INFORMATION ITEM #6
Meeting Date: July 15, 2021

Agenda Item Number: 6a

**Action Requested:** Review and Consideration of the an Amendment to the 2045 Metropolitan Transportation Plan (MTP) to include Public Transportation Agency Safety Plan Performance Measures (PTASP-PM)

**SUMMARY OF INFORMATION:**

Attachments: Yes X No

Per the recent Federal Transit Administration (FTA) guidance regarding MPO adoption of transit safety targets, FTA regulations state that MPOs have up to 180 days after receipt of safety targets from the transit provider to establish transit safety targets. The timing of adopting transit safety targets may impact FTA’s STIP/TIP approvals. The NCDOT Board of Transportation will take action on the next modification to the STIP on August 5, 2021. Thus, for there to be no impact to FTA’s STIP/TIP approvals, **MPOs must establish targets by July 30, 2021.** Anything beyond this date has a possibility of impacting transit funding in the MPO area. To assist MPOs in this matter, the Integrated Mobility Division (IMD) has developed the attached resolution.

There is no standard methodology MPOs must use to adopt transit safety targets. Therefore, MPOs have the choice to support safety targets on a per transit provider basis or to develop their own targets by combining multiple agency safety targets into one value. In November of 2020, the TAC adopted the Winston-Salem Transit Authority’s PTASP. To comply with the requirements the TAC must adopt each agencies PTASP Performance Measure (PTASP-PM) and staff has prepared an amendment to add the PTASP Performance Measures for Davidson County Transportation and the Piedmont Authority for Regional Transportation to the 2045 Metropolitan Transportation Plan (MTP).

Per the Public Participation Plan, amendments to the MTP require a 30 public review period. These amendments were made available from June 16, 2021 to July 16, 2021. Any comments received after today will be provided at the September 16 meeting.

IMD will compile the STIP/TIP modifications and the MPO target establishment resolutions then submit to FTA as one document to simplify FTA’s compliance verification process when approving STIP/TIP amendments.

TAC Vote: Motion by: Second by: Vote: For Against

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Winston-Salem Urban Area Metropolitan Planning Organization
Transportation Advisory Committee
Action Request
RESOLUTION
APPROVING AND AMENDING THE 2045 METROPOLITAN TRANSPORTATION PLAN TO INCLUDE PUBLIC TRANSPORTATION AGENCY SAFETY PERFORMANCE MEASURES (PTASP-PM)

A motion was made by TAC Member _________________ and seconded by TAC Member _________________ for the adoption of the following resolution, and upon being put to a vote was duly adopted.

WHEREAS, per recent Federal Transit Administration (FTA) guidance regarding Metropolitan Planning Organizations (MPOs) adopt transit safety targets for transit providers in the planning area; and

WHEREAS, MPOs have up to 180 days after receipt of the safety targets to adopt and include in their Metropolitan Transportation Plan (MTP); and

WHEREAS, in order to ensure there is no impact to FTA’s STIP/TIP approvals, MPOs mush establish targets by July 30, 2021; and

WHEREAS, Transportation Advisory Committee (TAC) adopts and supports the performance targets of Davidson County Transportation (DCT), the Piedmont Authority for Regional Transportation (PART) and the Winston-Salem Transit Authority (WSTA); and

WHEREAS, FTA published the PTASP Final Rule on July 19, 2018 requiring certain providers of public transportation systems that receive federal funds under FTA’s Urbanized Formula Grant to develop a PTASP that includes SPTs for transit-related fatalities, injuries, safety events, and system reliability (state of good repair); and

WHEREAS, all amendments to the MTP require a 30-day public review period, held from June 16, 2021 to July 16, 2021.

NOW, THEREFORE, BE IT RESOLVED that the Transportation Advisory Committee of the Winston-Salem Urban Area MPO approves the adoption and amendment of transit safety targets to be included in the 2045 Metropolitan Transportation Plan.

Adopted on this the 15th day of July, 2021.

______________________________
Mike Horn, Chairman
Transportation Advisory Committee

______________________________
Kirk E. Ericson, Secretary
Transportation Advisory Committee
MTIP Language

Public transit projects included in the STIP align with the transit safety planning and target setting process undertaken by the transit agencies and MPOs. While the North Carolina DOT aided with the development of a template for the initial Public Transportation Agency Safety Plans (PTASPs), each large urban transit provider is responsible for implementing its PTASP, which includes transit safety targets. Investments are made in alignment with PTASPs with the intent of keeping the state’s public transit operations, vehicles, and facilities safe and meeting transit safety targets. State and federal funding sources that can be used by transit agencies for operations, vehicles, and facility improvements are outlined in the Public Transportation Project Funding section of the WSUAMPO 2020-2029 Current TIP. Individual transit agencies determine the use of these sources for capital and operating expenses based on their local needs.

### Winston-Salem Urban Area Metropolitan Planning Organization

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Winston-Salem Urban Area Metropolitan Planning Organization  
Transportation Advisory Committee  
Action Request

Meeting Date: July 15, 2021  
Agenda Item Number: 6b

Action Requested: Review and Consideration of a Resolution adopting the Public Transportation Agency Safety Plan Performance Measures (PTASP-PM)

SUMMARY OF INFORMATION:  
Attachments: Yes X No ____

Per the recent Federal Transit Administration (FTA) guidance regarding MPO adoption of transit safety targets, FTA regulations state that MPOs have up to 180 days after receipt of safety targets from the transit provider to establish transit safety targets. The timing of adopting transit safety targets may impact FTA’s STIP/TIP approvals. The NCDOT Board of Transportation will take action on the next modification to the STIP on August 5, 2021. Thus, for there to be no impact to FTA’s STIP/TIP approvals, **MPOs must establish targets by July 30, 2021**. Anything beyond this date has a possibility of impacting transit funding in the MPO area. To assist MPOs in this matter, the Integrated Mobility Division (IMD) has developed the attached resolution.

There is no standard methodology MPOs must use to adopt transit safety targets. Therefore, MPOs have the choice to support safety targets on a per transit provider basis or to develop their own targets by combining multiple agency safety targets into one value. To comply with the requirements per FTA guidance, IMD is requesting the TCC/TAC adopt the enclosed resolution of support for PTASP Performance Measure (PTASP-PM). This resolution as its states includes the safety performance measures for Winston-Salem Transit Authority (WSTA), Davidson County Transportation (DCT) and the Piedmont Authority for Regional Transportation (PART).

IMD will compile the STIP/TIP modifications and the MPO target establishment resolutions then submit to FTA as one document to simplify FTA’s compliance verification process when approving STIP/TIP amendments.

TAC Vote: Motion by:  
Second by: 
Vote: For ______ Against ______
Resolution Establishing Transit Safety Performance Targets for the Public Transportation Agency Safety Plan Performance Measures

WHEREAS, the Winston-Salem Urban Area Metropolitan Planning Organization (WSUAMPO) has been designated by the Governor of the State of North Carolina as the Metropolitan Planning Organization (MPO) responsible, together with the State, for the comprehensive, continuing, and cooperative transportation planning process for the MPO’s metropolitan planning area; and

WHEREAS, the Moving Ahead for Progress Act (MAP-21) and the Fixing America’s Surface Transportation Act (FAST Act) requires States, providers of public transportation, and MPOs to transition to a performance-based planning and programming process to achieve desired performance outcomes for the multimodal transportation system, including the establishment of Safety Performance Targets (SPTs) for the transportation system; and

WHEREAS, the Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) Final Rule on July 19, 2018 requiring certain providers of public transportation systems that receive federal funds under FTA’s Urbanized Area Formula Grants to develop and adopt a PTASP that includes SPTs for transit-related fatalities, injuries, safety events, and system reliability (state of good repair); and

WHEREAS, the Federal Highway Administration (FHWA) and the FTA issued a joint final rule on planning (Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning), under which MPOs must establish SPTs 180 days after the transit agency establishes their Safety Performance Targets; and

WHEREAS, the Davidson County Transportation (DCT), Piedmont Authority for Regional Transportation (PART) and the Winston-Salem Transit Authority (WSTA), operating in the MPO’s planning area has/have developed information and transit safety targets toward compliance with the PTASP regulation and provided their targets to the MPO on June 15, 2021.

NOW THEREFORE BE IT RESOLVED that the WSUAMPO Transportation Advisory Committee (TAC) supports the Davidson County Transportation (DCT), Piedmont Authority for Regional Transportation (PART) and the Winston-Salem Transit Authority (WSTA) transit safety targets and agrees to plan and program projects that contribute toward the accomplishment of the transit provider targets, as follows:
## Winston-Salem Urban Area Metropolitan Planning Organization Transit Safety Performance Targets

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[Insert standard resolution certification statements/ Signature Block(s)]
Table of Contents

Section 1. Transit Agency Information ........................................................................................................5
  General Information ..................................................................................................................................5

Section 2. Plan Development, Approval, and Updates .................................................................................6

Section 3. Safety Performance Targets .......................................................................................................7

Section 4. Safety Management Policy .......................................................................................................8
  Safety Management Policy Statement ......................................................................................................8
  Safety Management Policy Communication .................................................................................................9

Authorities, Accountabilities, and Responsibilities ...................................................................................10
  Accountable Executive (AE): ...............................................................................................................10
  Chief Safety Officer (CSO) ...................................................................................................................10
  Supervisors ..........................................................................................................................................11
  Employees ...........................................................................................................................................11
  Key Staff ..............................................................................................................................................11

Employee Safety Reporting Program (ESRP) .............................................................................................11
  Immediate Action Required ................................................................................................................12
  Delayed Action Required ...................................................................................................................13
DCTS Responsibility........................................................................................................................................... 13

Section 5. Safety Risk Management................................................................................................................. 13

Safety Hazard Identification............................................................................................................................. 13
   Personnel .................................................................................................................................................... 13
   Assets ...................................................................................................................................................... 14
   System ................................................................................................................................................... 14

Hazard Identification Procedure ..................................................................................................................... 14

Safety Risk Assessment ................................................................................................................................... 15

Safety Risk Mitigation ..................................................................................................................................... 16

Section 6. Safety Performance Monitoring and Measurement ......................................................................... 17

Maintenance .................................................................................................................................................. 17
   Maintenance Standards and Procedures .................................................................................................... 17
   Operator Inspections ................................................................................................................................. 18
   Daily Servicing and Inspections .............................................................................................................. 18
   Mileage-Based Maintenance Inspections ............................................................................................... 18
   Maintenance Inspections of Contracted Providers .................................................................................. 18

Operations .................................................................................................................................................... 18
   Facility Monitoring .................................................................................................................................. 18
   Frequency ............................................................................................................................................... 18
   Reporting ............................................................................................................................................... 19
   Hazard Resolution ................................................................................................................................. 19
   Follow-up ............................................................................................................................................... 19
   Documentation ....................................................................................................................................... 19

