Sample Small Public Transportation Provider Agency Safety Plan (ASP)

FTA provides this sample ASP to assist small public transportation providers, as defined in 49 CFR § 673.5 (Part 673), with an example of how they can address minimum requirements in the PTASP regulation, Part 673. FTA uses the fictitious County Transit (CT) as the model small public transportation provider for this sample ASP. CT is not a real transit agency, and any similarities to an actual agency in this sample ASP are merely coincidental. Illustrative language in this sample ASP addresses all Part 673 elements; however, this language provides only one example of how a bus transit provider may meet Part 673 requirements. Part 673 is flexible and scalable and there are many ways to comply.

This sample plan is not legally binding in its own right and will not be relied upon by the FTA as a separate basis for affirmative enforcement action or other administrative penalty. Compliance with the guidance in this document (as distinct from existing statutes and regulations) is voluntary only, and noncompliance will not affect rights and obligations under existing statutes and regulations.
Table of Contents

1. Transit Agency Information .................................................................................................................. 1
2. Plan Development, Approval, and Updates .......................................................................................... 2
3. Safety Performance Targets .................................................................................................................. 3
4. Safety Management Policy ................................................................................................................... 4
5. Safety Risk Management ...................................................................................................................... 7
6. Safety Assurance ................................................................................................................................ 11
7. Safety Promotion ................................................................................................................................ 13
8. Additional Information ........................................................................................................................ 15
9. Definitions of Terms Used in the Safety Plan ...................................................................................... 16

**1. Transit Agency Information**

<table>
<thead>
<tr>
<th>Transit Agency Name</th>
<th>County Transit (CT)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transit Agency Address</td>
<td>1234 County Transit Road, AnyState 55555</td>
</tr>
<tr>
<td>Name and Title of Accountable Executive</td>
<td>John Smith, Director of Transit Services</td>
</tr>
<tr>
<td>Name of Chief Safety Officer or SMS Executive</td>
<td>Elena Rodriguez, Deputy Director of Transit Services and Chief Safety Officer</td>
</tr>
<tr>
<td>Mode(s) of Service Covered by This Plan</td>
<td>Fixed Route Bus; Paratransit</td>
</tr>
<tr>
<td>List All FTA Funding Types (e.g., 5307, 5310, 5311)</td>
<td>5307, 5311</td>
</tr>
<tr>
<td>Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)</td>
<td>Fixed Route Bus; Paratransit</td>
</tr>
<tr>
<td>Does the agency provide transit services on behalf of another transit agency or entity?</td>
<td>Yes</td>
</tr>
<tr>
<td>Description of Arrangement(s)</td>
<td>N.A.</td>
</tr>
<tr>
<td>Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided</td>
<td>N.A.</td>
</tr>
</tbody>
</table>
2. Plan Development, Approval, and Updates

<table>
<thead>
<tr>
<th>Name of Person Who Drafted This Plan</th>
<th>Elena Rodriguez, Deputy Director of Transit Services and Chief Safety Officer, County Transit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature by the Accountable Executive</td>
<td>Signature of Accountable Executive</td>
</tr>
<tr>
<td></td>
<td>John Smith</td>
</tr>
<tr>
<td>Approval by the Board of Directors or an Equivalent Authority</td>
<td>County Commissioners</td>
</tr>
<tr>
<td></td>
<td>Resolution #SP-121</td>
</tr>
<tr>
<td>Relevant Documentation (title and location)</td>
<td>A copy of County Commission Resolution #SP-121, approving the Agency Safety Plan, is maintained on file by the Deputy Director of Transit Services and Chief Safety Officer, County Transit.</td>
</tr>
</tbody>
</table>

Version Number and Updates

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

<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>New Document</td>
<td></td>
<td>7/20/2020</td>
</tr>
</tbody>
</table>

Annual Review and Update of the Public Transportation Agency Safety Plan

*Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.*

This plan will be jointly reviewed and updated by the Chief Safety Officer and Assistant Director of Operations by July 1 of each year. The Accountable Executive will review and approve any changes, signing the new ASP, then forward to the County Commission for review and approval.
3. Safety Performance Targets

Safety Performance Targets

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

Targets below are based on review of the previous 5 years of CT’s safety performance data.

