



COMMONWEALTH of VIRGINIA

Jennifer B. DeBruhl

DEPARTMENT OF RAIL AND PUBLIC TRANSPORTATION

(804) 786-4440

Director

600 EAST MAIN STREET, SUITE 2102
RICHMOND, VA 23219-2416

FAX (804) 225-3752
Virginia Relay Center
800-828-1120 (TDD)

March 1, 2023

The Honorable Glenn Youngkin
Governor, Commonwealth of Virginia
1111 Broad Street
Richmond, VA 23219

Re: 2022 Annual Status of Safety Report and Rail Fixed Guideway State Safety Oversight Program Performance in the Commonwealth of Virginia

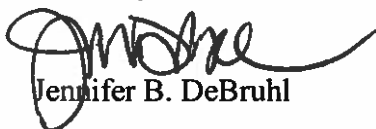
Dear Governor Youngkin,

The Moving Ahead for Progress in the 21st Century Act (MAP-21), and 49 CFR Part 674.13 (a) (7), mandates that at least once a year, the State Safety Oversight Agency reports the status of the safety of each rail fixed guideway public transportation system to the Governor. As such, the Virginia Department of Rail and Public Transportation (DRPT) submits this annual status of safety report for Hampton Roads Transit's Tide light rail system for the period January 1, 2022, through December 31, 2022.

The attached report outlines the program's mission, describes its current activities, while detailing ongoing efforts to comply with the federal regulation on State Safety Oversight of Rail Fixed Guideway Systems.

Please do not hesitate to contact the DRPT Transit Rail Safety and Emergency Management Administrator, Andrew Ennis (andrew.ennis@drpt.virginia.gov) should you or your staff members have questions or wish to discuss the program.

Sincerely,


Jennifer B. DeBruhl

Cc: W. Sheppard Miller, Secretary of Transportation
Andrew Ennis, DRPT

February 2023

2022 Annual Status of Safety Report

Rail Fixed Guideway State Safety Oversight Program

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Executive Summary

The Virginia Department of Rail and Public Transportation (DRPT) is the designated Rail State Safety Oversight Agency (SSOA) for the Commonwealth of Virginia. In this role, DRPT oversees the Hampton Roads Transit (HRT) Tide light rail system in Norfolk. The state safety oversight agency's mission is the continuous verification that HRT is carrying out its documented programs to ensure the safety of its passengers and employees.

The Transit Rail Safety and Emergency Management Administrator oversees DRPT's oversight program with support from contracted consultant staff who are experts in fields such as train signaling, civil engineering, and rail operations. The budget for the state safety oversight program is funded by Federal Transit Administration (FTA) dedicated formula grants that are matched with DRPT administrative funds.

In its oversight role, DRPT:

- Conducts audits and inspections (both announced and unannounced) of the Tide system
- Reviews and adopts accident, incident, and hazard investigations
- Tracks and verifies HRT's progress in correcting safety and security gaps on its light rail system

2022 Program Highlights

Approved Documents

DRPT formally approved HRT's Public Transportation Agency Safety Plan (PTASP), Version 3 on January 3, 2023.

Triennial Audits

- March: HRT's Security and Emergency Preparedness Department
- September: HRT's multi-department implementation of the PTASP including Facilities, Engineering, Procurement, Human Resources, and others

Inspections

- February: Rules Compliance Inspection
- April: Safety Department Inspection
- June: Supervision Inspection
- July: Light Rail Vehicle (LRV) Maintenance Inspection
- November: Rules Compliance Inspection

Accident notification and investigations (all investigations and reports adopted by DRPT)

In 2022, there were two collisions with private occupancy vehicles (POVs). Both were the fault of the POV driver, and one of the collisions resulted in substantial damage.

Federal Regulatory Compliance

The FTA conducted its triennial audit of the DRPT SSO program in June 2021. The final audit report was issued to DRPT in February 2022 and contained three findings. DRPT generated proposed corrective actions to address these findings, which were submitted to the FTA on March 25, 2022. All corrective actions were closed by the FTA as of June 29, 2022.

