Butte Regional Transit (BRT)
Butte County Association of Governments (BCAG)

Public Transportation Agency Safety Plan (PTASP)

June 25, 2020

Transit Agency Information

Butte Regional Transit/Butte County Association of Governments
326 Huss Drive, Suite 150
Chico, CA 95928
Phone: 530.809.4616

Chief Executive Officer - Accountable Executive(s):
Jon A Clark – Executive Director
Andy Newsum - Deputy Director

Board Chairman:
Bill Connelly – Chairman – BCAG/BRT Board of Directors

General Manager SMS Executive:
Lance Atencio – Transdev Services, Inc.

Chief Safety Officer:
Bradley Wright – Transdev Services, Inc.

Modes of Service Covered by this Plan:
Fixed Route Bus Service in Butte County
Dial Ride Service in Butte County

Federal Transit Administration (FTA) Funding Types:
5307, 5310, 5311

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Approvals

The individuals below, submitting and signing this Agency Safety Plan (ASP), verify it was prepared in accordance with the appropriate and applicable requirements and guidelines set forth by the Federal Transit Administration in 49 CFR Parts 625, 630, 670, 673 and others, that they are authorized representatives of the Transit Agency; that their signatures attest that all items and conditions contained in this plan are understood, accepted and approved; and that they are committed to implementing the Agency Safety Plan and achieving its safety goals and objectives.

APPROVED BY:
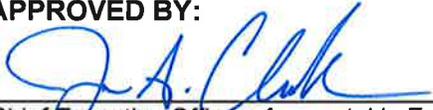
Chief Executive Officer, *Accountable Executive*
Jon A. Clark – Executive Director (ED)

6-25-20
Date

Secondary Chief Executive Officer, *Accountable Executive*
Andy Newsum – Deputy Director (DD)

6-25-20
Date
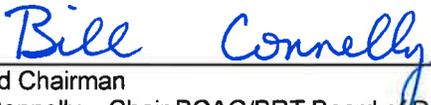
Board Chairman
Bill Connelly – Chair BCAG/BRT Board of Directors – (Chair)

6-25-20
Date

RECOMMENDED BY:

General Manager, *SMS Executive*
Lance Atencio – General Manager (GM)

6-25-20
Date
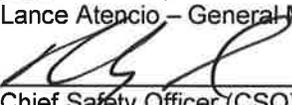
Chief Safety Officer (CSO)
Bradley Wright – Safety Manager

6-25-20
Date

Revisions/Amendments

Revision No	Revision Date	Revised Sections	Purpose
1		See App. VI	

Change Log

Number	Section/Pages	Change	Purpose

Executive Summary

Applicability

Butte Regional Transit and the Butte County Association of Governments BRT/BCAG are committed to comprehensive safety planning. As an operator of a public transportation system that receives Federal financial assistance under Title 49 of the United States Code (USC) Chapter 53, the Transit Agency is subject to 49 CFR Part 625, 630, 670, 673, and this Safety Plan is fully compliant with that Rule as well as with the requirements of the National Public Transportation Safety Plan (NSP) as promulgated through 49 CFR 670.

Policy

BRT/BCAG and the Federal Transit Administration (FTA) have adopted the principles and methods of System Safety and of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

The *BRT/BCAG* Safety Plan, hereafter referred to as the Transit Agency Safety Plan (TASP) is an agency-wide safety plan that meets and is responsive to FTA's Public Transportation Safety Program (PTSP). The Transit Agency Safety Plan reflects the specific safety objectives, standards, and priorities of *BRT/BCAG*. *BRT/BCAG* has incorporated its System Safety compliance into SMS principles and methods tailored to the size, complexity, and scope of its own public transportation system and the environment in which it operates.

Definitions

The Terms and Abbreviations used in this document are consistent with federal regulations and guidance as shown in Chapter 1.

Transdev Services, Inc. is the Contractor under agreement with BCAG/BRT to Manage, Operate and Maintain the Services of Butte Regional Transit through FY 23/24. *Butte Regional Transit is owned solely by BCAG/BRT*. As such, many of the responsibilities and actions taken under the TASP are largely borne and delivered by Transdev in concert with and oversight from BCAG/BRT. The term BCAG/BRT is explicitly meant to be interchangeable, as appropriate, with Transdev Services, Inc.

Safety Plan

General

BRT/BCAG has established a Safety Plan that meets or exceeds the General Requirements of 49 CFR - Part 625, 630, 670, 673, including the following required elements:

- The Safety Plan, and subsequent updates, will be signed by the *Accountable Executive*, and approved by the Butte County Association of Governments (BCAG)/Butte Regional Transit (BRT) Board of Directors.
- The Safety Plan documents the processes and activities related to SMS implementation.
- The Safety Plan includes performance targets based on the safety performance criteria established under the National Public Transportation Safety Plan (NSP), and the state of good repair standards established in the regulations that implement the National Transit Asset Management System and are included in the NSP.
- The Safety Plan addresses all applicable requirements and standards as set forth in the NSP.
- The Safety Plan will comply with the minimum safety performance standards authorized through the National Public Transportation Safety Plan.
- The Transit Agency will establish a process and timeline for conducting an annual review and update of the Safety Plan.
- The Safety Plan includes reference to an emergency preparedness and response plan and procedures that address the assignment of employee responsibilities during an emergency; and coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the Transit Agency area.
- The Safety Plan includes bus and demand response modes of service.
- The Transit Agency will maintain the Safety Plan in accordance with the recordkeeping requirements in subpart D of Part 673.

Certification of Compliance

BRT/BCAG will certify it has established this Safety Plan meeting the requirements of Part 673 by one year after the effective date of the final rule.

On an annual basis, *BRT/BCAG* will certify its compliance with Part 673.

Coordination with Planning Processes

To aid in the planning process, *BRT/BCAG* will make its safety performance targets available to the Department of Transportation (as requested) and the Metropolitan Planning Organization (MPO).

Safety Management System

BRT/BCAG herein establishes and implements a Safety Management System (SMS) compliant with Part 673. The Transit Agency SMS is appropriately scaled to the size, scope and complexity of the Transit Agency, and includes four components as required by 49 CFR 673:

   a. **Safety Management Policy (Part I)**
   b. **Safety Risk Management (Part II)**
   c. **Safety Assurance (Part III)**
   d. **Safety Promotion (Part IV)**

Safety Management Policy – Part I

BRT/BCAG has a written statement of safety management policy *(Chapter 1)* that includes the Transit Agency's safety objectives and safety performance targets. The *BRT/BCAG* safety management policy will be communicated throughout the organization.

