



# ANNUAL SAFETY STATUS REPORT 2023

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Illinois Department of Transportation  
State Safety Oversight Program  
Office of Intermodal Implementation

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March 2024



Illinois Department  
of Transportation



# Illinois Department of Transportation

Office of Intermodal Project Implementation  
69 West Washington Street / Suite 2100 / Chicago, Illinois 60602

March 15, 2024

Honorable J.B. Pritzker  
Governor, State of Illinois  
207 State House  
Springfield, Illinois 62708

**Subject: 2023 Safety Status Report for the State Safety Oversight Program**

Dear Governor Pritzker:

Please accept this letter as the formal transmittal of the 2023 Safety Status Report on behalf of the Illinois Department of Transportation (IDOT), the designated State Safety Oversight Agency (SSOA) for the State of Illinois. The report is being submitted in accordance with 49 CFR Part 674.13(a)(7) which states “*At least once a year, the SSOA reports the status of the safety of each rail fixed guideway public transportation system to the Governor, the Federal Transit Administration (FTA), and the board of directors, or equivalent entity, of the rail fixed guideway public transportation system.*” The rail fixed guideway public transportation system subject to oversight solely by IDOT and the focus of this annual report (**Attachment 1**) is the Chicago Transit Authority (CTA).

IDOT shares responsibility with the Missouri Department of Transportation, as the Bi-State State Safety Oversight (BSSO) agency to provide state safety oversight to the MetroLink rail system which operates within both the State of Illinois and the State of Missouri. Our approach to comply with the 2023 BSSO Annual Safety Status Reporting is described in **Attachment 2**.

IDOT commends CTA for their commitment to fulfilling safety and security program requirements throughout 2023, including the implementation of its Public Transportation Agency Safety Plan for its rail system as required by our Program Standards Manual and the federal safety rules.

Sincerely,

A handwritten signature in blue ink that reads "Jason Osborn".

Jason Osborn, AICP, Director  
Office of Intermodal Project Implementation

cc: Omer Osman, Secretary  
Jeremy LaMarche, Deputy Secretary  
Terry Glavin, Deputy Secretary

## ATTACHMENT 1

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### 2023 IDOT ANNUAL SAFETY STATUS REPORT

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#### 1.0 About State Safety Oversight

The Federal Transit Administration has established the federal safety requirements for all rail fixed guideway public transportation systems in the United States, including the State of Illinois. These regulations, directives, and other policy and guidance documents collectively represent the safety requirements that a rail transit agency subject to oversight must develop and implement.

The Illinois Department of Transportation (IDOT) was designated to be the state safety oversight agency (SSOA) in 2014. Subsequently, in mid-2016, IDOT assumed all oversight responsibilities from the Regional Transit Authority with respect to the Chicago Transit Authority.

As specified in 49 CFR Part 674, IDOT has the primary responsibility for the development of a Program Standards Manual, a written document that describes the policies, objectives, requirements, responsibilities, procedures, tasks, schedules, and activities used to provide oversight to the rail transit agency.

The effective implementation of safety and security practices by the rail transit agency is essential to compliance with all local, state, and federal laws. As such, the oversight activities of IDOT address all phases of safety and security including rail capital project design, engineering, construction, and testing as well as the operations and maintenance of the rail transit agency's systems, facilities, and equipment.

Through effective oversight, transparent reporting, and management accountability, IDOT seeks to identify and mitigate safety risks and realize a safe and connected transportation system for the passengers and employees of the Chicago Transit Authority and the citizens of the State of Illinois.

#### 2.0 Annual Safety Status Report

The Office of Intermodal Project Implementation (OIPI) is responsible for the development and implementation of the State Safety Oversight Program on behalf of IDOT. A core responsibility of this office is to prepare the Annual Safety Status Report. This Annual Report is one of many State strategic goals and objectives that align with federal laws and mandates guiding national efforts to manage safety risks and hazards within our nation's public transportation systems.

As part of the federal requirements under 49 CFR Part 674, the Annual Report, is a safety and security progress update to the Federal Transit Administration (FTA), Governor Pritzker, and the board of directors for the Chicago Transit Authority, the rail transit agency subject to oversight by IDOT. This annual report reflects on the major oversight activities and significant developments within the rail public transportation industry that took place in the calendar year 2023.

#### 3.0 Management Capacity and Capabilities

In 2023, to increase the depth and breadth of the Department's management and technical expertise for the oversight of rail system safety, OIPI added two new staff, increased its technical support services, and overhauled its procedures and standards to transform its policy and program management framework to guide the growth and development of its State Safety Oversight program.