Employee Hazard Reporting .......................................................................................................................... 19
   Loss Reports ......................................................................................................................................... 19
   Route/Operations Safety .......................................................................................................................... 19

Safety Events .................................................................................................................................................. 20
   Accident and Incident Reporting Process ............................................................................................... 20
   Notification ............................................................................................................................................. 20
   At-Scene Procedures ............................................................................................................................... 20
   Investigation .......................................................................................................................................... 21

Accident Review Process ............................................................................................................................... 21
   Hazard Resolution ................................................................................................................................. 21
Follow-up ............................................................................................................................................ 22
Internal Reporting ............................................................................................................................... 22
Documentation ................................................................................................................................... 22
Performance Measures ............................................................................................................................... 22
Maintenance ....................................................................................................................................... 22
Operations .......................................................................................................................................... 22
Safety .................................................................................................................................................. 23
7. Safety Promotion .................................................................................................................................... 23
Operator Selection ...................................................................................................................................... 23
    Hiring Practices ................................................................................................................................... 23
Training ................................................................................................................................................. 24
    Initial Bus Operator Training ............................................................................................................... 24
    Annual Training for All Bus Operators ................................................................................................ 25
    Initial Operation Supervisor Training .................................................................................................. 26
    Injury and Illness Prevention Training ................................................................................................ 27
    Emergency Response Planning and Coordination .............................................................................. 27
System Modification Design Review and Approval .................................................................................. 27
    General Process .................................................................................................................................. 27
    Modification Design Review ............................................................................................................... 27
    Modification Design Approval ............................................................................................................. 28
    Monitoring .......................................................................................................................................... 28
    Documentation ................................................................................................................................... 28
    Routes ................................................................................................................................................. 29
8. Additional Information ............................................................................................................................ 29
9. Definitions of Terms Used in the Safety Plan ...................................................................................... 29
10. Commonly Used Acronyms ................................................................................................................... 31
DCTS Hazard Report Form .................................................................................................................... 33
Appendix 2 .................................................................................................................................................. 34

HAZARD AND THREAT ASSESSMENTS .................................................................................................. 34
Section 1. Transit Agency Information

General Information
Davidson County Transportation System (DCTS)
Accountable Executive: Richard Jones
Chief Safety Officer: David Allen
945 N. Main Street, Suite B, Lexington NC. 27292
https://www.co.davidson.nc.us/DCRides

Modes of Service
FTA Funding Sources: FTA Section 5307, 5311, 5339,
Modes of Service Directly Provided:
☒ Bus (MB)
☒ Demand Response (DR)
☐ Demand Response Taxi (DT)
☐ Bus Rapid Transit (RB)
☐ Commuter Bus (CB)
☐ Jitney (JT)
☐ Public (PB)
☐ Trolleybus (TB)
☐ Vanpool (VP)

☒ DCTS Does not provide transit services on behalf of another transit agency or entity.
☐ DCTS provides the below transit modes on behalf of the following transit agency(s) or entity(s).
Transit Agency:
☐ Bus (MB)
☐ Demand Response (DR)
☐ Demand Response Taxi (DT)
☐ Bus Rapid Transit (RB)
☐ Commuter Bus (CB)
☐ Jitney (JT)
☐ Public (PB)
☐ Trolleybus (TB)
☐ Vanpool (VP)

Brief description of services provided on behalf of the above agency.

The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA’s Public Transportation Safety Program and the National Public Transportation Safety Plan.
Section 2. Plan Development, Approval, and Updates

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<td>Transportation Director</td>
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<th>Signature by the Accountable Executive</th>
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<td>Karen Watford</td>
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Relevant Documentation (title and location)
A copy of the DC Commissioners approving the Agency Safety Plan (ASP), is maintained on file by the Transportation Manager and Chief Safety Officer, for DCTS

### Version Number and Updates

*Record the complete history of successive versions of this plan.*

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### Annual Review and Update of the Public Transportation Agency Safety Plan

DCTS management will review the PTASP annually, update the document as necessary, and implement the changes within a time frame that will allow DCTS to submit the annual self-certification of compliance in a timely manner and no later than July 15th. Annual self-certification will consist of the Executive Director reviewing, approving and signing the document and submitting to the Davidson County Board of Commissioners for their approval. Necessary updates outside the annual update window will be handled as PTASP addenda which will be incorporated in the body of the PTASP. The DCTS PTASP updates will be shared with the relevant MPOs, FTA, and NCDOT.
Section 3. Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

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Performance Measures: Based on FTA Small Transit Provider

Following formulas used on Fixed Route and Demand Response

♦ SAFETY PERFORMANCE MEASURES: FATALITIES = 0
  Customers, employees and the public
  0-Fatalities on Fixed Route
  0-Fatalities on Demand Response

♦ SAFETY PERFORMANCE MEASURE: INJURIES
  ie. (Fixed Route) 1 injury x 100,000/100,000 VRM =0.1 injuries per 100,000 VRM
  o Customers, employees and the public

♦ SAFETY PERFORMANCE MEASURE: SAFETY EVENTS: (total number of reportable events and rate per total vehicle revenue miles by mode)
  * 4 safety events x 100,000 VRM / annual expected VRM = 180,533
  ie, (Fixed Route) ( 4 X 100,000 ) / 180,533 VRM = 2.22 safety events for CY 2020
  o Combined with reportable incidents for customers, employees and the public
    ▪ VRM is a 3 YEAR Average of Fixed Routes.
    ▪ Revenue miles by mode: 2017= 170,939, 2018= 175,064, 2019= 195,596,
    ▪ Combined average= 180,533

♦ SAFETY PERFORMANCE MEASURE: SYSTEM RELIABILITY (mean distance between major mechanical failures by mode)
  o DCTS is fortunate to have a Fleet Maintenance facility on the premises, which can attend to a variety of repairs quickly and effectively
    ▪ Based on 25% of VRM of 100000.
    ▪ 1-Road Call on Fixed Route
    ▪ 1-Road Call on Demand Response
    ▪ Oversight of Preventative Maintenance
Safety Performance Target Coordination

DCTS Executive Director and the DC. Board of Commissioners shares the DCTS PTASP, including Safety performance Targets with the North Carolina Department of Transportation (NCDOT IMD), Winston-Salem MPO, High Point MPO each year after the board have adopted the plan and DCTS staff have assured that its content has met the requirements of CFR 49, part 673; ptasp. This data also includes Transit Asset Plan updates and expected capital replacement schedule.

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Section 4. Safety Management Policy

Safety Management Policy Statement

Davidson County Board of Commissioners and the Transportation Advisory Board (TAB) along with the Executive Director strive to provide a Safe environment for employees, passengers and guest of DCTS Facilities and services operated by third-party contractors (Carolina Custom Transportation, Express Cab LLC, and Providence Transportation). DCTS aims to support a Robust Safety Culture, and achieve a High level of Safety performance. We also work to ensure that all employees are provided with adequate and appropriate safety information and training. We have established Safety performance targets to help us measure effectiveness of our processes.

- Communicating the purpose and benefits of the Safety Management System (SMS) to all supervisors, and employees.
- Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through DCTS’s Employee Safety Reporting Program (ESRP), unless such discloser indicates, beyond a doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.
- Identifying hazards and unsafe work conditions and analyzing data from all sources. (After analyzing provided data, DCTS Management will develop process and procedures to mitigate safety risks to an acceptable level.)
• Establishing Safety Performance Targets that are realistic, measurable, and data driven. Continually improving our Safety performance through management process that ensure appropriate Safety management action is taken and is effective. DCTS takes these commitments seriously as the lives of DCTS employees, riders, and the general public depend on DCTS ability to operate in a culture of Safety.

Richard M. Jones  Accountable Executive

12-2-2020

Date

Safety Management Policy Communication

DCTS realizes the importance of employee engagement is crucial to a functioning Safety Management System (SMS). Communication is in place to enable awareness of DCTS’s Safety objectives/Safety performance targets as well as provide on-going Safety communications up, down, and across the organization. Management proactivity engages employees and works to keep the lines of Safety communications honest and open. All employees are made aware of the importance of DCTS’s SMS through the distribution of the Safety Management Policy Statement in all facilities.

Employees: DCTS is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, DCTS seeks input from all staff, including other county departments, to determine if change is necessary based on trends, data analysis, operational changes or new assets. Several methods are used to communicate policy and/or procedure changes, including:

♦ Employee memorandum / Mail Boxes
♦ Bulletin board notices
♦ Employee email notification
♦ Departmental meetings / Training sessions
♦ System Safety Plan (SSP)
♦ Emergency Operations Plan (EOP)

DCTS includes a training element for safety management policies impacting safety or service delivery and is conducted before the policy effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgement signature is required of each employee verifying their understanding of the change.

Riders: If a rider policy is changed or added, DCTS notifies riders through the following methods:
Notice posted on vehicle and facilities including effective date and who to contact for more information
Changes to digital rider guidance including schedules and ride guides as appropriate
Public Meetings
Social Media
Any services impacted by policies changes will include outreach as required by Federal Guidance.

Authorities, Accountabilities, and Responsibilities

Accountable Executive (AE): The DCTS Director serves as DCTS’s Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:

- Responsible for ensuring an SMS culture for DCTS and contracted operations employees
- Controls and directs human and capital resources needed to develop and maintain the PTASP and SMS.
- A single person who has ultimate responsibility for carrying out the PTASP; responsibility for carrying out the TAM; and control or direction over the human and capital resources needed to develop and maintain both in accordance with 49U.S.C.5329(d), and the agency’s TAM. In accordance with 49U.S.C.5326.
- Designates a Chief Safety Officer who reports directly to the Accountable Executive, the AE. Designates the Safety and Compliance Technician as DCTS’s Chief Safety Officer. The CSO has the following authorities, accountabilities, and responsibilities under this plan:
  - Promotes Safety awareness throughout the organization ensuring that Safety management has a high priority;
  - Ensures the PTASP documentation is current and accessible to all employees, communicating changes to all personal;
  - Monitors the effective of Safety mitigations;
  - Provides Safety Risk Management advice and supports Transportation Director and personnel who conduct and oversee Safety Assurance activities.

Chief Safety Officer (CSO): DCTS has concluded one CSO will be sufficient to manage the day to day adherence to this Plan and, while in this role, report directly to the AE. As CSO, this individual will monitor safety and security throughout the organization including sub-contractors. All departments have been notified of the CSO’s role and the established reporting requirements relating to safety-related matters. The CSO has been adequately trained for this role and has the authority and responsibility for day-to-day implementation and operation of DCTS’s SMS. Along with CSO responsibilities, the CSO is also the Safety and Compliance Technician.
DCTS’s CSO will be responsible for the following:

- Developing and maintaining SMS documentation;
- Directing hazard identification and safety risk assessment;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Board of Directors on SMS implementation progress; and
- Planning safety management training.

Supervisors

Supervisors are responsible for the safety performance of all personnel and equipment under their supervision. They are responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources, Risk Management and Transportation Operations Department.