Responsibilities

As detailed in *Chapter 2*, *BRT/BCAG* has also established the necessary authorities, accountabilities, and responsibilities for managing safety amongst the following individuals in the Transit Agency, as they relate to development and management of the Transit Agency SMS:

   (1) *Accountable Executive.* The Transit Agency has identified the Executive Director (ED) as the Primary Accountable Executive. The Deputy Director (DD) will serve as the Accountable Executive in absence of the ED. The ED is accountable for ensuring the agency's SMS is effectively implemented throughout the Transit Agency system; and ensuring action is taken, as necessary, to address substandard performance in the Transit Agency's SMS. The ED may delegate specific responsibilities, but the ultimate accountability for the Transit Agency's safety performance cannot be delegated and always rests with the ED *who is the 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.*

   (2) *Chief Safety Officer (CSO) or Safety Management System Executive (SMSE).* The Manager of Safety, who reports directly to the General Manager, or other designee assigned by the ED, will serve as the CSO and the Accountable Executive when the ED or DD position is vacant or unavailable. *The CSO is an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.*

   (3) *BRT/BCAG* leadership *and Executive Management.* *BRT/BCAG* may also identify other members of its leadership and executive management who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

   (4) *Key staff. BRT/BCAG* may designate key staff, groups, or committees to support the ED, DD and CSO in developing, implementing, and operating the agency's SMS.

BRT/BCAG has also established a process that allows employees to report safety conditions to senior management with protections for employees who report adverse safety conditions to management.

Organization Chart of Hierarchy and Communication

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┌─────────────────────────────────┐
│           Jon Clark             │
│     Accountable Executive.      │
│          Andy Newsum            │
│  Secondary Accountable Executive│
└─────────────────────────────────┘

┌─────────────────────────────────┐
│          Lance Atencio          │
│  Safety Magament System (SMS)   │
│            Execuitve            │
└─────────────────────────────────┘

┌──────────────────┐   ┌──────────────────┐   ┌──────────────────────┐
│   Bradley Wright │   │ Transdev Staff - │   │ Transdev Staff -     │
│ Chief Saftey     │   │ Shop and         │   │ Management and       │
│ Officer (CSO)    │   │ Maintenance      │   │ Support              │
└──────────────────┘   └──────────────────┘   └──────────────────────┘
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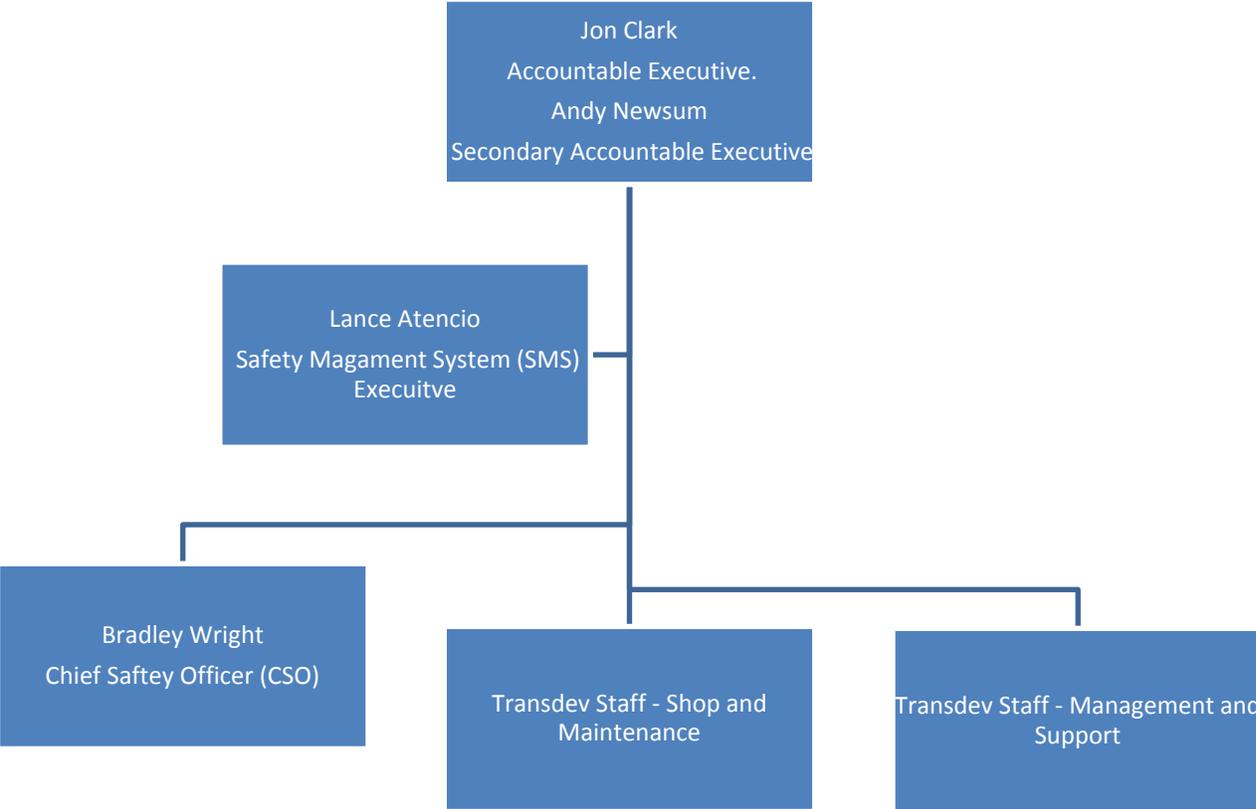
Safety Risk Management – Part II

Safety Risk Management Process

BRT/BCAG has developed and implemented a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process is comprised of the following activities:

- Identification of safety hazards,
- Analysis of safety hazards,
- Safety risk evaluation, and
- Safety risk mitigation.

Safety Hazard Identification and Analysis

BRT/BCAG has established a process for hazard identification and analysis (Chapter 4). *BRT/BCAG* includes, as a source for hazard identification and analysis, data as well as information provided by outside agencies.

Safety Risk Evaluation and Mitigation

BRT/BCAG has established activities to evaluate and prioritize the safety risk associated with the potential consequences of safety hazards (Chapter 4). Safety risks are evaluated in terms of probability and severity and consider mitigations already in place to reduce the probability or severity of the potential consequence(s) analyzed. *BRT/BCAG* has established criteria for the development of safety risk mitigations that are necessary based on the results of the agency's safety risk evaluation.

Safety Assurance – Part III

BRT/BCAG has developed and implemented a safety assurance process, consistent with this subpart.

Safety Performance Monitoring and Measurement

BRT/BCAG has established activities (described in Chapter 4) to:

- ✓ Monitor the Transit Agency system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- ✓ Monitor Transit Agency operations to identify hazards not identified through the Safety Risk Management process (per 49 CFR §673.25);
- ✓ Monitor Transit Agency operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- ✓ Investigate safety events to identify causal factors; and monitor information reported through any internal safety reporting programs

Management of Change

BRT/BCAG has established a process for identifying and assessing changes that may introduce new hazards or impact safety performance. If *BRT/BCAG* determines a change may impact its safety performance, then *BRT/BCAG* will evaluate the proposed change through its Safety Risk Management process. (See Chapter 5.)

Continuous Improvement

BRT/BCAG has established a process to assess its safety performance (Chapter 5). If *BRT/BCAG* identifies any deficiencies as part of its safety performance assessment, then *BRT/BCAG* will develop and carry out, under the authority of the ED, a plan to address the identified safety deficiencies.