<table>
<thead>
<tr>
<th>Mode of Transit Service</th>
<th>Fatalities (total)</th>
<th>Fatalities (per 100 thousand VRM)</th>
<th>Injuries (total)</th>
<th>Injuries (per 100 thousand VRM)</th>
<th>Safety Events (total)</th>
<th>Safety Events (per 100 thousand VRM)</th>
<th>System Reliability (VRM / failures)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fixed Route Bus</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>0.2</td>
<td>7</td>
<td>0.28</td>
<td>9,500</td>
</tr>
<tr>
<td>ADA / Paratransit</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0.1</td>
<td>1</td>
<td>0.1</td>
<td>68,456</td>
</tr>
</tbody>
</table>

Safety Performance Target Coordination

Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

CT’s Accountable Executive shares our Agency Safety Plan, including safety performance targets, with the Metropolitan Planning Organization (MPO) in our service area each year after its formal adoption by the County Commission. CT’s Accountable Executive also provides a copy of our formally adopted plan to the AnyState Department of Transportation. CT personnel are available to coordinate with AnyState and MPO in the selection of AnyState and MPO safety performance targets upon request.

<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>AnyState Department of Transportation</td>
<td>7/10/2020</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>Metropolitan Planning Organization</td>
<td>7/10/2020</td>
</tr>
</tbody>
</table>
4. Safety Management Policy

Safety Management Policy Statement

*Include the written statement of safety management policy, incorporating safety objectives.*

Safety is a core value at County Transit, and managing safety is a core business function. We will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. CT is committed to the following safety objectives:

- Communicating the purpose and benefits of the Safety Management System (SMS) to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- 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 CT’s reporting program, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence or a deliberate or willful disregard of regulations or procedures.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division 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.

John Smith

John Smith, County Transit Director of Transit Services and Accountable Executive

Safety Management Policy Communication

*Describe how the safety management policy is communicated throughout the agency’s organization. Include dates where applicable.*

The Chief Safety Officer, who leads CT’s SMS activities, introduced our staff to SMS principles in June 2020 at an All-Staff Meeting. CT’s Safety Management Policy Statement also was distributed to each employee in the form of a handout during this all-staff meeting. CT also posts copies of the Statement on bulletin boards at headquarters and in the operations and maintenance break areas of the operating division. CT also has incorporated review and distribution of the Safety Management Policy Statement into new hire training and all-staff annual refresher training.

Authorities, Accountabilities, and Responsibilities

*Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency’s SMS.*

| Accountable Executive | The Director of Transit Services serves as CT’s Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan: |