Jonathan Stevanovich has filled the role of Section Manager since October 2023. Mr. Stevanovich returns to IDOT after working two years at the CTA and completing a Master's program in Public Policy and Administration from Northwestern University. Additionally, IDOT appointed Bryant Philips as Chief Regulations Manager on December 1, 2023. Mr. Philips is also from the CTA where he worked his way up

the ranks, including invaluable experience gained within the Control Center, and also serving as one of the agency's lead accident investigators.

Since 2022, Dovetail Consulting has assisted IDOT with the oversight of the Chicago Transit Authority. This highly specialized firm brings extensive experience and understanding of federal safety rules and requirements to the State of Illinois. Last year, Dovetail Consulting assisted in a series of strategic initiatives for the SSO including a comprehensive update to the Program Standards Manual, a review of CTA safety and security plans for compliance to IDOT's requirements, performance of a comprehensive three-year safety and security audit of the CTA Agency Safety Plan, and provided technical oversight to the design, construction, testing, and operational readiness activities of multiple rail transit major capital projects.

#### 4.0 2023 Rail Safety Key Performance Indicators and Trends

During 2023, CTA experienced sixty-one (61) total injuries at a rate of 0.979 events per million vehicle revenue miles (VRM). Neither measure met target levels of less than forty-eight (48) total occurrences and 0.70 occurrences per VRM. CTA experienced zero (0) total fatalities not attributable to suicide or trespassing at a rate of 0 per VRM successfully meeting the safety performance targets for the year of zero (0) total fatalities and zero (0) per VRM. Additionally, CTA experienced thirty-nine (39) total safety events at a rate of 0.626 per VRM. While the total number of events met target criteria, the rate did not (<43 | <0.612). In 2023, CTA saw its mean distance between mechanical failures reach 136,063.26 mi, but this measure failed to exceed the target threshold of 155,039.37 mi.

**Injuries** - Total injury rates were generally low and stable throughout 2023 with a spike in November due to the event where a vehicle collided with a snow fighter. The event was severe enough to push this indicator past target thresholds. The majority of injuries (90%) were split roughly evenly between customers and CTA personnel. The majority of injuries (79%) occurred on the right-of-way or at stations.

**Fatalities** – Eleven (11) fatalities occurred on the CTA rail system in 2023 due to trespassing or suicide; no other fatalities affecting safety performance targets occurred that year.

**Safety Events** - Event occurrence data gathered over the last four years (2020-2023) show a downward trend overall. Collisions represent the majority of events at 55% percent, and the next highest category, derailments, represents 13%. Overall, however, collisions, specifically, have been trending down since 2019. In 2023, event rates exceeded target levels by mid-year.

**Rail System Reliability** - In 2023, mean miles without mechanical failures peaked in June at 151,633.12 mi, but never met the desired target threshold of 155,037.39 mi. Data from the last four years (2020-2023) demonstrate that system reliability has been trending down since 2020. Door and Brake defects accounted for the most defects in 2023 at 71%, followed by propulsion and suspension defects together at 19%. Nearly all suspension defects in 2023 occurred in 5000 series vehicles (at 97.5%). While the 5000 series vehicles represent 47% of the CTA fleet, this series only represents 34% of all defects in 2023. So, 5000 series defects found in 2023 represent a smaller proportion of total vehicle mechanical defects than expected.

**Improper Operations** – Incorrect Routing represented the highest proportion of improper operations performed in 2023 at 32.79% followed by Passed Signal Set at Danger (generally referred to as a red signal overrun) at 25.41%. All other improper operations represented 22% with the highest in the category being Improper Coupling.

#### 5.0 Program Standards Manual

Last year IDOT's most ambitious effort for 2023 was to rewrite the Program Standards Manual (PSM) to address inconsistencies, vagueness, and lack of procedures, checklists, and other management tools and

controls. IDOT is successfully implementing the updated Program Standards Manual in concert with CTA. Many of the new program management tools and controls are well underway and have improved the overall program coordination and communication. The PSM represents a more comprehensive, systematic, criteria-based approach to SSO reviews, approvals, and overall engagement with CTA.

The goal of the update was to ensure a PSM that would be used on a daily basis by rail safety stakeholders and to set requirements and expectations, and direct oversight and compliance activities. IDOT completed this process and adopted the updated PSM on October 16, 2023. CTA participated in ten candid and productive workshops that represented over 50 hours of discussion and collaborative problem solving. IDOT believes it has achieved the goal of a PSM that is clear, appropriate, comprehensive, and more useful to all stakeholders.

For example, standardized review checklists have been provided within the updated PSM to reinforce and clarify reporting criteria and requirements. Where applicable, IDOT has added expected timeframes for the submittal and review of work for both IDOT and CTA, to shorten turnarounds and better manage expectations. Since last quarter, CTA has been providing timely submittals of the new tracking logs for Safety Events and Corrective Action Plans for SSO audits, internal audits and from other sources. IDOT has been producing its written review checklists to assess compliance and provide feedback for CTA's monthly tracking logs and annual reports submitted earlier this month. The Department looks forward to the continued use of these tools for the review of CTA's Agency Safety Plan, which is anticipated in April.