Safety Promotion – Part IV

Safety Communications

BRT/BCAG fosters open and robust communication regarding safety between all levels of the agency (Chapter 6). This starts with fully promulgating the safety policy to all employees. *BRT/BCAG* uses notices, posters and bulletins to ensure all employees are aware of the agency's and their own safety commitments and requirements.

In addition, the Safety Department supports all other departments in ensuring safety messaging and awareness are communicated effectively within each department. Employees are required and encouraged to report hazards, take responsibility for safety in their tasks and work areas, educate themselves on safety in addition to formal training, and attend safety briefings, trainings, activities and events.

Finally, all levels of the agency are required, through formal and informal communications, to ensure safety information is disseminated throughout the agency. This Plan sets forth the requirements for both the formal and informal reporting that supports our SMS.

Competencies and Training

BRT/BCAG has established a comprehensive safety training program for all agency employees and contractors directly responsible for the management of safety in the Transit Agency's system (Chapter 6). The training program includes refresher training, as necessary.

Safety Plan Documentation and Recordkeeping

Safety Plan Documentation

At all times, *BRT/BCAG* maintains documents that set forth and support its Safety Plan, including those related to the implementation of *BRT/BCAG* 's SMS, and results from SMS processes and activities. *BRT/BCAG* maintains documents included in whole, or by reference, that describe the programs, policies, and procedures *BRT/BCAG* uses to carry out the Safety Plan. These documents are available upon request by the FTA, other Federal entities as required. *BRT/BCAG* maintains these documents for a minimum of three years.

Safety Plan Records

In addition to any documents or records required elsewhere by Part 673, *BRT/BCAG* maintains in perpetuity records of:

        (a)   Safety risk mitigations developed in accordance with § 673.25;

        (b)   Results from *BRT/BCAG* performance assessments as required under § 673.27; and

        (c)   Employee safety training taken for purposes of compliance with this part and the Public Transportation Agency Safety Program.

Part I -- Safety Management Policy

Chapter 1 – Safety Policy Statement

1.0   General Safety Policy

It is *BRT/BCAG's* policy to provide safe and reliable transportation service for the general public, to provide safe and healthful working conditions for our employees, and to comply with applicable occupational and environmental laws and regulations.

Operational and safety training, accident investigation, Standard Operating Procedures, and audit/inspection programs are documented and referenced in the Transit Agency's Safety Plan. The purpose of this plan, among others, is to recognize and correct unsafe acts and conditions, to promote safety awareness, and to assist in the prevention of injuries and illness as well as incidents that are harmful to the environment.

Every *BRT/BCAG* employee and any outside contractor who serves *BRT/BCAG* has the duty to adhere to the Safety Plan; to recognize, report and correct hazards; to work in a safe manner; to promote safety awareness; and to actively assist in accident prevention.

The General Manager accepts direction from the Accountable Executive and implements safety through direction to the CSO. Ultimate responsibility for the implementation of safety trough the SMS and CSO lies with the Accountable Executive. For clarification, any contradicting statements of authority and communication it this PTASP shall be superceded by this section.

All *BRT/BCAG* employees must carry out their assigned duties in a safe and efficient manner. The Safety and Security Review Committee is responsible for taking a proactive position in assisting *BRT/BCAG* management to implement SMS and identify and control hazards to ensure the highest practical degree of safety for *BRT/BCAG* riders and employees. As Chairman of the Safety Committee, the Chief Safety Officer bears the primary responsibility for coordinating implementation of the Safety Plan and monitoring compliance.

The signatures of the Chief Executive Officer/ED, General Manager, and the Chief Safety Officer included in the Approvals section of this plan attest that this plan is understood, accepted and approved; and management is committed to implementing SMS through the Safety Plan and achieving its safety goals and objectives.

1.1   Safety Management Policy Statement

BRT/BCAG is furthermore committed to comprehensive safety planning, and as an operator of a public transportation system that receives Federal financial assistance under Title 49 USC Chapter 53, also complies with 49 CFR Part 673.

BRT/BCAG has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

BRT/BCAG has a written statement of safety management policy that includes the safety objectives and safety performance targets.

Subject: Safety

Scope: This policy applies to all employees of _BRT/BCAG and their Contractors_.

At _BRT/BCAG_, safety is our credo — our core belief, our deepest conviction and our highest priority. Our responsibility and accountability for safety extends to all _BRT/BCAG_ and Transdev Services, Inc. Inc.as we care for our customers, passengers, the general public such as motorists, cyclists and pedestrians, and each other.

Operational safety shall always serve as the guiding principle and paramount priority when developing any _BRT/BCAG_ and Transdev Services, Inc. operational policies, practices and procedures. All decisions need to be viewed through the lens of safety.

The prevention of accidents, injuries, unsafe incidents and illness is the responsibility of every _BRT/BCAG_ and Transdev Services, Inc. employee. All employees, from the ED/DD and General Manger to the frontline employee, are expected to lead by example and:

- ✓ Provide a safe and healthy working environment;
- ✓ Abide by all safety policies, rules and regulations;
- ✓ Expect and insist upon a total commitment to safety from fellow employees; and
- ✓ Immediately raise any safety concerns to his or her supervisor or safety representative.

1.1.2 Communication

BRT/BCAG's safety management policy will be communicated throughout the organization through:

- Training in SMS for all employees;
- Notice to All Personnel from the GM;
- Email to all management and office personnel with electronic access;
- Signed receipt from all employees and new hires;
- Inclusion in employee Safety Briefings; and
- Posted on all general bulletin boards.

The Safety Plan will always be available to all employees. It will be maintained in an accessible electronic file and in hard copy(s) by all key SMS personnel in locations accessible to employees under their supervision and management.

1.2   Authority – Appendix I – Board Agenda Item

1.2.1   Transit Agency – Appendix II – Joint Powers Agreement

1.2.2   Vehicle Description – Appendix III – Fixed Route and Paratransit/Dial A Ride Fleet

1.2.3   Maintenance Facility – Appendix IV – Description of Facility

1.2.4   Safety Performance Indicators – Appendix V

1.2.5   Federal

Statutory mandates in the Moving Ahead for Progress in the 21st Century Act (Pub. L. 112– 141; July 6, 2012) (MAP–21), reauthorized by the Fixing America's Surface Transportation Act (Pub. L. 114–94; December 4, 2015) and codified at 49 U.S.C. 5329(d), are in place to strengthen the safety of public transportation systems that receive Federal financial assistance under Chapter 53. This legislation defines requirements for the adoption of Safety Management Systems (SMS) principles and methods; the development, certification, and update of Public Transportation Agency Safety Plans; and the coordination of Public Transportation Agency Safety Plan elements with other FTA programs and proposed rules, as specified in 49 U.S.C. 5329.

In Section 20021 of MAP–21, Congress directed FTA to establish a comprehensive Public Transportation Safety Program, one element of which is the requirement for Public Transportation Agency Safety Plans. Pursuant to 49 U.S.C. 5329(d), FTA must issue a final rule requiring operators of public transportation systems that receive financial assistance under Chapter 53 to develop and certify Public Transportation Agency Safety Plans. FTA also is required to issue a rule designating certain Urbanized Area Formula Program recipients.