Employees

All DCTS personnel are responsible for performing their work safely and for following established safety-related rules, procedures, and work practices. This includes reporting all accidents, incidents, and hazards to their supervisor per established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

Key Staff

DCTS staff will be responsible for maintaining high standards of safety, customer service, and security. The Employee Safety Reporting Program (ESRP) will define the employees’ role to identify and mitigate risk through open communication to superiors including the CSO and AE. Administrative staff will be instrumental in ensuring action is taken to reduce risk and the whole system is continuously monitored to ensure actions are effective and appropriate.

DCTS staff will be involved with updates, modifications and implementation of the PTASP. Each staff member brings a valued perspective to the development of policies and procedures he or she will be expected to implement. Every opportunity will be given for employees and riders to provide input to increasing safety at DCTS. Those opportunities include:

- Annual / Quarterly employee meetings, and Safety training,
- Department meetings
- Employee and Customer surveys
- DCTS has an open-door policy with access to all management staff.

Employee Safety Reporting Program (ESRP)

DCTS is committed to the Safest operating standards possible. To achieve this, it is imperative that DCTS have uninhibited reporting of all incidents and occurrences which may compromise the Safe conduct of our operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit Safety. DCTS encourages employees who identify Safety concerns in their day-to-day duties and to report them to management in good faith without fear of retribution.
DCTS encourages participation in the ESRP by protecting employees that report Safety conditions in good faith. However, DCTS may take disciplinary action if the Safety report received by DCTS is from a source other than the employee, or involves an illegal act, gross negligence, or a deliberate or willful disregard of promulgated regulations or procedures.

There are many ways employees can report Safety conditions:

- Pre/Post Trip Inspections
- Report conditions directly to Route Supervisor, Fleet Maintenance Manager, CSO, and the AE, or any office management staff at that time.
- Employee Evaluations
- Facility Maintenance Plan
- Training Program
- Rider and Public Complaint/Compliment Process
- Safety and Employee Meetings
- Incident/Accident Policies

Hazard Reporting Process

DCTS has developed a Hazard Report Form used to identify and provide information about hazards observed by DCTS employees while on-duty. The one-page form identifies vital information to assist employees in determining an action to mitigate the threat or hazard. This form is not meant to replace accident forms currently being used, but instead used in conjunction with the accident forms. It is a proactive reporting method to identify a perceived threat or hazard, potentially endangering employees, riders or the general public. The form serves a dual role as an incident, illness, and near miss report. The form is located in Appendix 1 of this Plan.

Effective May 26, 2020 all DCTS employees will receive one hour of training on the procedures associated with the Hazard Report Form. The training will cover the following areas:

- Locations of blank Hazard Report Form
- When to use a Hazard Report Form
- Capturing critical information on the form
- Notification process depending on the hazard
- Proper assessment of the reported hazard
- Levels of likelihood of repeat
- Supervisor and CSO role in completing the form
- Follow-up process to determine effectiveness of mitigation

The following process is used as part of the ESRP.

Immediate Action Required

If you have identified a hazard which you perceive to be a risk to yourself, fellow employees, passengers, or the public you must report it immediately to the on-duty supervisor or office management. Once reported you must determine if immediate action is necessary to prevent additional risk. If so, communicate to supervisor before taking action if time allows. Once action has been taken to mitigate
the potential harm to yourself, others or property advise a supervisor of the results of your actions. Once you are able, complete the Loss Prevention Investigation Report with complete information and give to management on-duty.

Delayed Action Required

Once a hazard has been identified, the DCTS employee should assess if the hazard requires immediate action to reduce the risk of if delayed action can be taken. If the employee determines delayed action is appropriate a full report must be completed using the Loss Prevention Investigation Report and submitted to the on-duty supervisor.

DCTS Responsibility

DCTS takes every hazard report seriously and investigates each one to determine if it’s an isolated case, or emerging trend requiring evaluation of policies and procedures or service modifications. Employees reporting hazards will not face disciplinary action unless that employee contributed to the hazard. DCTS wants to encourage all employees to report any hazard or threat they observe and help make the DCTS system as safe as possible for its employees, riders, and the general public. Employees may report the hazard to their immediate supervisor or go directly to the CSO to submit and discuss their report.

Section 5. Safety Risk Management

DCTS provides training to all personnel in the identification of hazards and security threat while also providing tools to enable personnel to report these risks. Once the risk has been identified DCTS conducts an assessment of the risk to determine the necessary response and response time. The response may include further investigation or monitoring, action(s) to mitigate the hazard or security threat and follow-up assessment to ensure action taken is appropriate and effective.

Safety Hazard Identification:

Hazard and security threats are identified through different methods of monitoring the system. This includes system, employee and asset assessments conducted daily and on incremental basis. Additionally, DCTS communicates with peers across the state, FTA and NCDOT, P.A.R.T. and NCPTA, to identify common hazards impacting multiple systems. DCTS conducts the following routine and random evaluations of the system in the following departments:

Personnel

Each DCTS employee is evaluated annually to ensure they are performing their job to the expectations of the Agency. As part of their orientation process the employee is provided training and tools to perform their job while not receiving permanent status until completing 180 - days of employment. During the 180 - day period, the employee is evaluated to determine if they are properly prepared to perform their job.

Additional evaluations of the employee are conducted throughout the year through spot-checks of some aspect of their job function. If through spot-check or annual evaluation it is determined the employee’s
performance does not meet expectations or training standards, remedial training will be provided and additional evaluations will take place to ensure remedial training was effective.

Assets
Rolling stock, facilities and equipment are monitored through a vigorous preventive maintenance plan aimed at identifying hazards and deficiencies as part of daily and scheduled inspections. Operations and Maintenance Departments coordinate the preventive maintenance program including daily Vehicle Inspection Reports (VIR), incremental and annual inspections.

DCTS updates the FTA required Transit Asset Management (TAM) Plan annually with data relevant to each asset to include a condition assessment, miles (with rolling stock and non-revenue vehicles) and age as to whether the asset is in a State of Good Repair (SGR). The TAM Plan allows DCTS management to plan asset replacement or rehabilitation for future years.

System
As part of DCTS’s safety management system monitoring, the agency uses service evaluations when planning, spot-checking or responding to an event like an accident or incident. New routes are strategically developed with safety being the first priority and passenger access second. DCTS route planners plan and test all routes before activating the route for revenue service. All routes are reviewed periodically to determine if environmental hazards may exist requiring modification to the route, schedule or vehicle.

All front-line staff have been trained to note any changes to service which may be considered a hazard or security threat and through the ESRP, notify their supervisors immediately or upon return to DCTS depending on the severity of the hazard.

Hazard Identification Procedure
Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Hazard Report Form and submit it to the CSO.

If the hazard requires immediate mitigation, the employee will be instructed on steps to take to reduce the risk which may or may not alleviate the risk completely. Additional actions may be taken once the immediate risk mitigation has been taken. Some hazards may not pose an immediate risk but are still reported and the CSO will be responsible for risk assessment, investigation and mitigation strategy.

In some cases, a passenger or member of the general public may call DCTS with a complaint about a front-line employee which may rise to the level of hazardous behavior or actions. DCTS currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action by on-duty supervisors.
Hazard Report Forms will be located in the Transportation office, on all vehicles along with standard safety kits for accident and incident reporting, with all Office operations, and Maintenance Departments. A copy of the form is located in Appendix 1.

The Hazard Report Form will require the employee to briefly describe the hazard noting date, time of day, location, and other pertinent information. The form includes a section for the CSO or immediate supervisor to document immediate action taken to reduce risk, a risk assessment chart prioritizing the risk, and a section for additional follow-up action. All forms will be processed by the CSO and summarized periodically for trend analysis and include in safety performance measures.

49 CFR part 673.5

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Safety Risk Assessment
All DCTS staff have been provided with training appropriate for their positions within the organization. DCTS expects its employees to respond to hazards or threats with professional judgement as sometimes there might not be time to contact a supervisor to prevent an emergency event. In cases where the hazard can be reported without immediate risk, the employee will make an initial assessment of the risk as part of their report.

Once received by the CSO, the initial risk assessment may be amended requiring immediate, short, or long-term response.

**Level 1** - Immediate: A deficiency, threat or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.

**Level 2** - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat or hazard. The deficiency, threat or hazard does not pose immediate danger but if no action is taken could elevate to an immediate level risk.

**Level 3** - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently but could at a later time. Continued monitoring and awareness are required.
The CSO in coordination with staff will investigate each identified hazard, assess the risk, and take appropriate action to mitigate the risk. Additional mitigation may be needed based on follow-up monitoring to the action taken.

Safety Risk Mitigation
In response to all identified and assessed hazards, DCTS will take steps to mitigate the hazard and reduce or eliminate the risk to employees, riders, and public. Mitigation strategies will be dependent on results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

Actions to mitigate risk will include all employees, riders, and public who may be impacted by either the hazard or the actions to reduce or alleviate the risk. DCTS will communicate actions to appropriate staff through methods appropriate risk assessment. In some cases, immediate communication through two-way communications (dispatch system, text burst, email, or web alert) may be necessary. In other cases, bulletin board notices or memorandum posting may be appropriate.

Once a risk mitigation strategy has been implemented DCTS will monitor the actions to determine if full mitigation is possible and if not, is additional action necessary to alleviate the risk or is stepped up monitoring necessary. Some risks may not be completely mitigated but awareness to the risk will, Safety is a top priority.

All actions taken to mitigate risk will be responsibility of the CSO combined with DCTS management staff, documented and linked to the initial deficiency, threat, or hazard identification step.
Section 6. Safety Performance Monitoring and Measurement

Safety performance monitoring and measurement involves the continual monitoring of the transit agency’s activities to understand safety performance. Through these efforts, DCTS can determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing Safety Management Systems (SMS).

DCTS is constantly striving to maintain the highest level of Safety through its monitoring methods to include adherence to policies and procedures, safety and maintenance plans, and system and employee evaluation processes. These methods allow DCTS to determine the need to make changes to improve policies, employee training and service delivery.

The CSO will monitor operations daily through observation, data analysis, communication and safety updates to identify mitigation strategies that may be ineffective. If mitigation actions are found to be ineffective additional strategies will be developed through key and impacted staff feedback.

Maintenance

Maintenance Standards and Procedures. Standards and procedures are included in the DCTS Maintenance Plan. In general, maintenance procedures are designed to ensure that the maintenance recommendations of the manufacturer are met, maximum efficiency in performance and operation is obtained, and maximum bus life and condition are maintained. Daily bus inspections, an active Preventive Maintenance Program, contractor oversight, and careful monitoring are included in procedures to ensure the safety of buses and adequacy of the Fleet Maintenance Plan.
Operator Inspections. All operators are required to perform a pre-trip and post-trip inspection to ensure that the vehicle is safe and in good operating condition. If any defects are noted by the operator, a Defect Slip is completed and, depending on the severity and extent of the defect, the vehicle may be repaired or taken out of service until a repair can be made. In the case of a defect that develops or is noted once a vehicle is in service, the operator is required to communicate the problem to Operations, who will then notify Maintenance.