IDOT has also added new chapters on safety risk management, capital project oversight (including oversight activities that the Department may engage in during every phase of safety and security certification), training, and risk-based inspections.

Last year, IDOT spent a great amount of time assessing and resolving shortcomings of our dispute resolution process. To assess the matter more deeply, the Department conducted a thorough review of backlogged accident investigations reports and Corrective Action Plans from all sources that dated back several years. IDOT's goal was to identify certain common communication and other procedural challenges that required solutions to avoid conflicting interagency positions in the future. With the updated PSM, IDOT clarified how to resolve conflicts promptly and appropriately with a wide array tools, to avoid unnecessary delays, and to provide timely and technically sound feedback to CTA on compliance.

## **6.0 Comprehensive Audit of the CTA Agency Safety Plan**

In August 2023, IDOT conducted its Safety and Security Audit of the CTA as required by the Program Standards Manual, Section 6, IL-SSOA Safety and Security Audits. On behalf of IDOT, Dovetail Consulting served as the lead auditors. The audit was the final part of an overall triennial audit cycle to determine the extent to which CTA is meeting the requirements of the Program Standards Manual, the CTA Public Transportation Agency Safety Plan (PTASP), and the following federal safety law and rules:

- 49 U.S. Code § 5329, Public Transportation Safety Program
- 49 CFR Part 674, State Safety Oversight
- 49 CFR Part 673, Public Transportation Agency Safety Plan
- 49 CFR Part 672, Safety Certification Training Program Provisions
- 49 CFR Part 670, National Public Transportation Safety Program
- 49 CFR Part 630, National Transit Database

From August 21 to September 1, the audit team conducted over 50 interviews and several site visits with CTA executive leadership, managers, and frontline personnel. In addition to the interview sessions, the audit team conducted follow up site visits to CTA facilities to verify operations, maintenance, and training records. from September 27 – 29, 2023.

The audit consisted of an evaluation of the following 22 elements:

Safety Management Policy	Internal Audit Process
Purpose, Objectives, and Safety Performance Targets	Rules Compliance
SMS Authorities, Accountabilities, and Responsibilities	Maintenance Audits and Inspections
Plan Review and Modification	Safety and Security Certification
SMS Recordkeeping	Management of Change
Security and Emergency Preparedness	Training and Certification
Safety Risk Management	Safety Communication
Event Notification, Investigation, and Reporting	Compliance with Local, State, and Federal Requirements
Corrective Action Planning	Hazardous Materials Program
Safety Assurance	Drug and Alcohol Program
Safety Data Acquisition and Analysis	Procurement
Safety Management Policy	Internal Audit Process

In the past, IDOT performed this over the course of three years. This time, IDOT conducted a top to bottom review which involved the analysis of nearly 5,000 pages of supporting documentation, preparation of more than 100 pages of auditor materials, and for the first time, IDOT provided an Audit Participant’s Guide to provide technical assistance and transparency to CTA personnel on the audit requirements and advice on how best to prepare.

IDOT anticipates delivery of the Draft Report of the 2023 PTASP Audit to CTA by March 15, 2024.

**7.0 Oversight of Major Capital Projects**

A substantial revision to the Program Standards Manual involved the incorporation of two new chapters dedicated to the performance of safety and security certification oversight of CTA major capital projects. Section 10, Safety and Security Certification: Planning Phase, describes IDOT’s requirements to ensure that project-specific Safety and Security Certification Plans (SSCP) are developed and implemented by CTA. Each SSCP must ensure that when revenue service begins, the project is safe and secure for passengers, employees, public safety personnel, and the general public through a formal program of safety and security certification, and hazard and security threat/vulnerabilities management. Section 11, Safety and Security Certification: Engineering and Construction Phase, describes IDOT’s oversight activities of CTA during the agency’s design, construction, testing and start-up, and project turn-over phases for New Starts, Small Starts, or other federally funded grant projects subject to IDOT’s state safety and security oversight program.

In 2023, the CTA projects subject to safety and security certification oversight by IDOT included the following:

- Red and Purple Modernization Program (RPM)
- State / Lake Elevated Station Project
- Red Line Extension Project

In early November 2023, IDOT provided concurrence for CTA’s Red Purple Modernization Project, Stage A milestone, representing the close-out of all items on IDOT’s review checklist. IDOT’s review verified that CTA has implemented a strong safety and security certification process supported by comprehensive documentation. CTA provided both management tools, such as tracking logs and checklists, as well as links to the eBuilder database for itemized verification materials, including design criteria, specifications, drawings, design deviations, field inspection reports, and test procedures. Through weekly meetings and construction site visits, IDOT and CTA routinely coordinated to address all items on IDOT’s review checklist with zero (0) remaining open items. The next RPM milestone requiring IDOT concurrence is not anticipated until the last quarter of 2024.