1.3   Terms and Abbreviations

The following definitions used in this document are consistent with 49 CFR Parts 625, 630, 670, 673, and 674 as of September 2016. The source of each is noted in brackets, including the recent "SMS Glossary of Terms: FTA's Guide to Relevant Terms for SMS Development" of September 2016 shown as "[SMS]"

1. **Accident**: Any event involving a transit vehicle or taking place on transit-controlled property where one or more of the following occurs:

   - A loss of life;
   - A report of a serious injury to a person;
   - A collision of a transit vehicles;
   - A runaway of transit vehicle
   - An evacuation for life safety reasons; or
   - Any transit vehicle, at any location, at any time, whatever the cause
   - An accident must be reported in accordance with the thresholds for notification and reporting set forth in Part 674.

2. **Administrator**: The Federal Transit Administrator or the Administrator's designee

3. **Advisory**: a notice from FTA to recipients regarding an existing or potential hazard or risk in public transportation that recommends recipients take a particular action to mitigate the hazard or risk. [670]

4. **Agency Safety Plan (ASP)**: a document adopted by a Transit Agency detailing its safety policies, objectives, responsibilities, and procedures.

5. **Audit:** an examination of records and related materials, including, but not limited to, those related to financial accounts. [670]

6. **BTW**: Behind-The-Wheel, a type of required Operator training

7. **CEL**: Certifiable Elements List

8. **ED/DD:** Chief Executive Officer of the Transit Agency

9. **Chief Safety Officer (CSO):** an adequately trained individual who has responsibility for safety and reports directly to an chief executive officer, Chief Executive Officer, president, or equivalent officer. The CSO does not serve in other operational or maintenance capacities, [unless Transit Agency is a small public transportation provider as defined in Part 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system]. [673, SMS]

10. **CM:** Construction Manager.

11. **Consequence**: the potential outcome(s) of a hazard. [SMS]

12. **Continuous Improvement:** a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies. [SMS]

13. **Contractor**: An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or a Transit Agency, through contract or other agreement

14. **Corrective Action Plan (CAP):** A plan developed by a Transit Agency that describes the actions the Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Transit Agency to develop and carry out a Corrective Action Plan

15. **Direct recipient**: an entity that receives funds directly from the Federal Transit Administration. [625]

16. **Event:** An Accident, Incident, or Occurrence

17. **Facility**: a building or structure that is used in the provision of public transportation. [625]

18. **FMLA:** Family Medical Leave Act

19. **FRA:** The Federal Railroad Administration is an agency within the United States Department of Transportation

20. **FTA:** The Federal Transit Administration is an agency within the United States Department of Transportation

21. **Grade Crossing** (as defined in the National Transit Database glossary): an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail or pedestrian traffic; either in mixed traffic or semi-exclusive situations.

22. **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 of a rail's fixed guideway public transportation system; or damage to the environment

23. **Hazard Analysis:** The method by which hazards are identified and analyzed as to their possible effects upon the safe operation of the entire system (i.e.: Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)

24. **Hazard Identification:** formal activities to analyze potential consequences of hazards during operations related to provisions of service

25. **Hazardous Condition:** An immediate condition that could cause an accident involving personal injuries or death

26. **Incident:** An unforeseen event or occurrence that does not necessarily result in death, injury, contact, or property damage. As defined by the FTA, and Incident is:
   - 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

27. **Individual**: Any person at the property of a transportation system

28. **Injury:** Any physical damage or harm to persons because of an incident that requires immediate medical attention away from the scene

29. **Investigation:** The process of determining the causal and contributing factors of an accident, incident, or hazard, for preventing recurrence and mitigating risks

30. **Lagging Indicators**: provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved. [SMS]

31. **Leading Indicators**: provide evidence, through monitoring, that key safety management actions are undertaken as planned. [SMS]

32. **Management of Change:** a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process. [SMS]

33. **National Public Transportation Safety Plan:** The plan to improve the safety of all public transportation systems that receives Federal Financial Assistance under 49 U.S.C. Chapter 53

34. **Near miss:** a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations. [SMS]

35. **NTSB:** National Transportation Safety Board, an independent federal agency

36. **Occurrence:** An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure and does not disrupt the operations of the transit agency

37. **Person**: A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a public transportation system

38. **Performance criteria:** categories of measures indicating the level of safe performance within a Transit Agency. [673, SMS]

39. **Performance measure**: a parameter used to assess performance outcomes. [625]

40. **Performance target:** a specific level of performance for a given performance measure over a specified timeframe. [625, 673]

41. **PHA:** Preliminary Hazard Analysis.

42. **PPE:** Personal Protective Equipment

43. **Practical Drift:** the slow and inconspicuous, yet steady uncoupling between written procedures and actual practices during the provision of services [SMS]

44. **Program Standard:** is a written document developed and adopted by a State that describes the policies, objectives, responsibilities, and procedures used to provide safety and security oversight of a transit agency

45. **Public Transportation Agency Safety Plan (PTASP):** The comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329(d) and based on a Safety Management System. Until one year after the effective date of FTA's PTASP Final Rule, a System Safety Program Plan (SSPP) developed pursuant to comply with 49 CFR part 659 will serve as the transit agency's safety plan.

46. **Public Transportation Safety Certification Training Program**: Either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1)

47. **Risk:** The composite of predicted severity and likelihood of the potential effect of a hazard

48. **Risk mitigation:** A method or methods to eliminate or reduce the effects of hazards

49. **Sabotage**: The deliberate destruction of transit property or the slowing down of public transit operations by employees with the intention of damaging business or the economic condition of the transit agency

50. **Safety:** the state in which potential of harm to persons or property damage during operations related to provision of reduced to and maintained at acceptable level through continuous hazard identification and safety risk management activities

51. **Safety Certification:** The process used to verify the system meets criteria, codes, regulations, and contract requirements as they relate to safety, fire/life safety, and security

52. **Safety Performance**: an organization's safety effectiveness and efficiency, as defined by safety performance indicators and safety performance targets, measured against the organization's safety objectives. [SMS]

53. **Safety Performance Indicator**: a data-driven, quantifiable parameter used for monitoring and assessing safety performance. [SMS]

54. **Safety Performance Measurement**: the assessment of non-consequential safety-related events and activities that provide ongoing assurance that safety risk mitigations work as intended. [SMS]

55. **Safety Performance Monitoring:** the activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets. [SMS]

56. **Safety Performance Monitoring and Measurement**: activities a transit agency must:

    1) Monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
    2) Monitor its operations to identify hazards not identified through the Safety Risk Management process;
    3) Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
    4) Investigate safety events to identify causal factors

57. **Safety Performance Target:** a specific level of performance for a given performance measure over a specified timeframe related to safety management activities. [SMS]

58. Safety Reporting Program: a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action. [SMS]

59. Safety Review: a formal, comprehensive, on-site review by DOT or FTA of the transit agency's safety practices to determine whether the agency complies with the policies and procedures required under the Safety Plan.