The Infrastructure Investment and Jobs Act (IIJA), signed into law in November 2021, required HRT to make several updates to their safety program, including establishing and implementing a joint labor-management safety committee vested with the responsibility to formally approve the HRT PTASP. HRT was required to establish the committee by July 31, 2022, and to have the committee formally approve the PTASP by December 31, 2022. HRT successfully met these objectives by the deadlines mentioned above. In addition to the creation of a joint labor-management safety committee, the IIJA required HRT to update its PTASP to include strategies to minimize the exposure to infectious diseases, developing a risk reduction program to reduce transit worker assaults, and de-escalation training. These requirements are described in greater detail in the “Federal and State Legislative Changes” section.

FTA also issued a special directive to DRPT in Fall 2022 regarding the development and implementation of a Risk-Based Inspection (RBI) program. DRPT currently performs routine announced and unannounced inspections and will work closely with HRT and the FTA as we make enhancements to the inspection program to meet the RBI requirements.

Program Background and Overview

In 1996, FTA issued the Rail Fixed Guideway Systems State Safety Oversight Rule, 49 Code of Federal Regulations (CFR) Part 659. Under this rule, each state with rail fixed guideway systems not subject to the regulatory authority of the Federal Railroad Administration was responsible for overseeing the safety and security program implementation of these systems. Pursuant to Subdivision 16 of § 33.2-285 of the Code of Virginia, the designated Rail State Safety Oversight Agency (SSOA) is the Department of Rail and Public Transportation (DRPT) in the Commonwealth of Virginia. DRPT oversees the Hampton Roads Transit (HRT) Tide light rail system in Norfolk, Virginia.

The FTA certified DRPT's State Safety Oversight (SSO) program under 49 CFR Part 674 on April 4, 2018. This regulation directs eligible states to significantly strengthen their authority to oversee and enforce safety requirements to prevent and mitigate accidents and incidents on rail fixed guideway systems subject to oversight. Additionally, it mandates eligible states to demonstrate legal and financial independence from these rail transit systems, as well as provide the necessary financial and human resources for overseeing the number, size, and complexity of rail transit systems within their jurisdictions. While the regulation does not mandate oversight of security practices at the rail transit system, DRPT maintains this authority over HRT security and emergency preparedness programs as authorized by the Code of Virginia. This report details State Safety Oversight activities at the HRT Tide light rail system¹ from January 1 through December 31, 2022.

State Safety Oversight Responsibilities

DRPT's SSO program activities are intended to ensure that the rail transit agency (RTA) places safety considerations over operational expediency in all decision making. An important distinction should be made in delineating the role of the SSOA versus the role of the RTA in maintaining and improving rail safety. The SSOA's role is that of the regulator ensuring that all the mechanisms in place at the RTA are sound and unconditionally applied. The state does not perform day-to-day functions at the RTA. Alternatively, the RTA's role is to perform all necessary programmatic, procedural, technical, engineering, and operational activities that it has formally adopted to maintain safety in rail operations.

DRPT's oversight mission is to continuously verify that the RTA is carrying out its documented programs to ensure the safety of its passengers and employees. DRPT's oversight efforts are fully transparent to HRT. All DRPT's actions, including those that denote various deficiencies at HRT, are communicated objectively with the goal of improving HRT's rail safety posture and without assigning fault. Although HRT's Safety and Security Departments are the custodians of HRT's safety and security programs, the entire organization, including its senior executives, middle managers, supervisors, and frontline personnel, is empowered and responsible for upholding its safety goals.

The entirety of this oversight effort is called the "Program." The activities of the DRPT oversight program are described in a document titled the Safety and Security Program Standard (SSPS).

¹ An interstate compact was enacted on August 22, 2017, creating the Washington Metrorail Safety Commission (WMSC). Effective March 18, 2019, the WMSC is the designated State Safety Oversight Agency for WMATA Metrorail. To learn more about WMSC's oversight role, please visit <https://wmsc.gov/oversight/>.

As mandated by federal regulation, the SSPS contains a description of DRPT's organizational structure and lines of authority that support the oversight program. It also lists DRPT's protocols for operating a federally compliant SSO program. The SSPS is a dynamic document that undergoes annual review and updates to reflect enhancements to the program. This document and its practices are subject to FTA review.