Public Transportation Agency Safety Plan Regulation (49 CFR Part 673)
Version 1 (February 2020)
Page 4
<table>
<thead>
<tr>
<th><strong>Chief Safety Officer or SMS Executive</strong></th>
<th><strong>The Accountable Executive designates the Deputy Director of Transit Services as CT’s Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Controls and directs human and capital resources needed to develop and maintain the ASP and SMS;</td>
<td>• Develops CT’s ASP and SMS policies and procedures;</td>
</tr>
<tr>
<td>• Designates an adequately trained Chief Safety Officer who is a direct report;</td>
<td>• Ensures and oversees day-to-day implementation and operation of CT’s SMS;</td>
</tr>
<tr>
<td>• Ensures that CT’s SMS is effectively implemented;</td>
<td>• Manages CT’s Employee Safety Reporting Program (ESRP),</td>
</tr>
<tr>
<td>• Ensures action is taken to address substandard performance in CT’s SMS;</td>
<td>• Chairs the CT Safety Committee and:</td>
</tr>
<tr>
<td>• Assumes ultimate responsibility for carrying out CT’s ASP and SMS; and</td>
<td>o Coordinates the activities of the committee,</td>
</tr>
<tr>
<td>• Maintains responsibility for carrying out the agency’s Transit Asset Management Plan.</td>
<td>o Establishes and maintains CT’s Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents, and</td>
</tr>
<tr>
<td> </td>
<td>o Maintains and distributes minutes of committee meetings.</td>
</tr>
<tr>
<td><strong>Agency Leadership and Executive Management</strong></td>
<td>• Advises the Accountable Executive on SMS progress and status;</td>
</tr>
<tr>
<td></td>
<td>• Identifies substandard performance in CT’s SMS and develops action plans for approval by the Accountable Executive;</td>
</tr>
<tr>
<td></td>
<td>• Ensures CT policies are consistent with CT’s safety objectives; and</td>
</tr>
<tr>
<td></td>
<td>• Provides SRM expertise and support for other CT personnel in conducting and overseeing Safety Assurance activities.</td>
</tr>
<tr>
<td>Agency leadership and executive management also have authorities and responsibilities for day-to-day SMS implementation and operation of CT’s SMS under this plan. CT Agency Leadership and Executive Management include:</td>
<td>• Director of Operations,</td>
</tr>
<tr>
<td>• Director of Vehicle Maintenance,</td>
<td>• Chief Dispatcher,</td>
</tr>
<tr>
<td>• Director of Human Resources and Training,</td>
<td>• Director of Procurement, and</td>
</tr>
<tr>
<td>• Director of Operations and Supervisors.</td>
<td>• Operations Managers and Supervisors.</td>
</tr>
<tr>
<td>CT Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:</td>
<td></td>
</tr>
<tr>
<td>Key Staff</td>
<td>CT uses the Safety Committee, as well as the monthly Drivers’ Meeting and quarterly All-Staff Meetings, to support its SMS and safety programs:</td>
</tr>
<tr>
<td>-----------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>• <strong>Safety Committee</strong>: Any safety hazards reported will be jointly evaluated by the Safety Committee and the Chief Safety Officer during the bi-monthly meeting. The Safety Committee members include the Chief Safety Officer, Assistant Director of Operations, an Operations Manager, a representative from dispatch, a representative from fixed-route, a representative from paratransit, and a representative of County Risk Management who meet bi-monthly to review issues and make recommendations to improve safety.</td>
</tr>
<tr>
<td></td>
<td>• <strong>Drivers’ Meetings</strong>: A permanent agenda item in all monthly drivers’ meetings is dedicated to safety. Safety issues are discussed and documented.</td>
</tr>
<tr>
<td></td>
<td>• <strong>Quarterly All-Staff Meetings</strong>: 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. Information discussed in these meetings will be documented.</td>
</tr>
</tbody>
</table>

**Employee Safety Reporting Program**

*Describe the process and protections for employees to report safety conditions to senior management.*

*Describe employee behaviors that may result in disciplinary action (and, therefore, are excluded from protection).*

CT’s ESRP encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. 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 via a locked comment box in the driver area,
- Report conditions using your name or anonymously to [Safety@CT.org](mailto:Safety@CT.org), and
- Report conditions directly to any Supervisor, Manager, or Director.
Examples of information typically reported include:

- Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles);
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection);
- Events that senior managers might not otherwise know about (for example, near misses); and
- Information about why a safety event occurred (for example, radio communication challenges).

On a daily basis, the Chief Safety Officer reviews the dispatch daily Operations Log, checks the comment box and dedicated email address, and documents identified safety conditions in the Safety Risk Register. CT’s Chief Safety Officer, supported by the Safety Committee, as necessary, will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through CT’s SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through CT’s Safety Assurance process.

