate redundant protections based on the RTA's unique operating characteristics and capabilities. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections. Verify compliance with GO 175-A 6.3 f.				
§GO 175-A 6 & 7, 671.39(c) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track including yard and end-of-line storage tracks. Categories of work requiring redundant protections. Redundant protections must be identified for roadway workers performing different categories of work on the roadway and within track zones, which may include but are not limited to categories such as: Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A section 6, including 6.1 a.-d., 6.2 a.-e., 6.3 a.-g, 7.1, & 7.2; and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6, 671.39(c)(1) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks.				

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Roadway workers moving from one track zone location to another. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6, 671.39(c)(2) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. Roadway workers performing minor tasks. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6, 671.39(c)(3) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. Roadway workers conducting visual inspections. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				

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§GO 175-A 6, 671.39(c)(4) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. Roadway workers using hand tools, machines, or equipment in conducting testing of track system components or non-visual inspections. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6, 671.39(c)(5) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. Roadway workers using hand tools, machines, or equipment in performing maintenance, construction, or repairs. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 6, 671.39(c)(6) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks.				

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Lone workers accessing the roadway or track zone or performing visual inspections or minor tasks. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections. Verify program complies with GO 175-A 5.3.				
§GO 175-A 6, 671.39(d)(1) & (2) Risk-based redundant protections. Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. Types of redundant protections. Redundant protections may be procedural or physical. Redundant protections may include but are not limited to: (i) Approaches consistent with the FRA rules governing redundant protections; (ii) Rail transit vehicle approach warning; (iii) Foul time; (iv) Exclusive track occupancy, defined as a method of establishing working limits, as part of ontrack safety, in which movement authority of rail transit vehicles and other equipment is withheld by the control center or restricted by flag persons and provided by a roadway worker in charge; (v) Warning signs, flags, or lights; (vi) Flag persons; (vii) Lock outs from the rail transit vehicle control systems or lining and locking track switches or otherwise physically preventing entry and movement of rail transit vehicles; (viii) Secondary warning devices and alert systems; (ix) Shunt devices and portable trip stops to reduce the likelihood of rail transit vehicles from entering work zone with workers; (x) Restricting work to times when propulsion power is down with verification that track is out of service, and when barriers are placed that physically prevent rail transit vehicles, including ontrack equipment, from entering the work zone; (xi) Use of walkways in tunnels and on elevated structures to reduce roadway worker time in the track zone; and (xii) Speed restrictions.				

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Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections. The protections described in 671.39(d)(1) & (2) should be considered and approved if included in the RTA RWP program.				
§GO 175-A 2.8, 6.1, & 6.2; 671.39(d)(3) Risk-based redundant protections. Plan Requirements: Minor tasks definition. Moving from one location to another with full attention on surroundings. The requirements in this section, a, b, and c below, do not apply to moving from one location to another on semiexclusive and non-exclusive alignments (as defined in the General Order 143 series), with full attention to surroundings. a. *Roadway worker*/crew must establish authorization for the identified area, and b. *Roadway worker(s)* must be able to comply with the *15-second rule*. c. *Roadway workers* may occupy General Order 143 series compliant emergency walkways in tunnels and on elevated structures where there is insufficient clearance to remain clear of the *track zone*. Trains must be slowed to 25 miles per hour or less before *roadway workers* may occupy the *track zone* on the emergency walkway. d. *Roadway workers* may occupy an area outside a fence installed as a physical barrier between the *roadway worker* and the track, where the fence is within the *track zone*. Performing *minor tasks* with sufficient attention to surroundings. a. *Roadway worker* must establish authorization for identified work area, and b. Notification must be given to train operators, and c. Notification of reverse direction and other abnormal train movement must be provided to roadway worker, and d. *Roadway worker* must be able to comply with the *15-second rule*, and e. One of the following, i or ii: i. Trains must stop short of the work location unless the *roadway worker* communicates by radio or hand signals to the train operator that the train may proceed. Trains approaching the work location must sound an audible warning until it is acknowledged by the *roadway worker*. Upon radio communication between the train operator and *roadway worker*, or upon visual confirmation by the *roadway worker*, that the train is stopped, the *roadway worker* may enter the *track zone*. Upon radio communication or hand				

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signals from the *roadway worker* that he or she is clear of the *track zone* or on a walkway under the provisions of Section 6.1.c, the train may proceed. ii. Trains are held outside the work location under a *Confirmed Hold*. Types of redundant protections. Redundant protections for lone workers must include, at a minimum, foul time or an equivalent protection approved by the SSOA. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A and 671. Note: GO 175-A does not include a section devoted to risk-based redundant protections.				
§GO 175-A 8 Protections for Emergency Response Personnel Plan Requirements: Protections for Emergency Response Personnel Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A, specifically sections 8.1, 8.2, 8.3, & 8.4; and 671.				
§GO 175-A 9, 671.41(a) RWP training and qualification program. Plan Requirements: Roadway Worker Protection Training. General. Each RTA must adopt an RWP training program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.1 & 9.2, 671.41(a)(1) RWP training and qualification program.				

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Plan Requirements: Each RTA shall adopt an RWP training program for roadway workers so that each worker understands the hazards of working along the right-of-way and the methods to safely work on the right-of-way. Each RTA shall adopt an RWP training program for any employee who may affect roadway worker safety, including their own safety. For example, the program shall cover employees such as rail transit vehicle operators, dispatchers, rail operations control center staff, and supervisors. The RWP training program must address all transit workers responsible for on-track safety, by position, including roadway workers, operations control center personnel, rail transit vehicle operators, operators of on-track equipment and roadway maintenance machines, and any others with a role in providing on-track safety or fouling a track for the performance of work. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.4, 671.41(a)(2) RWP training and qualification program. Plan Requirements: No RTA shall assign an employee to perform the duties of a roadway worker unless that employee has received training in the RWP procedures associated with the work assignment to be performed. Any person who is escorted and being provided RWP safety by an RWP trained employee is exempt from these training provisions. The RWP training program must be completed for the relevant position before an RTA may assign a transit worker to perform the duties of a roadway worker, to oversee or supervise access to the track zone from the operations control center, or to operate vehicles, on-track equipment, and roadway maintenance machines on the rail transit system. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§671.41(a)(3) RWP training and qualification program.				