Key Program Activities

Throughout the year, the SSOA's key program activities include:

- Conduct regular work sessions with HRT rail safety, security, operations, and maintenance personnel
- Conduct audits, inspections, and special assessments of HRT's light rail operations
- Review and approve primary HRT rail safety, security, and emergency preparedness plans
- Conduct or adopt rail investigations for accidents, incidents, and hazards occurring on the HRT light rail system
- Track and verify HRT's progress in correcting safety and security gaps on its light rail system

Staffing

The Transit Rail Safety and Emergency Management Administrator (Administrator) oversees DRPT's SSO program and reports directly to the DRPT Director. The Administrator, Andrew Ennis, performs all programmatic decision making and supervisory tasks with the support of contracted consultants. The consultant staff include subject matter experts (SMEs) in the fields of train signaling, engineering, track and structures, rail vehicles, and rail operations. The Moving Ahead for Progress in the 21st Century Act (MAP-21), published in 2012, and a subsequent federal regulation directed FTA to establish a more comprehensive and standardized training and certification program for designated state and RTA personnel who conduct rail safety reviews and have direct safety oversight responsibility. This certification program places greater emphasis on SSO and RTA staff obtaining certifications and competencies specific to the rail system they work and oversee. The DRPT Administrator and consultant staff are compliant with the above-mentioned regulations.

Budget/Funding

The Fixing America's Surface Transportation Act, published on December 4, 2015, reauthorized the United States Department of Transportation and FTA to provide dedicated formula grant funding to states with SSO responsibilities. This formula funding is based on the number of rail modes overseen by the state agency and the scale of the RTA's operation – such as track miles, passenger trips, and revenue miles. These FTA formula grant funds can be utilized for program administration and activities including but not limited to SSO staff salaries, FTA-mandated training, consultant services, and equipment purchases. In 2022, the DRPT oversight program budget was \$1,078,047. This was comprised of FTA formula grant funds of \$862,438 (80%) and matched with \$215,609 (20%) from DRPT administrative funds. DRPT utilizes this funding for various eligible purposes that include:

- Staff salary
- Consultant support
- Routine state safety program activities
- Annual FTA certifications and accredited rail standards training courses
- Dedicated response vehicle
- Equipment needed to perform program activities

Program Highlights from 2022

All the SSO program components command equal significance. These program components are designed to be symbiotic, with information and intelligence gathered in one program element informing another. For instance, information gathered in a triennial audit might inform an accident investigation. In the same manner, a finding of cause discovered during an accident investigation might spur closer scrutiny of a certain practice at the RTA, prompting frequent inspections by SSO staff.

Approval of Program Documents

Federal regulation mandates that the SSOA annually review and approve key documents associated with safety and security at the rail transit system. Accordingly, in 2022 DRPT reviewed and approved HRT's Security and Emergency Preparedness Plan Version 8.

The Public Transportation Agency Safety Plan (PTASP) Final Rule, 49 CFR Part 673, requires certain operators of public transportation systems that receive federal funds to develop safety plans that include the processes and procedures to implement safety management systems and safety performance targets. 49 CFR Part 673 also requires an annual review and update of the PTASP. Additionally, the IIJA had numerous implications for SSOAs and RTA safety programs. These requirements are described in greater detail in the "Federal and State Legislative Changes" section.

HRT incorporated all the applicable requirements from the IIJA into its agency safety plan. DRPT conditionally approved HRT's PTASP on December 1, 2022. The Joint Health & Safety Committee subsequently approved the PTASP by the December 31, 2022, deadline and DRPT provided final approval on January 3, 2023.

Triennial Audits

One of the mechanisms DRPT utilizes to assess the ongoing health of HRT's rail safety performance is the triennial audit process. Triennial audits gauge the level to which safety is integrated into rail operations, maintenance, training, human resources, procurement, engineering, quality assurance departments, and management structure. All these separate departments, and the organization, support the safe operation of the rail system. The methodology associated with the triennial audits is the continuous and robust assessment of all these departments and their documented efforts at ensuring safety of HRT's passengers and employees. Instead of a single audit of the entire program being conducted once every three years, DRPT conducts this audit on a continual three-year cycle. During these audits, if DRPT concludes that any aspects of HRT's documented programs related to rail safety are not being executed as officially described, DRPT will record these as findings.

