



January 8, 2008

**STATE OF TENNESSEE
RAIL FIXED GUIDEWAY SYSTEM
SAFETY OVERSIGHT PROGRAM**

System Safety Program Standard

Tennessee Department of Transportation
Multimodal Transportation Resource Division

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1 Introduction and Overview

1.1 Purpose

This document describes the State of Tennessee’s program for addressing regulations promulgated by the Federal Transit Administration (FTA). These regulations establish minimum requirements for safety and security programs at each rail transit agency (RTA) within the State’s jurisdiction. The purpose of this document is to provide standards, procedures, and technical direction to RTAs in order to implement the program specified by the State.

Note: Acronyms and definitions are located in Appendix A.

1.2 Authority

Through *T.C.A. 13-10-101 ET. Seq* the Tennessee General Assembly has assigned the Tennessee Department of Transportation, Office of Multimodal Transportation Resource Division (TDOT) as the agency responsible for rail transit safety and security oversight in the state. To implement the *T.C.A. 13-10-101 ET. Seq.*, this document establishes the system safety and security requirements for each RTA in the state to implement the provisions of the SSO program.

FTA's authority to require this program derives from its authority to condition the receipt of FTA grant funds in compliance with FTA guidance (49 U.S.C. § 4324(c)). The Intermodal Surface Transportation Efficiency Act (ISTEA), recently reauthorized by the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFTEA-LU), directed FTA to issue regulations requiring states to oversee the safety and security of rail transit agencies (49 USC § 5330). FTA promulgated its regulations through the adoption of a rule in 1995, entitled “Rail Fixed Guideway Systems; State Safety Oversight” (49 CFR Part 659). FTA recently revised 49 CFR Part 659, publishing its new final rule on April 29, 2005, hereinafter referred to as “the Rule” or Part 659.

T.C.A. 13-10-101 ET. Seq. and *Part 659* establish authority for TDOT’s program and the standards, procedures, and technical direction to be provided to each RTA operating within the state’s jurisdiction. This document combines TDOT’s program standard and procedures and comprises the state’s Initial Submission to FTA. It documents both RTA and TDOT required activities to implement *T.C.A. 13-10-101 ET. Seq.* and *Part 659*. It also specifies the program in place to ensure ongoing communication between TDOT and each affected RTA regarding safety and security information, and to address TDOT communication with the FTA, including initial, annual, and periodic submissions.

1.3 Roles and Responsibilities

1.3.1 Role of State of Tennessee

To fulfill the requirements of *49 CFR Part 659* and establish a Proactive Rail Safety Program, TDOT has been designated as the Official Oversight Agency for Rail Fixed Guideway Systems operations in Tennessee. Although TDOT is the state oversight agency, operations of Rail Fixed Guideway Systems, hereafter referred to as Rail Transit Agency or RTA, shall also satisfy all Federal and local safety statutory requirements.

To comply with these statutory requirements, this System Safety Program Standard (SSPS) is a document that establishes the relationship between TDOT and each RTA that specifies the procedure used to develop the RTA’s System Safety Program Plan (SSPP) and Security and Emergency Preparedness Plan (SEPP). Specifically, TDOT’s responsibilities are:

- 1) Issue an SSPS that establishes the relationship between TDOT and the RTAs under TDOT’s jurisdiction and specifies the requirements which the RTAs must follow. The SSPS is to include requirements for:
 - a. Safety practices to reduce the likelihood of unintentional events that may lead to death, injury, or property damage, and
 - b. Security practices to reduce the likelihood of intentional wrongful or criminal acts or terrorist activities.
- 2) Require each RTA within the state to develop, submit and implement an SSPP and SEPP that comply with the SSPS.
- 3) Review and approve each SSPP and SEPP on an annual basis and require updates as deemed necessary.
- 4) Require RTAs to conduct internal safety and security audits as an on-going activity and to submit annual reports to TDOT.
- 5) Require RTAs to report the occurrence of reportable accidents and hazardous conditions within a time frame specified by TDOT.
- 6) Conduct investigations of accidents and hazardous conditions with full access to all information and evidence collected by the RTA.
- 7) Conduct on-site safety and security reviews annually to assess whether the RTAs safety and security practices and procedures are in compliance with their SSPP and SEPP.
- 8) Report annually and as requested to the FTA with respect to oversight activities.

The program administered by TDOT is managed by Gina Pointer and Bill Hayes

Oversight Agency:	Tennessee Department of Transportation	
Program Manager:	Mrs. Evangeline Pointer Transportation Specialist 1 Tennessee Department of Transportation Phone: (615) 253-5518 Fax: (615) 253-1482 505 Deaderick St., Suite 1800 Nashville, TN 37243	Mr. Bill Hayes Transportation Specialist 1 TDOT Phone (615)-253-28 Fax: (615) 253-1482 505 Deaderick St., Suite 1800 Nashville, TN 37243

1.3.2 Role of the RTA

Each RTA shall prepare and implement an SSPP and SEPP in compliance with this SSPS. The responsibilities of the RTA include:

- 1) Conducting internal safety and security audits and submitting an annual report to TDOT summarizing the results of its internal safety and security audit process.
- 2) Identifying, classifying and resolving all hazardous conditions.
- 3) Notifying TDOT by telephone or fax of any accident that has occurred or identified hazardous condition within two (2) hours.
- 4) Conducting accident and hazardous condition investigations for TDOT when directed to do so. A complete written report of each investigation shall be filed with TDOT.
- 5) Preparing and implementing corrective action plans to minimize, correct and/or eliminate identified hazardous conditions and conditions that caused accidents.

1.3.3 Role of FTA

The FTA determines if TDOT has complied with the Rule or has made adequate efforts to comply with it. FTA reviews and comments on all reports relative to accidents and safety audits submitted by TDOT.

1.3.4 Other Regulatory Agencies

Commitment to safety requires the RTA to comply with the applicable safety regulations of other Federal, State and local agencies, which include:

- 1) U.S. Environmental Protection Agency (EPA)
- 2) National Transportation Safety Board (NTSB)
- 3) Tennessee Department of Transportation (TDOT)
- 4) Tennessee Department of Environment and Conservation (TDEC)
- 5) Occupational Safety and Health Administration (OSHA)

1.4 Scope and Application of the SSPS

This SSPS applies to each RTA now operating or planned for operation in Tennessee. This SSPS is approved by TDOT for use by all RTAs operating in Tennessee to use in developing a SSPP and a SEPP. The sections and tasks in this SSPS shall be selectively tailored and applied as required in the preparation of the SSPP and SEPP subject to the following:

- 1) In some operations, the requirements of this SSPS may exceed those of the RTA. In this case, the RTA may request in writing that TDOT grants an exception to this standard, provided that it does not violate the requirements of the Rule.
- 2) Recommendations, additions, deletions and any other pertinent data, which may be of use in improving this document, should be submitted in writing to TDOT for consideration and approval prior to use.
- 3) That safety, consistent with operating requirements, is designed into the system and its equipment, facilities and their interfaces and operation.
- 4) That Management emphasis be applied to safety throughout the life cycle of the system, making sure mishap/risk is understood and risk reduction is always considered in the safety audit process.
- 5) That the safety program stresses early hazard identification and elimination or reduction of associated risks to an acceptable level.

1.4 Distribution of SSPS

This document is distributed through the TDOT's Office of Multimodal Transportation Resource Division. Copies can be obtained from:

TDOT Office of Multimodal Transportation Resource Division
505 Deaderick Street, Suite 1800
Nashville, TN 37243

This document can also be obtained directly from the TDOT point-of-contact and from the TDOT website: www.tdot.com. In addition, copies of this document have been distributed directly to the designated safety and security points-of-contact established by each affected RTA.

1.5 Revisions and Updates of SSPS

To ensure currency, this document will be reviewed biennially to determine if updates are necessary. The first biennial review will be performed beginning on the first working day in January 2008. After a 30-day review period, during which TDOT will develop its proposed revisions, the revised document will be circulated for review in draft form to the affected RTAs. At least 30 days will be provided for the RTAs to submit comments to the TDOT point-of-contact.

Following this review and comment period, draft changes will be approved by TDOT and incorporated into the next version of the document. After every update, final versions of the revised document will be submitted to the RTA safety and security points-of-contact. Final versions of the revised document will also be submitted to FTA's Office of Safety and Security as part of TDOT's Annual Submission. Final versions of this document will also be available for distribution in the manner described in Section 1.5.

In addition to the biennial update, changes may be requested to this document based on reviews or audits from internal or external sources, such as FTA, or based on policy changes, statewide meetings, and/or organizational changes. Each request for change will be reviewed by appropriate TDOT staff in a timely manner. Proposed changes to this document will be circulated for review in draft form to the affected RTAs in the manner described for the biennial reviews. As with the biennial updates, final copies of the revised version of this document will be submitted to the RTA safety and security points-of-contact and to the FTA as part of the TDOT's Annual Submission.

1.6 Conflict of Interest

No individual or entity may provide services to both TDOT and an RTA when there is a conflict of interest or an appearance of a conflict. A conflict of interest occurs when an individual or entity performing work for an RTA or TDOT is unable, or potentially unable, to render impartial assistance or advice on the development or implementation of the standards and provisions of this SSPS, or to objectively perform such work without bias. A third party contractor to TDOT or an RTA may not have an unfair competitive advantage over other contractors. Each contractor is subject to full disclosure on all present and potential conflicts of interest in its activities or relationships prior to being awarded a contract with TDOT or an RTA.

2 System Safety Program Plan Standard

2.1 Objective and General Requirements

Each RTA shall prepare a System Safety Program Plan (SSPP) that conforms to the requirements specified by the FTA and by this System Safety Program Standard (SSPS). The SSPP shall apply to all systems, subsystems, equipment, facilities and every activity of the system life cycle beginning with construction and going through retirement and disposal of the system. The RTA must prepare the Security and Emergency Preparedness Plan (SEPP) as a separate document.

2.2 SSPP Minimum Requirements

TDOT has adopted the minimum requirements for RTA SSPPs from 49 CFR 659.17 and 49 CFR 659.19 of the revised Rule. TDOT encourages the RTAs to exceed this standard in their revenue service operations and to further enhance safety by applying system safety principles throughout all life cycle phases of the transit system's activities.

Each RTA must develop, implement, and maintain a written SSPP that complies with the program requirements outlined in Figure 1 on the following pages. These requirements are based on Appendix E of the *FTA Resource Toolkit for State Oversight Agencies Implementing 49 CFR Part 659*, issued January 2006.

At a minimum, the SSPP developed by the RTA must:

- be endorsed by top management of the transit agency;
- establish the safety and security goals and objectives of the transit agency;
- identify the safety roles and responsibilities of all RTA departments/functions;
- require cooperation within the transit agency and the accountability of executive leadership for addressing identified safety issues;
- identify the hazard management process to be managed by the RTA;
- identify the internal safety audit process to be managed by the RTA and overseen by TDOT;
- identify the notification, investigation and reporting procedures to be used jointly by the RTA and TDOT in managing accidents meeting thresholds specified by FTA's rule;
- require communication and coordination with TDOT in all SSO program provisions; and
- provide a schedule for the implementation and revision of the SSPP.