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State or Federal Code Cite Plan Requirements Guidance	Included Y	 N	Page Ref.	RTSB Questions/ Comments
Plan Requirements: The RWP training program must address RWP hazard recognition and mitigation, and lessons learned through the results of compliance testing, near-miss reports, reports of unsafe acts or conditions, and feedback received on the training program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.4 a., 671.41(a)(4) RWP training and qualification program. Plan Requirements: Each RTA at least once every 24 months shall retrain all roadway workers and employees with RWP responsibilities on the RWP training program for roadway workers. The RWP training program must include initial and refresher training, by position. Refresher training must occur every two years at a minimum. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not differentiate between initial and refresher training.				
§GO 175-A 9.3, 671.41(a)(5) RWP training and qualification program. Plan Requirements: Each RTA shall make changes to its training program to address problems identified through the results of compliance testing, near-miss reports, reports of unsafe acts or conditions, and comments received on the training program. The RTA must review and update its RWP training program not less than every two years, to reflect lessons learned in implementing the RWP program and information provided by the SSOA and FTA. The RTA must provide an opportunity for roadway worker involvement in the RWP training program review and update process.				

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State or Federal Code Cite Plan Requirements Guidance	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not include review and update every two years, and reflecting lessons learned and information from the SSOA and FTA.				
§GO 175-A 9.5 a., 671.41(b) RWP training and qualification program. Plan Requirements: The training of all roadway workers at a minimum shall include: a. Classroom training with the opportunity to ask the RWP trainer questions and raise and discuss RWP issues. Required elements. The RWP training program must include interactive training with the opportunity to ask the RWP trainer questions and raise and discuss RWP issues. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 b., 671.41(b)(1) RWP training and qualification program. Plan Requirements: The training of all roadway workers at a minimum shall include: b. Experience in a representative field-setting. Initial training must include experience in a representative field setting. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 f., 671.41(b)(2) RWP training and qualification program. Plan Requirements: The training of all roadway workers at a minimum shall include:				

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	Y	N		
f. Checks or tests to ensure the ability to comply with RWP instructions given by persons performing, or responsible for, on- track safety and RWP functions. Initial and refresher training must include demonstrations and assessments to ensure the ability to comply with RWP instructions given by transit workers performing, or responsible for, on-track safety and RWP functions. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A section 9 does not include or require demonstrations.				
§GO 175-A 9, 671.41(c) RWP training and qualification program. Plan Requirements: Roadway Worker Protection Training. The training of all *roadway workers* at a minimum shall include: Minimum contents for RWP training. The RWP training program must address, as applicable, the following minimum contents: Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 c., 671.41(c)(1) RWP training and qualification program. Plan Requirements: The RTA's RWP rules and procedures. How to interpret and use the RTA's RWP manual. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§671.41(c)(2) RWP training and qualification program.				

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State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
Plan Requirements: How to challenge and refuse assignments in good faith. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A section 9 does not reference good faith challenges. Verify compliance with GO 175-A section 4.3.				
§GO 175-A 9.5 k., 671.41(c)(3) RWP training and qualification program. Plan Requirements: Classroom discussion of the RTA's RWP near-miss program including, but not limited to how to report near-misses. How to report unsafe acts, unsafe conditions, and near-misses after they occur, and the mandatory duty to make such reports. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not specify training requirements for reporting unsafe conditions and how reporting is mandatory.				
§GO 175-A 9.5 d., 671.41(c)(4) RWP training and qualification program. Plan Requirements: Recognition of all tracks and understanding of the space around them within which RWP is required. Recognition of the track zone and understanding of the space around tracks within which on-track safety is required, including use of the track access guide. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not specify training requirements for the track access guide.				

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	Y	N		
§GO 175-A 9.5 e., 671.41(c)(5) RWP training and qualification program. Plan Requirements: The functions and responsibilities of various persons involved with RWP procedures. The functions and responsibilities of all transit workers involved in on-track safety, by position. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 f., 671.41(c)(6) RWP training and qualification program. Plan Requirements: Checks or tests to ensure the ability to comply with RWP instructions given by persons performing, or responsible for, on- track safety and RWP functions. Proper compliance with on-track safety instructions given by transit workers performing or responsible for on-track safety functions. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 g., 671.41(c)(7) RWP training and qualification program. Plan Requirements: The proper signals, standardized for each RTA, to be given by an employee, including hand signals, and the proper procedures upon receiving a rail transit vehicle approach warning from a watchperson, including applicable operating and flagging rules. Signals and directions given by watchpersons, and the proper procedures upon receiving a rail transit vehicle approach warning from a watchperson.				

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	Y	N		
Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: Verify that watchpersons are only providing train approach warning.				
§GO 175-A 9.5 h., 671.41(c)(8) RWP training and qualification program. Plan Requirements: The hazards associated with working on or near all tracks, including review of RWP rules and procedures. The hazards associated with working on or near rail transit tracks to include traction power, if applicable. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not specifically include training for hazards associated with traction power.				
§GO 175-A 9.5 c., 671.41(c)(9) RWP training and qualification program. Plan Requirements: The RTA's RWP rules and procedures. Rules and procedures for redundant protections identified under § 671.37 and how they are applied to RWP. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not specifically include training for redundant protections.				
§GO 175-A 9.5 c., 671.41(c)(10) RWP training and qualification program. Plan Requirements: The RTA's RWP rules and procedures.				

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	Y	**N**		
Requirements for safely crossing rail transit tracks in yards and on the mainline. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: RWP Program training shall include GO 175-A section 6 & 7 requirements.				
§GO 175-A 9.4 c. Plan Requirements: Each *RTA* shall provide an opportunity in its training program for *roadway workers* to raise and discuss issues regarding the effectiveness of the training program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 i. Plan Requirements: The training of all *roadway workers* at a minimum shall include: Flag protection rules and procedures and how they are applied to *RWP*. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 c. & e., 671.41(d) RWP training and qualification program. Plan Requirements: The training of all roadway workers at a minimum shall include: c.The *RTA's RWP* rules and procedures. e. The functions and responsibilities of various persons involved with RWP procedures.				