Findings are classified as either Findings of Non-Compliance (FNCs) or Findings of Compliance with Recommendations (FCRs). FNCs generally relate to those areas where the RTA is not following federal or state requirements or its own established plans, policies, procedures, or where such documents are nonexistent. FCRs are deficiencies where the RTA has practices or plans that do not rise to the level of non-compliance with established policies, procedures, or industry standards. Further, they are a preemptive attempt at preventing a low hazard condition from progressing to a situation where it could result in a non-compliance/safety critical issue if unchecked. The RTA is required to address such findings through corrective action plans (CAPs). These CAPs can take the form of recalibrating a program or procedure to better match their practical applications, reinstruction, or instituting new procedures or programs. DRPT reviews and approves all CAPs proposed by HRT and monitors these CAPs to ensure completion within established timeframes.

DRPT conducted two triennial audits of HRT in March and September 2022. Both triennial audits were conducted on-site. HRT submitted documents subject to audit early for review, and interviews with HRT personnel were pre-scheduled and conducted.

The March triennial audit assessed HRT's Security and Emergency Preparedness Department. This audit resulted in the following FNCs and FCRs:

- FNC-1: HRT did not submit its 2021 SEPP updates to DRPT for review by July 31 as required by SSPS Section 4.3.
- FCR-1: Several of HRT's security procedures were not reviewed, and if applicable, updated annually in accordance with HRT EXE-101.
- FCR-2: HRT does not require its contracted security personnel to complete refresher training other than for track access training.

The September triennial audit assessed the implementation of the PTASP across HRT's Finance, Marketing and Communications, Internal Audit, Records Management, Planning and Development, Engineering and Facilities, Technology, and Human Resources Departments. This audit resulted in the following FNCs and FCRs:

- FNC-1: Customer Relations did not post a customer service alert related to the out-of-service elevators at NSU station because the appropriate staff were not notified.
- FNC-2: Technology has not been consistently attending the SMSC meetings nor providing the specified data reporting to the committee per the PTASP.
- FNC-3: According to Facilities, two quarters of fire suppression system inspections were missed due to a lapse in the contract with HRT's inspection vendor.
- FNC-4: Facilities currently maintains completed vendor inspection reports in an Outlook email folder. This is not in compliance with HRT's REM-100 policy.
- FNC-5: The elevator inspection done in April 2022 shows both NSU elevators' certificates expired in 2019; however, HRT allowed these elevators to continue in service after failing certification.
- FNC-6: At time of the audit, relevant stakeholders in external departments were not properly notified regarding the out of service elevators at NSU.
- FCR-1: Business Development is currently housed under the Marketing and Communications Department, however, the current PTASP lists this function under Planning and Development.
- FCR-2: HRT's employee handbook requires the following revisions: inclusion of HRT's safety reporting program; include a reference to reasonable suspicion in the fitness for duty section.

- FCR-3: Although the Finance Department is listed as a participant in SMSC, Procurement does not routinely attend the meetings and is not currently required to report data. HRT may benefit from regular reporting by Procurement about the status of safety related procurements and the status of requests for safety-related budget resource.
- FCR-4: The Public Affairs Officer and Social Media Coordinator have not completed appropriate National Incident Management Systems (NIMS) training in accordance with HRT's Security and Emergency Preparedness (SEPP) and emergency management best practices.
- FCR-5: Marketing and Communications were not on the internal distribution list regarding service changes that may need to be announced via social media.
- FCR-6: The PTASP should be updated to clarify the nuance of Facilities' responsibilities at the NTF, and Tide stations does not extend to the whole facility but rather the admin areas and the "building envelope" and that "specialty equipment" maintenance is the responsibility of operations and maintenance departments.
- FCR-7: The hazmat program description in the PTASP and referenced documentation should clarify where Facilities is responsible for keeping the inventory and SDS.
- FCR-8: The PTASP currently delegates HRT's Transit Asset Management program to the Facilities Department, however it has transitioned to the Executive Department.
- FCR-9: HRT Facilities does not have a sufficient process to oversee and ensure compliance by contractors for safety-critical systems and equipment.
- FCR-10: Records Management does not currently engage directly with departmental records coordinators to determine whether other departments are adhering to records management policies.