Daily Servicing and Inspections. The DCTS Operators inspects buses used in revenue service each day. The buses are fueled and washed, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. The operators clean the bus interiors each day. When a defect is noted, it is reported to the Lead Mechanic or Supervisor on shift so that evaluation and, if necessary, a repair can be conducted.

Mileage-Based Maintenance Inspections. All buses receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real-world experience. A description of the schedule and type of inspection and service performed for each bus series is included in the DCTS Maintenance Plan.

Maintenance Inspections of Contracted Providers. DCTS contracts for the operation and maintenance of paratransit services. The contractor must ensure that all passenger vehicles and associated equipment are maintained in proper working condition. The contractor is required to implement a maintenance and safety program that includes a preventive maintenance schedule that complies with FTA requirements for preventive maintenance for vehicles. Further, contractors are required to maintain comprehensive maintenance records on each vehicle and send the information to DCTS. In addition, on-site inspections are conducted at least quarterly to verify vehicle condition.

Operations

Facility Monitoring
Formal facility inspections of all DCTS facilities and grounds are conducted by DCTS CSO, Maintenance/Safety/Facilities quarterly using a facility checklist, and inspected biannually by DC Support Services that include the SS Director, Supervisors, and Maintenance employees. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

Any guests to DCTS’s administration facility must check in through a secured process requiring check-in and validation of visit purpose. Employees are trained on procedures for visitors in the workplace and facility access is limited through security systems.

Frequency
The Safety Committee conducts its safety inspections annually. Mechanics and Facilities Maintenance employees look for potential hazards with equipment whenever they are using that equipment. The vehicle hoists, chain pulls, and cranes in the vehicle maintenance shop are inspected annually by contractors. Preventive maintenance of equipment and facilities is performed in accordance with the manufacturer’s recommended practice. Hazards are also identified by analyzing work accident trends,
through Hazard Report Forms submitted by employees. Forms are used by employees to report safety concerns and to make safety recommendations.

Reporting
When deficiencies are noted during monthly inspections, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or CSO. Hazard Report Forms are routed to the department, Chief Safety Officer or Staff member’s best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution
The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. In view of this, it is crucial that all departments and employees be involved in the Facility Inspection and the Hazard Identification and Resolution processes. Hazard resolution is related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Follow-up
Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the management of the department area in which the hazard exists or the CSO. This includes arranging for the services of other DCTS departments or outside parties, as necessary, to eliminate or control the hazard.

Documentation
Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Safety Committee and maintained by CSO

All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through observation or interaction with customers or the general public, it is reported to the immediate supervisor as well as following DCTS’s hazard reporting process.

Employee Hazard Reporting

Loss Reports
Employees can fill out a Hazard Report Form which is turned into the effected department and the CSO, talk with a supervisor or the Operations Manager. They can also contact a management staff, member which is comprised of administrative members. Depending on the severity/risk of the hazard identified, immediate action may be taken, or the input will be brought to the Safety Committee for discussion. Feedback will be provided to the employee on what action, if any, will be taken. All employees follow the Employee Hazard Reporting Program Policy.

Route/Operations Safety
Employees can fill out a Hazard Report Form or discuss suggestions for making the system/route safer. DCTS encourages employees to be advocates for safety while also suggesting methods of increasing
performance. Management has an open-door policy and makes clear the importance of employee feedback; positive and negative.

Safety Events

Accident and Incident Reporting Process
All accidents and loss incidents are to be investigated. DCTS’s safe driving standards require professional safe performance of all operators. To ensure better than average safety performance, DCTS employs the Smith System Defensive Driving, National Safety Council, RTAP, other guidelines to determine if a collision or onboard incident could have been prevented. All personnel operating any DCTS vehicle are held to this standard.

The DCTS SSP, along with other materials includes procedures and responsibilities for accident/incident investigation. The combined manuals establish procedures for accident notification, response, and investigation.

Transit Operations coordinates with outside law enforcement agencies if they investigate an event. Administrative staff coordinates with outside insurance providers and provides support among DCTS departments and independent investigation to manage DCTS liability and claims.

Most accidents and incidents involving DCTS are relatively minor in severity and are investigated by CSO, Route Supervisor and the DC Accident Review Committee. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification
Bus Operators are to notify the operations system supervisor anytime a DCTS vehicle might have been damaged, anytime a DCTS vehicle and another vehicle come into contact, or anytime an instance occurs in where a customer may have been injured. Management on duty will be directed to the scene. Police and ambulance will be dispatched, if necessary.

At-Scene Procedures
Bus Operators will adhere to the following procedures defined in the DC Accident / Incident forms:

♦ Assist the injured.
♦ If blocking traffic, set out reflective triangles.
♦ Do not move the coach unless required to do so by an Operations Supervisor, fire or police order, or impending danger from traffic.
♦ Obtain names, addresses, and phone numbers of all witnesses.
♦ Have all witnesses sign the witness card list.
Management On-Duty are responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for preserving transient evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation
An attempt is made to complete the investigation of most accidents within three days. Route Supervisor, or CSO are required to complete an Accident/Incident Report. Operators are required to complete an Accident Information Report. The CSO is required to file both reports electronically as well as a hard copy and attach all relevant media for use by the Director of Operations and the CSO.

A Report of Injury Form must be completed if an employee suffers an injury or illness as a result of an accident or incident.

Accident Review Process

Accidents and Incidents are classified as Preventable or Non-Preventable.

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by the National Safety Council Guidelines, the Five Keys of the Smith System, and/or Transit Operations Procedures and Policies.

After reviewing all related documents and evidence, the investigating Route Supervisor, CSO, Risk Manager makes an independent preliminary determination of whether the accident was preventable.

The final accident determination is made by the Safety Committee. The committee meets a minimum of once monthly and is comprised, of several different departments with the county and the Administrative representative to take minutes.

The Committee follows all policies, procedures, and definitions as established in the Davidson County Vehicle Accident Review Policy. Examples of investigations may include reviews of accident and injury reports, vehicle condition reports, witness statements, employee interviews, accident scene sketches, bus videos, physical evidence, brake test reports, training manuals, and accident site visits. Employees who are not in agreement with the Committee’s determination can appeal directly to the Committee by providing additional evidence and testimony. If the employee is not in agreement with the appeal results, he or she can make a second and final appeal to the Accountable Executive. The Transportation Manager may review all relevant information, interview the employee making the appeal, interview Safety Committee members, and confer with any available person or resource he or she considers valuable to his or her deliberation.

Hazard Resolution
The primary purpose of the Accident Investigation process is to determine the cause(s) of accidents so that they may be prevented or mitigated in the future. To this end, it is crucial that all relevant departments be appropriately involved in the Process. A serious attempt is made to use lessons learned
through the investigatory process to incorporate hazard resolutions into future procedures, designs, construction, modifications, training, and procurements.

Follow-up
Follow-up in the form of corrective actions is the responsibility of the employee’s director. The responsibility may be delegated to the employee’s manager, supervisor or CSO.

Any disciplinary action will be assessed using the Collective Bargaining Agreement procedures and/or the DCVARP. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Training will be provided, in most cases, for employees who have been involved in one preventable accidents within one year. Training and re-training are not disciplinary in nature.

Internal Reporting
The Route Supervisor or CSO are responsible for ensuring that all accident reports are completed and filed with Human Resources, Risk Management and CSO. Human Resources will advise on the history of the employee if a pattern of safety events is evident.

Documentation
Transit Operations and Human Resources and CSO maintain the accident investigation documentation.

Performance Measures
Through a series of performance measures relative to operations, maintenance, and safety, DCTS can monitor the system’s safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures are on a daily, monthly, and quarterly basis.

Maintenance
♦ **Preventive Maintenance On-time Inspection Percentage** – determines the effectiveness of the maintenance department to ensure all inspections are conducted per manufacturing and DCTS mileage intervals.

♦ **Vehicles Removed From Revenue Service** – tracks vehicles removed from service due to a mechanical defect developed while in service requiring immediate service either on-site of failure or once returned to the facility.

♦ **Annual Vehicle Condition Assessment** – through annual inspection, determines on a scale of 1-5 the overall condition of the asset. This performance measure is also used in annual updates of DCTS’s Transit Asset Management Plan.

Operations
♦ **Customer Complaints Per Month** – tracks all customer complaints to identify areas of deficiency with vehicle, driver or other DCTS areas. Safety-related complaints are immediately routed to a supervisor on-duty or the CSO for investigation mitigation and response. Complaints may be a result of phone calls, website or DCTS public forums.
On-time Performance – serves as an indicator to issues with time management, environmental factors, scheduling, and vehicle and driver performance.

On-board Surveys – conducted annually, allow DCTS to receive rider feedback about bus operator performance, customer service, and vehicle safety.

Safety

Safety Performance Measure: Fatalities (total number of reportable fatalities and rate per total vehicle revenue miles by mode)

Safety Performance Measure: Injuries (total number of reportable injuries and rate per total vehicle revenue miles by mode)

Safety Performance Measure: Safety Events (total number of reportable events and rate per total vehicle revenue miles by mode)

Safety Performance Measure: System Reliability (mean distance between major mechanical failures by mode)

7. Safety Promotion

Operator Selection

Hiring Practices
Selecting applicants best suited to excel at the Bus Operator job requirements is critical to safe transit operations. The transit Bus Operator is directly responsible for the safety of not only the passengers, but also the pedestrians, bicyclists, drivers, and all others who share the road with the transit vehicle. DCTS’s hiring process includes the following components:

Applications
Applicants are sought through postings in traditional and culturally diverse media, referrals from current employees, posted, DC website DC Net, and applications filed by prospective candidates when there are no positions available. The applications are screened by key personnel in Human Resources and Transit Operations.

Interview
After application reviews, applicants are then interviewed by a panel comprised of a Route Supervisor, Operator/Trainer CSO, and the DCTS Manager, or other administrative staff. The interview process is designed to evaluate a candidate’s strengths in customer service, the ability to simultaneous perform tasks, conflict resolution, and the ability to perform well under temporal and interpersonal pressure.

Driving Record
To be eligible for hire, a candidate must have a North Carolina’s driver’s license. Davidson County’s Human Recourse’s will review applicants Motor Vehicle Record (MVR) dating back five years. This establishes 21 years as the de facto minimum age requirement for new hire Bus Operators.
Licensing
To be eligible for hire, a candidate must be able to earn a CDL with a Passenger Endorsement.

Criminal Background Check
To be eligible for hire, a candidate must submit to a Criminal Background Check administered by the North Carolina State Police with the Federal Bureau of Investigation. The results must meet all statutory and DCTS standards for the Bus Operator position.

Drug Testing
To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test.