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	Y	N		
Specialized training and qualification for transit workers with additional responsibilities for on-track safety. The RWP training program must include additional training for watchpersons, flag persons, lone workers, roadway workers in charge, and other transit workers with responsibilities for establishing, supervising, and monitoring on-track safety. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not specify special training and qualifications per role.				
§GO 175-A 9, 671.41(d)(1) RWP training and qualification program. Plan Requirements: Roadway Worker Protection Training. This training must cover the content and application of the additional RWP program requirements carried out by these positions and must address the relevant physical characteristics of the RTA's system where on-track safety may be established. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.5 b. & j., 671.41(d)(2) RWP training and qualification program. Plan Requirements: The training of all roadway workers at a minimum shall include: b. Experience in a representative field-setting. j. Classroom discussion of the compliance testing program requirements. This training must include demonstrations and assessments to confirm the transit worker's ability to perform these additional responsibilities. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				

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	Y	**N**		
§GO 175-A 9.5 a., 671.41(d)(3) RWP training and qualification program. Plan Requirements: The training of all roadway workers at a minimum shall include: a. Each RTA at least once every 24 months shall retrain all roadway workers and employees with RWP responsibilities on the RWP training program for roadway workers. Refresher training on additional responsibilities for on-track safety, by position, must occur every two years at a minimum. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.6, 671.41(e) RWP training and qualification program. Plan Requirements: Each RTA shall ensure that their RWP training personnel are competent to provide effective RWP training, and at a minimum will consider the following: Competency and qualification of training personnel. Each RTA must ensure that transit workers providing RWP training are qualified and have active RWP certification at the RTA to provide effective RWP training, and at a minimum must consider the following: Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671. Note: GO 175-A does not require that RWP training personnel have active RWP certification at the RTA to provide effective RWP training.				
§GO 175-A 9.6 a., 671.41(e)(1) RWP training and qualification program. Plan Requirements: Experience and knowledge of effective training techniques.				

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	Y	N		
A trainer's experience and knowledge of effective training techniques in the chosen learning environment. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.6 b., 671.41(e)(2) RWP training and qualification program. Plan Requirements: Experience with the RTA's RWP rules. A trainer's experience with the RTA RWP program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.6 c., 671.41(e)(3) RWP training and qualification program. Plan Requirements: Knowledge of the RTA's RWP rules, program, operations, and operating environment, including applicable operating rules. A trainer's knowledge of the RTA RWP rules, operations, and operating environment, including applicable operating rules. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.6 d., 671.41(e)(4) RWP training and qualification program. Plan Requirements: Knowledge of the training requirements specified in this General Order.				

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	Y	N		
A trainer's knowledge of the training requirements specified in this part. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 3.7, 671.43(a) RWP compliance monitoring program. Plan Requirements: Each RTA shall include RWP rules in its compliance testing program to ensure compliance, to assess the degree of compliance, and to make any necessary changes to enhance compliance. General. Each RTA must adopt a program for monitoring its compliance with the requirements specified in its RWP program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§671.43(b) RWP compliance monitoring program. Plan Requirements: Required elements. The RWP compliance monitoring program must include inspections, observations, and audits, consistent with safety performance monitoring and measurement requirements in the RTA's ASP described in § 673.27(b) of this chapter and the SSOA's program standard. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§671.43(b)(1) RWP compliance monitoring program. Plan Requirements: The RTA must provide quarterly reports to the SSOA documenting the RTA's compliance with and sufficiency of the RWP program.				

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	Y	N		
Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§671.43(b)(2) RWP compliance monitoring program. Plan Requirements: The RTA must provide an annual briefing to the Accountable Executive and the Board of Directors, or equivalent entity, regarding the performance of the RWP program and any identified deficiencies requiring corrective action. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
E. Recordkeeping				
§GO 175-A 3.4, 671.51(a) Recordkeeping. Plan Requirements: Each RTA shall maintain for a minimum of four years records of employee-reported unsafe acts or conditions that could result in a roadway worker accident or incident. Records may be kept as part of an RTA's Near-Miss program and recordkeeping specified in Section 10. Each RTA must maintain the documents that set forth its RWP program; documents related to the implementation of the RWP program; and results from the procedures, processes, assessments, training, and activities specified in this part for the RWP program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 9.4 b., 671.51(b) Recordkeeping. Plan Requirements:				

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	Y	**N**		
Records showing compliance with the requirement in subsection a. (24-month retraining) above shall be maintained for a minimum of three (3) years. Each RTA must maintain records of its compliance with this requirement, including records of transit worker RWP training and refresher training, for a minimum of three years after they are created. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
§GO 175-A 8.3 & 10.2, 671.51(c) Recordkeeping. Plan Requirements: RTAs shall offer training to non-RTA emergency response personnel in their service territory either: 1) no less than every two years, or 2) regularly and accommodating all requests for training. Under either option, records of training must be available for three years for Commission inspectors' review. RWP near-miss records shall be retained by the RTA for a period of four (4) years and shall be made available to CPUC staff on demand. These documents must be made available upon request by the FTA or other Federal entity, or an SSOA having jurisdiction. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A and 671.				
GO 175-A Rights and Responsibilities				
§GO 175-A 4 (4.2, 4.5, 4.6, & 4.7) Rights and Responsibilities Plan Requirements: Right to discuss and confirm understanding. In any *job safety briefing* provided prior to work on the *right-of-way*, each *RTA* shall grant each *roadway worker* the right to discuss and confirm understanding of the safety provisions to be provided.				

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	Y	**N**		
Each *RTA* shall ensure that every *roadway worker* knows they have a responsibility to ascertain that *track zone* safety is established and understood prior to entering the *track zone*. Each *RTA* shall ensure that every *roadway worker* knows they have a duty to warn other *roadway workers* and *employees* in an unprotected *track zone* to move to the clear. Shared responsibility. Each *RTA* shall communicate to its *roadway workers* that each worker ultimately is responsible for his or her actions at a work site, and that compliance with the *RWP* rules are designed to require actions that will keep workers safe and must be followed consistent with this section. Additional Guidance: RTA RWP program include rights and responsibilities in compliance with GO 175-A and 671.				