60. Safety risk management: A process within a Transit Agency's Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risks

61. Security and Emergency Preparedness Plan (SEPP): is defined as a document developed and adopted by the transit agency describing the application of operating, technical, and management techniques and principles to the security aspects of the system throughout its life to reduce threats and vulnerabilities and describing the emergency preparedness policies and procedures for mobilizing the system and other public safety resources to assure rapid, controlled, and predictable responses to various types of transportation and community emergencies.

62. Serious injury: 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 nose);
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

63. **SMS Executive**: A Safety Officer or an equivalent. [673]

64. **SSOC:** Safety & Security Operations Committee

65. State: A State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands

66. State Safety Oversight Agency (SSO): An agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in this part

67. **Subsystem**: An element of a system that may constitute a system

68. **System Safety Program Plan (SSPP):** It is a document developed and adopted by the transit agency, describing its safety policies, objectives, responsibilities, and procedures. Until one year after the effective date of FTA's PTASP Final Rule, an SSPP developed pursuant to comply with 49 CFR part 659 will serve as the rail transit agency's safety plan.

69. System Security Plan (SSP): A document developed and adopted by the transit agency describing its security policies, objectives, responsibilities, and procedures

70. **Vehicle:** Any rolling stock used on a public transportation system, including, but not limited to, passenger and maintenance vehicles

1.4 Objectives and Performance Targets

BRT/BCAG has established Safety Objectives, performance targets, and performance measures in compliance with the National Public Transportation Safety Plan. These are delineated in Part III: Safety Assurance.

1.5 Scope

BRT/BCAG has adopted the practices and methods of SMS as described in the National Transportation Safety Plan (NSP). The purpose of this Safety Plan is to systematically implement *BRT/BCAG* System Safety Policy and introduce safety processes where they are necessary to achieve assurance. The Safety Plan is reviewed annually to ensure all systems, equipment, facilities, plans, procedures, manuals, and training programs are compliant with established safety requirements; and that the Safety Plan reflects current SMS configuration at the Transit Agency. Specifically, the Safety Plan:

- Establishes the safety program on a company-wide basis.
- Provides a framework for implementing *BRT/BCAG*'s safety management system, policy, goals and objectives.
- Identifies the relationships and responsibilities of each *BRT/BCAG* department relative to achieving safety goals and objectives.
- Identifies the relationships and responsibilities of *BRT/BCAG* with municipal, parish, and state governing bodies and other organizations and agencies that impact transit system safety.
- Provides a mechanism whereby *BRT/BCAG* can demonstrate its commitment to safety, foster a positive safety culture and meet safety performance goals.
- Provides requirements that, as appropriate, contractors and suppliers meet the *BRT/BCAG*'s safety requirements prior to commencing work while on the premises.
- Satisfies federal, state, and local requirements.
- Ensures that the system meets or exceeds accepted industry safety standards.
- Facilitates FTA safety inspections, reporting, corrective actions and general and special directives and requirements.
- Implements NSP performance criteria, state of good repair, vehicle safety standards, meet training criteria and all other safety management requirements and goals.

Chapter 2 - Safety Accountability and Responsibility

2.0 Safety and Security Operations Committee

The Safety Committee will be assigned to facilitate the incorporation of the System Safety Program into all aspects of transit operations and services. The General Manager acts as a resource for the operations, maintenance, and administrative staff, and is responsible for the administration of the System Safety Program, with assistance from management as required.

The General Manger has the authority and responsibility to:

- Perform accident/incident investigations
- Ensure all major accidents/incidents, hazards, and internal safety issues are reviewed and resolved
- Ensure internal safety reviews and inspections are conducted
- Report unacceptable hazardous conditions to the *BRT/BCAG* executive management as soon as possible
- Work with operations and maintenance staff daily to ensure all System Safety Program requirements are implemented and Program goals and objectives are achieved
- Develop Corrective Action Plans (CAP) that result from accident/incident investigations, hazard analyses, and safety reviews and audits, as well as tracking corrective actions through completion to ensure all identified deficiencies are adequately eliminated or mitigated
- Ensure the Regional VP and Regional Safety Director are immediately notified of hazards of imminent danger or as other problems are identified or arise
- Ensure recommendations are followed upon and corrected
- Review findings and comprehensive reports with recommendations, findings, and actions that cannot be resolved by staff. Develop action plans and monitor the implementation of any corrective action plan pursuant to any reports and recommendations
- Review, approve, or recommend changes to the reports and corrective action plans, submitted to the Safety Committee for safety hazards, and threat and vulnerabilities audit findings and corrective actions, prior to submittal of the final reports to the responsible parties for implementation
- Review, approve, or recommend changes to corrective action plans developed in response to recommendations of the DOT
- Review, approve, or recommend changes to the annual reports of the internal safety review process required for submission to the DOT
- Review, approve, or recommend changes to transit safety rules and procedures established to implement the requirements and programs defined in the ASP

2.1 Contractors

Contractors are responsible for executing certain requirements outlined in the Agency Safety Plan. This responsibility includes determining and implementing countermeasures required to neutralize safety hazards and problems. The contractor is accountable and responsible for the safety performance of all personnel and equipment and for administering activities along the physical system and for reporting all accidents and incidents. All contractor employees are responsible for performing their work safely and in accordance with requirements for the

protection of themselves, co-workers, customers, and the public, considering the proper use of facilities and equipment.

The following are the management positions

- **General Manager**
- **Manager of Operations**
- **Safety Manager**
- **Maintenance Manager**

2.2 General Manager

The General Manager acts as the **direct point of contact** for the day-to-day management of the transit system. The position directs and manages all staff and contractors to ensure compliance with established bus system policies, directives, regulations and ordinances (city, state, and federal) and both the Standard Operating Procedures (SOP) and Standard Maintenance Procedures (SMP) in all phases of operation and maintenance, as well as the direct supervision of all operational, safety and maintenance staff to provide a safe, dependable, timely, and fixed transit service.

Among the assigned duties are:

- Direct and coordinate all operational personnel by establishing and monitoring program and project objectives. The Systems Operations General Manager will supervise the development and implementation of the processes and procedures, reviewing performance, completing required status changes and timekeeping documents, implementing and monitoring training. This position will oversee the safety programs, manage budgets, compiling and reporting data, supervising the hiring process, developing goals and objectives, and implementing team-building processes.
- Maintain reliable and high-quality bus service by ensuring the scheduling of personnel, facilities, and training; monitoring of ridership trends, analyzing data, verifying compliance with all regulations, and following manufacturers' instructions. Verify the correct implementation of the processes for operations, evaluating staff performance, recommending, and completing service upgrades and modifications; monitoring workflow, monitoring expenditures, coordinating operational requirements with the maintenance staff, reporting equipment failures, establishing and monitoring service standards, and developing short- and long-range plans.
- Complete administrative-related tasks by reviewing and analyzing data and statistics, coordinating and managing the budget process, addressing, and resolving labor relations issues; monitoring training and safety, developing and presenting information, writing papers, memos, and other correspondence, as well as investigating accidents and promoting safety in general.
- Administer contractual agreements with contractors and their personnel as assigned to the bus project, including supervisory, operations, and maintenance personnel. Oversee day-to-day issues, working with the contractor's manager, including safety, service quality, training, development, scheduling, discipline, and similar functions. Literally, to provide the highest level of customer service possible.
- Develop, refine, and ensure implementation of the operations and maintenance plan, and related standards and documents, such as rules and procedures. This position oversees job and position expectations for supervisory, operations, and maintenance personnel. Coordinate and oversee data and reports regarding operations and maintenance,

including key performance indicators, accident/incident reports, personnel measurements, and statistics related to any contractor's contract compliance.