For the State/Lake and the Red Line Extension projects, IDOT attended ad hoc calls and workshops with CTA project stakeholders responsible for design, construction, and safety and security certification, to clarify the requirements for Safety and Security Certification Plans and provided technical feedback intended to inform and strengthen the design of CTA's certification process.

To maintain consistency and transparency in its oversight practices with CTA, IDOT will prepare a project-specific oversight plan for transmittal to CTA's Chief Safety and Security Officer and its key safety and security certification personnel for each capital project subject to state safety oversight. The oversight plan will include the following information:

- Purpose, authority, and benefits of the oversight plan.
- Overview of the scope, management structure, certifiable elements, and project schedule.
- Designated rail transit agency points-of-contact authorized to coordinate the implementation of the oversight plan with IDOT.
- Designated IDOT points-of-contact authorized to develop and implement the oversight plan, including a list of key responsibilities and safety and security oversight activities.
- IDOT requirements and milestones schedule for the project including, but not limited to:
  - Record and Document Submittals
  - Meeting Attendance
  - Site Visits and Observations
  - Safety and Security Readiness Review
  - Safety and Security Certification Verification Report (SSCVR)
- Conditions necessary for IDOT to consider the oversight complete such as the receipt of all required submittals, including documented evidence of the satisfactory completion of all integrated tests, safety and security risk mitigations, of the SSCVR open items.
- Process and documentation to be issued by IDOT to demonstrate its concurrence that the project may initiate revenue service.

IDOT looks forward to the development of project-specific oversight plans for CTA's rail projects as envisioned within the 2023 Program Standards Manual and successfully implemented, in partnership with CTA, on the RPM project.

## **8.0 Special Technical Reviews**

IDOT completed a comprehensive reconciliation of all CAPs that ranged from 2013 to present, to determine the origin and status, and then chart a path to closure for longstanding open items. As a result of these efforts, 46 corrective action plans were brought to closure in 2023. More importantly, IDOT enhanced its communications with CTA through meetings and workshops and improved the transparency of its written compliance assessment of CAPs. IDOT accomplished this by expanding the CAP closure letters to include a thorough discussion and analysis of the documentation submitted for the verification of closure. IDOT also explained how it determined that the verification materials and practices met the adopted requirements of CTA's established plans and procedures, the IDOT Program Standards Manual, and applicable federal rules and guidance.

Next, IDOT completed a comprehensive special technical review of CTA accident investigation final reports that ranged from 2020 to 2023, that were also languishing within the SSO review and approval process. Consequently, IDOT adopted and closed 13 final reports with significant aging, clarified discrepancies, and set expectations for SSO reporting going forward. Overall, IDOT found CTA's accident investigations, analysis, and reporting to be comprehensive, detailed, and technically sound, including the substantiation of causal and contributing factors, and identification of corrective actions to prevent recurrence of rail safety events.



For this review, IDOT used its new compliance management and checklist tools from its revised Program Standards Manual, and also clarified the 2-hour notification criteria for events that are reportable to IDOT:

<b>Event Notification Thresholds for Accidents</b>
A loss of life. <i>Loss of life means a fatality at the scene or within 30 days following the accident involving a passenger, patron, rail transit agency employee, and / or contractor.</i>
A report of serious injury to one or more persons (based on the information available to the rail transit agency at the time). <i>Serious injury means any injury which:</i> <ol style="list-style-type: none"> <li>(1) <i>Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received</i></li> <li>(2) <i>Results in a fracture of any bone (except simple fractures of fingers, toes, or nose)</i></li> <li>(3) <i>Causes severe hemorrhages, nerve, muscle, or tendon damage</i></li> <li>(4) <i>Involves any internal organ or</i></li> <li>(5) <i>Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.</i></li> </ol>
A collision involving a rail transit vehicle with any other rail transit vehicle that results in a fatality, serious injury, or substantial damage. <i>Substantial damage means any physical damage to transit or non-transit property, including vehicles, facilities, equipment, rolling stock, or infrastructure.</i>
Any collision at a grade crossing. <i>This type of collision is reportable to IDOT and requires a written investigation report, even when the collision does not meet the Part 674 accident criteria of involving a fatality, serious injury, or substantial damage.</i>
A runaway train.
An evacuation for life safety reasons.
Any derailment of a rail transit vehicle, yard and mainline.

## 9.0 Accident Investigations

Currently, IDOT is party to the National Transportation Safety Board (NTSB) investigation of a collision that occurred on the CTA Yellow Line on November 16, 2023. Upon notification that NTSB was investigating, IDOT personnel and contractors immediately mobilized to respond to the scene and arranged support to participate in the investigation throughout the early stages of the fact-finding process.