Training
There are formal training programs for Bus Operators, Maintenance employees and Operations employees. These include training classes, manuals, DCTS Standard Operating Procedures, and on-the-job training.

The safety component of training is designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training is intended to motivate employees to work safely. Trainings fall into three main categories: (1) Initial, (2) Periodic, and (3) Remedial or Refresher.

Initial Bus Operator Training
New Bus Operators receive an intensive 40 hours of training to include course that covers every aspect of their new job. Some components of the training are delivered in the classroom. The majority of learning occurs on the buses during off-route and on-route training. The training includes, but is not limited to, the following areas:

- Smith System, Defensive Driving The 5 Keys: Aim High in Steering, Get the Big Picture, Keep your Eyes Moving, Leave yourself an Out, and Make Sure They See You.
- Orientation to Bus System
- Basic Bus Maneuvers
- Advanced Bus Maneuvers
- Service Stops
- System Overview
- System Procedures
- Communication skills
- Customer Service
- Accessible Service
- Emergency Management
• Fleet Services
• Personal Safety
• Health/Injury Prevention
• Stress Management
• CDL Preparation if required.
• First Aid / Fire Extinguisher P.A.S.S. Training
• Vehicle Orientation of all Vehicles
• SMS Training

On-route training provides real service experience with an Operator Instructor on the new operator’s regularly scheduled work. The time the new employee operates the revenue route is increased daily. Each day the student receives a full review and debriefing from his or her instructor. Instructors communicate among one another regarding where additional training for new operators is required. Student rotation among the Operator Instructor group provides each student with experience across a variety of routes, vehicles, times of day, instructional styles, and driving conditions.

After the initial training, new Bus Operators receive additional support and training, including:

• Check-rides at the following intervals within every 3 months
• Four-Week Follow-up: Procedure and Policy Review
• Fall / Bad Weather: Driving and Defensive Driving Course (DDC)
• Refresher
• One-Year Follow-up: Debriefing with Operations Training Supervisor and safety review with Human Resources, Operations Management and CFO

Annual Training for All Bus Operators
Every year, each Bus Operator receives quarterly refresher and topical training during the autumn months. The training addresses, but is not limited to, the following topics:

• Fatigue Awareness
• Dealing With Difficult People
• Resolving Conflict
• Harassment
• Effectively Dealing With People of Differing Ages
• Proper Securement of Mobility Devices
• Defensive Driving Course
• Bloodborne Pathogens
• Safety/Security Update
• Injury Prevention
• Accessible Service Sensitivity
• PTASP and SMS

Partial-day trainings are also scheduled on safe winter driving and whenever warranted by the addition of new equipment or a change in configuration.

Initial Operation Supervisor Training
Transit Operations Supervisors begin their career path, almost exclusively, as Bus Operators who first work in the position of Temporary Supervisor. A Temporary Supervisor performs many functions of the full supervisory position and receives training in, but not limited to, the following areas:

• Drug & Alcohol (Policy and procedures for all types of FTA-mandated testing)
• Accident Investigation (based on the TSI model)
• Emergency Procedures
• Security Procedures
• On-the-job Injury Claims
• BloodBorne Pathogens
• Data Entry and Recordkeeping
• Harassment
• Cultural Diversity
• Coaching/Criticism/Discipline
• Dispatch Operations
• Field Operations
• First Aid and Defibrillator
• Basic Writing
• Conflict Resolution

In addition to their initial training, all Transit Operations Supervisors receive five full days of refresher and topical training annually. On a quarterly basis, when applicable (pandemic requirements)
Injury and Illness Prevention Training

Injury and Illness Prevention Training is directed toward achieving a safe working environment for all employees and reducing the chance of occupational-related injuries and illnesses. The majority of training targets employees working in the Maintenance and Facilities Maintenance Departments because these employees have the greatest exposure to occupational hazards. The program is based on applicable Federal, State, and local safety codes and regulations. Some areas addressed in training include:

- Slips, Trips, and Falls
- Personal Protection Equipment
- Safety Data Sheets (SDS) and Labels
- First Aid
- Bloodborne Pathogens
- Hazardous Materials Storage
- Fall Protection
- Confined Space Program

Emergency Response Planning and Coordination
Details are contained in the DCTS Emergency Action Plan and Evacuation Request Procedures.

System Modification Design Review and Approval

General Process
The DCTS bus system is regularly modified in response to operational experience, the addition of new types of service, and changes in service design and levels. DCTS’s philosophy is to use appropriate new technologies to benefit the environment and the community it serves. The challenge is to review any proposed modification adequately before it is approved. Any proposed modification should be evaluated to ensure it is compatible with existing systems and does not introduce new hazards to the system or reduce the effectiveness of existing hazard controls.

Equipment modifications may be proposed by any employee of any department that uses the equipment. Changes may also occur from an analysis of reliability performance, historical data, and available improvements in equipment design and components.

Modification Design Review
A review of any modification in equipment design shall be made by the director and managers of the department responsible for the equipment. It is an informal practice to include: TAB Board, Human Resources and Operations in the review of any change that might affect safety. The impact on the safety
of all designs and specifications should be identified and evaluated before the change is approved. Some of the areas to be considered include but are not limited to:

- Motor Vehicle Safety
- Human Factor
- Occupational Health and Safety
- Materials Compatibility
- Fire Protection
- Lighting
- Braking systems
- Mirrors
- Warning Devices

Modifications must not be made before it is determined how they might affect the safety of the system, or any other systems. Other departments may evaluate a proposed change to determine its compatibility with other systems (e.g., hoists, fueling systems, communications systems). The evaluation may also include a review of applicable regulations, such as the Federal Motor Vehicle Safety Standards and Regulations and the U.S. Department of Labor’s Occupational Safety and Health Act.

Testing may also be performed to evaluate the safety of a proposed modification. The testing of small changes may be minimal. For substantial modifications, extensive field testing, mock-ups, and structural evaluations may be employed.

Modification Design Approval
Final approval is generally made by either the Director of Transportation. When modifications are made by a bus manufacturer, NCDOT IMD. Works with the manufacturer, and contractual changes may be made. If changes are substantial, additional training will be provided for maintenance and operation staff.

Monitoring
Once a modification is put in place, feedback from the operating department is solicited to evaluate the performance of the modification. Unsolicited input from the operating department and its employees (end users) is also encouraged. Depending on the nature of the modification, Human Resources, and the Safety Committee may be involved for input.

Documentation
The Maintenance Department is responsible for documenting any vehicle modifications. Facilities Services is responsible for documenting any modifications made to a facility. Documentation may involve changing diagrams, schematics, manuals, service bulletins, service intervals, standard operating
procedures, and Material Safety Data Sheets. Maintenance Supervisors are responsible for updating Safety Data Sheets based on input from product manufacturers.

Routes
Route modifications are designed by the AE, CSO, Route Supervisor, and P.A.R.T. Planning may use a current Bus Operator to test routing and bus stop placement. This experience-based, real-world process is designed to protect the safety of the transit bus, transit passengers, other vehicles, and pedestrians.

The Planning Department informs the Operations Department and DCTS staff of any proposed route modifications. The Planning Department can request that the Committee evaluate a specific proposal, or the Committee can choose to evaluate any proposed modifications.

Transit operations management may request a route modification it believes will improve operations. It may also choose to evaluate a modification that has been proposed by another department. Input from individual Bus Operators is encouraged through the Hazard Report Form, direct communication, and periodic surveying of Operators conducted by DCTS.

Finally, the Planning Department maintains a cooperative working relationship with the appropriate planning and road departments of all municipal levels of government within which DCTS operates.

8. Additional Information

This PTASP was developed from information in other DCTS documents, policies and procedures and manuals. Those documents are listed below:

- DCTS Transit Policy
- Safety and Security Plan (SSP)
- Vehicle Maintenance Plan
- Facility Maintenance Plan
- New Hire / Annual Training Materials

9. Definitions of Terms Used in the Safety Plan

DCTS incorporates all of FTA’s definitions that are in 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

- **Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; 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.

- **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency’s Public Transportation Agency
Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency’s Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.

• **Equivalent Authority** means an entity that carries out duties similar to that of a Board of Directors for a recipient or sub recipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or sub recipient’s Public Transportation Agency Safety Plan.

• **Event** means any Accident, Incident, or Occurrence.

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

• **Incident** means an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

• **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

• **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

• **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

• **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.

• **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

• **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.

• **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.

• **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.

• **Risk mitigation** means a method or methods to eliminate or reduce the effects of hazards.

• **Safety Assurance** means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

• **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
• **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

• **Safety performance target** means a performance target related to safety management activities.

• **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

• **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

• **Safety Risk Management** means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

• **Serious injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second or third-degree burns, or any burns affecting more than 5 percent of the body surface.

• **Transit agency** means an operator of a public transportation system.

• **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.

10. Commonly Used Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>ADA</td>
<td>American's with Disabilities Act of 1990</td>
</tr>
<tr>
<td>ASP</td>
<td>Agency Safety Plan (also referred to as a PTASP in Part 673)</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CT</td>
<td>County Transit</td>
</tr>
<tr>
<td>ESRP</td>
<td>Employee Safety Reporting Program</td>
</tr>
<tr>
<td>FTA</td>
<td>Federal Transit Administration</td>
</tr>
<tr>
<td>NCDOT</td>
<td>North Carolina Department of Transportation</td>
</tr>
<tr>
<td>MPO</td>
<td>Metropolitan Planning Organization</td>
</tr>
<tr>
<td>Part 673</td>
<td>49 CFR Part 673 (Public Transportation Agency Safety Plan)</td>
</tr>
<tr>
<td>SMS</td>
<td>Safety Management System</td>
</tr>
<tr>
<td>SSP</td>
<td>System Safety Plan</td>
</tr>
<tr>
<td>VRM</td>
<td>Vehicle Revenue Miles</td>
</tr>
</tbody>
</table>
Appendix 1