CT’s Chief Safety Officer discusses actions taken to address reported safety conditions during the quarterly All-Staff Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee follows up directly with the employee when CT determines whether or not to take action and after any mitigations are implemented.

CT encourages participation in the safety reporting program by protecting employees that report safety conditions in good faith (see CT Employee Handbook [Section #] for more information). However, CT may take disciplinary action if the report involves:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

### 5. Safety Risk Management

#### Safety Risk Management Process

Describe the Safety Risk Management process, including:

- **Safety Hazard Identification**: The methods or processes to identify hazards and consequences of the hazards.
- **Safety Risk Assessment**: The methods or processes to assess the safety risks associated with identified safety hazards.
- **Safety Risk Mitigation**: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.
Safety Risk Management Process

CT 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 CT’s leadership. CT’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.

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

CT’s SRM process applies to all elements of our system including our operations and maintenance, facilities and vehicles, and personnel recruitment, training and supervision.

In carrying out the SRM process, CT uses the following terms:

- **Event** – Any accident, incident, or occurrence.
- **Hazard** – 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 CT; or damage to the environment.
- **Risk** – Composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk Mitigation** – Method(s) to eliminate or reduce the effects of hazards.
- **Consequence** – An effect of a hazard involving injury, illness, death, or damage to CT property or the environment.

Safety Hazard Identification

The safety hazard identification process offers CT the ability to identify hazards and potential consequences in the operation and maintenance of our system. Hazards can be identified through a variety of sources, including:

- Employee safety reporting,
- Review of vehicle camera footage,
- Review of monthly performance data and safety performance targets,
- Observations from supervisors,
- Maintenance reports,
- Comments from customers, passengers, and third parties, including CT’s transit insurance pool and vendors,
- Safety Committee, Drivers’ and All-Staff Meetings,
- Results of audits and inspections of vehicles and facilities,
- Results of training assessments,
- Investigations into safety events, incidents, and occurrences, and
- FTA and other oversight authorities (mandatory information source).

When a safety concern is observed by CT’s management or supervisory personnel, whatever the source, it is reported to CT’s Chief Safety Officer. Procedures for reporting hazards to CT’s Chief Safety Officer are reviewed during All-Staff Meetings and in the Safety Committee. CT’s Chief Safety Officer also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations
CT’s Chief Safety Officer reviews these sources for hazards, and documents them in CT’s Safety Risk Register.

CT’s Chief Safety Officer also may enter hazards into the Safety Risk Register based on their review of CT’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.

CT’s Chief Safety Officer may conduct further analysis 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. In following up on identified hazards, CT’s Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard;
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary;
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard;
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.);
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard;
- Review any past reported hazards of a similar nature; and
- Evaluate tasks and/or processes associated with the reported hazard.

CT’s Chief Safety Officer will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee during bi-monthly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analysis, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately 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 which would constitute a violation of Environmental Protection Agency or AnyState environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further SRM activity.

Safety Risk Assessment

CT assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk.

The Chief Safety Officer and Safety Committee assess prioritized hazards using CT’s Safety Risk Matrix. This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as “1A” or the combination of a Catastrophic severity category and a Frequent probability level.
This matrix also categorizes 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 CT to mitigate the safety risk,
- “Medium” hazard ratings will be considered undesirable and require CT’s Safety Committee to make a decision regarding their acceptability, and
- “Low” hazard ratings may be accepted by the Chief Safety Officer without additional review.

Using a categorization of High, Medium or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

The Chief Safety Officer schedules safety risk assessment activities on the Safety Committee agenda and prepares a Safety Risk Assessment Package. This package is distributed at least one week in advance of the Safety Committee meeting. During the meeting, the Chief Safety Officer reviews the hazard and its consequence(s) and reviews available information distributed in the Safety Risk Assessment Package on severity and likelihood. The Chief Safety Officer 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 Chief Safety Officer will facilitate completion of relevant sections of the Safety Risk Register, using the CT Safety Risk Assessment Matrix, with the Safety Committee. The Chief Safety Officer 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 Safety Committee agendas, Safety Risk Assessment Packages, additional information collection, and completed Safety Risk Register sections will be maintained on file by the Chief Safety Officer for a period of three years from the date of generation.