Figure 1: SSPP Requirements – 21 Elements (Elements of Internal Safety Review)

1. Executive Approval (Policy Statement)
2. Purpose, Goals and Objectives
 - 2.1 Purpose
 - 2.2 Goals
 - 2.3 Objectives
3. Management Structure
 - 3.1 Overview
 - 3.1.1 General Overview and History of Transit Agency
 - 3.1.2 Scope of Transit Services
 - 3.1.3 Physical Plant
 - 3.1.4 Operations
 - 3.1.5 Maintenance
 - 3.2 Integration of Safety Function
 - 3.3 Lines of Authority for Safety
4. Plan Review and Modification
 - 4.1 SSPP Review Schedule
 - 4.2 SSPP Control and Update Procedures
 - 4.3 SSPP Review and Approval by the State Oversight Agency
 - 4.4 SSPP Change Management
5. SSPP Implementation – Tasks and Activities
 - 5.1 Overview
 - 5.2 System Safety Function
 - 5.2.1 Methodology Used by the System Safety Unit
 - 5.3 Safety Responsibilities of Other Departments
 - 5.4 Safety Task Responsibility Matrix (or Narrative Description)
6. Hazard Management Process
 - 6.1 Overview
 - 6.2 Hazard Management Process – Activities and Methodologies
 - 6.3 Coordinating with the State Oversight Agency
7. Safety Certification
8. Managing Safety in System Modifications
9. Safety Data Acquisition
 - 9.1 Data Acquisition Process
 - 9.2 Access to Data
10. Accident/Incident Notification, Investigation and Reporting
 - 10.1 Overview
 - 10.2 Accident/Incident Reporting Criteria

- 10.3 Accident/Incident Investigation Procedures
- 10.4 Internal Notification Procedure
- 10.5 External Notification Procedure
- 10.6 Accident/Incident Reporting and Documentation
- 10.7 Corrective Action Resulting from Accident Investigation
- 10.8 Coordination with State Oversight Agency

11. Emergency Response Planning/Coordination/Training

- 11.1 Accident Response
- 11.2 Evacuation Procedures
- 11.3 Responsibilities for Emergency Preparedness
- 11.4 Coordinated Schedule
- 11.5 Emergency Drills and Exercises
- 11.6 Emergency Procedures
- 11.7 Emergency Training
- 11.8 Familiarization Training

12. Internal Safety Audit Process

- 12.1 Overview
- 12.2 Scope of Activities
- 12.3 Audit Process
 - 12.3.1 Integrity of Audit Process
 - 12.3.2 Cycle/Schedule and Responsibility for Scheduling Audits
 - 12.3.3 Checklists and Procedures
 - 12.3.4 Annual Audit Report
 - 12.3.5 Audit Reporting
 - 12.3.6 Coordination with the Oversight Agency
 - 12.3.7 Audit Completeness

13. Rules Compliance/Procedures Review

- 13.1 Overview
- 13.2 Review of Rules and Procedures
- 13.3 Process for Ensuring Rules Compliance
- 13.4 Compliance Techniques – Operations and Maintenance Personnel
- 13.5 Compliance Techniques – Supervisory Personnel
 - 13.6 Documentation

14. Facilities and Equipment Inspections

- 14.1 Facilities and Equipment Subject to Inspection
- 14.2 Facilities and Equipment Safety Inspection Schedules and Procedures
- 14.3 Regular Inspection and Testing
- 14.4 Checklists
- 14.5 Coordination with Hazard Management Process

15. Maintenance Audits/Inspections

- 15.1 Systems and Facilities Subject to Maintenance Program
- 15.2 Resolution of Audit/Inspection Findings

- 15.3 Checklists
- 16. Training and Certification Review/Audit
 - 16.1 Overview
 - 16.2 Employee Safety Program
 - 16.3 Safe Number of Working Hours for Safety-Sensitive Positions
 - 16.4 Contractor Safety
 - 16.5 Record Keeping
 - 16.6 Compliance with Training Requirements
- 17. Configuration Management
 - 17.1 Overview
 - 17.2 Process for Changes
 - 17.3 Authority for Change
- 18. Compliance with local, state and federal Requirements
 - 18.1 Employee Safety Program
 - 18.2 Working on or near Rail Transit Controlled Property
 - 18.3 Compliance with Required Safety Programs
- 19. Hazardous Materials
- 20. Drug & Alcohol Abuse
- 21. Procurement

2.3 3 Year Annual Review of SSPP

Each RTA shall conduct a triennial annual of its SSPP and update it as necessary to ensure that the SSPP is current at all times. This review will assess seven (7) elements of the SSPP per year on a three year cycle. The RTA shall complete the review for the previous calendar year and submit a revised SSPP to the TDOT point-of-contact by March 1. The SSPP should be submitted in electronic format via email to the TDOT point-of-contact. As appropriate, referenced materials affected by the revision(s) should also be submitted with the SSPP. Referenced materials and supporting procedures may be submitted in hard copy via mail or fax. Each revised SSPP submitted to TDOT by an RTA shall include a text or tabular summary that identifies and explains proposed changes and includes a time frame for completion of the associated activities.

TDOT will review the submitted SSPP, using the checklist provided in Appendix C. In its review, TDOT will follow the process specified in Figure 2 on the following page. Upon approval of modifications, TDOT will issue to the RTA written approval of its SSPP within 30 calendar days of submission and the completed SSPP checklist found in Appendix C.

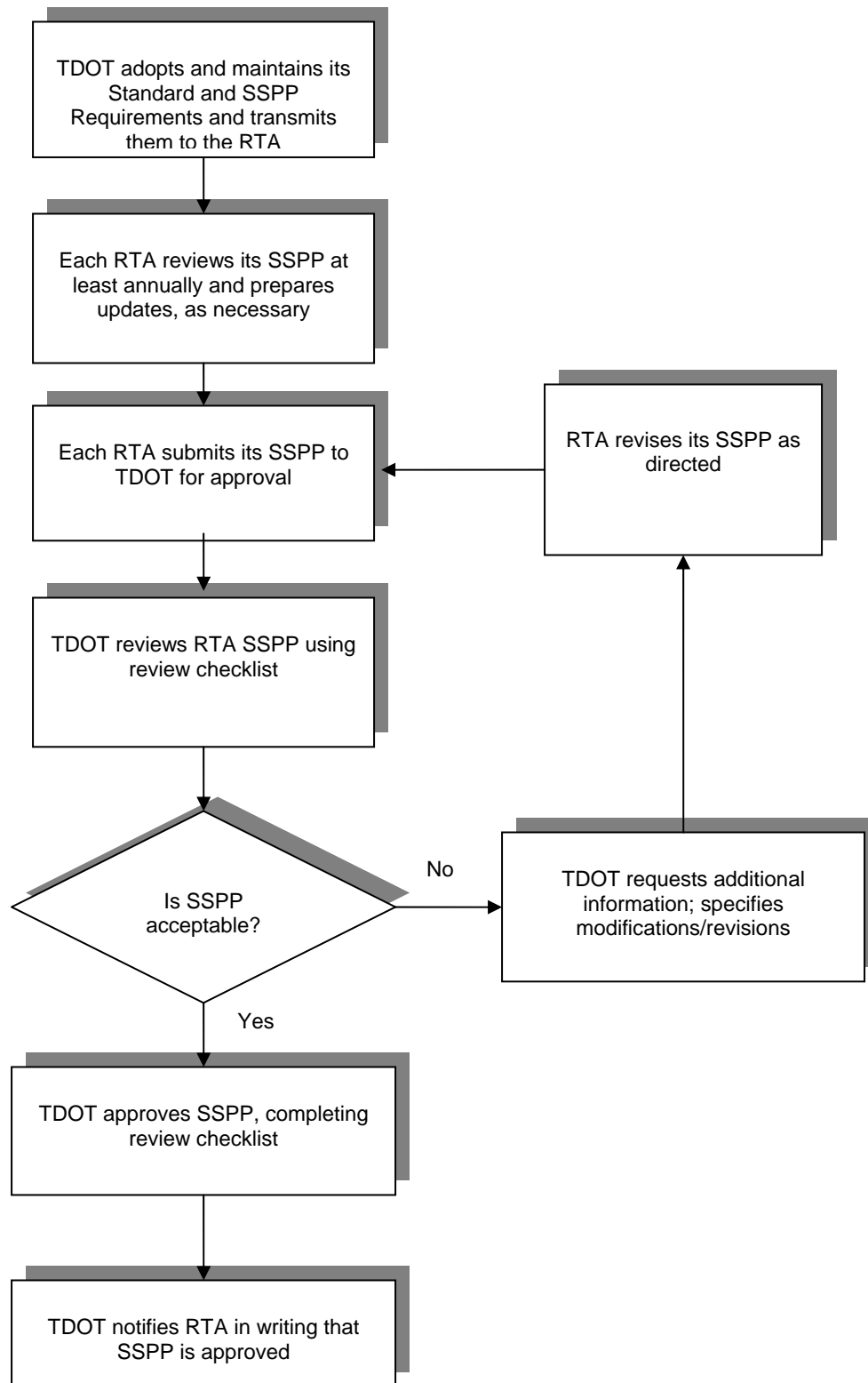
In the event that an RTA conducts its annual SSPP review and determines that no update is necessary for that year, it must prepare and submit formal correspondence notifying TDOT of this determination by March 1. If TDOT wishes to object to this determination, the TDOT point-of-

contact will notify the RTA within 30 calendar days. If TDOT does not object, TDOT will, by March 1, formally notify the RTA that its SSPP is still in compliance with TDOT's SSPS.

Additional reviews of the RTA SSPP may be required to address specific issues based on revisions to TDOT's SSPS, revisions to FTA 49 CFR 659, audit results, on-site reviews, investigations, or changing trends in incident data. Upon receipt of a written notification from TDOT for SSPP modifications, the RTA shall submit a revised SSPP to TDOT within 30 calendar days. TDOT will review and approve the revised SSPP, providing a formal approval letter and a completed review checklist (if appropriate for the change) within 30 calendar days of receipt of the revised RTA SSPP.

In the event that the RTA initiates updates outside of the annual review cycle, the RTA shall submit the modified SSPP, and any subsequently modified procedures, to TDOT for review and approval within 30 calendar days of the effective date of the change.

Figure 2: SSPP Approval Process



2.4 SSPP Submittals from New Start Projects

An RTA New Starts project shall make an initial submittal of an SSPP and all referenced procedures/materials to TDOT at least 180 calendar days before beginning passenger service operations. The initial SSPP will be approved and adopted by the RTA as part of the New Starts project safety certification process.

TDOT will review and approve the initial SSPP using its review checklist in Appendix C, and will transmit a formal letter of approval and the completed checklist to the RTA point-of-contact. While conducting its review, TDOT may request additional information, clarifications or revisions from the RTA safety point-of-contact. A meeting or teleconference may also be conducted to address any issues identified by TDOT during its review of the SSPP. Any additional requirements will be conveyed by the TDOT point-of-contact.

2.5 SSPP Readiness Review

TDOT reserves the right to conduct an on-site SSPP Readiness Review of any New Starts project. This review would be conducted after receipt of the RTA's initial SSPP submission but prior to its entry into passenger operations. This assessment would focus on the capabilities of the RTA to implement its SSPP during passenger operations. This assessment may be conducted in conjunction with TDOT review and approval of the initial SSPP submission.

This assessment may be conducted formally, following the procedures specified for the On-Site Safety and Security Review, identified in Section 8 of this document. Or this assessment may be conducted less formally, as an on-site walk-through of the RTA's safety program with the RTA's safety point-of-contact and other RTA personnel to ensure both the accuracy of its initial SSPP submission and the capacity of the RTA to implement its SSPP.

Based on the type of review conducted, TDOT may issue an official report with required corrective actions, or may address any findings through the review and approval process used for the RTA's SSPP.

3 Security and Emergency Preparedness Plan Standard

3.1 SEPP Objective and General Requirements

This section identifies the minimum requirements for the Security and Emergency Preparedness Plan (SEPP) to be developed, approved, adopted and implemented by the each RTA in the TDOT program. The RTA must prepare the SEPP as a separate document from the SSPP. 49 CFR Part 659 does not require public availability of the RTA's SEPP and any referenced procedures.

3.2 SEPP Minimum Requirements

Each RTA must develop, implement, and maintain a written SEPP that complies with the program requirements outlined in Figure 3 on the following page. These minimum requirements are based on Appendix G of the *FTA Resource Toolkit for State Oversight Agencies Implementing 49 CFR Part 659*, issued January 2006. The FTA guidance addresses all of the activities specified in 49 CFR Part 659.21 and 49 CFR Part 659.23. In addition, compliance with the FTA guidance is required for RTAs participating in the Department of Homeland Security (DHS), Office for Domestic Preparedness (ODP), and Transit Security Grant Program (TSGP). The program requirements also affirm the authority of the Transportation Security Administration (TSA) in the areas of rail transit security and terrorism preparedness.

At a minimum, the SEPP developed by the RTA must:

- Identify the policies, goals, and objectives for the security program endorsed by the chief executive of the RTA;
- Document the RTA process for managing threats and vulnerabilities during operations and for major projects, extensions, new vehicles and equipment, including integration with the safety certification process;
- Identify controls in place that address the personal security of passengers and employees;
- Document the RTA process for conducting internal security audits to evaluate compliance and measure the effectiveness of the SEPP; and
- Document the RTA process for making available its SEPP and accompanying procedures to TDOT for review and approval.

In addressing this last item, TDOT has authority in place to protect against the public disclosure of RTA security documents. To ensure the further protection of these documents, TDOT requests that all security submissions are either delivered to the TDOT point-of-contact in person, via email, or delivered via overnight mail with a signature required.