DRPT approved proposed CAPs for all the findings listed for both the March and September audits. One of the requirements for a CAP is the RTA must provide an estimated completion date that is both realistic and practical. The estimated completion date should be based on the severity and complexity of the finding the CAP is designed to address. Because of this, it is understood that some CAPs may have a shorter estimated completion period while others may have estimated completion plans that could span several months or years. CAPs with long-term estimated completion dates are acceptable with continued monitoring. A final completion date is assigned when a CAP is verified by the SSO program as ready for closure. As of this writing, all findings from the September 2022 triennial audit and associated corrective actions remain open, in accordance with timeframes prescribed in the SSPS. These corrective actions are actively monitored by DRPT, which will continue to work collaboratively with HRT on resolving open corrective actions.

Inspection Program

The DRPT inspection program is intended as a cooperative effort with HRT to assess the safety and security of operations and maintenance practices. Additionally, it is used to verify overall compliance with federal rules and standards as well as all relevant HRT rules, standards, and procedures on an ongoing basis. The program allows DRPT to:

- Evaluate topics of heightened risk based on recent information, trends, or incidents
- Identify potential problem areas requiring further investigation and solution development
- Assist HRT by providing independent evaluations of procedural and rules compliance
- Gain consistent involvement in HRT operations, maintenance, and safety programs

Inspections typically last one to two days and involve multiple topics and types of observations or reviews, some of them simultaneous. Inspection activities are based on both a regular rotation of subject matter areas as well as areas of heightened risk. Areas of heightened risk are determined through extensive data analysis. Inspection activities can include the following areas of focus:

- Rail Vehicles
- Vehicle Maintenance Facilities and Yards
- Track Access/Roadway Worker Protection
- Traction Power System
- Signal System
- Rail-Highway Grade Crossings
- Operations Control Center
- Rule compliance results provided by HRT

Inspections may be announced or unannounced. For announced inspections, DRPT may provide notice to HRT up to 24 hours before the inspection occurs. If DRPT anticipates an inspection will require specific HRT personnel or preparation, DRPT will provide advance notice to assist with scheduling. For unannounced inspections, DRPT personnel will arrive on the property without advanced notice to HRT. Inspections are conducted from public areas as well as on the Tide right-of-way. Inspections taking place from public areas, such as onboard trains, in stations, or from the street, will not be announced to the HRT personnel performing the operations or maintenance being observed. For any inspections performed on the Tide operating right-of-way, DRPT will provide advanced notification to HRT to ensure coordination and compliance with all HRT right-of-way access and permitting requirements. DRPT oversight program representatives will abide by all HRT safety rules and regulations while on HRT property, including roadway worker protection requirements.

DRPT will publish an inspection report detailing inspection activities after its conclusion. For each inspection, the report will document any observations, violations, potential hazards, deficiencies, and areas for improvement. Unlike the triennial audits, HRT is not required to develop CAPs in response to items in the report unless it is specifically issued by DRPT in an inspection report. However, DRPT strongly encourages HRT to respond to the report and develop CAPs. Even if no deficiencies are identified during an inspection, HRT often proactively addresses inspection items by generating corrective actions or mitigations.

In 2022, DRPT conducted the following inspections:

- February: Rules Compliance
- April: Safety Department
- June: Rules Compliance
- July: LRV Maintenance
- November: Rules Compliance

Finding(s) issued by DRPT during the 2022 inspection cycle:

- FNC-1: HRT is not completing its OCS fixed termination tension inspections in accordance with OPS-LRSY 302.
 - HRT resolved this finding through the CAP process before the end of 2022.

Safety Event Notification and Investigation

Federal regulation requires rail transit agencies subject to oversight to notify the SSOA and the FTA of accidents that occur on the rail system. The FTA defines “accidents” as “an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision involving a rail transit vehicle; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.” Further, DRPT requires HRT provide additional notifications of safety events that do not meet the FTA definition for an accident. Additional safety events can include “incidents” and “occurrences” like multiple injuries, significant damage, rule violations or service delays. All event notifications are reported directly to the Administrator within the timeframes prescribed in the SSPS.

DRPT is required to investigate all accidents. To conduct these investigations, DRPT may authorize HRT to investigate on its behalf, or DRPT can conduct its own independent investigation. In the event the National Transportation Safety Board (NTSB), FTA, or other federal entity launches an investigation into an HRT light rail accident, DRPT will join the investigative process. DRPT is ultimately responsible for the sufficiency and thoroughness of all investigations, whether conducted by DRPT or HRT. DRPT reviews all investigation reports prepared by HRT for accuracy and adopts each report as its own official investigative report once all DRPT requirements have been met.