The Roadway Worker Protection Plan is:

☐ **Acceptable**

☐ **Unacceptable. Revise and Resubmit**

Reviewed by: *Signature* _____ **Date:** _____
Name and Title

Approved by: *Signature* _____ **Date:** _____
Name and Title

Attachment 26: CPUC Checklist for Review of Non-FTA-Funded RTA's Roadway Worker Protection Plan
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State or Federal Code Cite Plan Requirements Guidance	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		
1. General Provisions				
§ GO 175-A 1 (1.1-1.5) Plan Requirements: Authority. These rules and regulations are authorized by and implement the provisions of 49 U.S.C. § 5330; 49 C.F.R. § 6591; and California Public Utilities Code Sections 778 and 99152, as well as the California Public Utilities Code sections establishing each individual *rail transit agency* within California. Purpose. The purpose of these rules and regulations is to provide a safe working environment for *RTA roadway workers*. These rules and regulations are intended to ensure that each *RTA* adopts a program for *roadway workers* containing specific rules for protecting these workers from the danger of being struck by trains or other *on-track equipment*. Applicability. These rules and regulations are applicable to all *RTAs* in California. These rules and regulations do not prohibit *RTAs* from implementing rules that provide greater safety. These rules and regulations do not apply to: a. Fire protection and law enforcement personnel. b. *Employees* responding to a life-threatening emergency. c. Track that is being constructed until any *RTA* vehicles or *employees* occupy the construction area, except for *RTA employees* who must occupy the area to perform inspections needed during construction, and who will do so under the construction *contractor*'s protections and regulatory obligations. d. Work being performed on a platform outside of the platform edge warning strip where an *employee* or any tool does not infringe on the warning strip. Additional Rules. The Commission may make such additional rules and regulations or changes to these rules and regulations as necessary for the purpose of safety. Exemptions and Modifications. Requests for exemptions or modifications from these rules and regulations shall contain a full statement of the reasons justifying the request. A request must demonstrate that safety would not be reduced by the proposed exemption or modification. Any exemption or modification so granted shall be limited to the particular matter covered by the request and shall require Commission approval.				

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	Y	N		
Additional Guidance: General Order 175-A applies to any employee who performs work on the right-of-way and applies to all RTAs in California.				
2. Definitions				
§GO 175-A 2. Definitions Plan Requirements: *Confirmed Hold* means a specific procedure that can be used as specified in this General Order to hold rail transit vehicles, including on-track equipment, out of a work location as follows: The rail operations control center will instruct a rail transit vehicle operator of the next vehicle in line to arrive at the work zone to stop at a designated location, and the rail transit vehicle operator will confirm to the rail operations control center that the vehicle is actually stopped at the designated location. Roadway workers will not be permitted to enter the work zone until the Employee in Charge (EIC) receives notification from the rail operations control center that a Confirmed Hold has been verified for each approaching rail transit vehicle. The Confirmed Hold will not be lifted until the EIC has determined all roadway workers are clear of the track zone, or in a place of safety as applicable, and confirms the release of the work location to the rail operations control center. A confirmed hold can be established by a rail transit vehicle operator when the operator is the person performing the authorized minor task. In this instance, the operator acts as both the EIC and the train operator, and can establish the required communication with the rail operations control center. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Director* means the Director of the Commission's division overseeing rail transit safety, or the Deputy Director overseeing rail transit safety. Additional Guidance: If a term is used in the RWP program, RTA may use the GO definition.				

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	Y	**N**		
§GO 175-A 2. Definitions Plan Requirements: *Employee* means a person employed by a rail transit agency (RTA) in California, an employee of a utility providing services to the RTA or accessing the RTA's right-of-way to maintain their facilities who could occupy the track zone, or a contractor working on behalf of such RTA. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Employee in Charge (EIC)* means the *RTA employee* with responsibility for supervising and ensuring safety, including use of *roadway worker* protections, at a *right-of-way* worksite. In the case of a *minor task*, the *EIC* would be the *roadway worker* performing the *minor task* if alone. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Fifteen-second rule*, or *15-second rule*, means a rule that requires a roadway worker to be clear of the track zone or in a place of safety 15 seconds before a rail transit vehicle moving at the maximum authorizable speed on that track could arrive at the location of the roadway worker. Additional Guidance:				

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	Y	**N**		
RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Job safety briefing* means a meeting conducted at the job site by the EIC of the work that focuses on the hazards of the work to be performed and the provisions to eliminate or protect against those hazards. The term is further defined through the requirements for a job safety briefing provided in this General Order. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Maximum authorizable speed* is defined only for the purpose of calculating the 15-second rule distance, and is defined as the maximum allowable speed under all conditions on that track, unless a lower speed restriction is enforced by automatic train controls that also control speeds [of] trains operating in manual mode. If a lower speed is enforced by automatic train controls, then the maximum authorizable speed on that track is the automatic train control-enforced speed. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Minor tasks* are defined as those tasks without tools unless specified herein where an individual can continue to look out at least every five (5) seconds for approaching rail transit vehicles and where they can be performed without violating the 15-second rule. Minor tasks are limited to the following: a. Retrieving or removing an item from the track zone.				

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	Y	**N**		
b. Lining manual or electric-lock track switches, including the use of a switch bar. c. Placing or removing flags. d. Taking photographs of an actual or suspected safety hazard or an actual or suspected violation of a rail safety law, regulation, order, or standard using a stand-alone camera that cannot be used for electronic communications; the only exception to the stand-alone requirement is that a camera may have a send-only feature that can send photos. After each time pressing the camera shutter release to take one photo or a one-second burst of photos, the employee must step out of the track zone to check the surroundings for any hazards, and only when it is safe step back into the track zone to take additional photos. Sending photos is not a minor task, and must be done either outside the track zone or under higher levels of protection. e. A visual inspection at one specific fixed location, deemed an immediate need. Tasks and tools not listed herein may be performed and used upon written request to the *Director* with copy to the affected *employees*' labor union representative(s) and written concurrence from the *Director*. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Near-miss* means an incident infringing on the safety of a roadway worker on or near the tracks, but without contact or injury. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *On-track Equipment* is a subset of the comprehensive rail transit vehicle definition herein, and means any rolling equipment besides revenue vehicles used for any purpose, including but not limited to testing, inspection, and maintenance. The definition is included to avoid possible confusion in subsections herein where a rail transit vehicle mistakenly might be assumed to be only a vehicle in				

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State or Federal Code Cite Plan Requirements Guidance	Included Y	 N	Page Ref.	RTSB Questions/ Comments
revenue passenger service. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Place of Safety* means a space where a person or persons can safely get sufficiently clear of any rail transit vehicle, including any on-track equipment, moving on any track. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Rail Fixed Guideway System* (RFGS) means any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, cable car, automatic people mover, or automated guideway transit system used for public transit and not regulated by the Federal Railroad Administration or not specifically exempted by statute from Commission oversight. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Rail Transit Agency* (RTA) means the entity that plans, designs, constructs, and/or operates a RFGS. Additional Guidance:				