Figure 3: SEPP Requirements – 7 Elements

1.0	System Security and Emergency Preparedness Program Introduction
1.1.	Purpose of the SEPP
1.1.1	System Security
1.1.2	Emergency Preparedness
1.2	Goals and Objectives
1.2.1	Goals
1.2.2	Objectives
1.3	Scope of Program
1.4	Security and Law Enforcement
1.5	Management Authority and Legal Aspects
1.6	Government Involvement
1.7	Security Acronyms and Definitions
2.0	System Description
2.1	Background & History of System
2.2	Organizational Structure
2.3	Human Resources
2.4	Passengers
2.5	Services and Operations
2.6	Operating Environment
2.7	Integration with Other Plans and Programs
2.8	Current Security Conditions
2.9	Capabilities and Practices
3.0	SEPP Management Activities
3.1	Responsibility for Mission Statement and System Security Policy
3.2	Management of the SEPP Program
3.3	Division of Security Responsibilities
3.3.1	Security/Police Function Responsibilities
3.3.2	Security Responsibilities of Other Departments/Functions
3.3.4	Job-specific Security Responsibilities
3.3.5	Security Task Responsibilities Matrix
3.3.7	Security Committees
4.0	SEPP Program Description
4.1	Planning
4.2	Organization
4.3	Equipment
4.4	Training and Procedures
4.5	Emergency Exercises and Evaluation
5.0	Threat and Vulnerability Identification, Assessment, and Resolution
5.1	Threat and Vulnerability Identification
5.1.1	Asset Analysis
5.1.2	Security Data Collection for the Identification of Threats and Vulnerabilities
5.1.3	Other Sources of Information – Security Reviews, Testing and Inspection

	Programs
	5.1.4 Identifying Threats for Prioritized Assets
	5.1.5 Identifying Vulnerabilities
5.2	Threat and Vulnerability Assessment
5.3	Threat and Vulnerability Resolution
6.0	Implementation and Evaluation of SEPP
6.1	Implementation Tasks for Goals and Objectives
6.2	Implementation Schedule
6.3	Evaluation
7.0	Modification of SEPP
7.1	Initiation
7.2	Review Process
7.3	Implement Modifications

3.3 3 Year Annual Review of SEPP

Each RTA shall conduct a triennial annual review of its SEPP and update it as necessary to ensure that the SEPP is current at all times. This review will assess two (2) elements of the SEPP per year on a three year cycle. The RTA shall complete the review for the previous calendar year and submit a revised SEPP to the TDOT point-of-contact by March 1. As appropriate, referenced materials affected by the revision(s) should also be submitted with the SEPP. Each revised SEPP submitted to TDOT by an RTA shall include a text or tabular summary that identifies and explains proposed changes and includes a time frame for completion of the associated activities.

TDOT will review the submitted SEPP using the checklist provided in Appendix D. In its review, TDOT will follow the process specified in Figure 4 on the following page. Upon approval of modifications, TDOT will issue to the RTA written approval of its SEPP within 30 calendar days of submission and a copy of the completed SEPP review checklist found in Appendix D.

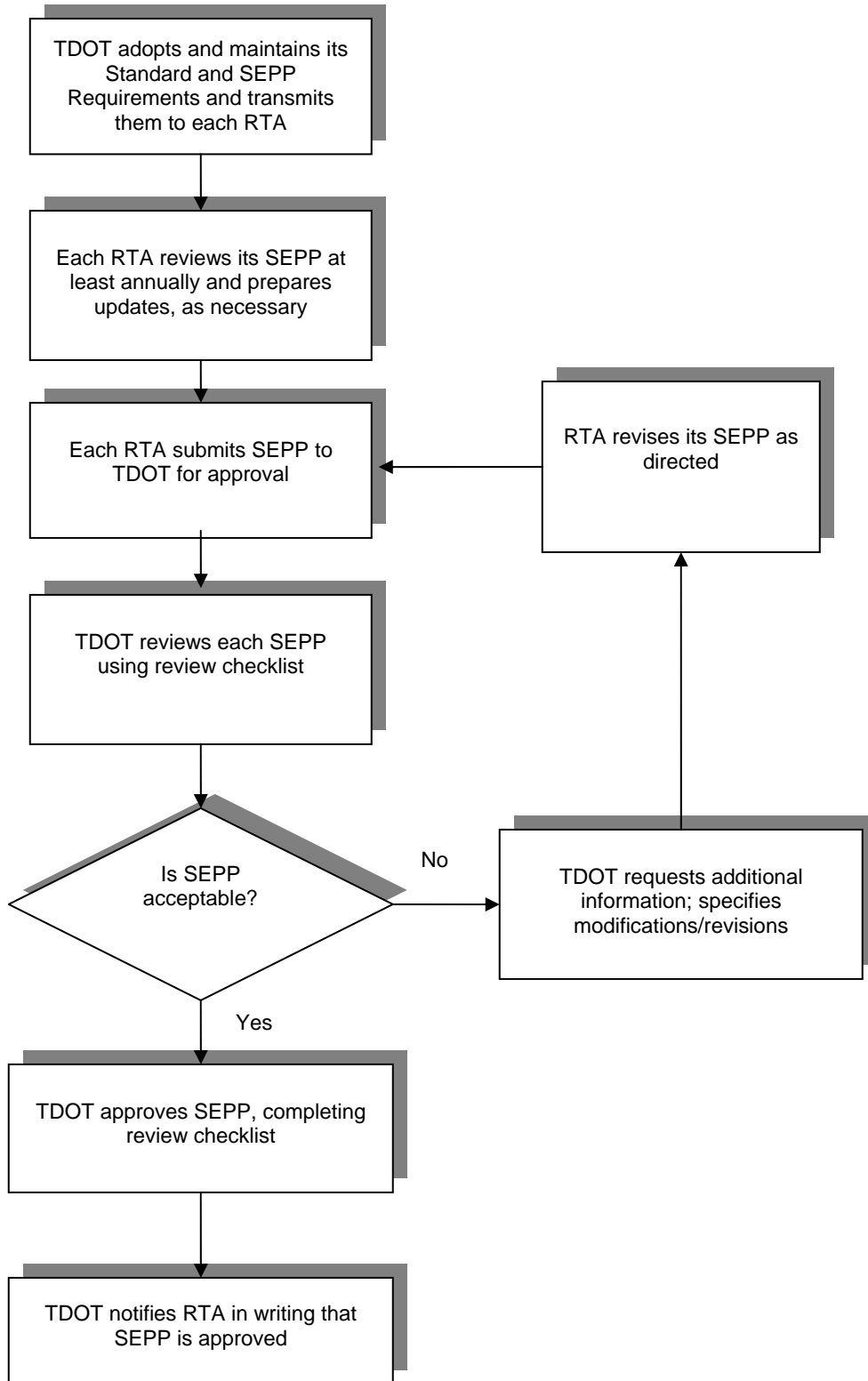
In the event that an RTA conducts its annual SEPP review and determines that no update is necessary for that year, it must prepare and submit by March 1 formal correspondence notifying TDOT of this determination. If TDOT wishes to object to this determination, the TDOT point-of-contact will notify the RTA within 30 calendar days. If TDOT does not object, TDOT will by March 1 formally notify the RTA that its SEPP is still in compliance with TDOT's SSPS.

Additional reviews of the RTA SEPP may be required to address specific issues based on revisions to TDOT's SSPS, revisions to FTA 49 CFR 659, audit results, on-site reviews, investigations, or changing trends in crime data or terrorism threat levels. Upon receipt of a written notification from TDOT for SEPP modifications, the RTA shall submit a revised SEPP to TDOT within 30 calendar days. TDOT will review and approve the revised SEPP, providing a formal approval letter and a completed review checklist (if appropriate for the change) within 30 calendar days of receipt of the revised RTA SEPP.

In the event that the RTA initiates updates outside of the annual review cycle, the RTA shall submit the modified SEPP, and any subsequently modified procedures, to TDOT for review and approval within 30 calendar days of the effective date of the change.

TDOT encourages the RTA to ensure that submissions of updated SEPPs are also made to DHS/ODP and TSA, following the conditions specified in grant program, directives or other requirements and regulations administered by these agencies.

Figure 4: SEPP Approval Process



3.4 SEPP Submittals from New Start Projects

Any RTA New Starts project shall make an initial submittal of an SEPP and all referenced procedures/materials to TDOT at least 180 calendar days before beginning passenger service operations. This submission shall be made following any restrictions placed on these materials by either the RTA or TDOT to ensure their protection from public release. The initial SEPP shall be approved and adopted by the RTA as part of the New Starts project safety certification process.

TDOT will review and approve the initial SEPP using its review checklist in Appendix D, and will transmit a formal letter of approval and the completed checklist to the RTA point-of-contact. During its review, TDOT may make requests for additional information, revisions or modifications. Any additional requirements will be conveyed by the TDOT point-of-contact.

3.5 Readiness Review

TDOT reserves the right to conduct an on-site SEPP Readiness Review of any New Starts project. This review would be conducted after receipt of the RTA's initial SEPP submission but prior to its entry into passenger operations. This assessment would focus on the capabilities of the RTA to implement its SEPP during passenger operations. This assessment may be conducted in conjunction with TDOT review and approval of the initial SEPP submission.

This assessment may be conducted formally, following the procedures specified for the On-site Safety and Security Review, identified in Section 8 of this document. Or this assessment may be conducted less formally, as an on-site walk-through of the RTA's security and emergency preparedness program with the RTA's security point-of-contact and other RTA personnel to ensure both the accuracy of its initial SEPP submission and the capacity of the RTA to implement its SEPP.

Based on the type of review conducted, TDOT may issue an official report with required corrective actions (see Section 7 of this document), or may address any findings through the review and approval process used for the RTA's SEPP.

4 Construction, Operations and Maintenance

4.1 Objective

This section of the SSPS provides safety program planning guidelines to support system construction, operation and maintenance. To this end, the RTA shall create and maintain documents as described in this section. These requirements may be covered in separate documents or included in the SSPP.

4.2 Role of the Architect/Engineer

An Architect/Engineer (A/E) firm retained to design a new system or modifications to an existing system shall be responsible for conducting hazard analyses and other SSPP functions as required to design safety into the system covering both the construction and operational stages. Contract documents with the A/E firm shall reflect this requirement.

4.3 System Construction, Modification and Expansion

The two distinct phases in the lifecycle of a transit system are construction and operation. Since system construction is an on-going phase because of modification and expansion, these two phases are interrelated and require continual coordination in order to be compatible. In order to ensure proper safety management consistent with system operation during construction activities, a detailed written approval procedure with specific sign-off requirements and exception capabilities shall be required as a part of the design phase. The design of new systems and modifications to expansion of existing systems shall be subject to the following:

- 1) System, subsystem and operating hazard analyses shall be performed and documented to identify, evaluate, prioritize and resolve hazards associated with each new design.
- 2) Design changes shall be documented, reviewed and approved by appropriate RTA personnel.
- 3) Appropriate RTA personnel shall establish design control measures to provide proper review of new design features.
- 4) Upon completion of construction and prior to beginning passenger service, new facilities, addition and modifications shall be inspected and tested for safe operation, as well as conformance to the design plans and specifications.
- 5) Computer software and hardware for microprocessor-controlled vital functions shall be analyzed, validated and documented to verify that it is free of errors that can cause hazardous conditions to occur in passenger service operations.

When RTA utilizes Federal Transit Administration (FTA) and/or TDOT funds to make capital improvements to its rail passenger vehicles, stations, tracks, bridges, and other facilities or infrastructure, The RTA must submit to TDOT for approval a description of the planned improvements, design documents, and a schedule for completion. TDOT will review the request and all documentation and issue a formal notice to proceed to the RTA within 10 days. Upon completion of the work and prior to beginning passenger service, the RTA will request TDOT to jointly participate with RTA staff on the inspection of the capital improvements. TDOT will provide the RTA with a written sign-off of the successful completion of each of the capital improvements.

4.3.1 Design standards

The RTA shall create and maintain standards and specifications for the design, construction, modification, maintenance and operation of all systems facilities. These shall be revised and updated as required. The requirements for Design Standards can be found in Appendix B.

4.4 Passenger Comfort and Safety

The RTA shall provide comfortable and safe conditions for passengers not only in the operation of transit vehicles but in passenger waiting areas also. Safety and security measures shall be coordinated with local police departments and other law enforcement agencies to ensure passenger safety.

4.5 Standard Operation Procedures (SOP)

The RTA shall prepare and adopt standard operating procedures for daily system operations. This shall be a written document created and maintained as a working reference for all employees. The SOP shall address the following:

- 1) Description of the transit system.
- 2) Operating area of the system.
- 3) List and location of facilities.
- 4) Description of vehicles.
- 5) Methods and description of operations.
- 6) Employee testing and certification.
- 7) Operating schedules.
- 8) Maintenance plans and schedules.
- 9) System organization and staffing.
- 10) Method of revisions to rules and procedures.
- 11) Other factors affecting system operation and safety.