DCTS Hazard Report Form
<table>
<thead>
<tr>
<th><strong>1. Brief description of Hazard/Health and Safety issue:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>(Include details, if any, of action taken to ensure the safety of persons who may be affected.)</td>
</tr>
<tr>
<td><strong>LEVEL 1 IMMEDIATE ACTION REQUIRED</strong></td>
</tr>
<tr>
<td><strong>LEVEL 2 SHORT-TERM ACTION REQUIRED</strong></td>
</tr>
<tr>
<td><strong>LEVEL 3 LONG-TERM ACTION REQUIRED</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>2. Where is the hazard located in the workplace?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Likelihood of a repeat: YES/NO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>3. Time/date hazard identified</strong></th>
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</thead>
<tbody>
<tr>
<td>Date: <strong><strong>/</strong></strong>/____ Time: am/pm</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>4. Recommended action to fix hazard/issue</strong></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th><strong>5. Reported to DCTS MANAGEMENT/STAFF</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature: : : :</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>6. Has the hazard/issue been addressed? YES/NO</strong></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th><strong>7. Do you consider the issue/hazard fixed? YES/NO</strong></th>
</tr>
</thead>
</table>

| Signature: : | |
| Date: ____/____/____ | |
Appendix 2

HAZARD AND THREAT ASSESSMENTS
**Accident and Incident Assessment**

<table>
<thead>
<tr>
<th>Threat/Hazard</th>
<th>A. Likelihood</th>
<th>B. Impact on Service Delivery</th>
<th>C. Financial Impact</th>
<th>Vulnerability Index (A+B+C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor Vehicle Collision</td>
<td>8</td>
<td>5</td>
<td>3</td>
<td>16</td>
</tr>
<tr>
<td>Major Collision no injuries</td>
<td>2</td>
<td>7</td>
<td>9</td>
<td>18</td>
</tr>
<tr>
<td>Major Collision injury/injuries</td>
<td>3</td>
<td>10</td>
<td>10</td>
<td>23</td>
</tr>
<tr>
<td>Major Collision fatality</td>
<td>1</td>
<td>10</td>
<td>10</td>
<td>21</td>
</tr>
<tr>
<td>Passenger Injury before boarding/after alighting</td>
<td>4</td>
<td>2</td>
<td>2</td>
<td>8</td>
</tr>
<tr>
<td>Passenger Fall on vehicle/no injury</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Passenger Fall on vehicle/injury</td>
<td>4</td>
<td>4</td>
<td>2</td>
<td>10</td>
</tr>
<tr>
<td>Employee Injury</td>
<td>2</td>
<td>10</td>
<td>8</td>
<td>20</td>
</tr>
<tr>
<td>Category</td>
<td>1</td>
<td>3</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>----</td>
<td>----</td>
<td>----</td>
<td>----</td>
</tr>
<tr>
<td>Wheelchair Lift Failure/no injury</td>
<td>1</td>
<td>3</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Wheelchair Lift Failure/injury</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Injury Based on Securement Problem</td>
<td>1</td>
<td>8</td>
<td>8</td>
<td>17</td>
</tr>
</tbody>
</table>
## Organizational Infrastructure Assessment

<table>
<thead>
<tr>
<th>Threat/Hazard</th>
<th>A. Likelihood</th>
<th>B. Impact on Service Delivery</th>
<th>C. Financial Impact</th>
<th>Vulnerability Index (A+B+C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trespassing</td>
<td>6</td>
<td>1</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>Vandalism</td>
<td>8</td>
<td>1</td>
<td>9</td>
<td>18</td>
</tr>
<tr>
<td>Employee Theft</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Bomb Threat</td>
<td>1</td>
<td>10</td>
<td>1</td>
<td>12</td>
</tr>
<tr>
<td>Dangerous Mail</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Brief Power Outage</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Extended Power Outage</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Hard Drive Crash/Cyber Attack</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Loss of Landline Phone Service</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Event Description</td>
<td>Frequency</td>
<td>Number</td>
<td>Number</td>
<td>Total</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>-----------</td>
<td>--------</td>
<td>--------</td>
<td>-------</td>
</tr>
<tr>
<td>Loss Of Cell Phone Service</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Loss Of Radio System</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Minor Structural Fire</td>
<td>1</td>
<td>3</td>
<td>3</td>
<td>7</td>
</tr>
<tr>
<td>Major Structural Fire</td>
<td>1</td>
<td>8</td>
<td>10</td>
<td>19</td>
</tr>
<tr>
<td>Vehicle Fire without injuries</td>
<td>2</td>
<td>9</td>
<td>8</td>
<td>19</td>
</tr>
<tr>
<td>Vehicle Fire with injury/fatality</td>
<td>1</td>
<td>10</td>
<td>10</td>
<td>21</td>
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</tbody>
</table>
# Acts of Nature Assessment

<table>
<thead>
<tr>
<th>Threat/Hazard</th>
<th>A. Likelihood</th>
<th>B. Impact on Service Delivery</th>
<th>C. Financial Impact</th>
<th>Vulnerability Index (A+B+C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flooding in community</td>
<td>5</td>
<td>8</td>
<td>1</td>
<td>14</td>
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<tr>
<td>Flooding of transit facilities</td>
<td>1</td>
<td>5</td>
<td>10</td>
<td>16</td>
</tr>
<tr>
<td>Severe Winter Weather</td>
<td>3</td>
<td>10</td>
<td>9</td>
<td>22</td>
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<tr>
<td>Fog</td>
<td>4</td>
<td>4</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Tornado</td>
<td>5</td>
<td>10</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>Severe Thunderstorms</td>
<td>8</td>
<td>9</td>
<td>4</td>
<td>21</td>
</tr>
<tr>
<td>Fires</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Landslide/Rockslide/Mudslide/Sinkhole</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
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</tbody>
</table>
## Hazardous Materials Assessment

<table>
<thead>
<tr>
<th>Threat/Hazard</th>
<th>A. Likelihood</th>
<th>B. Impact on Service Delivery</th>
<th>C. Financial Impact</th>
<th>Vulnerability Index (A+B+C)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Hazardous Materials</strong></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Blood borne Pathogen Spill</td>
<td>6</td>
<td>9</td>
<td>2</td>
<td>17</td>
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<tr>
<td>Toxic Release</td>
<td>1</td>
<td>10</td>
<td>9</td>
<td>20</td>
</tr>
<tr>
<td>Fuel Related Event</td>
<td>3</td>
<td>8</td>
<td>6</td>
<td>17</td>
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</table>
# Criminal Activity Assessment

<table>
<thead>
<tr>
<th>Threat/Hazard</th>
<th>A. Likelihood</th>
<th>B. Impact on Service Delivery</th>
<th>C. Financial Impact</th>
<th>Vulnerability Index (A+B+C)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 = improbable</td>
<td>1 = minor</td>
<td>1 = negotiable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>10 = certain</td>
<td>10 = catastrophic</td>
<td>10 = catastrophic</td>
<td></td>
</tr>
<tr>
<td><strong>Non-employee Theft</strong></td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td><strong>Menacing Behavior on Vehicle</strong></td>
<td>9</td>
<td>10</td>
<td>1</td>
<td>20</td>
</tr>
<tr>
<td><strong>Assault on Vehicle</strong></td>
<td>4</td>
<td>10</td>
<td>1</td>
<td>15</td>
</tr>
<tr>
<td><strong>Assault on Employees at or near facility</strong></td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td><strong>Shooter on Vehicle</strong></td>
<td>2</td>
<td>10</td>
<td>2</td>
<td>14</td>
</tr>
<tr>
<td><strong>Hostage Situation on Vehicle</strong></td>
<td>1</td>
<td>10</td>
<td>2</td>
<td>13</td>
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</tbody>
</table>
## Domestic or International Terrorism Assessment

<table>
<thead>
<tr>
<th>Threat/Hazard</th>
<th>A. Likelihood</th>
<th>B. Impact on Service Delivery</th>
<th>C. Financial Impact</th>
<th>Vulnerability Index (A+B+C)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 = improbable</td>
<td>1 = minor</td>
<td>1 = negotiable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>10 = certain</td>
<td>10 = catastrophic</td>
<td>10 = catastrophic</td>
<td></td>
</tr>
<tr>
<td><strong>Terrorism</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspicous Item on Vehicle</td>
<td>1</td>
<td>10</td>
<td>1</td>
<td>12</td>
</tr>
<tr>
<td>Improvised Explosive Device</td>
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<td>10</td>
<td>1</td>
<td>12</td>
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<tr>
<td>Chemical Weapon</td>
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<tr>
<td>Biological Weapon</td>
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<td>10</td>
<td>10</td>
<td>21</td>
</tr>
<tr>
<td>Radiological Weapon</td>
<td>1</td>
<td>10</td>
<td>10</td>
<td>21</td>
</tr>
</tbody>
</table>
Piedmont Authority for Regional Transportation

Public Transportation Agency
Safety Plan
The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA’s Public Transportation Safety Program and the National Public Transportation Safety Plan.

<p>| Piedmont Authority for Regional Transportation System Safety Program Plan Revisions |
|-----------------------------------------|----------------------------------|</p>
<table>
<thead>
<tr>
<th><strong>Section</strong></th>
<th><strong>Revisions</strong></th>
<th><strong>Reason for Revision</strong></th>
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</tbody>
</table>
# Piedmont Authority for Regional Transportation Agency Safety Plan

## 1. Agency Information

<table>
<thead>
<tr>
<th>Transit Agency Name</th>
<th>Piedmont Authority for Regional Transportation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transit Agency Address</td>
<td>107 Arrow Road, Greensboro, NC 27409</td>
</tr>
<tr>
<td>Name and Title of Accountable Executive</td>
<td>Scott W. Rhine, Executive Director</td>
</tr>
<tr>
<td>Name of Chief Safety Officer or SMS Executive</td>
<td>Sabrina Glen, Director of Commuter Operations</td>
</tr>
<tr>
<td>Mode(s) of Service Covered by This Plan</td>
<td>Bus and Vanpool</td>
</tr>
<tr>
<td>List All FTA Funding Types (e.g., 5307, 5310, 5311)</td>
<td>5307 and 5339</td>
</tr>
<tr>
<td>Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)</td>
<td>Fixed Route Bus Transit and Vanpool Leasing</td>
</tr>
<tr>
<td>Does the agency provide transit services on behalf of another transit agency or entity?</td>
<td>Yes ☐ No ☒ Description of Arrangement(s) N/A</td>
</tr>
</tbody>
</table>

## 2. Plan Development, Approval, and Updates

<table>
<thead>
<tr>
<th>Name of Entity That Drafted This Plan</th>
<th>Piedmont Authority for Regional Transportation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature by the Accountable Executive</td>
<td>Signature of Accountable Executive</td>
</tr>
<tr>
<td>PART Board of Directors</td>
<td>April 8, 2020</td>
</tr>
<tr>
<td>Relevant Documentation (title and location)</td>
<td></td>
</tr>
<tr>
<td>Governing Body Adopting Resolution</td>
<td></td>
</tr>
<tr>
<td>Certification of Compliance</td>
<td>Name of Individual/Entity That Certified This Plan</td>
</tr>
<tr>
<td>PART Regulatory Affairs Specialist</td>
<td>April 8, 2020</td>
</tr>
<tr>
<td>Relevant Documentation (title and location)</td>
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### Version Number and Updates

<table>
<thead>
<tr>
<th>Version Number</th>
<th>Section/Pages Affected</th>
<th>Reason for Change</th>
<th>Date Issued</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>All</td>
<td>New Document</td>
<td>April 8, 2020</td>
</tr>
</tbody>
</table>

### Annual Review and Update of the Public Transportation Agency Safety Plan

PART management will review the ASP annually, update the document as necessary, and implement the changes within a timeframe that will allow the agency to submit the annual self-certification of compliance in a timely manner and no later than July 15. Annual self-certification will consist of the Executive Director reviewing, approving and signing the document and submitting to the PART Board for their approval. Necessary updates outside the annual update window will be handled as ASP addenda which will be incorporated in the body of the ASP. The PART ASP updates will be shared with the relevant MPOs, FTA and NCDOT.