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	Y	**N**		
RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Rail Transit Vehicle* means an *RTA*'s rolling stock, including but not limited to passenger and maintenance vehicles. Additional Guidance: If a term is used in the RWP program, RTA may use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Right-of-way* means a strip of land that is granted, through an easement or other mechanism, for transportation purposes which includes the RTA's rails; track; crossties; ballast; bridges; underpasses; tunnels; wayside signals; communication, overhead catenary system, and substation facilities adjacent to or extending into the track zone; and station areas in or adjacent to the track zone, excluding station platforms. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Roadway Worker* means any employee who performs any work on the right-of-way. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions				

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	Y	**N**		
Plan Requirements: *Contractor* means an entity that performs tasks on behalf of the *RTA*. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *RWP* means *Roadway Worker* protection. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Station Platform* means the portion of a transit facility directly adjacent to the tracks at a station where a transit vehicle stops to load and unload passengers, and where passengers are allowed to be when trains are moving. Additional Guidance: If a term is used in the RWP program, RTA may use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Stopping Point* means the specific location where trains must stop according to the provisions herein. Additional Guidance:				

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	Y	**N**		
If a term is used in the RWP program, RTA may use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Track Zone* means an area within six (6) feet of the outside rail on both sides of any track. a. The track zone definition is intended to provide a threshold that can be identified by workers as an area where a person or equipment could be struck, or has the potential to be struck, by the widest equipment that could occupy the track. The zone provides additional space away from the widest revenue rail transit vehicle that could occupy the track to address the potential for inadvertent movement into the area where a person or roadway working equipment could be struck. b. This zone should be widened, or extra safety provisions put in place, to safely accommodate any movement that might be anticipated into the area. Examples include equipment placed just outside the zone that has a bucket or swing boom that could extend far enough to be struck, or have the potential to be struck, or on-track equipment that might be wider than revenue rail transit vehicles..2 Fouling a track means placing oneself, or any equipment or appurtenance in an area where it could be struck by the widest equipment that could occupy the track. Additional Guidance: RTA shall use GO definition.				
§GO 175-A 2. Definitions Plan Requirements: *Watchperson*, sometimes called a lookout, means an employee who has been trained and qualified on RWP rules and procedures, whose sole duty is to provide effective warning in compliance with the 15-second rule to roadway workers of approaching rail transit vehicles, including trains or any on-track equipment, who does not perform or assist in any other work aside from the watchperson duty, and who remains clear of the track zone, or when clearance is unavailable, remains in a place of safety. Additional Guidance: RTA shall use GO definition.				

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State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
3. RTA Responsibilities				
§GO 175-A 3 (3.1, 3.2, 3.3) RTA Responsibilities Plan Requirements: Each *RTA* shall adopt and implement a program that will afford safety to all its *roadway workers*. Each *RTA* shall adopt *RWP* rules that satisfy the requirements of this General Order. Each *RTA* shall adopt a training program in accordance with Section 9. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A.				
§GO 175-A 3.4 Plan Requirements: Each RTA shall maintain for a minimum of four years records of employee-reported unsafe acts or conditions that could result in a roadway worker accident or incident. Records may be kept as part of an RTA's Near-Miss program and recordkeeping specified in Section 10. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 3.5 Plan Requirements: Each RTA shall create and maintain a separate dedicated manual excerpting all necessary roadway worker safety procedures and rules from its rule book(s), make it freely available to roadway workers, and ensure that roadway workers have easy access to the manual when performing job functions.				

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	Y	**N**		
Additional Guidance: General Order 175-A requires a separate dedicated manual.				
§GO 175-A 3.6 Plan Requirements: Each RTA shall specify one or more objective method(s) to determine appropriate sight distance for 15-second rule compliance as part of their training program. The information shall be provided to all employees who are involved in operations requiring the 15-second rule. Appropriate use of the rule shall be included in each RTA's training program. Examples: a. Track surveys that designate areas with insufficient sight distance to see a *rail transit vehicle* traveling in any direction at the *maximum authorizable speed* per the *15-second rule*. b. Speed-distance tables, the time it would take for a vehicle to close the distance from where it could first be seen to arriving at the location of the *roadway worker* and/or *watchperson*, and roadside markers *roadway workers* can confidently rely on to determine the sight distance necessary to be able to clear the *track zone* per the *15-second rule*. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§GO 175-A 3.7 Plan Requirements: Each RTA shall include RWP rules in its compliance testing program to ensure compliance, to assess the degree of compliance, and to make any necessary changes to enhance compliance. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 3.8				

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	Y	**N**		
Plan Requirements: If an *RTA* uses flag protection to provide *roadway worker* safety, it shall establish written flag protection procedures and rules and include those rules in the manual described in Section 3.5. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A.				
§GO 175-A 3.9 Plan Requirements: Each RTA shall establish what safety equipment a person accessing the track zone is required to use consistent with applicable standards such as federal, state, American Public Transportation Association or other industry rules and/or guidelines. Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A.				
§GO 175-A 3.10 Plan Requirements: Anyone allowed access to the track zone, by request, easement, or other form of permission, shall either complete the required RWP training or be escorted by an RWP-trained employee. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
4. Rights and Responsibilities				
§GO 175-A 4.1 Plan Requirements: Right to a job safety briefing. Each RTA shall require that a job safety briefing be performed prior to the performance of any job				

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	Y	**N**		
duty that may occur on the right-of way, and shall require that all roadway workers at the job participate. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§GO 175-A 4.2 Plan Requirements: Right to discuss and confirm understanding. In any *job safety briefing* provided prior to work on the *right-of-way*, each *RTA* shall grant each *roadway worker* the right to discuss and confirm understanding of the safety provisions to be provided. Additional Guidance: RTA RWP program include rights and responsibilities in compliance with GO 175-A.				
§GO 175-A 4.3 Plan Requirements: Right to challenge. Each RTA shall provide every roadway worker the right to challenge, and/or refuse, in good faith, any RWP assignment he or she has reason to believe is unsafe or would violate any RWP rule or procedure. The roadway worker must describe the safety or rule concern and remain clear of the track zone until the challenge is resolved. Additional Guidance: RTA RWP program shall provide procedures in compliance with GO 175-A.				
§GO 175-A 4.4 Plan Requirements: Right and responsibility to report unsafe acts or conditions. Each RTA shall provide opportunities for roadway workers to report to the RTA any unsafe acts or conditions that could result in an accident or incident, and shall not discourage such reporting.				