The RTA's SOP should be included in its SSPP as an appendix.

4.5.1 Operating Rules Manual

The RTA shall prepare and adopt an operating rules manual that applies to all operators of rolling stock. The operating rules manual shall be the primary document governing the activities and conduct of all employees. Each operating employee shall be required to be familiar with all rules and be tested periodically for compliance. He/she shall have access to a rules manual at all times while on duty. This manual shall contain general instructions in:

- 1) General Instructions -
 - a. Operating procedures and practices.
 - b. Compliance with rules.
 - c. Training.
 - d. Conduct.
- 2) Safety rules -
 - a. Safe movement of transit vehicles.

- b. Proper use of transit vehicle tools and equipment.
 - c. Injury avoidance and prevention.
- 3) Operation and maintenance rules –
- a. Operation of transit vehicles.
 - b. Operator’s pre-trip inspection.
 - c. Radio rules.
 - d. Signal and cab signal indications.
 - e. Speed limits.
- 4) Provisions for issuing amendments/revisions –
- a. Instructions to employees affecting transit and other vehicles movements.
 - b. Permanent changes to operating rules and procedures.
 - c. When questions arise on the proper course of action.
- 5) Vehicle identification and right-of-way reference points.
- 6) Proper procedures to be followed in an accident, incident and other emergency situations.
- 7) Support of instruction of these practices.

The RTA’s Operating Rules Manual should be included in its SSPP as an appendix.

4.6 Effective Communication

Management shall ensure that communications within the system, relative to safety, are functioning properly at all times. Written documents shall be prepared establishing the lines of communication to follow during an emergency. This document shall address the services of off-site emergency response agencies such as the local fire and police departments. Training in emergency response shall be developed in coordination with these agencies.

4.7 On-Board Safety Equipment Required for Transit Vehicles

The RTA shall adopt rules prescribing safety devices and equipment required to be maintained on rolling stock operating on RTA tracks. All equipment shall be maintained in a safe and operable condition and operated in accordance with the manufacturer’s instructions and as prescribed in system operating rules. The equipment shall be checked and tested periodically for proper performance and operation.

4.8 Revisions

Any revisions made to the requirements of this section shall be cleared with TDOT prior to being incorporated. Revisions, which must conform to the requirements of the Rule, are deemed approved when accepted by TDOT.

5 Internal Safety and Security Audit Program

5.1 Objectives

The section describes TDOT's requirements for the internal safety and security audit program to be implemented by the RTA.

5.2 Minimum Requirements for Audits

As described in the SSPP and SEPP, the RTA must implement a process for the performance of ongoing internal safety and security audits to ensure the implementation of the RTA SSPP and SEPP, and to evaluate the effectiveness of these plans. To ensure compliance with FTA's 49 CFR Part 659.27, the RTA must:

- Develop and submit to TDOT an internal safety and security audit schedule, which addresses all required 21 elements of the SSPP listed in Figure 1 and all seven (7) required elements of the SEPP listed in Figure 3, over a three-year cycle. At a minimum, annual updates of this schedule must be provided to TDOT with the annual report discussed in Section 5.3 below.
- Develop checklists and procedures for conducting each of the 21 required SSPP audits. These materials must ensure sufficient criteria to determine if all audited elements are performing as intended.
- Develop checklists and procedures for conducting each of the seven (7) required SEPP audits. These materials must ensure sufficient criteria to determine if all audited elements are performing as intended.
- Not less than 30 calendar days prior to the conduct of an internal safety or security audit, notify TDOT. Notification must be in writing and may be transmitted to the TDOT point-of-contact via letter, email or fax. Notification should include the time and location of the internal audit. TDOT will acknowledge in writing the notification for the audit and inform the RTA the members of the TDOT Oversight Staff who will participate in any internal audit.
- In addition, at the time of notification, checklists and procedures relevant for the audit being conducted must be submitted to TDOT. These materials may be submitted to the TDOT point-of-contact in electronic copy via email or in hard copy via mail or fax. For security audits, any special provisions established by the RTA or TDOT to ensure the protection of these materials must be followed.
- Based on the results of each audit conducted, the RTA must prepare a written report documenting recommendations and any corrective actions identified as a result of the audit.
- The RTA must also prepare an Internal Safety and Security Audit Findings Log to track through to implementation all findings, recommendations, and corrective actions developed as a result of the internal safety and security audit process. This log should be available to TDOT and may be referenced during activities performed in support of the Hazard Management

Process.

5.3 Minimum Requirements for Annual Reports on the Internal Safety and Security Audit Process

By February 1 of each year, TDOT requires the RTA to submit an annual report to the TDOT point-of-contact that documents the internal audits conducted for the previous year. This report may be submitted in electronic copy via email or in hard copy via mail or fax. For sections devoted to the results of security audits, any special provisions established by the RTA or TDOT to ensure the protection of these materials must be followed.

This annual report must include:

- 1) Cycle/Schedule – An updated schedule for next year’s audits should be included. All departments must know when audits will be conducted and they must be as unobtrusive as possible.
- 2) Checklists – A list describing the scope of the audit must be prepared and furnished.
- 3) Documentation – All findings of the audit must be recorded and maintained.
- 4) Corrective Action – Corrective actions recommended in the audit report must be approved by management and then tracked for compliance.
- 5) Follow-up – Compliance with findings, recommendations and corrective actions resulting from the audits conducted that year.

Using the checklists shown in Appendices C AND D E of the SSPS, as a reference TDOT will review the RTA’s internal safety and security audits. The checklists are based on the 21 required elements for the RTA’s SSPP and 7 required elements for the RTA’s SEPP. If all is in order, TDOT will approve the RTA’s report within 30 calendar days. While conducting its review, TDOT staff may request additional information, clarifications or revisions from the RTA safety or security point-of-contact. A meeting or teleconference may also be conducted to address any issues identified by TDOT during its review of the annual report. Any additional requirements will be conveyed to the RTA by the TDOT point-of-contact.

In addition to the annual report, also by February 1, TDOT requires that the RTA submit a formal letter of certification, signed by the rail transit agency’s chief executive, stating that, based on the evaluation performed during the internal safety and security audit process during the previous year, the RTA is in compliance with its SSPP and SEPP.

If the RTA determines that findings from its internal safety and security audits indicate that the RTA is not in compliance with its SSPP, the chief executive must then identify the activities that the RTA will take to achieve compliance. TDOT must review and approve this action plan using the procedures specified in Section 9 of this document.

6 Hazard Management Process

A hazard is any real or potential condition which can cause injury or death to people or damage to or loss of equipment or property. Identifying, minimizing the effect of hazard(s) and tracking measures to eliminate or mitigate hazard occurrences is vital to the continued safe operations of the RTA.

6.1 Objective

This section describes TDOT requirements for the RTA Hazard Management Process. The objective of this process is to provide TDOT with the notification of hazards and an on-going role in overseeing the RTA's identification, assessment and resolution of hazards.

6.2 Minimum Requirements

TDOT requires each RTA to develop and document in its SSPP a process to identify and resolve hazards for new starts projects, extensions, or modifications of existing systems, operational or environmental changes, or from hazards discovered during reviews, audits, inspections, and investigations.

The hazard management process must, at a minimum:

- Define the RTA's approach to hazard management and the implementation of an integrated system-wide hazard resolution process;
- Specify the sources of, and the mechanisms to support, the on-going identification of hazards;
- Define the process by which identified hazards will be evaluated and prioritized for elimination and control;
- Identify the mechanism used to track through resolution the identified hazard(s);
- Identify the process for integrating identified problems into the hazard management process;
- Define the minimum thresholds for the notification and reporting of hazards to TDOT; and
- Specify the process by which the RTA will provide on-going reporting of hazard resolution activities to TDOT.

6.3 Hazard Tracking Log

In its SSPP, the RTA must specify its approach to identifying and assessing hazards. Each RTA may use a variety of methodologies, including informal processes, such as reports from operations and maintenance personnel, results from rules compliance checks and employee evaluations, the analysis of maintenance data, results from facilities and vehicles inspections, findings from internal safety and security audits, annual TDOT on-site findings, and daily review of the RTA's unusual occurrences log, as well as more formal approaches, such as trend analysis, hazard classification and resolution using the Mil-Std 882 process, hazard analyses using inductive processes (Preliminary Hazard Analysis, Failure, Modes, and Effects Analysis, Job Hazard Analysis, etc.) and hazard analysis using deductive processes (Fault Tree Analysis).

Based on its selected methods, the RTA must identify its process for consolidating all hazard information into a single, coordinated process. This process may use worksheets, forms, databases and other tools to support standardization and organization of hazard information. Based on this process,

TDOT requires the RTA to establish a Hazard Tracking Log which reflects the consolidation of information in the hazard management process. The Hazard Tracking Log must contain all hazards identified through the various methods applied by the RTA. The Hazard Tracking Log may be organized by the hazard number assigned by the RTA, or by the type of hazard, the source from which it was identified, or the element of the RTA's operation affected by the hazard (i.e., facilities, vehicles, track and signal, communications, personnel training and operating procedures, etc.).

6.4 Notification of Hazards

The RTA must notify TDOT by telephone or fax of all hazardous conditions within two (2) hours of identification. A hazardous condition that results in two (2) or more persons requiring immediate medical attention away from the identification and the occurrence of hazard must be reported to TDOT. After the initial notification, the RTA shall submit the Preliminary Accident/Incident/Hazardous Condition Report Form found in Appendix E to TDOT by fax or email.

6.5 Investigation of Hazards

After notification of a hazardous condition, the basic steps to be followed in conducting an investigation are:

- 1) The RTA, at the direction of TDOT, shall investigate all hazardous conditions on behalf of TDOT.
- 2) If RTA conducts the investigation and determines that the condition is more than routine and involves inspections, examinations and testing on a step-by-step basis, TDOT shall be notified before the fact that they may participate in the investigation. The accident investigation procedures of the RTA previously approved by TDOT will be used to conduct the investigation into the hazardous condition.
- 3) The RTA's investigation shall be documented in a written report that identifies the most probable cause and other contributing causes of the hazardous condition. The report shall also contain or reference a corrective action plan and schedule to mitigate the hazardous condition.
- 4) The RTA's investigation report, including pictures, and corrective action plan with accompanying schedule shall be submitted to TDOT for review and approval.
- 5) TDOT may make such order or recommendations with respect to the RTA's investigation, as TDOT in its judgment deems just and reasonable.

6.5.1 Initial Investigation Report

The RTA shall submit to TDOT the initial report of its investigation of the hazardous condition within 14 calendar days of the hazard being reported to the TDOT point-of-contact. The RTA may transmit an electronic copy via email or a hard copy via mail or fax.

6.5.2 Final Investigation Report

The RTA shall prepare and submit to TDOT for review and approval a final report that includes a description of activities, findings, identified causal factors, and a corrective action plan. The RTA shall transmit an electronic copy of the final investigation report to the TDOT point-of-contact via email. Within 30 calendar days of receiving a report designated as final, TDOT will review the report. Within

30 calendar days of acceptance of the RTA investigation report, TDOT will issue to the RTA written approval of the report. In the event that TDOT does not accept the RTA report, TDOT will communicate in writing the area(s) of disagreement or concern. The report shall not be considered final until all conditions are met and the report is approved by TDOT.

6.5.3 Corrective Action Plans (CAP)

The RTA shall develop a corrective action plan (CAP) to correct each hazardous condition. The CAP must be submitted to TDOT within 14 calendar days after the accident investigation report has been accepted.

TDOT will notify the RTA in writing of its acceptance or rejection of the CAP within 14 calendar days of receipt. In the event that the CAP is rejected, TDOT will state its reasons for rejection and recommend revisions in writing. The RTA must submit a revised plan to TDOT within 14 calendar days following rejection of receipt notice. The RTA may meet with TDOT to discuss the reasons for rejection and recommended revisions. If this is the case, the RTA will have 14 calendar days after this meeting to submit a revised plan. TDOT will maintain an active CAP file throughout the process. After approval of the plan, TDOT will enter it in its active CAP file.

The RTA shall maintain corrective action data on file and make it available to TDOT. When the CAP has been fully implemented, the RTA shall notify TDOT in writing. Following notification, TDOT will verify implementation and remove it from its active file. The RTA will maintain a permanent record of the CAP on file.