- The position is responsible for identifying solutions for deviations from the Service Plan and related agreements, within the parameters of the Inter-Governmental Agreement.
- Take every reasonable precaution given the circumstances to ensure the protection of employees, patrons, and members of the public. Identify and inform employees of hazards in the workplace. Determine safe work methods and ensure employees are notified of new and modified methods. Ensure employees are trained on safety policies and procedures. Ensure employees to follow procedures. Respond to employee health and safety concerns in a timely manner.

2.3   Maintenance Manager

Under the supervision of the General Manager, the Maintenance Manager oversees:

- The maintenance and repair of equipment and facilities;
- Coordination of duties for all transit maintenance personnel and contractors as required for the safe and efficient operation of the fleet.
- Management of warranties and vendor interaction in support of all bus and facility-related equipment;
- Inspection of buildings and surrounding areas and recommended modifications or repairs;
- Planning and implementation of preventive maintenance (PM) programs for all bus equipment;
- Inspection of work in progress and recommendations regarding adjustments of personnel assigned to work, ensuring timely completion of work orders;
- Allocation of personnel, materials, and other resources to balance workflow and ensure availability of equipment;
- Servicing and daily cleaning activities of all bus equipment;
- Development and implementation of processes and procedures within the bus maintenance division to ensure the safe and efficient operation of all transit, maintenance support equipment, and bus facility equipment;
- Implementation of transit system maintenance and management programs, industrial hazard identification, accident, and security incident notification, internal maintenance, and safety audits, emergency preparedness, and response;
- Training sessions with maintenance and equipment support personnel on a regular basis;
- Regulatory compliance and implementation of training materials in coordination with Safety personnel;
- Completion of all maintenance tasks, monitoring of vehicle performance trends, analysis of data, ensuring compliance with all regulations and establishment of Original Equipment Manufacturer processes;
- Development and execution of comprehensive plans to consistently improve safety performance across all areas.
- Safe work methods and communications with personnel to ensure they are notified about new and modified maintenance methods consistent with procedures and policies;
- Ensure personnel are trained, and that safety policies and procedures are continuously reviewed;
- Supervision of assigned staff;

- Scheduling, assigning, instruction, guidance, and follow-up on work;
- Appraisal of employee performance;
- Training and development;
- Personnel rules and regulations and work behavior standards are enforced in an impartial manner
- Interview applicants, hiring, discipline, merit pay, and/or other employee status changes, while counseling, motivating, and maintaining harmony in the workforce.

2.4   Operations Manager

Under the supervision of the General Manager he/she is responsible for the following responsibilities:

- Assist in planning, organizing, coordinating, and directing transit on fixed route and/or demand response operations through subordinate supervisors, ensuring timely, efficient, and safe customer service.
- Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements.
- Monitor daily operations, meet with route supervisors on service-related issues, such as road closures or special assignments; maintain and analyze complaint files for service improvement.
- Issue written and/or oral instructions to transit supervisors and dispatchers.
- Monitor overtime and other operating expenses.
- Oversee and monitor fixed route and demand response to ensure enough staffing to facilitate orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, and/or the public.
- Provide accurate information to inquiries and respond to complaints, including complaints from individuals who may be irate.
- Ensure accidents / complaints are properly investigated.
- Interact with other departments, supervisors, co-workers, and the public.
- Assign, schedule, and monitor work.
- Appraise employee performance and review subordinates' appraisals.
- Provide for training and development.
- Counsel, motivate, and maintain supervisor-subordinate harmony.
- Identify and resolve staff differences, conflicts, and deficiencies.
- Investigate grievances, take statements, and make recommendations.
- Interview applicants.
- Recommend hiring, discipline, termination, merit pay or other employee status changes.
- Enforce personnel rules and regulations; work behavior standards firmly and impartially.
- Monitor and ensure equitable distribution of overtime.
- Promote the observation of safe work practices.
- Monitor sick leave abuse and oversee vacation sign-up.
- Ensure all accidents or emergencies are properly investigated

2.5 Safety Manager

BRT/BCAG's safety compliance falls under the responsibility of the Safety Manager. Under the supervision of the General Manager, the Safety Manager verifies and assesses the daily operations of *BRT/BCAG*. The Safety Manager has the authority to stop any work or operation if it represents an imminent hazard.

The Safety Manager has among their duties, the following:

- Assists in accident investigation;
- Performs investigation of security breaches;
- Conducts unannounced, random inspections;
- Performs annual safety audits;
- Manages hazard analysis;
- Provides safety & security training;
- Conducts threat and vulnerability assessments; and
- Answers as responsible party for all System Safety regulatory reporting requirements.

The Safety Manager's responsibilities in the day-to-day activities may include, but are not limited to:

- Directing/overseeing the overall safety operations of jobsites and on-board systems including reporting and conducting safety meetings;
- Directing/overseeing the development and implementation of training programs (operator, safety policy courses, passenger/assistance service sensitivity classes, etc.);
- Directing/overseeing the security program for all facilities (including on-road), remote surveillance, and on-board camera systems;
- Training of staff;
- Developing and monitoring contents of classroom training to ensure compliance;
- Investigating incidents, accidents, hazardous conditions, and work-related injuries, including accident reports, accident files, accident register, and follow up with the claims' office and adjusters as necessary;
- Planning, scheduling, and conducting monthly safety meetings based on safety and security training goals and objectives;
- Setting up regular accident review committees to determine preventability of accidents;
- Addressing employees' safety complaints;
- Developing and maintaining the Operational Hazard Analysis Log;
- Assists the Chief Safety Officer with the Corrective Action Plans (CAPs) implementation and follow-up.
- Maintain the OSHA 300 Log

Chapter 3 - Emergency Management & Public Safety Liaison (EMPSL)

3.0 Emergency Management

Beginning in pre-revenue operations period and continuing into revenue service, this position is responsible for coordinating emergency response planning and drills among various law enforcement and other first responder groups. These include, but are not limited to, the US Department of Homeland Security, police and fire departments, private security organizations, emergency medical units, public health resources, and other police units including state, city, and contracted security. The EMPSL serves as the liaison to the local Emergency Operations Center (EOC) whenever it is activated due to an incident involving or affecting service or property.

3.1 Integration with Public Safety & Emergency Management

As required by *BRT/BCAG*, the Manager of Safety or designee, will coordinate, conduct, and/or participate in safety/security related drills and exercises with Homeland Security, and other agencies, such as local Fire and Police. The purpose of participation is to ensure all potential emergency responders are familiar with equipment and property. Participation may include hands-on training, demonstrations, video demonstrations, handouts, or any other media. Minimally, emergency responder training will include basics of vehicle and system operation, familiarization with operations and routing, and emergency entry methods into vehicles.