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	Y	N		
Additional Guidance: RTA RWP program shall establish on-track safety requirements in compliance with GO 175-A.				
§GO 175-A 4.5 Plan Requirements: Each *RTA* shall ensure that every *roadway worker* knows they have a responsibility to ascertain that *track zone* safety is established and understood prior to entering the *track zone.* Additional Guidance: RTA RWP program include rights and responsibilities in compliance with GO 175-A.				
§GO 175-A 4.6 Plan Requirements: Each *RTA* shall ensure that every *roadway worker* knows they have a duty to warn other *roadway workers* and *employees* in an unprotected *track zone* to move to the clear. Additional Guidance: RTA RWP program include rights and responsibilities in compliance with GO 175-A.				
§GO 175-A 4.7 Plan Requirements: Shared responsibility. Each *RTA* shall communicate to its *roadway workers* that each worker ultimately is responsible for his or her actions at a work site, and that compliance with the *RWP* rules are designed to require actions that will keep workers safe and must be followed consistent with this section. Additional Guidance: RTA RWP program include rights and responsibilities in compliance with GO 175-A.				

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	Y	N		
5. Job Safety Briefing				
§GO 175-A 5.1 Plan Requirements: Each RTA shall require that an EIC provide a job safety briefing prior to any roadway work within the RTA right-of-way. The job safety briefing for each roadway worker must include a discussion and explanation of the job function, rules, and procedures for carrying out job duties. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 a. Plan Requirements: The general work plan for a crew; or for each crew when there are multiple crews, each with a different general work plan. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 b. Plan Requirements: The hazards involved and the means by which safety is to be provided to the roadway workers through compliance with these roadway worker safety rules and procedures. Special attention shall be given to the presence of on-track equipment, to the presence of any adjacent tracks, and to any need to widen the track zone according to the provisions of the track zone definition. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				

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	Y	**N**		
§GO 175-A 5.1 c. Plan Requirements: Personal Protective Equipment. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 d. Plan Requirements: Identification and location of key personnel such as a watchperson and an EIC. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 e. Plan Requirements: Appropriate flags and proper flag placement. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 f. Plan Requirements: A place of safety shall be predetermined that will allow workers to move to the safe area at least 15 seconds before any approaching rail transit vehicle moving at the maximum authorizable speed on that track can pass the location of the roadway worker.				

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	Y	N		
Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 g. Plan Requirements: The means for determining if and how the 15-second rule will be met shall be discussed including: i. Determination of sight distance. ii. Visibility conditions. iii. Ambient noise interference. iv. Maximum authorizable speed. v. Time needed to disengage from the work. vi. Location of places of safety. vii. Time to get to the place of safety. viii. Adjacent tracks, the hazards associated, and provisions to address those hazards. . Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 h. Plan Requirements: The means of communication among the roadway workers to be used in the job performance, including communication with any roadway maintenance machine operators. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 i.				

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	Y	**N**		
Plan Requirements: Acknowledgement by each *employee* that they understand the rules to be used. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.1 j. Plan Requirements: If a *watchperson* is being used, each *employee*, including the *watchperson*, must receive a review of the *watchperson*'s duties, at a minimum to include the information in the definition herein of a *watchperson*, as follows: The *watchperson*'s sole duty is to provide effective warning in compliance with the *15-second rule* to *roadway workers* of approaching *rail transit vehicles*, including trains or any *on-track equipment*. The *watchperson* does not perform or assist in any other work aside from the *watchperson* duty and remains clear of the *track zone*. If clearance is unavailable, the *watchperson* remains in a place of safety. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.2 Plan Requirements: If there is any change in the scope of work or crew after the initial job safety briefing, a follow-up job safety briefing shall be conducted. Additional Guidance: RTA RWP program shall establish policies in compliance with GO 175-A.				
§GO 175-A 5.3 Plan Requirements:				

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	Y	**N**		
In the case of an individual roadway worker moving from one location to another (Section 6.1) or performing a minor task (Section 6.2), the job safety briefing will be a discussion, between the roadway worker and the employee providing the authorization to enter the right-of-way, of the protection to be used. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
6. Minimum controls/limitations for employees…				
§GO 175-A 6, GO 143-B 14.01, CPUC RTSB Program Standard 1.5.0 Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track other than yard or end-of-line storage tracks. System Access by Commission Representatives: Representatives of the Commission shall be allowed to enter upon the property and onto any LRV or streetcar for the purpose of determining compliance with Commission rules, making tests, and inspecting records. Additional Guidance: RTA RWP manual must describe the training, qualification, and supervision required for employees to access the track zone.				
§GO 175-A 6.1 Plan Requirements: Moving from one location to another with full attention on surroundings. The requirements in this section, a, b, and c below, do not apply to moving from one location to another on semi-exclusive and non-exclusive alignments (as defined in the General Order 143 series), with full attention to surroundings. a. *Roadway worker*/crew must establish authorization for the identified area, and b. *Roadway worker(s)* must be able to comply with the *15-second rule*. c. *Roadway workers* may occupy General Order 143 series compliant emergency walkways in tunnels and on elevated structures				

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	Y	**N**		
where there is insufficient clearance to remain clear of the *track zone*. Trains must be slowed to 25 miles per hour or less before *roadway workers* may occupy the *track zone* on the emergency walkway. d. *Roadway workers* may occupy an area outside a fence installed as a physical barrier between the *roadway worker* and the track, where the fence is within the *track zone*. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.2 Plan Requirements: Performing *minor tasks* with sufficient attention to surroundings. a. *Roadway worker* must establish authorization for identified work area, and b. Notification must be given to train operators, and c. Notification of reverse direction and other abnormal train movement must be provided to roadway worker, and d. *Roadway worker* must be able to comply with the *15-second rule*, and e. One of the following, i or ii: i. Trains must stop short of the work location unless the *roadway worker* communicates by radio or hand signals to the train operator that the train may proceed. Trains approaching the work location must sound an audible warning until it is acknowledged by the *roadway worker*. Upon radio communication between the train operator and *roadway worker*, or upon visual confirmation by the *roadway worker*, that the train is stopped, the *roadway worker* may enter the *track zone*. Upon radio communication or hand signals from the *roadway worker* that he or she is clear of the *track zone* or on a walkway under the provisions of Section 6.1.c, the train may proceed. ii. Trains are held outside the work location under a *Confirmed Hold*. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3				