**Safety Risk Mitigation**

CT’s Accountable Executive and Chief Safety Officer review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the Safety Committee. CT can reduce safety risk by reducing the likelihood and/or severity of potential consequences of hazards.

Prioritization of safety risk mitigations is based on the results of safety risk assessments. CT’s Chief Safety Officer tracks and updates safety risk mitigation information in the Safety Risk Register and makes the Register available to the Safety Committee during bi-monthly meetings, and to CT staff upon request.

In the Safety Risk Register, CT’s Chief Safety Officer will also document any specific measures or activities, such as reviews, observations or audits, that will be conducted to monitor the effectiveness of mitigations once implemented.
## 6. Safety Assurance

Through our Safety Assurance process, CT:

- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk,
- 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

*Describe activities to monitor the system for compliance with procedures for operations and maintenance.*

CT has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits,
- Informal inspections,
- Regular review of on-board camera footage to assess drivers and specific incidents,
- Safety surveys,
- ESRP,
- Investigation of safety occurrences,
- Safety review prior to the launch or modification of any facet of service,
- Daily data gathering and monitoring of data relating to the delivery of service, and
- Regular vehicle inspections and preventative maintenance.

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where corrective action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation by the Safety Committee.

*Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.*

CT monitors safety risk mitigations to determine if they have been implemented, and are effective, appropriate and working as intended. The Chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate Director, Manager or Supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports, conducting job performance observations, or other activities. The
Chief Safety Officer will endeavor to make use of existing CT processes and activities before assigning new information collection activities.

CT’s Chief Safety Officer and Safety Committee review the performance of individual safety risk mitigations during bimonthly Safety Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the Safety Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution.

CT’s Chief Safety Officer and Safety Committee also monitor CT’s operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- Reviewing results from accident, incident, and occurrence investigations,
- Monitoring employee safety reporting,
- Reviewing results of internal safety audits and inspections, and
- Analyzing operational and safety data to identify emerging safety concerns.

The Chief Safety Officer works with the Safety Committee and Accountable Executive to carry out and document all monitoring activities.

Describe activities to conduct investigations of safety events to identify causal factors.

CT maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event (see CT Safety Event Investigation Procedures manual for specific procedures for conducting safety investigations). These procedures also reflect all traffic safety reporting and investigation requirements established by AnyState’s Department of Motor Vehicles.

The Chief Safety Officer maintains all documentation of CT’s investigation policies, processes, forms, checklists, activities, and results. As detailed in CT’s procedures, an investigation report is prepared and sent to the Accident/Incident Review Board for integration into their analysis of the event.

CT’s Accident/Incident Review Board consists of seven members that represent management, the union, operations, and maintenance. The Chief Safety Officer chairs the board. CT’s Accident/Incident Review Board determines whether:

- The accident was preventable or non-preventable;
- Personnel require discipline or retraining;
- The causal factor(s) indicate that a safety hazard contributed to or was present during the event; and
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.
Describe activities to monitor information reported through internal safety reporting programs.

The Chief Safety Officer and Safety Committee routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer and Safety Committee ensure that the concerns are investigated or analyzed through CT’s Safety Risk Management process.

The Chief Safety Officer and Safety Committee also review internal and external reviews, including audits and assessments, with findings concerning CT’s safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

7. Safety Promotion

**Competencies and Training**

*Describe the safety training program for all agency employees and contractors directly responsible for safety.*

CT’s comprehensive safety training program applies to all CT employees directly responsible for safety, including:

- Bus Vehicle Operators,
- Dispatchers,
- Maintenance Technicians,
- Managers and Supervisors,
- Agency Leadership and Executive Management,
- Chief Safety Officer, and
- Accountable Executive.