The contractor will implement new findings from emergency drills and exercises and ensure appropriate and timely employee training occurs, as necessary. Furthermore, to ensure personnel are trained to perform satisfactorily during emergency conditions, annual recertification will incorporate discussion and refresher training regarding procedures, practices, actions, and responsibilities during emergency situations. After action reports are developed following emergency drills and exercises, those reports will be documented and maintained

Training for employees and local public safety organizations, along with more extensive discussion is contained in the SSEPP.

3.2   Documentation & Record Keeping

All safety activities are formally documented. The type of document used will vary depending on the type of activity. The following is a list of activities and the type of document used for documentation.

Activity	Type of Document
Inspections	Checklist Photos Evidence that finding have been corrected
Audits	Notification letters Auditing Checklist Auditing report with supportive documentation Corrective Actions generated by the audit
Safety Meetings	Agendas Attendant Sheet
Training	Agenda Attendant sheet Training material

For record keeping, *BRT/BCAG* uses a hosted service for current recordkeeping storage service. All official documentation generated on the project must be saved on the cloud for record keeping. Documents kept on the drive include, but are not limited to, letters to DOT, audit reports, Corrective Action Plans, and Hazard Log(s).

Maintenance work orders, pre-trip inspections, etc. generated in hard copy will be kept on record by the department manager. Those documents must be kept in an organized form, in a location that prevents deterioration and keeps them secure.

Official documents must be kept for a period of no less than 3 calendar years. The process for destroying official documentation will follow AGENCY guidelines.

Part II – Safety Risk Management Process

Chapter 4 – Safety Risk Management

4.0 Safety Risk Management

The objective is to identify hazardous conditions and/or behaviors, document them, develop and apply mitigation strategies, and assess if they can be eliminated or minimized to an acceptable risk status.

BRT/BCAG defines a hazard as any real or potential condition/behaviors that can cause injury, illness, or death; damage or loss of the facilities, equipment, rolling stock, or infrastructure of a transit system; or damage to the environment. The Safety Manager is directly responsible for the implementation and ongoing management of the Hazard Management process. This includes:

- Developing, updating, and auditing the program;
- Training all designated transit employees and contractors on the hazard management process; and
- Documenting and tracking all identified hazards up to resolution.

The hazard resolution process is from 'cradle to grave' and can be applied throughout the 5 phases of the system life cycle, which are:

1. Planning
2. Design
3. Construction
4. Operations
5. Decommissioning

Hazard analysis attempts to determine the set of primary events in the hazard generation process. Upon identification of these events, *BRT/BCAG* will undertake measures to mitigate, control, or eliminate the generation of hazards in ways that can reduce their risk to an acceptable level. Hazard resolution is the corrective action taken in response to the hazard identification and assessment process, but time and resource restrictions may determine the level of resolution that can be accomplished.

The following are actions addressed in hazard resolution:

- Eliminate the hazard, if possible
- Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard
- Provide training to educate the workforce on possible hazards
- If hazard cannot be eliminated, reduce exposure to it

Monitor the Hazard Mitigation to determine if the risk has been managed to an acceptable level, to ensure it does not re-occur. Refer to SOP titled "*Hazard Management Plan*" for details.

4.1 Safety Hazard Identification

Hazard identification encompasses a set of methodologies that first searches throughout the system for anything with the potential to do harm. Identification of hazards is the responsibility of all divisions and is the key to system safety. Identified hazards are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level. The Safety Manager shall review all hazards identified. Hazards can be identified in several ways such as:

- Design Review
- Daily walk-throughs
- Monthly facility self-inspections
- On board in cab cameras (e.g.: Event Vehicle Recorders)
- Accidents, Incidents, and System Reliability, and Failure Reports
- Ride Checks and Proficiency Checks
- System Inspections, Audits, and Regulatory Inspections
- Customer, Contractor, and Employee Complaints
- Safety Committee
- Transit Industry Experience
- Employee Safety Reporting

BRT/BCAG will use a hazard identification and analysis process before purchasing and accepting new equipment and/or modifications of existing facilities, systems or rolling stock, and infrastructure elements.

4.1.1 Hazard Analysis Methods

Analysis of a hazard is based on both the probability *and likelihood* of occurrence and the severity of an event. Hazards with greatest potential to cause serious injury will take highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of events by introducing protective devices and equipment, procedures and/or forms, or system modifications that reduce the amount of human and property damage resulting from an accident.

While identifying every hazard is virtually impossible, there are two methods for orderly identification of hazards: inductive and deductive analysis.

- **The inductive hazard** identification process consists of an analysis of system components to identify their respective failure modes and the effects they may have on the total system. This process assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem.

- **The deductive hazard** identification process involves defining an undesired effect (e.g. collision, fire) and then deducing the possible conditions or system component faults (or combinations of them) necessary to cause the undesired effect.

The Safety Manager will continually evaluate the project using the methods described above to identify new hazards. This will be documented as described in this document.

For existing infrastructure elements, vehicles, procedures/processes management should consider using audits – either ad hoc or structured - based on identified safety issues to identify existing hazards and hazard potentials.

In addition, the Safety Manager utilizes a variety of software and technologies (e.g.: Incident database, data visualization software, EVRs) to assist in his/her analysis efforts.

4.2 Safety Hazard Assessment

Hazard Risk Assessment is a quantitative calculation based on largely subjective judgments used to determine the risk associated with each hazard and thus the urgency for implementing corrective measures to eliminate or reduce risks to a level of acceptability. Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and evaluating hazard probability. The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of safety on the system in the community where the system operates.

4.2.1 Hazard Severity

Hazard severity is a subjective determination. As data is accumulated over time, an objective determination applicable specifically to AGENCY can be derived. The determination reflects a credible mishap that could be anticipated to result from human error, procedural deficiencies, design inadequacies, component failure, or malfunction. Hazard Severity is based on the U.S. Department of Defense Military Standard for Systems Engineering (MIL-STD-882-E) as follows:

Table 1: Definition of Severity

SEVERITY CATEGORIES		
Description	**Severity Category**	**Criteria**
Catastrophic	1	Could result in one or more of the following: Death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding $10M.
Critical	2	Could result in one or more of the following: Permanent or partial disability, injuries, or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding $1M but less than $10M.
Marginal	3	Could result in one or more of the following: Injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding $100K but less than $1M.
Negligible	4	Could result in one or more of the following: Injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than $100K.

The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle not all hazards pose an equal amount of risk to personal or system safety. During the performance of hazard analyses, *BRT/BCAG* will identify any Category 1 Catastrophic and Category 2 Critical hazards. These hazards will be addressed immediately. These issues will be monitored using the Hazard and CAP logs.

4.2.2 Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event occurs to the total number of trials in which this event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per units of time, miles, trips/runs or passengers carried. Table 2 identifies the probability thresholds used by the *BRT/BCAG* for hazard assessment. A hazard probability may be derived from the analysis of transit system operating experience, evaluation of safety data or from historical safety data from other passenger bus systems and/or demand response.