During 2022, there were two collisions involving light rail vehicles and privately owned vehicles (POVs), six reportable fires, and several signal and rule violations by rail Tide operators. The investigations into these events concluded:

- The two collisions with POVs were the fault of the POV drivers (traffic violations).
- The six fires were found to be non-preventable.
 - One fire took place at the Holt Street traction power substation. The root cause was identified as component failure.
 - Three of the fires were found to be caused by imprudent actions of patrons. The remaining fires were caused by imprudent actions of the public (brush fires).
- The signal and rule violations were found to be preventable. HRT implemented and closed several CAPs to address these violations before the end of 2022.

Of these events, one of the POV collisions and the fire at the Holt Street traction power substation met the criteria for reporting to the FTA. HRT properly reported these events to the FTA. All investigation reports were reviewed and adopted by the DRPT Administrator.

FTA Actions

On June 8-11, 2021, the FTA conducted its triennial audit of the DRPT SSO program. The FTA issued its final audit report to DRPT in February 2022 with following findings:

- DRPT did not have a process for investigating allegations of noncompliance with HRT’s PTASP.
- DRPT did not determine an appropriate staffing level for the current SSO Program.
- DRPT did not demonstrate its employees and other personnel are qualified to perform their functions.

In March, DRPT submitted proposed corrective actions to address these findings. All proposed corrective actions were approved by the FTA and closed by the FTA as of June 29, 2022.

In October 2022, the FTA issued Safety Advisory 22-1 and Safety Advisory 22-2. Safety Advisory 22-1 recommended that SSOAs direct RTAs to evaluate the sufficiency of current RTA periodic maintenance inspection procedures for rail car passenger door inspection and function testing. To address Safety Advisory 22-1, HRT performed an assessment of the current inspection procedures for rail car passenger door inspections and functioning testing. HRT provided the completed vehicle inspection checklists to DRPT to show that door inspections are included as part of their periodic maintenance inspection programs.

Safety Advisory 22-2 recommended that SSOAs direct RTAs to consider signal system safety and train control as part of their safety risk management (SRM) process and SSOAs review the signal system safety and train control SRM activities to confirm RTAs have adequately addressed hazards and potential consequences. To address Safety Advisory 22-2, HRT provided DRPT with copies of its current safety data related to the function of the Tide signal system. Additionally, HRT will submit copies of meeting minutes from its monthly Safety Management System Committee through June 2023 to verify that signal system performance and failures are being discussed as part of the SRM process.

On October 21, 2022, the FTA issued Special Directive 22-49 requiring DRPT to develop and implement a risk-based inspection program within two years of the issuance of the Directive. DRPT will work to enhance its risk-based inspection program to comply with the FTA Special Directive 22-49.

Federal and State Legislative Changes

The Infrastructure Investment and Jobs Act (49 U.S.C. § 5329 / IIJA § 30012) continues the public transportation safety program. The Act includes the following changes for the program:

- Provides state safety oversight agencies authority to collect and analyze data and conduct risk-based inspections of rail fixed guideway transportation systems
- Requires agency safety plans to be consistent with Centers for Disease Control and Prevention and State health authority guidelines to minimize exposure to infectious diseases
- Requires recipients serving an urbanized area with a population of fewer than 200,000, to develop their agency safety plan in cooperation with frontline employee representatives
- Requires recipients of section 5307 funds that serve urbanized areas with populations of 200,000 or more to undertake the following activities:
 - Establish a Safety Committee, composed of representatives of frontline employees and management, that is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the agencies' safety risk assessment.
 - Develop and add to their agency safety plan, a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the national transit database.

- Set risk reduction performance targets using a three-year rolling average of the data submitted by the recipient to the National Transit Database and allocate not less than 0.75 percent of their section 5307 funds to safety related projects.
- Require maintenance personnel to meet the existing safety training requirements and safety, operations, and maintenance personnel to complete de-escalation training.

HRT incorporated all the applicable requirements detailed above into its agency safety plan and met all IIJA deadline requirements