CT dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee’s individual safety-related job responsibilities and their role in the SMS.

Basic training requirements for CT employees, including frequencies and refresher training, are documented in the CT’s Safety Training Matrix and the CT Employee Handbook.

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, and
• Accident investigation training for operations supervisors and managers.

Vehicle maintenance safety-related skill training includes the following:
• Ongoing vehicle maintenance technician skill training,
• Ongoing skill training for vehicle maintenance supervisors,
• Accident investigation training for vehicle maintenance supervisors,
• Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
• Training provided by vendors.

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

Safety Communication

Describe processes and activities to communicate safety and safety performance information throughout the organization.

CT’s Chief Safety Officer and Director of Human Resources and Training coordinate CT’s safety communication activities in the SMS. CT’s activities focus on the three categories of communication activity established in Part 673:

• **Communicating safety and safety performance information throughout the agency:** CT communicates information on safety and safety performance in its quarterly newsletter and during quarterly All-Staff Meetings. CT also has a permanent agenda item in all monthly Drivers’ Meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact CT’s service or safety performance, and updates regarding SMS implementation. CT also requests information from drivers during these meetings, which is recorded in meeting minutes. Finally, CT’s Director of Human Resources and Training posts safety bulletins and flyers on the bulletin boards located in all bus operator and maintenance technician break rooms advertising safety messages and promoting awareness of safety issues.

• **Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency:** As part of new-hire training, CT distributes safety policies and procedures, included in the CT Employee Handbook, to all employees. CT provides training on these policies and procedures and discusses them during safety talks between supervisors and bus operators and vehicle technicians. For newly emerging issues or safety events at the agency, CT’s Chief Safety Officer issues bulletins or messages to employees which are reinforced by supervisors in one-on-one or group discussions with employees.

• **Informing employees of safety actions taken in response to reports submitted through an ESRP:** CT provides targeted communications to inform employees of safety actions taken in response to
reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

8. Additional Information

**Supporting Documentation**

*Include or reference documentation used to implement and carry out the ASP that are not included elsewhere in this ASP.*

CT will maintain documentation related to the implementation of its SMS; the programs, policies and procedures used to carry out this Agency Safety Plan; and the results from its SMS processes and activities for three years after creation. They will be available to the Federal Transit Administration or other Federal or oversight entity upon request.
9. Definitions of Terms Used in the Safety Plan

CT 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 subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient’s Public Transportation Agency Safety Plan.

- **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(14).

- **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 Federal Transit Administration (FTA).
• **Public Transportation Agency Safety Plan** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

• **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 functions 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 (SMS)** 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 Management System (SMS) Executive** means a Chief Safety Officer or an equivalent.

• **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 Public Transportation 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 of 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.

• **Small public transportation provider** means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

• **State** means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

• **State of good repair** means the condition in which a capital asset is able to operate at a full level of performance.

• **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.
# Commonly Used Acronyms

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<thead>
<tr>
<th>Acronym</th>
<th>Word or Phase</th>
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<tbody>
<tr>
<td>ADA</td>
<td>American’s with Disabilities Act of 1990</td>
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<tr>
<td>CAP</td>
<td>Corrective Action Plan</td>
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<td>CEO</td>
<td>Chief Executive Officer</td>
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<td>CT</td>
<td>County Transit</td>
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<td>DOT</td>
<td>Department of Transportation</td>
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<td>ESRP</td>
<td>Employee Safety Reporting Program</td>
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<td>FOF</td>
<td>Field Observation and Feedback</td>
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<td>FTA</td>
<td>Federal Transit Administration</td>
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<td>Metropolitan Planning Organization</td>
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<td>Public Transportation Agency Safety Plan</td>
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<td>Safety Risk Management</td>
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<td>USC</td>
<td>United States Code</td>
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