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Plan Requirements: Visual Inspections, Maintenance, and Repairs, Using Hand Tools, Machines, or Equipment. The provisions of this section must cover all *roadway worker*/crew activities not covered in sections 6.1 and 6.2. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 a. Plan Requirements: *Roadway worker*/crew must establish authorization for identified work area. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 b. Plan Requirements: Communication between the rail operations control center, the train operator, and the EIC must be established, and the means by which protection is going to be provided documented and confirmed by these individuals, affirming that no worker will be permitted to enter the track zone until the provisions in this section are implemented. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 c. Plan Requirements: Notification of reverse direction and other abnormal train movement must be provided to *roadway worker(s)*.				

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	Y	**N**		
Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 d. Plan Requirements: On-rail vehicle movement into the work zone must be controlled by applying one or more of the following controls, i through v, as appropriate: Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 d. i. Plan Requirements: with flags: (a) flags that indicate speed restrictions, advance warnings of *stopping points*, and *stopping points*, and (b) *watchperson(s)*, and (c) with all movements proceeding at a speed that will allow stopping within half the range-of-vision, and no greater than 25 miles per hour unless the *EIC* sets a slower speed, and, (d) after November 7, 2017, with an early warning alarm device, and (e) Trains must stop at *stopping points*, unless the *EIC* provides permission to proceed without stopping under all four of the following conditions: (1) train operator communicates directly with the *EIC* using a radio; and (2) train operator identifies the train and its location. *EIC* identifies their work zone area; and (3) *roadway workers* are clear of the *track zone*, or when clearance is unavailable, are in a *place of safety*. (4) hand signals are given by a person who can visually be identified as being authorized to give such hand signals. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				

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	Y	**N**		
§GO 175-A 6.3 d. ii. Plan Requirements: without flags: (a) either pursuant to specific authorization granted by the Commission and subject to any conditions accompanying that authorization; or pursuant to written authorization from the *Director* after an *RTA* submits a plan to the *Director* in a written proposal describing the intended use and plan for using this section, justifying the plan's safety, and only to be used under limited conditions where the use of flags cannot be reasonably implemented; and, (b) with an early warning electronic device; and (c) with *watchperson(s)*; and (d) with all movements proceeding at a speed that will allow stopping within half the range-of-vision, and no greater than 25 miles per hour unless the *EIC* sets a slower speed. (e) trains must stop upon receiving an alert and not proceed until receiving an appropriate proceed signal, but in the situation where the operator has to stop too far away from the work site to be able to receive a proceed signal, after stopping, the operator may proceed at restricted speed, but not to exceed 10 miles per hour, until the work site becomes visible. If at that point the operator does not receive a proceed signal, he or she must wait until the appropriate *employee* gives the signal. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 d. iii. Plan Requirements: lining and locking track switches or otherwise physically preventing entry and movement of *rail transit vehicles*, including *on-track equipment*, with a *watchperson.* Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				

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	Y	**N**		
§GO 175-A 6.3 d. iv. Plan Requirements: restricting work to times when propulsion power is down with verification from control that track is out of service, and barriers are placed that physically prevent *rail transit vehicles*, including *on-track equipment*, from entering the work zone. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 d. v. Plan Requirements: for *RTAs* with positive train control systems that are operating as designed across the entire system, (1) with a *watchperson*: the rail operations control center shall establish red signals or stop commands as applicable to the system, or (2) without a *watchperson*: the rail operations control center shall establish red signals or stop commands as applicable to the system and stop commands are physically locked in a field train-control room, by means such as a route prohibit, or other means that make it impossible for the rail operations control center to inadvertently allow proceed signals or commands into the work limits. Exception: This subsection does not apply where the positive train control system allows operators to exceed 25 miles per hour in manual mode. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 e. Plan Requirements: Within working limits, *rail transit vehicles*, including *on-track equipment*, shall move only under the direction of the *EIC*, and shall move at a speed that will allow stopping within half the range-of-vision, and no greater than 25 miles per hour unless the *EIC* sets a slower speed.				

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	Y	**N**		
Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 f. Plan Requirements: Beginning November 7, 2017, early warning alarm technology must be used, with the exception that it is recommended but optional when the protections of Sections 6.3.d iii, iv, and v(2) are in place. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 6.3 g. Plan Requirements: A standalone camera may be used for work-related purposes under the protections in this section. A cell phone, smartphone, or similar communication device camera may be used for work-related purposes under the protections in this section if it is an RTA issued device and if it is rendered incapable of sending and receiving communications while in the *track zone*; the device must be made immediately available to an *RTA* supervisor or Commission inspector upon request. Photographs may only be sent from outside the *track zone* unless all of the following conditions are met: ☐ The sender is unable to step out of the *track zone*. ☐ No on-track vehicles are working in the *track zone*. ☐ The protections of Sections 6.3.d, iii, iv, or v are being used. ☐ The sender moves to as safe a location as possible. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
7. Minimum controls/limitations for employees…				

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	Y	**N**		
§GO 175-A 7 Plan Requirements: Minimum controls/limitations for employees performing different categories of work when within the track zone on any track including yard and end-of-line storage tracks. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 7.1 Plan Requirements: Each *RTA* shall have and submit to Commission staff its yard and end-of-line storage track *RWP* program within 90 days of the effective date of this General Order and each time the plan is changed. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 7.2 Plan Requirements: Each *RTA* shall comply with its yard and end-of-line storage track *RWP* program. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
8. Protections for Emergency Response Personnel				
§GO 175-A 8.1 Plan Requirements:				

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State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
The *RWP* plan of each *RTA* shall include provisions for protection of non-*RTA* emergency response personnel. The provisions shall include consideration of movements on adjacent tracks. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 8.2 Plan Requirements: The *RWP* plan provisions shall include provisions for the *RTA* to offer coordination of emergency response activities with all fire protection and law enforcement agencies in their service territory, including emergency training drills with emergency response agencies. Notwithstanding the foregoing, when it is beyond their control, *RTA*s are not responsible for ensuring that other agencies participate in or comply with response coordination or training drills. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 8.3 Plan Requirements: *RTAs* shall offer training to non-*RTA* emergency response personnel in their service territory either: 1) no less than every two years, or 2) regularly, and accommodating all requests for training. Under either option, records of training must be available for three years for Commission inspectors' review. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A.				
§GO 175-A 8.4 Plan Requirements:				