### 3. Safety Performance Targets

#### Safety Performance Targets

<table>
<thead>
<tr>
<th>Mode of Transit Service</th>
<th>Fatalities (total)</th>
<th>Fatalities (per million VRM)</th>
<th>Serious Injuries (total)</th>
<th>Serious Injuries (per million VRM)</th>
<th>Safety Events (total)</th>
<th>Safety Events (per million VRM)</th>
<th>System Reliability (VRM/failures)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bus</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>54</td>
<td>38.4</td>
<td>43,300</td>
</tr>
<tr>
<td>Vanpool</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>140,477</td>
</tr>
</tbody>
</table>

#### Safety Performance Target Coordination

The Accountable Executive and Board of Directors shares the PART ASP, including safety performance targets with the North Carolina Department of Transportation (NCDOT), Burlington/Graham MPO, Greensboro Urbanized Area MPO, High Point MPO and Winston-Salem MPO each year after the board have adopted the plan and PART staff have assured that its content has met the requirements of CFR 49, part 673; Public Transportation Agency Safety Plan.

<table>
<thead>
<tr>
<th>Targets Transmitted to the State</th>
<th>State Entity Name</th>
<th>Date Targets Transmitted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Integrated Mobility Division NCDOT</td>
<td>April 9, 2020</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Targets Transmitted to the Metropolitan Planning Organization(s)</th>
<th>Metropolitan Planning Organization Name</th>
<th>Date Targets Transmitted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Burlington/Graham Urban Area MPO</td>
<td>April 9, 2020</td>
</tr>
<tr>
<td></td>
<td>Greensboro Urban Area MPO</td>
<td>April 9, 2020</td>
</tr>
<tr>
<td></td>
<td>High Point Urban Area MPO</td>
<td>April 9, 2020</td>
</tr>
<tr>
<td></td>
<td>Winston-Salem Urban Area MPO</td>
<td>April 9, 2020</td>
</tr>
</tbody>
</table>
4. Safety Management Policy

Safety Management Policy Statement

The PART Board of Directors and Executive Director strive to provide a safe environment for employees, customers and guests of PART facilities and services operated by a third-party contractor (currently National Express Transit Corp. (NEXT)). PART aims to support a robust safety culture, and achieve a high level of safety performance. We also work to ensure that all employees are provided with adequate and appropriate safety information and training. We have established safety performance targets to help us measure the overall effectiveness of our processes.

PART is committed to the following safety objectives:

- Communicating the purpose and benefits of the Safety Management System (SMS) to all managers, supervisors, and employees.
- Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through PART’s Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.
- Identifying hazardous and unsafe work conditions and analyzing data from all sources. (After analyzing provided data, the PART Safety Committee will develop processes and procedures to mitigate safety risk to an acceptable level.)
- Establishing safety performance targets that are realistic, measurable, and data driven. Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

Scott W. Rhine, PART Executive Director and Accountable Executive

April 9, 2020

Date

Safety Management Policy Communication

Employee engagement is crucial to a functioning Safety Management System (SMS). Communication is in place to enable awareness of PART safety objectives/safety performance targets as well as to provide on-going safety communication up, down, and across the organization. Management proactively engages employees and works to keep the lines of safety communication honest and open. All employees are made aware of the importance of PART’s SMS through the distribution of PART’s Safety Management Policy Statement to each employee. PART also posts copies of the Safety Management Policy Statement in all facilities.

Authorities, Accountabilities, and Responsibilities

<table>
<thead>
<tr>
<th>Accountable Executive</th>
<th>The Executive Director serves as PART’s Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Responsible for ensuring an SMS culture for PART and contracted operations employees</td>
</tr>
<tr>
<td></td>
<td>• Controls and directs human and capital resources needed to develop and maintain the ASP and SMS.</td>
</tr>
<tr>
<td></td>
<td>• Designates a Chief Safety Officer who reports directly to the Accountable Executive.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Chief Safety Officer or SMS Executive</th>
<th>The Accountable Executive designates the Director of Commuter Operations as PART’s Chief Safety Officer. The Chief Safety Officer has the following authorities,</th>
</tr>
</thead>
</table>

### Key Staff

PART relies on Dispatch/Supervisors, Operators, Mechanics and Utility Techs as front-line safety personnel. Several of these employees are members of the third-party

### Agency Leadership and Executive Management

<table>
<thead>
<tr>
<th>Accountabilities, and responsibilities under this plan:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Promotes safety awareness throughout the organization ensuring that safety management has a high priority;</td>
</tr>
<tr>
<td>• Ensures that ASP documentation is current and accessible to all employees, communicating changes to all personnel;</td>
</tr>
<tr>
<td>• Monitors the effectiveness of safety mitigations;</td>
</tr>
<tr>
<td>• Provides Safety Risk Management advice and supports the Executive Director and personnel who conduct and oversee Safety Assurance activities.</td>
</tr>
</tbody>
</table>

Agency Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of PART’s SMS under this plan. PART Agency Leadership and Executive Management include:

- Operations Manager,
- Safety/Training Manager,
- Director of Planning,
- Director of Finance and Administration
- Human Resources Administrator, and
- Regulatory Affairs Specialist & DBE Liaison Officer.

PART Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:

- Participate as members of PART’s Safety Committee as called upon;
  - PART Safety Committee: Reported safety hazards are evaluated by the Safety Committee. Safety Committee members include the Chief Safety Officer, Operations Manager, Safety/Training Manager and the Field Operations Specialist.
- Oversee day-to-day operations of the SMS in their departments;
- Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executive or the Chief Safety Officer.

The Safety/Training Manager (a third-party contractor employee) has the following additional authorities, accountabilities, and responsibilities:

- Provides safety related training to third-party contractor employees;
- Maintains full knowledge of all standard and safety operating procedures;
- Ensures that third-party contractor employees make safety a primary concern when on the job;
- Listens and acts upon any safety concerns raised by PART staff and third-party contractor employees;
- Oversees day-to-day implementation and operation of PART’s SMS; and
- Maintains PART’s Safety Event Log.

The Operations Manager has the following additional authorities, accountabilities, and responsibilities:

- Monitors PART’s Safety Event Log and analyzes trends in hazards, occurrences, incidents, and accidents to maintain PART’s Safety Risk Register as part of Safety Risk Management (SRM); and
- Identifies substandard performance in PART’s SMS and develops action plans for approval by the Accountable Executive.
- Chairs the PART Safety Committee and coordinates quarterly meetings.
contractor Safety Committee, and all take part in monthly Safety Meetings in support of the SMS:

- Third-party contractor Safety Committee: All Safety Events are discussed as well as any activities that have been put in place to prevent future occurrences. Facility inspections and any hazards identified are also discussed. This committee’s members include the Safety/Training Manager (chair), at least one Dispatch/Supervisor and one or more of the Transit Operators, Mechanics and Utility Employees.
- All-Employee Safety Meetings: A permanent agenda item in monthly All-Employee Safety Meetings is dedicated to safety. Safety issues are discussed and documented. Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged.

**Employee Safety Reporting Program (ESRP)**

PART is committed to the safest transit operating standards possible. To achieve this, it is imperative that PART have uninhibited reporting of all incidents and occurrences which may compromise the safe conduct of our operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. PART encourages employees who identify safety concerns in their day-to-day duties and to report them to senior management in good faith without fear of retribution.

PART encourages participation in the ESRP by protecting employees that report safety conditions in good faith. However, PART may take disciplinary action if the safety report received by PART is from a source other than the employee, or involves an illegal act, gross negligence, or a deliberate or willful disregard of promulgated regulations or procedures.

There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- Report conditions anonymously through the third-party contractor 800 number
- Report conditions directly to any supervisor, manager, or director.

### 5. Safety Risk Management

**Safety Risk Management Process**

PART uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to PART’s leadership. PART’s SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary.

PART’s Operations Manager leads PART’s SRM process, working with PART’s Safety Committee to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of PART’s SRM process are documented in our Safety Risk Register and Assessment Log and referenced materials.

**Safety Hazard Identification**

Establishing effective hazard identification programs is fundamental to safety management at PART. Hazard identification can be reactive or proactive in nature. Occurrence reporting, incident investigation and trend analysis are essentially reactive. Other hazard identification methods actively seek feedback by observing and analyzing day-to-day operations. Common hazard identification activities include:

- Safety audits and inspections of vehicles and facilities;
- Safety event and incident investigation and reporting;
- Review of vehicle camera footage;
• Results of training assessments;
• Review of performance data and safety performance targets;
• Observations from supervisors;
• Maintenance reports;
• PART ESRP
• Safety Committee, Drivers’ and other staff meetings
• Evaluating safety related comments from customers, passengers and third parties;
• Federal Transit Administration (FTA) oversight

The practice of reporting and learning from accident precursors (drive-cam) is a valuable complement to other hazard identification practices. To be successful, hazard identification must take place within a just safety culture. Accident precursors are not only an opportunity to identify potential hazards, but also for supervisors to coach operators through various safety situations.

When a safety concern is observed by PART personnel and/or third-party contractor it is reported to PART’s Operations Manager—the reports are made in accordance with PART’s employee reporting policy. PART’s Operations Manager also receives customer comments related to safety, and the dispatch daily Operations Log. PART’s Operations Manager reviews these sources for hazards and documents them in PART’s Safety Risk Register.

PART’s Operations Manager may enter hazards into the Safety Risk Register based on their review of PART’s operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

PART’s Operations Manager may conduct further analyses of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment.

PART’s Operations Manager will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Chief Safety Officer and Operations Manager will evaluate recommendations from the Safety Committee and any identified hazard that poses a real and immediate threat to life, property, or the environment will be brought to the attention of the Accountable Executive and addressed through the SRM process (with or without the full Safety Committee) for safety risk assessment and mitigation. This means that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or any state environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further SRM activity.

**Safety Risk Assessment**

Once hazards have been identified, PART will conduct an assessment to determine the potential consequences. Factors to be considered are the likelihood of occurrence, the severity of the consequences, and the level of exposure to the hazard. The Operations Manager and Safety Committee assess prioritized hazards using a Risk Assessment Matrix (RAM). Results of the risk assessment process will help determine whether the risk is being effectively managed by prioritizing combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- “High” hazard ratings will be considered unacceptable and require action from PART to mitigate the safety risk
- “Medium” hazard ratings will be considered undesirable and require PART’s Safety Committee to make a decision regarding their acceptability
- “Low” hazard ratings may be accepted by the Chief Safety Officer without additional review.