In addition, TDOT may, during the course of an investigation, identify corrective actions to avoid or minimize the reoccurrence of the unsafe condition or address a related, systemic problem. At any time during an investigation, TDOT reserves the right to request a full briefing from the RTA on the known circumstances of the investigation, including corrective actions.

6.5.4 TDOT Investigation of Hazards

TDOT reserves the right to conduct independent investigations of identified hazardous conditions. A description of TDOT's investigation process is provided Section 7.3.2 of this document.

If TDOT elects to conduct an independent investigation of the hazardous condition, it will utilize the accident investigation procedures of the RTA, previously approved by TDOT.

Upon its determination to conduct an independent investigation, TDOT will inform the RTA in writing of its intention to conduct an investigation of a reported hazard no later than 7 calendar days following receipt of the RTA initial report. TDOT will advise the RTA of the following:

- Investigation processes;
- Identity of individual(s) conducting the investigation; and
- Tentative schedule of investigation elements.

The RTA shall assist the TDOT investigators by providing required information and resources necessary for conducting the investigation. TDOT will complete an investigation report that includes a description of activities, findings, identified causal factors, and a CAP. The report will be finished within 30 calendar days after completion of the investigation, and will be delivered to the RTA for

review. The RTA will have 15 calendar days to prepare a CAP and submit it to the TDOT point-of-contact.

7 Accident Notification, Investigation and Reporting

7.1 Objective

This section addresses the requirements in place for the notification, investigation and reporting of accidents meeting the thresholds specified in FTA's 49 CFR Part 659.33. To prevent a recurrence of the condition, data developed from the investigation shall be entered into a hazard resolution process.

7.2 Minimum Requirements

The requirements for effective investigations and reporting are proper notification procedures, approved accident investigation procedures, preparation and delivery of reports and corrective action planning, and review and approval by TDOT and the FTA. Accident Reports will be available upon request to representatives of the NTSB and FTA.

7.2.1 Initial Notification

The RTA shall notify TDOT within two (2) hours of any safety or security incident involving a rail transit vehicle or taking place on RTA controlled property where one or more of the following occurs:

- A fatality at the scene; or where an individual is confirmed dead within 30 calendar days of a transit-related incident;
- Injuries requiring immediate medical attention away from the scene for two or more individuals;
- Property damage to RTA vehicles, non-RTA vehicles, other RTA property or facilities, and non-RTA property that equals or exceeds \$25,000;
- An evacuation due to life safety reasons;
- Any hazardous condition which is known to exist and can cause death or injury to patrons, employees or other persons if not immediately corrected;
- A collision at a grade crossing;
- A main-line derailment;
- A collision with an individual on a RTA right of way; or
- A collision between a RTA vehicle and a second RTA vehicle or a RTA non-revenue vehicle.

Each RTA that shares track with a general railroad system and is subject to the Federal Railroad Administration (FRA) notification requirements shall notify TDOT within two (2) hours of an incident for which the RTA must notify the FRA.

TDOT representatives that are to be contacted in the event of an accident:

- | | | | |
|---------------|--|----|--|
| 1) Primary: | Gina Pointer, TDOT
Tel: 615 – 253-5518
Fax: 615 - 253 – 1482
Cell: 615 – 969-1325 | or | Bill Hayes, TDOT
Tel: 615-253-1028
Fax: 615-253-1482 |
| 2) Alternate: | George Coleman TDOT | | |

Tel: 615-253-1054
Fax 615-253-1482

- 3) Contingency: Tennessee Emergency Management Agency
Tel: 800-336-3300 (24 hour line)

After the initial notification, the RTA shall submit the Preliminary Accident/Incident/Hazardous Condition Report Form found in Appendix F to TDOT by fax or email.

TDOT shall be notified of all reportable and hazardous conditions within two (2) hours of their occurrence.

7.3 Investigation of Reportable Events

49 CFR Part 659.35 requires TDOT to investigate, or cause to be investigated, at a minimum, any incident involving a rail transit vehicle or taking place on rail transit-controlled property meeting the notification thresholds identified in Section 7.2. In conducting these investigations, TDOT may authorize the RTA to conduct an investigation on its behalf, conduct its own independent investigation, or, if the NTSB is investigating the accident, join in the investigation through NTSB's Party System. If TDOT elects to conduct independent accident investigation it will utilize as accident investigation procedures or the approved accident investigation procedures of the RTA where the accident occurred (see Appendix G)

The accident investigation must determine the facts relative to the cause of the accident and to document specific actions that shall be taken to prevent future occurrences. Specific steps to be followed in conducting an accident investigation, as a minimum, are as follows:

- 1) Interview employees (at the scene, if possible)
- 2) Interview witnesses (at the scene, if possible)
- 3) Interview passengers (at the scene, if possible)
- 4) Focus on conditions and hazards that caused the accident.
- 5) Determine actions that can be taken to prevent future occurrences.
- 6) Gather all relevant data at the site, such as (but not limited to) improper vehicle operation, substance abuse, disregarding signals, equipment failure, power failure and failure to yield right-of-way.
- 7) Make measurements, draw diagrams, etc.
- 8) Do not be quick to point a finger.
- 9) Have an open and unbiased mind.
- 10) Conduct internal hearings.
- 11) Prepare and file and report with RTA Management, TDOT and NTSB (if applicable)
- 12) Employees of the RTA involved, observing or having knowledge of an accident as required to make a verbal report to the RTA's transit vehicle dispatch center immediately.

Accident investigations shall be completed within 30 calendar days of occurrence. When the RTA conducts the investigation, status reports shall be submitted weekly until the investigation has been

completed. RTAs shall file written monthly and annual reports for all accidents to TDOT. If there are no accidents, each RTA shall submit a monthly written report stating this.

Subject to the Tennessee statute on Public roads, especially TCA section 10-7-503_Records open to Public Inspection – Exceptions and TCA sections 10-7-509 confidential records. TDOT may withhold an investigation report that may have been prepared by an RTA or adopted by TDOT from being admitted as evidence or used in a civil action for damages resulting from a matter mentioned in the report.

7.3.1 RTA Investigations on Behalf of TDOT

In general, TDOT authorizes the RTA to conduct accident investigations on its behalf, unless otherwise notified. For all investigations conducted by the RTA on behalf of TDOT, the RTA must use investigation procedures that have been approved by TDOT. Copies of each RTA's approved accident investigation procedures are found in Appendix G.

The RTA must submit any updates and revisions to its accident investigation procedures to TDOT as they are completed and implemented by the RTA or with the annual update of the SSPP. These procedures should be treated as part of the SSPP.

When the RTA conducts the investigation on behalf of TDOT, TDOT may participate in the investigation process. The terms of participation are specified in the RTA SSPP and in the RTA accident investigation procedures.

Each RTA investigation conducted on behalf of TDOT must be documented in a final report that includes a description of investigation activities, findings, identified causal factors, and a corrective action plan. At its discretion, and as specified in its accident investigation procedures, the RTA may separate its investigation report into two parts: (1) description of investigation activities, investigation findings, and determination of the most probable cause and additional contributing causes; and (2) recommendations to prevent recurrence, including a corrective action plan.

The following is a step-by-step reporting procedure for an investigation conducted by the RTA on behalf of TDOT:

- 1) Accident occurrence.
- 2) RTA notifies TDOT within two (2) hours.
- 3) RTA notifies NTSB if applicable.
- 4) RTA conducts the investigation.
 - a. RTA submits status reports to TDOT, bi-weekly until resolved.
 - b. RTA issues preliminary report to TDOT.
 - c. TDOT reviews and comments on preliminary report.
 - d. If the report is not acceptable, RTA is requested to furnish additional information.
 - e. RTA submits draft final report to TDOT (and NTSB if applicable).
 - f. If TDOT concurs with the findings of the RTA's draft final report, TDOT will approve the RTA's report and it will become the final report. If TDOT does not concur with the findings of the RTA's draft final report, TDOT will communicate in writing the area(s) of disagreement or concern. TDOT will work with the RTA to address these issues so that TDOT can approve the RTA's report. In the event

that agreement cannot be reached on these issues, TDOT will issue its own accident investigation report, which may be no more than the RTA report and the TDOT dissent.

- g. RTA prepares corrective action plan.

7.3.2 Independent TDOT investigations

At its discretion, TDOT may choose to conduct an independent investigation of any accident meeting the thresholds specified in Section 7.2.1 utilizing its own personnel.

TDOT will inform the RTA of its intention to conduct an investigation or participate in an RTA investigation of a reported event no later than seven (7) calendar days following notification of the accident. TDOT will advise the RTA as to the personnel who will be conducting the independent investigation, and provide a preliminary schedule as to the investigation process.

All TDOT authorized accident investigation personnel are granted authority under the state safety oversight program to conduct an investigation and evaluate records, materials, data, analysis, and other information which is pertinent to the investigation. It is expected that the RTA will provide to the TDOT investigation team the resources and information necessary to conduct the investigation in an effective and efficient fashion.

TDOT accident investigation personnel may conduct field analysis, operational surveys, interviews, record checks, data analysis, and other on-site and off-site tasks which may be necessary for a comprehensive investigation. If TDOT accident investigation personnel require information or analysis which is not readily available, or which may require additional resources by the RTA, it will request this data in a written request to the RTA safety point-of-contact via email or letter.

The following is a step-by-step reporting and investigation procedure:

- 1) Accident occurrence.
- 2) RTA notifies TDOT within two (2) hours.
- 3) RTA notifies NTSB if applicable.
- 4) TDOT notifies the RTA within seven (7) days that TDOT will conduct an independent investigation.
- 5) TDOT conducts the investigation.
 - a. If additional data is required, RTA is requested to furnish it.
 - b. TDOT prepares preliminary report.
 - c. RTA reviews and comments on preliminary report.
 - d. TDOT prepares final report and issues to NTSB and RTA.
 - e. RTA prepares corrective action plan.

7.3.3 NTSB Investigations

In the event that the NTSB conducts an investigation of an accident, TDOT will participate in the investigation as an observer and provide assistance as required and requested. All NTSB reports and findings will be reviewed and commented on by TDOT. TDOT will contribute information to NTSB reports and make recommendations relative to the findings. When the report has been completed, TDOT will track implementation of all NTSB findings and recommendations. TDOT will be involved in all NTSB hearings and other formal activities.

The following is a step-by-step reporting and investigation procedure:

- 1) Accident occurrence.
- 2) RTA notifies TDOT within two (2) hours.
- 3) RTA notifies NTSB.
- 4) NTSB conducts the investigation.
 - a. If insufficient data to complete investigation, NTSB requests RTA to furnish additional information.
 - b. RTA furnishes additional data.
 - c. NTSB issues final report to TDOT and RTA.
 - d. RTA prepares corrective action plan.

8 On-Site Safety and Security Reviews

8.1 Objectives

On-site monitoring by TDOT complements the triennial review of 7 elements of the SSPP and 2 elements the first 2 years and 3 elements the last year of the SEPP annually and serves as an independent evaluation of the RTA. Key objectives are as follows:

- 1) Determine if SSPP and SEPP are being followed by the RTA.
- 2) Determine if hazardous conditions and security risks are being identified in a timely manner.
- 3) Determine effectiveness of RTA internal audit process.

8.2 Minimum Requirements

49 CFR Part 659.29, states that the State Safety Oversight Agency shall conduct an on-site review of the rail transit agency's implementation of its system safety program plan and security & emergency preparedness plan. Alternatively, the on-site review may be conducted in an on-going manner over the three year timeframe.”

In Section 2 and 3 of this Program Standard, TDOT sets minimum requirements for RTA SSPPs and SEPPs. TDOT must ensure that the RTAs have appropriate plans that meet these minimum requirements. Once appropriate plans are in place, TDOT is responsible for conducting on-site reviews of those plans' implementation. The elements TDOT reviews annually follow the same outlines as the transit agencies' SSPP and SEPP. These elements can be found in Figures 1 and 3 of this document and the TDOT review checklists found in Appendices C and D. TDOT will be responsible for ensuring that all review elements are accomplished each year.

In conducting the on-site review, TDOT will establish a review team and prepare a schedule, procedures and a checklist to guide the review process. Criteria will be established through which TDOT can evaluate the RTA's implementation of its SSPP and SEPP.

At the conclusion of the review, TDOT will prepare and issue a report containing findings and recommendations resulting from the review, which will analyze the effectiveness of the SSPP and SEPP and whether either should be updated. Corrective actions required as a result of this review will be managed through the process described in Section 9 of this document.