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State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
An RTA's SSPP must include provisions for training of employees who may occupy the track zone during response to emergencies. Additional Guidance: RTA RWP program shall establish requirements in compliance with GO 175-A				
9. Roadway Worker Protection Training				
§GO 175-A 9.1 Plan Requirements: Each RTA shall adopt an RWP training program for roadway workers so that each worker understands the hazards of working along the right-of-way and the methods to safely work on the right-of-way. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 9.2 Plan Requirements: Each RTA shall adopt an RWP training program for any employee who may affect roadway worker safety, including their own safety. For example, the program shall cover employees such as rail transit vehicle operators, dispatchers, rail operations control center staff, and supervisors. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 9.3 Plan Requirements: Each RTA shall make changes to its training program to address problems identified through the results of compliance testing,				

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State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
near-miss reports, reports of unsafe acts or conditions, and comments received on the training program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 9.4 Plan Requirements: No RTA shall assign an employee to perform the duties of a roadway worker unless that employee has received training in the RWP procedures associated with the work assignment to be performed. Any person who is escorted and being provided RWP safety by an RWP trained employee is exempt from these training provisions. a. Each *RTA* at least once every 24 months shall retrain all *roadway workers* and *employees* with *RWP* responsibilities on the *RWP* training program for *roadway workers*. b. Records showing compliance with the requirement in subsection a. above shall be maintained for a minimum of three (3) years. c. Each *RTA* shall provide an opportunity in its training program for *roadway workers* to raise and discuss issues regarding the effectiveness of the training program. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 9.5 Plan Requirements: The training of all roadway workers at a minimum shall include: a. Classroom training with the opportunity to ask the RWP trainer questions and raise and discuss RWP issues. b. Experience in a representative field-setting. c. The RTA's RWP rules and procedures. d. Recognition of all tracks and understanding of the space around them within which RWP is required. e. The functions and responsibilities of various persons involved with RWP procedures.				

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	Y	**N**		
f. Checks or tests to ensure the ability to comply with RWP instructions given by persons performing, or responsible for, on-track safety and RWP functions. g. The proper signals, standardized for each RTA, to be given by an employee, including hand signals, and the proper procedures upon receiving a rail transit vehicle approach warning from a watchperson, including applicable operating and flagging rules. h. The hazards associated with working on or near all tracks, including review of RWP rules and procedures. i. Flag protection rules and procedures and how they are applied to *RWP*. j. Classroom discussion of the compliance testing program requirements. k. Classroom discussion of the *RTA's RWP near-miss* program including, but not limited to how to report *near-misses.* Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
§GO 175-A 9.6 Plan Requirements: Each RTA shall insure that their RWP training personnel are competent to provide effective RWP training, and at a minimum will consider the following: a. Experience and knowledge of effective training techniques. b. Experience with the RTA's RWP rules. c. Knowledge of the RTA's RWP rules, program, operations, and operating environment, including applicable operating rules. d. Knowledge of the training requirements specified in this General Order. Additional Guidance: RTA RWP program shall adopt a RWP training program in compliance with GO 175-A.				
10. Near-miss Reporting Program and Records				
§GO 175-A 10 (10.1-10.6) Near-Miss reporting programs and records				

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State or Federal Code Cite **Plan Requirements** **Guidance**	**Included**		**Page Ref.**	**RTSB Questions/ Comments**
	Y	**N**		
Plan Requirements: Each *RTA* shall develop and implement a program for reporting and recording *near-misses* regarding *RWPs*. *RWP near-miss* records shall be retained by the *RTA* for a period of four (4) years and shall be made available to CPUC staff on demand. The *near-miss* program shall include: a. A policy statement supporting the *near-miss* program signed by the *RTA*'s Chief Executive Officer, and b. A process to encourage and allow *roadway workers* to report *near-misses*, and c. Methods to store, easily access, and track *near-misses* and corrective actions, and d. Analyses to identify primary and contributory causal factors including root causes, and to implement corrective actions. Each *RTA* shall submit a copy of its *near-miss* program to staff within 90 days of the effective date of this order and within 30 days of any subsequent modifications. Each *RTA* shall reference their *near-miss* program in their *SSPP (PTASP).* Each RTA shall periodically review the effectiveness of its near-miss program taking into consideration industry practices and make adjustments if needed for increased effectiveness to achieve program goals. Additional Guidance: RTA RWP program shall include near-miss requirements in compliance with GO 175-A.				

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State or Federal Code Cite Plan Requirements Guidance	Included		Page Ref.	RTSB Questions/ Comments
	Y	N		

The Roadway Worker Protection Plan is:

☐ **Acceptable**

☐ **Unacceptable. Revise and Resubmit**

Reviewed by: *Signature* _____ **Date:** _____
Name and Title

Approved by: *Signature* _____ **Date:** _____
Name and Title

Attachment 27: CPUC Checklist for Annual Audit of FTA-Funded RTA's RWP Program

CPUC CHECKLIST FOR ANNUAL AUDIT OF FTA-FUNDED RTA'S RWP PROGRAM		
Rail Transit Agency		**Dated**
No.	**Analysis of the Effectiveness of the RWP Program:**	**Recommendations (if any)**
1	All RWP-related events over the period covered by the audit.	
2	All RWP-related reports made to the Transit Worker Safety Reporting Program over the period covered by the audit.	
3	All documentation of instances where a transit worker(s) challenged and refused in good faith any assignment based on on-track safety concerns and documentation of the resolution of any such instance during the period covered by the audit.	
4	Assessment of the adequacy of the track access guide, including whether the guide reflects current track geometry and conditions.	
5	A review of training and qualification records for transit workers who must enter a track zone to perform work	
6	A representative sample of written job safety briefing confirmations as described in 49 CFR Part 671.33.	
7	The compliance monitoring program described in 49 CFR Part 671.43.	

Reviewed by: *Signature* _____ Date: _____
Name and Title
Approved by: *Signature* _____ Date: _____