The Operations Manager schedules safety risk assessment activities on the Safety Committee agenda. During the meeting, the Operations Manager reviews the hazard and its consequence(s) and reviews available information on severity and likelihood. The Chief Safety Officer and/or Operations Manager may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment.
Once sufficient information has been obtained, the Operations Manager will facilitate completion of relevant sections of the Safety Risk Register, using the PART Safety Risk Assessment Matrix, with the Safety Committee. The Operations Manager will document the Safety Committee’s safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Safety Risk Register. The Operations Manager will maintain on file Safety Committee agendas, additional information collected, and the Safety Risk Register and Assessment Tool entries for a period of three years from the date of generation.

Safety Risk Mitigation
PART’s Operations Manager and the Safety Committee also review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards. If the risks are unacceptable, PART will take steps to lower the risk to an acceptable or tolerable level, or to remove or avoid the hazard. The level of risk can be lowered by:

- Reducing the severity of the potential consequences;
- Reducing the likelihood of occurrence and/or;
- Reducing the exposure to that risk; or
- Some combination of 1, 2 or 3 above.

In general, PART will take the following safety actions to mitigate risk. These actions can be grouped into three broad categories, including:

- **Physical Defenses**: These include objects and technologies that are engineered to discourage, or warn against, or prevent inappropriate action or mitigate the consequences of events (e.g. traffic control devices, fences, safety restraining systems, etc.).
- **Administrative Defenses**: These include procedures and practices that mitigate the likelihood of accident/incident (e.g. safety regulations, standard operating procedures, personnel proficiency, supervision inspection, training, etc.).
- **Behavioral Defenses**: These include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior.

PART’s Operations Manager tracks and updates safety risk mitigation information in the Safety Risk Register and makes the Register available to the Safety Committee and to other PART staff upon request.

6. **Safety Assurance**

Safety Assurance provides the necessary feedback to ensure that the SMS is functioning effectively and that PART is meeting or exceeding its safety objectives. Safety assurance requires a clear understanding of how safety performance will be evaluated, or in other words, what metrics will be used to assess system safety and determine if the safety management system is working properly. Having decided on the metrics by which success will be measured, safety management requires using these metrics within the organization for ongoing performance improvement.

Through our Safety Assurance process, PART:

- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;
- Investigates safety events to identify causal factors; and
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions.

**Safety Performance Monitoring and Measurement**

One purpose of the PART SMS is to ensure that PART is tracking and addressing safety concerns of all types that arise within PART services and facilities. PART has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures including:

- Monitoring Activities:
• Facility Inspections
• Safety Meetings
• Training Activities
• Accident Investigation Reports
• Injury Reports
• Bus Inspections
• Preventative Maintenance of Vehicles
• Comprehensive Vehicle Maintenance Review
• Ride-along Evaluations (Driver and Route)
• Security Officers
• Security Cameras

The safety data collected from the above sources will be analyzed by PART and third-party contractor for potential safety impacts. Data are compared against performance trends by the Operations Manager to determine where action needs to be taken.

PART is committed to using the data collected and information learned from mitigation efforts to inform decision making and instill positive change. The main objective of all safety mitigations is the improvement of transit system safety. The mechanism for monitoring safety risk mitigations varies depending on the mitigation. PART’s Operations Manager and PART’s Safety Committee monitor operations to identify mitigations that may be ineffective, inappropriate, or not implemented as intended.

When performance goals are not met, PART will work with the third-party contractor through our operations briefings to identify why such goals were not met and what actions can be taken to minimize the gap in achieving defined goals.

• Identify why the mitigations were unsuccessful
  o Identify unrealistic expectations that may have been hampering process
  o GAP analysis
• Create new mitigation strategies
• Help make informed resource allocation decisions
• Identify improvements
• Reassessment

PART’s third-party contractor maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA). Accident management includes following defined accident scene and record keeping procedures.

Conducting safety event investigations includes:

• Complete accident/incident investigation report
• Take photographs if needed
• Review available video/audio of event
• Collect police reports if available (determining factors may be identified by police report)
• Report claims to insurance (determining factors may be identified by insurance investigation professionals)
• Coach/council or discipline of personnel if needed

The Safety Manager and other staff will be able to use data collected through the investigation process to compile a list of potential determining factors for analysis and to assign mitigation measures as needed.
Internally reported safety concerns can be recorded through an incident report (the form is available to all third-party contractor personnel) or through the ESRP. These safety concerns are either handled immediately by the Safety/Training Manager and/or brought to the attention of PART Safety Manager and the Safety Committee as needed. All concerns are filed for data/record keeping purposes.

7. Safety Promotion

Competencies and Training

PART’s Accountable Executive and Agency Leadership must complete FTA’s SMS Awareness online training and an executive session on safety management sponsored by CT’s transit insurance pool.

PART’s third-party contractor safety training program applies to all employees directly responsible for safety, including:

• Bus vehicle operators,
• Dispatchers,
• Maintenance technicians,
• Managers and supervisors, and
• Safety/Training Manager

Basic training requirements for PART’s third-party contractor employees, including frequencies and refresher training, are documented by the contractor.

Operations safety-related skill training includes the following:

• New-hire bus vehicle operator classroom and hands-on skill training,
• Bus vehicle operator refresher training,
• Bus vehicle operator retraining (recertification or return to work),
• Classroom and on-the-job training for dispatchers,
• Classroom and on-the-job training for operations supervisors and managers,
• Accident investigation training for operations supervisors and managers,
• Driver Evaluations,
• Personal Protective Equipment,
• Lockout/Tagout training, and
• Bloodborne Pathogens.

Vehicle maintenance safety-related skill training includes the following:

• Ongoing vehicle maintenance technician skill training,
• Ongoing skill training for vehicle maintenance supervisors,
• Personal Protective Equipment,
• Bloodborne Pathogens,
• Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
• Lockout/Tagout training

Safety Communication

PART believes safety promotion is critical to the success of an SMS and aids in ensuring that the organization understands safety policies, procedures, and structure. Further, safety promotion involves establishing an organizational and workplace culture that recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

PART’s safety communication activities focus on requirements established in 49 CFR Part 673 (Part 673): That a transit agency must communicate safety and safety performance information throughout its organization which conveys information on hazards and safety risks relevant to employees’ roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the employee safety reporting program.
PART’s third-party contractor maintains safety communication through:

- Employee trainings,
- Safety Communication Board,
- Daily Safety Announcements/Messages,
- Monthly Safety Meetings for Drivers and Maintenance Techs,
- Driver Award Programs, and
- Safety section of employee handbook.

Positive safety culture must be generated from the top-down. The actions, attitudes, and decisions at the policy-making level must demonstrate a genuine commitment to safety. Safety must be recognized as the responsibility of each employee with the ultimate responsibility for safety resting with the Executive Director of PART. Employees must trust that they will have management support for decisions made in the interest of safety while recognizing that intentional breaches of safety will not be tolerated.

The primary goal of safety promotion at PART is to develop a positive safety culture that allows SMS to succeed. A positive safety culture at PART is defined as one which is:

A. An Informed/Learning Culture
   - Employees understand the hazards and risks involved in their areas of operation;
   - Employees are provided with the necessary knowledge, training and resources; and
   - Employees work continuously to identify and overcome threats to safety.

B. A Just Culture
   - Employees know and agree on what is acceptable and unacceptable behavior per policies outlined in their respective employee handbooks; and
   - Human errors must be understood but negligence and willful violations cannot be tolerated.

C. A Reporting Culture
   - Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action; and
   - When safety concerns are reported they are analyzed and appropriate action is taken.
   - Employees are updated on safety issues by management and safety reports are fed back to staff so that everyone learns the pertinent lessons.

Additional Information

Supporting Documentation

PART will maintain documentation related to the implementation of its SMS; the programs, policies, and procedures used to carry out this ASP; and the results from its SMS processes and activities for three years after creation. They will be available to the FTA or other Federal or oversight entity upon request.

Definitions of Special Terms Used in the Safety Plan

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accountable Executive</td>
<td>A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency’s Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency’s Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.</td>
</tr>
<tr>
<td><strong>Accident</strong></td>
<td>An event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; or an evacuation for life safety reasons, at any location, at any time, whatever the cause.</td>
</tr>
<tr>
<td><strong>Hazard</strong></td>
<td>Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure belonging to PART; or damage to the environment.</td>
</tr>
<tr>
<td><strong>Risk</strong></td>
<td>Composite of predicted severity and likelihood of the potential effect of a hazard.</td>
</tr>
<tr>
<td><strong>Risk Mitigation</strong></td>
<td>Method(s) to eliminate or reduce the effects of hazards.</td>
</tr>
<tr>
<td><strong>Safety Assurance</strong></td>
<td>Processes within a transit agency’s Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.</td>
</tr>
<tr>
<td><strong>Safety Event</strong></td>
<td>Is any accident, safety incident or safety occurrence (defined below).</td>
</tr>
<tr>
<td><strong>Safety Incident</strong></td>
<td>An event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts transit operations.</td>
</tr>
<tr>
<td><strong>Safety Management Policy</strong></td>
<td>A transit agency’s documented commitment to safety, which defines the transit agency’s safety objectives and the accountabilities and responsibilities of its employees in regard to safety.</td>
</tr>
<tr>
<td><strong>Safety Management System</strong></td>
<td>The formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency’s safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.</td>
</tr>
<tr>
<td><strong>Safety Occurrence</strong></td>
<td>An event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt transit operations.</td>
</tr>
<tr>
<td><strong>Safety Performance Target</strong></td>
<td>A performance target related to safety management activities.</td>
</tr>
<tr>
<td><strong>Safety Promotion</strong></td>
<td>A combination of training and communication of safety information to support SMS as applied to the transit agency’s public transportation system.</td>
</tr>
<tr>
<td><strong>Safety Risk Assessment</strong></td>
<td>The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.</td>
</tr>
<tr>
<td><strong>Safety Risk Management</strong></td>
<td>A process within a transit agency’s Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.</td>
</tr>
<tr>
<td><strong>Serious Injury</strong></td>
<td>Any injury which: (1) requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received; (2) results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) causes severe hemorrhages, nerve, muscle, or tendon damage; (4) involves any internal organ; or (5) involves second-or third-degree burns, or any burns affecting more than 5 percent of the body surface.</td>
</tr>
</tbody>
</table>

<p>| <strong>List of Acronyms Used in the Safety Plan</strong> |
| <strong>Acronym</strong> | <strong>Word or Phrase</strong> |
| ASP | Agency Safety Plan |
| CFR | Code of Federal Regulations |
| ESRP | Employee Safety Reporting Program |</p>
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>FTA</td>
<td>Federal Transit Administration</td>
</tr>
<tr>
<td>MPO</td>
<td>Metropolitan Planning Organization</td>
</tr>
<tr>
<td>SMS</td>
<td>Safety Management System</td>
</tr>
<tr>
<td>SRM</td>
<td>Safety Risk Management</td>
</tr>
<tr>
<td>VRM</td>
<td>Vehicle Revenue Miles</td>
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</tbody>
</table>