TDOT will submit its completed report for the on-site safety and security review to FTA as part of its Annual Submission.

8.3 On-Site Review Process

As described above, TDOT's on-site reviews are intended to determine transit agency compliance with its own plans. TDOT on-site reviews also seek to highlight any areas where existing plans and procedures or activities could be improved. As such, the following three criteria are used for all TDOT reviews. They are listed in order of precedence:

1. The transit agency's SSPP and/or SEPP (as appropriate to the review area) will be the primary review criteria. Other transit agency plans and procedures that support the safety or security plan also will be utilized as review criteria as appropriate (for example, transit agency maintenance standards will be used to judge safety in maintenance areas).
2. Applicable standards from outside agencies, including both those that may be binding on the transit agency (e.g., government regulations) and those that are advisory (e.g., industry practice) will form the second criteria set.
3. Professional judgment and analyses conducted by TDOT review personnel will form the third and final criteria set for TDOT reviews, and will be used when the first two sets of criteria are unclear or non-existent.

TDOT's safety and security reviews will follow this general outline:

TDOT will work directly with RTA safety and security managers to arrange and schedule TDOT on-site reviews. Sixty (60) days prior to the commencement of the annual on-site review, the TDOT State Safety Oversight staff will send a letter of notification to the Chief Executive Officer of the RTA and its Safety/Security Manager(s). Attached to the letter will be copies of audit review checklists which will focus on the twenty-one (21) elements of the RTA's SSPS and the seven (7) elements of its SEPP. (See Appendix E) TDOT may also request the RTA to submit certain documents for review by staff prior to the audit.

These documents could include, but not be limited to, copies of the RTA's current Standard Operating Procedures, the Operating Rules Manual, Hazard Tracking Log, copy of corrective action data for all Corrective Action Plans submitted to TDOT, and a current inventory of all revenue and non-revenue rail vehicles, maintenance, and support equipment.

Thirty (30) days prior to the on-site review, TDOT oversight staff will conduct a teleconference with RTA Safety/Security staff to go over the planned schedule and details of the audit. The expected result of this call will be to pre-schedule all on-site reviews of RTA staff, i.e. in charge of maintenance, operations, training, facilities and equipment, records management, safety and security functions within ten (10) days of the audit, TDOT will send a final detailed schedule and audit checklist to the RTA.

At the beginning of the audit, an entrance conference will be held between RTA staff and the TDOT inspection team to review the schedule and how the TDOT will conduct the audit. At the conclusion of the site review, the TDOT inspection team will held an exit conference at which the general findings of the audit will be presented.

After assessing records for the topic area as well as implementation of the topic area, TDOT will make an assessment of whether or not the transit agency is following its safety and security plans and procedures. TDOT will also identify any other areas where the transit agency might be able to improve its activities. The results of this preliminary assessment will be verbally transmitted to the transit agency managers immediately.

TDOT may take additional time to review documents or other materials off-site after the initial review.

8.4 On-Site Review Reporting

After on-site activities and any follow-up activities have been completed, TDOT will formulate a written report (generally in letter format) describing its findings. This letter will be sent to the transit agency manager responsible for the topic area. A copy will also be sent to either the safety manager or the security manager as appropriate. TDOT will send its report to the transit agency within thirty (30) days of the end of the review.

TDOT's written report will contain the following information:

1. Description of the elements reviewed, personnel interviewed, facilities visited, and documents examined.
2. List of areas where TDOT has determined that the transit agency is not in compliance with its own plans.
3. List of areas where current plans or procedures seem to require updating.

The transit agency will have thirty (30) calendar days to review the report and to assemble and transmit an appropriate response. Where TDOT has identified areas of safety or security plan non-compliance, or plan deficiency, the transit agency must also submit appropriate corrective actions in accordance with TDOT's Corrective Action Plan procedure detailed in Section 9 of this document.

9 Corrective Action Plans

9.1 Objectives

This section addresses TDOT's procedure to ensure that corrective action plans (CAPs) are developed and implemented by the RTA to address hazardous conditions identified through accident investigations, the hazard management process, the RTA's annual internal safety and security audit, deficiencies in the RTA's implementation of its SSPP or SEPP, or findings specified by TDOT in its annual on-site review report.

9.2 Minimum Requirements

The RTA must develop CAPs for the following:

- results from investigations in which identified causal factors are determined by the RTA or TDOT as requiring corrective actions; and
- hazards or deficiencies identified from internal and external safety and security audits/reviews performed by the RTA or TDOT or from the hazard management process.

Each CAP shall identify:

- identified hazard or deficiency;
- planned activities or actions to resolve deficiency or hazard;
- RTA department(s) responsible for implementing corrective actions; and
- scheduled completion dates for implementation.

The CAP shall be submitted to TDOT for review and approval. In the event that TDOT and the RTA dispute the need, findings, or enforcement of a CAP, TDOT will allow the RTA seven (7) calendar days to submit its case. TDOT will then issue final direction to the RTA regarding the CAP.

In the event that the NTSB conducts an investigation, the RTA and TDOT shall review the NTSB findings and recommendations to determine whether or not a CAP should be developed by the RTA. If a CAP is required either by the NTSB or TDOT, the RTA shall develop it.

The RTA shall develop and maintain a Corrective Action Monitoring Log, which identifies all CAPs approved by TDOT and presents their status. This log shall be submitted monthly to the TDOT point-of-contact in electronic form via email or in hard copy via mail or fax. As CAPs are closed out, the RTA must submit verification that the corrective action(s) has been implemented as described in the CAP or that a proposed alternative action(s) has been implemented. This verification should be submitted with the monthly Corrective Action Plan Tracking Log in electronic or hard copy format. In the monthly log, the RTA must also inform TDOT concerning any alternative actions for implementing a CAP.

9.3 Notification

The RTA shall develop a CAP with the intent of addressing the hazard or deficiency identified as a result of an accident investigation, the hazard management process, or the internal and external safety and security audits/reviews performed by the RTA or TDOT. The RTA shall submit the CAP to TDOT for approval within 30 calendar days after the need for the CAP has been identified by either

the RTA or TDOT. Depending on the complexity of the issue requiring corrective action, and TDOT's discretion, additional time may be granted to the RTA to prepare the CAP.

9.4 Corrective Action Plan Review and Approval

TDOT will notify the RTA of its approval or rejection of a CAP within seven (7) calendar days of receiving the CAP. In the event that TDOT rejects a CAP, TDOT will state its reasons in writing and recommend revisions. The RTA shall submit a revised CAP to TDOT no later than seven (7) calendar days following the rejection.

9.5 Monitoring and Tracking

The RTA shall maintain a Corrective Action Monitoring Log and provide TDOT with monthly corrective action implementation updates. The RTA shall verify to TDOT in writing when a corrective action has been fully implemented and will submit status reports to TDOT at bi-weekly intervals until resolution. The RTA corrective action is subject to independent TDOT verification.

TDOT will also maintain a corrective action monitoring log for all CAPs of each of Tennessee's two RTA's. TDOT will track the resolution of all actions required in each CAP. When the RTA has satisfactorily addressed and resolved all required actions in a CAP, TDOT will close the CAP and remove the CAP from the active monitoring log.

10 Reporting to the FTA

10.1 Objective

This section addresses TDOT's procedures for making initial, annual and periodic submissions to FTA's Office of Safety and Security, in compliance with 49 CFR Part 659.39 and Part 659.43.

10.2 Reporting Requirements to FTA

Initial submission. The following information, contained in TDOT's initial submission to the FTA, must be updated as necessary:

- The name and address of the TDOT State Safety Oversight point-of-contact;
- The names and addresses of the transit agencies subject to TDOT jurisdiction under 49 CFR Part 659;
- TDOT's program standard and referenced procedures; and
- TDOT's certification that the SSPP and the SEPP have been developed, reviewed, and approved.

In the event that the state should ever determine that oversight authority should be transferred to another agency of the state, TDOT will work with this agency to ensure that a new Initial Submission is delivered to FTA within thirty (30) calendar days of the determination to make change. TDOT will also work with this agency to ensure that at no point are the RTAs affected by 49 CFR Part 659 left without a duly authorized oversight agency.

Annual submission. Before March 15 of each year, TDOT must submit the following to FTA:

- A publicly available annual report summarizing its oversight activities for the preceding twelve months, including a description of the causal factors of investigated accidents, status of corrective actions, updates and modifications to rail transit agency program documentation, and the level of effort used by the oversight agency to carry out its oversight activities.
- A report documenting and tracking findings from on-site safety review activities and whether an on-site safety and security review has been completed since the last annual report was submitted.
- Program standard and supporting procedures that have changed during the preceding year.
- Certification that any changes or modifications to the rail transit agency SSPS or SEPP have been reviewed and approved by the oversight agency.

Annual Certification. With its Annual Submission, TDOT must certify to the FTA that it has complied with the requirements of 49 CFR Part 659. TDOT will submit this certification electronically to FTA using a reporting system specified by FTA. TDOT will maintain a signed copy of each annual certification to FTA, subject to audit by FTA.

Periodic submissions. Status reports of accidents/incidents, hazardous conditions, and CAPs or other program information must be forwarded to the FTA upon request.

TDOT will ensure that all submissions to FTA are submitted electronically using the reporting system specified by FTA.

Appendix A – Definitions and Acronyms

Acronym/Word	Description/Definition
A/E	Architect/Engineer
Accident	An unforeseen event or occurrence that causes death or injury to persons, or damage to property.
Annual Safety and Security Audit Report	The report prepared by the RTA describing safety auditing activities performed during the preceding twelve months.
AREA	American Railway Engineering Association
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
Committee	Safety Management Committee
Configuration Management	A process to assure that all documentation that describes a system and its various components is current and reflects the actual functional and physical characteristics of the system throughout its life cycle.
Contractor	An entity that performs tasks required on behalf of the oversight or rail transit agency. The rail transit agency may not be a contractor for the oversight agency.
Corrective Action Plan or CAP	A plan prepared by an RTA that describes the actions it will take to correct, eliminate, mitigate or control hazardous conditions.
Emergency	A situation which is life threatening or which causes damage on or in any RTA facility, right-of-way or vehicle.
EPA	Environmental Protection Agency
ERT	Emergency Response Team
ESP	Engineering Standard Plan
FHA	Federal Highway Administration
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
Hazard	Any real or potential condition that can cause injury or death to people, or damage to or loss of equipment or property.
Hazard Analysis	A systematic analysis performed to identify hazards and establish requirements for their elimination or control.
Hazardous Condition	A condition that may endanger human life or property. (Formerly called “unacceptable hazardous conditions.”)

Acronym/Word	Description/Definition
Hazardous Material	Any commodity or product identified or regulated by the United States Department of Transportation in title 49 CFR Parts 171 - 179 which may be transported under restricted conditions.
HMM	Hazardous Material Manager
Incident	An unforeseen event or occurrence which does not necessarily result in death, injury or property damage.
Individual	A passenger; employee; contractor; other rail transit facility worker; pedestrian; trespasser; or any person on rail transit-controlled property.
Injury	An injury of the magnitude requiring medical treatment or transport to a health care facility for medical treatment.
Investigation	A process to determine the probable cause of an accident or a hazardous condition. Unless the Division considers additional action necessary, its investigation may involve no more than a review and approval of the transit system's determination of the probable cause of an accident or a hazardous condition.
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
Life Cycle	The course of developmental change which a transit system passes through from its inception to its retirement and disposal.
Light Rail	Every rail transportation system in which one or more rail vehicles are propelled electrically upon tracks located substantially within an urban area and are operated exclusively in the transportation of passengers and their baggage, and including all bridges, tunnels, equipment, switches, spurs, tracks, stations, used in connection with the operation of light rail.
MSDS	Material Safety Data Sheets
Mil-Std	Military Standard
New Starts Project	Any rail fixed guideway system funded under FTA's 49 U.S.C. 5309 discretionary construction program.
NFPA	National Fire Protection Agency
NTSB	National Transportation Safety Board
On-Site Safety Audit	A formal, comprehensive, on-site examination by the Oversight Agency of a transit agency's safety practices to determine whether they comply with the policies and procedures required under the transit agency's SSPP.
OSHA	Occupational Safety and Health Administration