A brief recap of the event is provided below:

*On November 16, 2023, about 10:30 a.m. local time, southbound Chicago Transit Authority (CTA) Yellow Line passenger train (run 593) collided with a stationary CTA snow removal machine (S-500) on south Skokie track 1 and derailed. The train was carrying 1 operator and 30 passengers. There were six CTA employees on board the snow removal machine. Sixteen people were transported to a hospital, treated, and released. Three people were critically injured. There were no fatalities. The train remained upright following the collision. CTA estimated damage to equipment to be about \$8.7 million. At the time of the accident, visibility conditions were daylight and clear; the weather was 61°F with no precipitation.*

Since that time, IDOT has participated in the working groups established by the NTSB to delve into the facts, sequence of events, personnel and equipment analysis, and other relevant investigative activities, including work with the mechanical group and participating in brake testing. The Department took part in the operations group, the mechanical group, and was responsible for preparation of a significant portion of the field notes. The IDOT Director participated in the organizational meeting, received daily briefings from the IDOT response team, and continues to actively engage in discussions and briefings with the NTSB as the investigation unfolds.

Presently, CTA continues to investigate the accident to prevent its recurrence, and IDOT will continue to oversee CTA's event investigation process according to the milestones of the Program Standards Manual.



IDOT appreciates CTA’s status updates, including the implementation of safety enhancements, like a slow speed order in the area of the accident and system-wide testing. IDOT will continue to monitor the progress of the investigation closely with NTSB and CTA.

At the conclusion of NTSB’s investigation, IDOT will make a determination of whether or not the rail transit agency is required to adopt the NTSB recommendations as correction action plans subject to the requirements of the Program Standards Manual.

**10.0 Federal Reporting and Coordination**

**FTA Three-Year Audit of the IDOT SSO Program** - In September 2022, FTA assessed IDOT's implementation of 49 CFR Part 674, the State Safety Oversight rule, and conformance to its Program Standards Manual. This was FTA’s first audit of the SSO program since being certified in 2018. On May 25, 2023 IDOT received the final audit report which included six open findings. On July 10, IDOT provided factual responses to the draft report and proposed six corrective actions to address FTA’s findings. On August 1, 2023, FTA closed two of the findings, and approved three out of the four corrective actions. The fourth finding, related to staffing, was not approved. Instead, FTA issued Special Directive 23-1 to IDOT on October 26, 2023 related to staffing.

At the time of this annual report, IDOT has provided responses to all corrective actions, which are currently under review by FTA.

<i><b>Finding</b></i>	<i><b>Response</b></i>
IDOT did not demonstrate enforcement authority over all RTAs within the State.	IDOT revised the Program Standards Manual in October 2023 with an updated conflict resolution process.
IDOT did not disburse obligated federal grants in accordance with FTA Circular 5010 and the grant agreement	IDOT submitted a spend down plan on December 29, 2023, that fully disburse all obligated funds in accordance with FTA Circular 5010 and the grant agreement.
IDOT did not have all designated personnel adequately trained and included on the technical training plan (TTP).	IDOT Director OIPI established an Individual Training Plan, enrolled in the Public Transportation Safety Certification Training Program, and is included in the Technical Training Plan for the SSO program. All other SSO staff and contractors have been and continue to be PTSCTP certified or on the path of certification within one year of hire.

**FTA Safety Advisory 22-1, Rail Car Passenger Door Inspection and Function Testing** - On October 13, 2022, FTA issued Safety Advisory 22-1 to recommend safety practices for Periodic Maintenance Inspections (PMIs) for Rail Car Passenger Door Inspection and Function Testing. FTA recommended that State Safety Oversight Agencies, including IDOT, direct the rail transit agencies within their jurisdiction to review current policies, procedures, and checklists for rail car passenger door PMIs to determine if they meet the recommended practices outlined by FTA and revise and improve them, as necessary.

Given IDOT’s safety oversight authority, including investigative and enforcement authority over CTA, IDOT can require or review any safety-related procedural or inspection evaluations or changes to rail system. As such, IDOT developed a review checklist to document its determination if CTA’s existing PMI procedures for each rail car fleet are sufficient or insufficient.

As required by November 14, 2022, IDOT issued a letter directing CTA to perform the recommended actions outlined within FTA SA-22-1 and required a response and submittal of supporting documentation by December 14, 2022.

On December 14, 2022, CTA submitted the several preventative maintenance inspection procedures and forms for a sufficiency review by IDOT in response to the FTA Safety Advisory including those related to car body inspection, preventative maintenance, bypass operations, side door operations, and the Operator's duties and responsibilities.