Acronym/Word	Description/Definition
Passenger	A person who is on board, boarding, or alighting from a rail transit vehicle for the purpose of travel.
Passenger Operations	The period of time when any aspect of rail transit agency operations are initiated with the intent to carry passengers.
Pedestrian Grade Crossing	A location where one (1) or more fixed guideway system tracks cross a public sidewalk or pathway by pedestrians at a grade.
Rail Fixed Guideway System	<p>Any light, heavy or rapid rail system, monorail, inclined plane, funicular, trolley, or automated guideway for the movement of passengers. It includes, in addition to the fixed guideway and transit vehicles, the power system, communication system, buildings, maintenance facilities, station, transit vehicle yard and other stationary and movable apparatus, equipment, appurtenances and structures that are:</p> <ol style="list-style-type: none"> 1) Is not regulated by the Federal Railroad Administration; or 2) Is included in FTA's calculation of fixed guideway route miles or receives funding under FTA's formula program for urbanized areas (49 USC 5336); or 3) Has submitted documentation to FTA indicating its intent to be included in FTA's calculation of fixed guideway route miles to receive funding under FTA's formula program for urbanized areas (49 U.S.C. 5336).
Rail/Highway Grade Crossing	A location where one (1) or more (railroad) fixed guideway system tracks cross a public highway, road, street or private roadway.
Rail Transit Agency (RTA)	An entity that operates a rail fixed guideway system.
Rail Transit-Controlled Property	Property that is used by the rail transit agency and may be owned, leased, or maintained by the rail transit agency.
Rail Transit Vehicle	The rail transit agency's rolling stock, including but not limited to passenger and maintenance vehicles.
RCRA	Resource Conservation and Recovery Act of 1976
Reportable Accidents	Reportable accidents are those which exceed the thresholds described in Section 7 and which are associated with the operation and maintenance of rail transit vehicles, other on-track equipment, signal systems, traction power systems, or the maintenance of track and other wayside equipment.
RFGS	Rail Fixed Guideway System

Acronym/Word	Description/Definition
Risk	Probability that a safety/security incident will occur.
Rolling stock	Wheeled vehicles operating on RTA tracks.
Safety	Freedom from harm resulting from unintentional acts or circumstances.
Safety and Security Audit	A formal, comprehensive, internal on-site examination by the RTA of all or part of a systems safety and security practices conducted annually to determine whether they comply with the policies and procedures required under the system's SSPP and SEPP.
Safety Related Activities	Activities that must be performed in a prescribed manner to assure that the RTA meets its stated safety goals and objectives. Typical examples include designing, acquiring, constructing, inspecting, testing, operating, maintaining, repairing, modifying or extending those elements of the public transit guideway that are important to preventing or mitigating accidents.
Security	Freedom from harm resulting from intentional acts or circumstances.
Security Program	A form of risk management that eliminates or controls transit system threats and vulnerabilities through an ongoing threat and vulnerability resolution process.
SEPP	Security and Emergency Preparedness Plan, the document adopted by the transit agency detailing its security policies, objectives, responsibilities, and procedures.
SHA	System Hazard Analysis
State	A State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.
State Oversight Agency	The agency designated by the state having responsibility for overseeing safety of RFGSS operating in that state. In this case, the relevant SOA is the Tennessee Department of Transportation, Office of Public Transportation, Division of Rail and Water.
SOC	Safety Oversight Coordinator
SOW	Scope of Work
SSM	System Safety Manager

Acronym/Word	Description/Definition
SSPP	System Safety Program Plan, the document adopted by the transit agency detailing its safety policies, objectives, responsibilities, and procedures.
SSPS	System Safety Program Standard, the standard developed and adopted by the State Oversight Agency which, at a minimum, complies with the APTA Guidelines and which address personal security.
System Safety	Freedom from intentional danger for passengers, employees, system facilities, equipment and all who come in contact with the system. A system safety program involves the application of technical and managerial principles, criteria and techniques to optimize system safety throughout the life-cycle of an RTA.
System Safety Program	The combined tasks and activities of system safety management and system safety engineering that enhance operational effectiveness by satisfying the system safety requirements in a timely manner throughout all phases of a system life-cycle.
System Safety Program Standard	A written document developed and adopted by the oversight agency, that describes the policies, objectives, responsibilities, and procedures used to provide rail transit agency safety and security oversight.
System Security Plan	A document developed and adopted by the rail transit agency describing its security policies, objectives, responsibilities, and procedures.
TCA	Tennessee Code Annotated
TDOT	Tennessee Department of Transportation, Office of Public Transportation, Rail and Water Division
TDEC	Tennessee Department of Conservation and Environment, Division of Solid Waste Management
Terrorism	A criminal act committed against society to receive attention for a political or personal motive. These acts are often violent and involve multiple deaths and injuries, as well as considerable property damage.
Threat	Any real or potential condition that result in a security incident.
Threat and Vulnerability Analysis	The comprehensive study of a system to identify threats and vulnerabilities and to make recommendations for their elimination or control during all life cycle phases.
USDOT	United States Department of Transportation
Vulnerability	Any condition or act that endangers human life or property.

Acronym/Word	Description/Definition
Waiver/Deviation	An approved departure from establish safety and security policies, procedures, instructions and rules.

Appendix B – Design Standards

1) General

The RTA shall create and maintain standards and specification for the design, construction, modification, maintenance and operation of all systems facilities. These shall be revised and updated as required and shall include, but are not limited to, the following standards.

2) Track Standards

The RTA shall create and maintain track design, maintenance and inspections standards. These standards shall be completed before the construction of any track or track structures. These structures shall include the following:

- A) The design standards used in the construction or extension of any transit system track.
- B) Safety standards for the track structure.
 - a. Track geometry
 - i. Alignment
 - ii. Profile
 - iii. Curve superelevation
 - iv. Cross level on tangents and curves
 - b. Track gauge
 - c. Wear limits for rail and switch components
 - d. Minimum side clearance
 - e. Frequency and procedures for all rail flaw detection
 - f. Temperature stabilization procedures for laying and maintaining welded rail.
 - g. General welding procedures
 - h. Frequency and methods for the inspection of track
 - i. Procedures for corrective deviations from these standards
 - j. Qualifications of employees or agents responsible for track maintenance.

3) Bridge and Elevated Structure Standards

The transit system shall create and maintain safety standards for all truck-carrying structures, including bridges, overpasses and other elevated structures. These standards shall include at least the following information:

- A) Maximum allowable limits for load-carrying capacity
- B) Frequency and methods for flaw and defect detection
- C) Procedures for correcting defects
- D) Frequency and methods for inspection
- E) Record keeping
- F) Welding procedures
- G) Qualifications and responsibilities of employees or agents performing inspections

4) Traction Power Substation Standards

The RTA shall create and maintain standards for the construction, maintenance and inspection of traction power substations. These stations shall include:

- A) Design standards used in construction
- B) Safety standards and procedures for maintenance and inspection
- C) Frequency and methods for inspection
- D) Procedures for correcting deviations from these standards
- E) Qualifications and responsibilities of employees or agents performing operations, inspections and maintenance.

5) Overhead Catenary and Support Standards

The RTA shall create and maintain standards for the construction, maintenance and inspection of overhead catenary and support systems. These standards include:

- A) Design specifications
- B) Standards for maintenance and inspection
- C) Frequency and methods for inspection
- D) Repair procedures and standards
- E) Qualifications of employees or agents responsible for inspection and repair

6) Communications Equipment

The RTA shall create and maintain standards and specifications for the installation, maintenance and inspection of communications equipment.

7) Traffic and Transit Control Equipment

The RTA shall create and maintain standards and specifications for the installation, maintenance and inspection for traffic and transit control equipment.

8) Fire Support System

The RTA shall create and maintain standards and specifications for the design, construction, maintenance and inspection of all alarms, telephones, fire extinguishers and wet and dry standpipes.

9) Sign Standards

RTA shall create and maintain and Engineering Standard Plan (ESP) used in the design and placement of all safety, directional, warning and transit control signs or markers used on the RTA. The ESP shall include:

- A) Provisions for permanent signing of all exits, fire escapes, high voltage locations, platform edges and any sign required in National Fire Protection Association (NFPA) manuals.
- B) The dimensions, color and configuration for each required sign on the system.
- C) Requirements for the placement of the necessary information and warning signs on or adjacent to RTA property.

10) System Traffic Control Signs

The transit system shall adopt rules prescribing the requirements for the type of material, installation and maintenance of signs required for safe traffic movement on the RTA. Sign material and maintenance shall be in accordance with applicable USDOT, TDOT and local design standards.

11) Grade Crossings

Every street/highway grade crossing on the transit system shall be constructed of material that will provide a smooth wide and constructed, at a minimum, or material comparable to or exceeding the type and quality of the material used in the approaching roadway. Grade crossings of unconsolidated material shall be prohibited.

12) Crossing Width

The crossing shall be of the same width as the approaching roadway, including drivable shoulders, plus two feet on each side.

13) Angle of Intersection

The roadway alignment shall intersect the track as near to right angles (90°) as practicable. The roadway surface shall be in the same plane as the top of rails for a minimum distance of two feet outside of the rails for either single or multiple track crossings. Where multiple tracks cross the roadway, the tops of rail of all tracks shall be brought to the same grade where practicable.

14) Lane Marking

All traffic lanes over grade crossings, including left turn lanes, shall be distinctly marked in accordance with the recommendations of the Federal Highway Administration's (FHS) *Manual of Uniform Traffic Control Devices for Street and Highways* (MUTCD) (Latest Edition), Part III "Markings." These markings shall be the responsibility of local public authorities.

15) American Railway Engineering Association (AREA) Guidelines

The applicable parts of the AREA's *Guidelines for the Construction or Reconstruction of Highway-Railway Crossings* shall be adopted by reference as a recommended practice for construction and reconstruction of crossings on the transit system.

16) Pedestrian Crossing

The transit system shall maintain a pedestrian grade crossing at all roadway crossings of equal width of the approaching sidewalk on one or both sides of the crossing as required. The material shall be of hard and durable quality compatible with the sidewalk(s).

17) Rail-Highway Crossing Warning Systems

The transit system shall adopt rules to be followed in the installation of rail-highway crossing warning systems. The Division adopts Part VIII, "Traffic Control Systems for Railroad-Highway Grade Crossing" of *MUTCD* (Latest Edition) as the standards to be followed by transit systems in installing rail-highway grade crossing warning systems. These rules may be changed or amended as required by local conditions and the roadway design guidelines of USDOT and TDOT.

18) Temporary Closing of Rail-Highway Grade Crossings

Whenever it is necessary to close a public rail-highway grade crossing for the purpose of maintaining or constructing the crossing surface or track structure, the RTA shall notify the proper road authority, local law enforcement agency, local fire department and local emergency center, not less than twenty-four (24) hours in advance, except in an emergency. Closing of grade crossings shall conform to the requirements for signing, work protection and detours outlined in the FHA's *MUTCD* (Latest Edition).

19) Visual Obstructions at Public Grade Crossings

In order to maintain visibility at public grade crossings, it shall be the duty of every RTA operating within Tennessee to maintain the right-of-way at public grade crossings so that it will be clear of vegetation, undergrowth, debris, signs, buildings and other structures as required by road authorities at grade crossings.

20) Walkways Adjacent to Tracks

The RTA shall adopt rules governing safety standards for the construction, reconstruction and maintenance of walkways adjacent to system tracks. These rules shall apply only to those tracks where passengers walk and employees routinely walk in the performance of their duties. Walkways are defined as those areas located as follows:

- A) On both sides of the track within eight feet six inches (8' 6") of the centerline of the track
- B) At manual throw switches for an area six feet in diameter around head block ties.
- C) At manual throw switches from a point one hundred feet (100') behind the point of switch, extending through the switch to a point one hundred feet (100') ahead of the last switch tie.
- D) At other locations prescribed by operating and maintenance supervisory personnel.
- E) At locations determine from inspections conducted during audits.

Walkways shall be constructed of compacted granular material not exceeding three-fourths of an inch (3/4") in diameter applied to the level at the end of the cross of switch tie and sloping away from the ties at a rate of one inch (1") per foot. All walkway surfaces shall be maintained smooth and free of trash, debris and vegetation. Drainage facilities of adequate size shall be installed as required and maintained free of obstructions to pass the expected water flow and prevent water from standing on the walkways.