On January 4, IDOT completed its sufficiency review of CTA's rail car passenger door inspection and function testing documentation and determined all items were addressed, and no further action was required.

***FTA Safety Advisory 22-2, Signal System Safety and Train Control*** - On November 14, 2022, IDOT issued a directive to CTA that required the rail transit agency to perform the recommended actions outlined within FTA SA-22-2. Specifically, IDOT required that CTA evaluate the risk assessments for the hazards and potential consequences identified by FTA for signal and train control systems.

On March 24, 2023, as required by IDOT's directive, CTA submitted a comprehensive response and supporting documentation for our review and verification. CTA's response to the advisory included a Safety Assessment Workbook, which documented its safety risk assessment of the signal system safety and train control. CTA explained that its safety risk assessment process followed the established methods outlined in the CTA Agency Safety Plan and Safety Risk Management Plan. These plans were used to assess the safety risks associated with each of the hazards and consequences identified by the FTA in Table 1 of the advisory.

To ensure a thorough assessment, CTA's Department of Safety collaborated with the Department of Engineering and the Department of Power and Way - Signals. Together, they conducted a detailed review of CTA's existing controls related to the hazards and consequences identified by the FTA. This review encompassed various aspects such as equipment, procedures, and maintenance currently employed by CTA. IDOT verified that the findings of this cross-functional working group, which documented the assessment of FTA's identified hazards and consequences, were recorded in the Safety Assessment Workbook.

To determine the likelihood of the consequences, the CTA working group analyzed train-to-train collisions and derailments that occurred between 2017 and 2022. They carefully examined the root causes, evaluated the role of signal equipment, identified any signal equipment issues, and reviewed the relevant rules and standard operating procedures that may have been implicated. Subsequently, the working group determined if each event was consistent with an FTA-identified consequence. The tally of events representing FTA consequences was then subjected to a risk ranking process comparable to MIL-STD 882e. The Safety Risk Assessment Workbook included several tabs, namely Tab 1: Issue Statement, Tab 2: Safety Risk Assessment, Tab 3: Accident Analysis, Tab 4: Risk Summaries, and Tab 5: Safety Assurance.

On April 5, 2023, in response to initial observations from IDOT, CTA clarified several points related to its methodology for the safety risk assessment. On Tab 2, Safety Risk Assessment, CTA clarified that the "Risk Assessment Ranking" column is representative of CTA's true and actual present state, meaning it factors in and accounts for the agency's present state mitigations to each identified hazard. The safety risk assessment in response to FTA Safety Advisory 22-2 does not evaluate or assign risk assessment codes to hypothetical states where hazards are completely unmitigated. If the criteria of an initial risk assessment are deemed unacceptable or undesirable, CTA commits to identifying and tracking the effectiveness of additional mitigations through a Mitigation Monitoring Plan. CTA aims to achieve a lower risk assessment by applying additional mitigations (or increasing compliance with existing ones) and assessing the results through improved performance data. Outside of hypothetical safety risk management exercises (i.e., a Preliminary Hazard Analysis), CTA has endeavored to imbue its safety risk assessment process as one driven by data. CTA believes hypothetical conditions lacking empirical data would yield arbitrary and imaginary risk assessment codes devoid of meaningful information for informed decision-making. IDOT concurred with this methodology and verified that CTA is actively employing more empirical and less subjective risk assessment exercises.

Additionally, in its response CTA identified a connection between two key concepts: safety risk management and compliance. CTA observed that a risk assessment code may indicate insufficiency in existing mitigations, necessitating new or layered approaches. Alternatively, it may highlight a compliance issue that, once addressed, could restore an acceptable level of safety risk. CTA asserted that its mitigations are appropriate and adequate when adhered to and complied with. By basing the safety risk assessment exercise on the present actual condition, CTA aims to recognize and act on these factors effectively. In general, and specifically for this FTA advisory, IDOT agreed with these conceptual observations and CTA's methodology for safety risk management.

On April 14, 2023, CTA provided IDOT with an updated Safety Risk Assessment Workbook that provided additional clarity, refinements, and aided in the interpretation of the workbook. On May 12, 2023, IDOT issued a review checklist approving CTA's response to FTA Safety Advisory 22-2. On May 16, 2023, IDOT and CTA held a brief work session to review and discuss a final set of refinements to the workbook. On May 27, 2023, CTA submitted a final version of the workbook that included these clarifications, but did not affect IDOT's original approval.

Lastly, with respect to the response, IDOT observed, and CTA agreed that there is an opportunity to update the rail transit agency's Safety Risk Management Plan. The purpose of the update will be to incorporate the concepts, objectives, and methodologies of safety risk management and safety risk assessment processes that were applied in the response to this safety advisory into its current governance documents.

Looking ahead, IDOT anticipates that in the next annual review cycle in Spring 2024, CTA will update its Safety Risk Management Plan to align with the safety risk assessment methodology and activities implemented in response to the advisory. To maintain awareness of CTA's observations during its safety assurance and performance monitoring period for the signal system/train control hazards and consequences, IDOT has added the agenda item "Continuous Monitoring Plan for Signals/Train Control" to the Quarterly Leadership Meeting agenda through the period April 2024.

The results of the analysis demonstrated CTA's commitment to safety, a healthy safety culture, and an extensive grasp of the technical concepts and methodologies necessary to implement the Safety Risk Management component of its Safety Management System. IDOT verified that CTA has addressed the safety concerns outlined in the advisory and taken appropriate measures to ensure the well-being of its passengers and employees.

***FTA Special Directive 23-1*** – On October 25, 2023, the FTA issued Special Directive 23-1 which requires IDOT to take action to maintain appropriate program staffing levels commensurate with the number, size, and complexity of the Chicago Transit Authority, the rail fixed guideway public transportation system that IDOT oversees in the State of Illinois. FTA identified four required actions, including IDOT submitting an updated staffing plan.

In addition, IDOT understands that FTA is required to audit each State's compliance with their SSO program at least once every three years. The FTA audit team conducted the onsite and virtual portion of the audit from September 12 – 21, 2022, and issued the final report on May 25, 2023. FTA issued a finding requiring IDOT to ensure an appropriate staffing level for the SSO commensurate with the number, size, and complexity of the rail fixed guideway public transportation systems in the State.

On July 10, 2023, IDOT proposed a response to this corrective action plan, which FTA did not approve on August 21, 2023. Immediately upon receipt, IDOT asked FTA for clarification on the criteria and rationale for the lack of approval of its staffing plan.

On November 17, 2023, FTA formally responded to IDOT's request for clarification regarding the requirements of the special directive. In its clarification, FTA discussed its certification of IDOT's SSO

program as compliant to State Safety Oversight (SSO) rule, 49 CFR Part 674. One of the requirements of the certification is the SSO having sufficient authority, resources, and qualified personnel to oversee the number, size, and complexity of the rail transit systems within its jurisdiction. FTA further explained that SSOs must monitor staffing needs based on program requirements and workload assessments are a tool to guide SSOs in determining staffing requirements. FTA stated that its records indicate that IDOT has not performed a workload assessment since 2018, nor maintained staffing levels commensurate with the staffing levels required during certification. Additionally, due to the overlap of SD 23-1 and Finding 4 described above, FTA formally consolidated Finding 4 from the 2022 Audit with the requirements of Special Directive 23-1, and closed Finding 4.

<i>Finding</i>	<i>Description</i>
1	IDOT fails to develop a staffing plan appropriate to meet the needs of the SSO Program.
2	IDOT fails to demonstrate and maintain a staffing level appropriate to the needs of the SSO Program.
3	IDOT’s SSO Program designated personnel are not adequately trained and included on the TTP.
4	IDOT fails to ensure that its SSO Program designated personnel have the required skills and competencies to effectively support SSO activities.

Essentially, the special directive requires IDOT to update its workload assessment, develop a staffing plan, and submit a training plan, activities which also occur routinely, or which have been discussed as part of upcoming risk-based inspection implementation.

To help facilitate the Department’s rapid response to any of these items, a Special Directive Response Team (SDRT) consisting of the Department’s, Deputy Secretaries, Chief Counsel’s office, and other leadership, was formed and attends bi-weekly meetings set up by the FTA. Since last quarter, the SDRT has been instrumental in the development of a workload assessment. The Department will soon be developing a staffing plan to support the workload assessment and will continue to implement training for SSO staff.

***FTA Special Directive 22-31: Risk-Based Inspection Program*** - In October 2022, FTA published Special Directive 22-31, Risk-Based Inspection Program. The directive requires IDOT to develop an inspection program that addresses 6 categories – authority, policies and procedures, data collection, inspection prioritization, commensurate size and complexity, and staffing and training. Throughout 2023, IDOT has participated in monthly meetings with FTA to ask questions, receive technical feedback and resources, and demonstrate its progress. During a monthly one-on-one meeting with FTA, IDOT provided an overview of its new Section 14, Risk Based Inspection of its Program Standards Manual, which is a major step toward meeting these inspection requirements. In November 2023, IDOT met with FTA to discuss the progress of its RBI program development while attending the annual FTA Joint SSO/RTA Training Workshop in St. Louis, MO. Most recently, IDOT added an RBI Program Development Manager to the SSO program, through its consulting services contract.

IDOT plans to submit its RBI Development Plan to the FTA in advance of the October 2024 deadline for approval of the plan. To inform its submittal, IDOT will hold on-site workshops over the next few months with the CTA safety team and user groups to facilitate the program’s development while continuing to perform on site evaluations, inspections, and other verifications as a follow up to safety risk management, accident investigation, and audit related activities.