Appendix C – Checklist for Reviewing the SSPP and the RTA Internal Safety Audit

Rail Transit Agency (RTA) _____

State Oversight Agency Reviewer _____ Date _____

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
1.	Policy Statement	<ul style="list-style-type: none"> • A policy statement is developed for the System Safety Program Plan (SSPP). • The policy statement describes the authority that establishes the system safety program plan. • The policy statement is signed and endorsed by the rail transit agency’s chief executive. 			
2.	Purpose, Goals and Objectives	<ul style="list-style-type: none"> • The purpose of the SSPP is defined. • Goals are identified to ensure that the SSPP 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. 			
3.	Management Structure	<ul style="list-style-type: none"> • An overview of the management structure of the rail transit agency is provided including an organization chart. • Organizational structure is clearly defined and includes: <ul style="list-style-type: none"> ○ 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 rail transit organization is provided. • Clear identification of the lines of authority used by the rail transit agency to manage safety issues is provided. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
4.	Plan Review and Modification	<ul style="list-style-type: none"> • An annual assessment of whether the system safety program plan should be updated is specified. • The process used to control changes to the system safety program plan is described. • Specific departments and persons responsible for initiating, developing, approving, and issuing changes to the SSPP are identified. • Required coordination with the oversight agency regarding plan modification, including timeframes for submission, revision, and approval, is addressed. 			
5.	Plan Implementation	<ul style="list-style-type: none"> • A description of the specific activities required to implement the system safety program plan is included. • Tasks to be performed by the rail transit 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 should be 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, should be provided. 			
6.	Hazard Management Process	<ul style="list-style-type: none"> • The process used by the rail transit agency to implement its hazard management program, including the role of the oversight agency in providing on-going communication, is described. • The hazard management process includes activities for: hazard identification, hazard investigation, evaluation, and analysis, hazard control and elimination, hazard tracking. • Requirements for on-going reporting to the oversight agency relating to hazard management activities and status are specified. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
7.	Safety Certification Process	<ul style="list-style-type: none"> A description of the safety certification process required by the rail transit agency to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for New Starts and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment. 			
8.	System Modifications	<ul style="list-style-type: none"> The process used by the rail transit agency to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal safety certification, but which may have safety impacts, is described. 			
9.	Safety Data Acquisition	<ul style="list-style-type: none"> 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 rail transit organization receives the necessary information to support implementation of the system safety program is clarified. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
10	Incident Notification, Investigation, and Reporting	<ul style="list-style-type: none"> • A description is provided regarding the process used by the rail transit agency to perform accident notification, investigation and reporting. • Criteria for determining what accidents/incidents require investigation, and who is responsible to conduct specific investigations are developed. • 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 recommendations, and follow-up to verify corrective action implementation is provided. • Notification thresholds for internal departments/functions are defined. • Criteria are specified for notifying external agencies (NTSB, state oversight agency) of accidents and incidents. • Procedures are established for documenting and reporting on accident investigations. • Process used to develop, implement, and track corrective actions that address investigation findings is specified. • Coordination with the oversight agency is specified. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
11	Emergency Management Program	<ul style="list-style-type: none"> • The agency's emergency planning responsibilities and requirements are identified. • A description of the process used by the rail transit agency 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. • The process used to evaluate emergency preparedness, such as annual emergency field exercises, is documented. • After action reports and implementation of findings are required. • The process is explained to be used by the rail transit agency for the revision and distribution of emergency response procedures. • The agency's responsibilities for providing employee training are identified. • The agency's responsibilities for providing familiarization training to local public safety organizations are identified. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
12.	Internal Safety Audit Program	<ul style="list-style-type: none"> • A description of the process used by the rail transit agency to ensure that planned and scheduled internal safety audits are performed to evaluate compliance with the SSPP is included. • Identification of departments and functions subject to audit is performed. • Auditors must be independent from the first line of supervision responsible for the activity being audited. • A triennial audit schedule must be developed, reviewed, maintained and updated to ensure that all 21 SSPP elements are reviewed during the audit cycle. • The process for conducting audits, including the development of checklists, and procedures for conducting audits and issuing of findings is described. • The SSPP must describe the requirement of an annual audit report that summarizes the results of individual audits performed during the previous year and includes the status of required corrective action items. This report must be submitted to the state oversight agency for review and approval. • The process for resolving problems and disagreements, report distribution, and follow-up on corrective action procedures is described. • The ISAP process and reporting must be coordinated with the state oversight agency. • The ISAP process should be comprehensive. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
13.	Rules Compliance	<ul style="list-style-type: none"> • 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. • 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 hazard management program. 			
14.	Facilities and Equipment Inspections	<ul style="list-style-type: none"> • 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 Audit and Inspection Program	<ul style="list-style-type: none"> • 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. • Use of a written checklist for conducting maintenance audits is required. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
16.	Training and Certification Program	<ul style="list-style-type: none"> • 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. • 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. 			
17.	Configuration Management Process	<ul style="list-style-type: none"> • A description of the configuration management control process is provided and appropriate references are made to other rail transit agency documents governing this process. • 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 Safety Requirements	<ul style="list-style-type: none"> • A description of the safety program for employees and contractors that incorporates the applicable local, state, and federal requirements is provided. • Safety requirements that employees and contractors must follow when working on, or in close proximity to, rail transit agency controlled property are identified. • Processes for ensuring the employees and contractors know and follow the requirements are described. 			
19.	Hazardous Materials Program	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements is provided. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
21.	Procurement	<ul style="list-style-type: none"> <li data-bbox="430 224 1144 341">• A description of the measures, controls, and assurances in place to ensure that safety principles, requirements, and representatives are included in the rail transit agency procurement process. 			

Appendix D – Checklist for Reviewing the SEPP and the RTA Internal Security Audit

Rail Transit Agency (RTA) _____

State Oversight Agency Reviewer _____ Date _____

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
1.	Policy Statement	<ul style="list-style-type: none"> • A policy statement should be developed for the System Security and Emergency Preparedness Plan. • The policy statement should describe the authority that establishes the SEPP, including statutory requirements and the rail transit agency’s relationship with the oversight agency. • The policy statement is signed and endorsed by the rail transit agency’s chief executive. 			
1.1	Purpose	<ul style="list-style-type: none"> • The SEPP should identify the purpose of the security program endorsed by the agency’s chief executive. • The SEPP should introduce the concept of “system security.” • The SEPP introduce the concept of “emergency preparedness.” 			
1.2	Goals and Objectives	<ul style="list-style-type: none"> • The SEPP should identify the goals of the SEPP program endorsed by the agency’s chief executive. • The SEPP should identify the objectives of the SEPP program endorsed by the agency’s chief executive. 			
1.3.	Scope	<ul style="list-style-type: none"> • Describe the scope of the SEPP and Program. 			
1.4	Security and Law Enforcement	<ul style="list-style-type: none"> • Describe the security and law enforcement functions that manage and support implementation of the SEPP. 			
1.6	Government Involvement	<ul style="list-style-type: none"> • Describe how the SEPP interfaces with local, state and federal authorities to ensure security and emergency preparedness for the system. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
1.7	Security Acronyms and Definitions	<ul style="list-style-type: none"> Provide a listing of acronyms and definitions used in the SEPP. 			
2.1	Background and History	<ul style="list-style-type: none"> A description of the agency including general overview, a brief history and scope of rail transit services provided. 			
2.2	Organizational Structure	<ul style="list-style-type: none"> Organizational charts showing the lines of authority and responsibility as they relate to security and emergency preparedness. 			
2.3	Human Resources	<ul style="list-style-type: none"> Provide a categorization and break-down of all employees and contractors who work for/on the rail transit agency. 			
2.4	Passengers	<ul style="list-style-type: none"> Provide a description of the rail transit agency's ridership. 			
2.5	Services and Operations	<ul style="list-style-type: none"> Describe the rail transit agency's operations and services. 			
2.6	Operating Environment	<ul style="list-style-type: none"> Describe the rail transit agency's operating environment. 			
2.7	Integration with Other Plans	<ul style="list-style-type: none"> Describe how the SEPP integrates with other plans and programs maintained by the rail transit agency. 			
2.8	Current Security Conditions	<ul style="list-style-type: none"> Description of the current security conditions at the rail transit agency and the types of security incidents experienced by the transit system and their frequency of occurrence. 			
2.9	Capabilities and Practices	<ul style="list-style-type: none"> Summary description of methods and procedures, devices, and systems utilized to prevent or minimize security breaches, including passenger education, campaigns, delay, detection, and assessment devices, and others that may be applicable. 			
3.1	Responsibility for Mission Statement	<ul style="list-style-type: none"> Identification of the person(s) responsible for establishing transit system security and emergency preparedness policy and for developing and approving the SEPP. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
3.2	Management of the SEPP Program	<ul style="list-style-type: none"> • Identification of the person(s) with overall responsibility for transit security and emergency preparedness, including day-to-day operations, SEPP-related internal communications, liaison with external organizations, and identifying and resolving SEPP-related concerns. 			
3.3	Division of Security Responsibility	<ul style="list-style-type: none"> • Listing of SEPP-related responsibilities of the personnel who work within the transit agency security/police function. • Listing of SEPP-related responsibilities of other departments/functions, including their relationship to the security/police function. • Listing of security-related responsibilities for other (non-security/police) rail transit agency employees, including their relationship to the employee's other duties. • A SEPP Program Roles and Responsibilities Matrix should be developed showing interfaces with other transit system departments/functions and the key reports or actions required. • The responsibilities of external agencies for supporting SEPP development and implementation should be identified. • The committees developed by the rail transit agency to address security issues should be identified. 			
4.1	Planning	<ul style="list-style-type: none"> • Identification of SEPP activities and programs in place at the rail transit agency to support planning for system security and emergency preparedness. 			
4.2	Organization	<ul style="list-style-type: none"> • Identification of the organization of SEPP-related activities and programs and the ability to coordinate with external response agencies. 			
4.3	Equipment	<ul style="list-style-type: none"> • Description of the equipment used to support implementation of the SEPP program. 			
4.4	Training and Procedures	<ul style="list-style-type: none"> • Description of SEPP-related training and procedures available to ensure employee proficiency. 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
4.5	Exercises and Evaluation	<ul style="list-style-type: none"> Description of SEPP-related activities to ensure the conduct of emergency exercises and evaluation. 			
5.1	Threat and Vulnerability Identification	<ul style="list-style-type: none"> Description of the rail transit agency's activities to identify security and terrorism-related threats and vulnerabilities. 			
5.2	Threat and Vulnerability Assessment	<ul style="list-style-type: none"> Description of the rail transit agency's activities to assess the likely impacts of identified threats and vulnerabilities on the system and to identify particular vulnerabilities which require resolution. 			
5.3	Threat and Vulnerability Resolution	<ul style="list-style-type: none"> Description of how response strategies (both short- or long-term strategies) are developed for prioritized vulnerabilities, including the decision process used to determine whether to eliminate, mitigate, or accept security problems. 			
6.1	Required Tasks for Goals and Objectives	<ul style="list-style-type: none"> Identification of tasks to be performed to implement the goals and supporting objectives required to implement the SEPP. 			
6.2	Task Schedule	<ul style="list-style-type: none"> General schedule with specific milestones for implementation of the security program, threat and vulnerability analyses, staff security training, and regular program reviews during the implementation process. 			
6.3	Evaluation	<ul style="list-style-type: none"> Description of the types of internal management reviews to be conducted, the frequencies of the reviews, and the person(s) responsible. 			
7.1	Initiation of SEPP Revisions	<ul style="list-style-type: none"> 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). 			
7.2	Review Process	<ul style="list-style-type: none"> Description of the process used to review and revise the security plan as necessary, including frequency of reviews, and responsible person(s). 			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
7.3	Implement Modifications	<ul style="list-style-type: none"> <li data-bbox="470 250 1184 367">• Description of process used to communicate and disseminate new and revised procedures and other elements of the security plan to appropriate transit agency staff. 			

**APPENDIX E – TDOT CHECKLIST FOR REVIEW
RTA INTERNAL SAFETY AND SECURITY
AUDITS**

Appendix F – Preliminary Report Form

Tennessee Department of Transportation Preliminary Accident/Incident/Hazardous Condition Report Form (Information Subject to Change)

<input type="checkbox"/> Accident <input type="checkbox"/> Incident <input type="checkbox"/> Hazardous Condition Accident/Incident Number, if known: _____
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Reported By:			
Notification Time: : AM PM		Name/Department:	
Date of Incident: / /		Time of Incident: : AM PM	
Incident Location:			
Incident Description:			Reportable to TDOT? <input type="checkbox"/> Yes <input type="checkbox"/> No
Train Number(s):		Employee Number(s):	
Total Number of Injuries:	Serious:	First Aid:	Unknown:
Preliminary Cause(s):			
Damage Estimate:			
Date of TDOT Notification:		Time of TDOT Notification: : AM PM	
TDOT Personnel Notified:			Within 2 hours of incident? <input type="checkbox"/> Yes <input type="checkbox"/> No

APPENDIX G – APPROVED RTA ACCIDENT INVESTIGATION PROCEDURES