**11.0 2024 Strategic Outlook**

Beginning in 2022 and continuing in 2023, IDOT looked inward to build a more effective oversight team and program by fostering mutual accountability and expanding technical capacity and capabilities. Going forward, IDOT will engage in two new initiatives:

*Proposed Special Studies* - IDOT has worked internally to identify the best path forward to procuring professional services to undertake this research. The Department has collected a list of items for research

consideration from the CTA and Bi-State. Given the present status of RBI development, IDOT is shifting its focus on conducting research to support the RBI program, many of the previous ideas can be folded into that effort. We hope to have an RFP on the streets by this fall.

*On Site Observation / Verification Activities* - Lastly, with the hire of the Chief Regulations Manager, IDOT has begun to draft a comprehensive set of standard operating procedures to instruct staff when carrying out all SSO program activities, including SOPs for conducting on-site observations and other inspection and verification activities. In 2024, the Department will be deploying regularly to the CTA rail system and facilities to conduct novel and follow-up audits, investigations, and inspection activities. IDOT views these as an important parts of gearing up for the RBI program.

## **12.0 Conclusion**

In closing, IDOT would like to acknowledge the efforts of FTA to strengthen the safety of public transportation throughout the United States. The current state safety oversight legislation and the proposed changes to these rules are a long-standing, concerted effort that began many years ago to establish and enforce minimum federal safety standards for rail transit systems. The Bipartisan Infrastructure Law, and its predecessor, MAP-21, transformed the policy and program management framework necessary to guide the growth and development of the nation's vital transportation infrastructure. This performance-based program was created to address the many challenges facing the U.S. transportation system, especially improving safety.

The regulation also increased the authority of FTA to impose a range of financial consequences on states and rail systems in response to a lack of compliance with the rail safety rules. Additionally, the FTA is authorized to continually evaluate the implementation of each State Safety Oversight Program, including our effectiveness in reviewing, approving, overseeing, and enforcing the implementation of the safety plans for the rail transit agency that we oversee. As part of these safety rules, the Program Standards Manual is subject to review and verification of compliance by the FTA. While this process allowed IDOT to obtain its initial certification in 2018, it also requires IDOT to continue to carry out its oversight responsibilities in a manner that is commensurate with the scope, size, and complexity of the Chicago Transit Authority, the agency we oversee.

IDOT fully recognizes and is committed to continuing its strategic journey of growth and development in the current age of transportation safety and realizes that this may require an increased level of effort on the part of the IDOT and CTA.

With this annual report, IDOT sought to demonstrate our commitment to the principles embodied within the federal safety regulations, to provide the status of the rail safety program, and to highlight significant SSO program accomplishments and strategic initiatives.

With the updated Program Standards Manual, expanded staff and consultant capabilities, comprehensive auditing and investigative activities, continuous process improvement, and responsiveness to FTA directives and advisories, IDOT has made significant progress to fulfill the federal aim to establish a robust SSO program that represents a performance and risk-based management system for effective rail safety oversight.

**ATTACHMENT 2**

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**2023 BSSO ANNUAL SAFETY STATUS REPORT**



Illinois Department of Transportation

Bi- State Safety Oversight Program



March 14, 2024

Dr. Melonie Barrington  
Office of Transit Safety and Oversight  
Federal Transit Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Subject: 2023 BSSO Program Annual Safety Status Reporting**

Dear Dr. Barrington:

This letter serves to fulfill the annual State Safety Oversight (SSO) Program Safety Status Reporting obligation for 2023 from Illinois Department of Transportation (IDOT) and Missouri Department of Transportation (MoDOT) that cover the joint Bi-State Safety Oversight (BSSO) reporting profile. These reports are submitted to your office in compliance with the federal requirements promulgated in 49 code of federal regulation (CFR) 674.13.

Both IDOT and MoDOT SSO are required to provide an annual report of safety and security efforts for each Rail Fixed Guideway System (RFGS) under its oversight to the Federal Transit Administration (FTA) on a yearly basis. To avoid duplication and potential confusion, our joint oversight efforts of Bi-State Development's (BSD) MetroLink light rail system is included in each state's respective annual reporting of oversight activities throughout 2023, including coordination with each RFGS and the Federal Transit Administration. Both reports are included in the BSSO 2023 reporting submittal.

Thank you for your consideration of the above regarding the BSSO Annual Safety Status Reporting.

Sincerely,

Justin Sobek  
State Safety Oversight Program Manager  
Missouri Department of Transportation

Jason Osborn  
Director of Intermodal Project Implementation  
Illinois Department of Transportation

cc: Tim Braxton, State Safety Oversight Program Manager, FTA  
BSSO file