Table 2: Definition of Exposure

PROBABILITY LEVELS			
Description	**Level**	**Specific Individual Item**	**Fleet or Inventory**
Frequent	**A**	Likely to occur often in the life of an item	Continuously experienced
Probable	**B**	Will occur several times in the life of an item	Will occur frequently
Occasional	**C**	Likely to occur sometime in the life of an item	Will occur several times
Remote	**D**	Unlikely, but possible to occur in the life of an item	Unlikely, but can
Improbable	**E**	So unlikely, it can be assumed occurrence may not be experienced in the life of an item	Unlikely to occur, but possible
Eliminated	**F**	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated	Incapable of occurrence. This level is used when potential hazards are identified and later

Table 3: Risk Assessment Value

RISK ASSESSMENT MATRIX				
SEVERITY PROBABILITY	**Catastrophic** **(1)**	**Critical** **(2)**	**Marginal** **(3)**	**Negligible** **(4)**
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (D)	Eliminated			

4.3 Safety/Risk Hazard Mitigation

Resolution of hazards utilizes the results of the Risk Assessment Process. The objectives of the hazard resolution process are to:

1. Identify areas where hazard resolution requires a change in the system design, installation of safety devices, or development of special procedures;
2. Verify hazards involving interfaces between two or more systems have been resolved; and
3. Verify the resolution of a hazard in one system does not create a new hazard in another system.

The following methodology to ensure system safety and security objectives to eliminate or control hazards. These controls are implemented throughout design, construction, procurement, and operations:

1. Design out hazards or design to minimize hazard severity to the extent permitted by cost and practicality. Identified hazards are eliminated or controlled by the design of equipment, systems, and facilities.
2. Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design which are controlled to an acceptable level using fixed, automatic, or other protective safety design features or devices. Provisions are made

for periodic performance of functional checks of safety devices and employee training to meet system safety objectives.

3. When design, training, and safety devices cannot reasonably nor effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons of the hazard.

4. Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures and training are used to control the hazard. Cautionary notations are standardized for use by all persons involved and safety-critical issues will require certification of authorized personnel.

The Initial Risk Index defines the magnitude of any specific hazard item without implementation of design, construction, procurement, or operational measures to control or mitigate the risk.

The Safety Manager will identify sets of proposed mitigation actions to eliminate or control each identified risk and evaluate the Residual Risk Index, based on those mitigating actions, to assess the potential effectiveness, and inform the GM of the determination of whether the hazard is adequately controlled or mitigated.

Part III - Safety Assurance

Chapter 5 - Safety Assurance

5.1 Performance Monitoring and Measurement

5.1.1 Accident Investigation

All employees and contractors are expected to comply with *BRT/BCAG*'s accident and incident reporting procedures and use the forms prescribed. Roles, responsibilities, and accident reporting thresholds are outlined in the procedure, including accident notification, reporting, and investigation throughout the organization. The level of investigation required is dependent on the seriousness of the event.

Each accident/incident is investigated as specified in the *BRT/BCAG* Accident Investigation Plan (AIP). The AIP complies with 49 CFR Part 672 and 673, State Safety Oversight Rule for bus incidents/accidents.

5.1.1.1 Accident / Incident Investigation and Reporting Criteria

BRT/BCAG must make reports available to DOT and the MPO regarding accidents/incidents. The Safety Manager conducts internal accident investigations on its behalf, unless otherwise notified.

All investigations conducted by *BRT/BCAG* will follow the Accident Investigation Plan.

DOT/MPO may participate in the investigation process when it is conducting the investigation on DOT's behalf. If DOT elects to address an investigation of accidents or incidents, *BRT/BCAG* may also conduct an independent investigation.

5.1.1.2 Internal Notification of Accidents/Incidents and Unacceptable Hazards

In the instance where an accident or incident occurs, the Supervisor or frontline employee will notify the established contact personnel included in the Emergency Notification list that an accident/incident has occurred. The Supervisor will provide the time of the occurrence, the location, and any other important details. The Emergency Notification Group includes the notification to the established appointed contacts at the location.

5.1.1.3 Notification of Accidents and Incidents to External Agencies

Recordable accidents tracked by *BRT/BCAG* and made available to DOT, MPO and FTA

1. Fatality (occurring at the scene or within 30 days following the accident):
2. One or more persons requiring immediate medical treatment away from the scene of the accident
3. One or more vehicles incurring disabling damage and needing to be towed from the scene of the accident as result of the accident.

Job related employee fatalities shall be reported to OSHA within 8 hours of occurrence. In-patient hospitalization, amputation, or eye loss shall be reported within 24 hours.

Pursuant to the NTD Safety and Security Reporting Manual, **substantial damage** is defined as damage to any involved vehicles, facilities, equipment, rolling stock, or infrastructure that:

1. Disrupts the operations of the transit agency

2. Adversely affects the structural strength, performance, or operating characteristics of the vehicle, facility, equipment, rolling stock, or infrastructure, requires towing, rescue, on-site maintenance, or immediate removal prior to safe operation.

Substantial damage excludes damage limited to:

1. Cracked windows;
2. Dents, bends, or small puncture holes in the body

5.1.1.4 Accident/Incident Reporting and Documentation

Each bus investigation conducted on behalf of DOT must be documented in a final report that includes a description of investigation activities, findings, identified causal factors, and a corrective action plan, if applicable. All accident reports must follow the requirements established in the Accident Investigation Plan. At its discretion, and as specified in its accident investigation plan, *BRT/BCAG* may separate its investigation report into two parts:

1. Description of investigation activities, investigation findings, and determination of the most probable cause and additional contributing causes; and
2. Recommendations to prevent recurrence, including a corrective action plan which implements the recommendations.

BRT/BCAG prepares written accident and unacceptable hazardous condition reports on standard forms. Such written reports are maintained. Reports contain the most probable cause, other contributing causes, corrective action plans, and a schedule for implementing corrective actions.

The status investigation reports at a minimum shall include:

1. Minutes of any meeting held by a local safety ad hoc reportable event investigation committee or contractor;
2. Disclosure of any immediate corrective actions of planned or completed principal issues or items currently being evaluated; and
3. Overall progress and status of the investigation.

Written reports are filed for all occurrences that fall into the category of an accident, incident, or injury. The Safety Manager files a monthly statement of all accidents, incidents, unacceptable hazardous conditions, and tracks open corrective action items through completion.

In addition, *BRT/BCAG* maintains a file of the annual safety performance report in a format available for review by DOT at any time during an investigation. The report shall be prepared and a full briefing on the known circumstances of the event, status of *BRT/BCAG*'s investigation and investigation activities.

Reports and records of accident investigations submitted to DOT by *BRT/BCAG* as well as related reports and records produced by both DOT and *BRT/BCAG*, will be treated as confidential information, and will not be released without concurrence by both DOT and *BRT/BCAG*.

5.1.2 Safety Data Acquisition

BRT/BCAG has the responsibility to monitor the safety performance of operations. The Safety Manager is responsible for compiling and analyzing all safety data to determine if safety performance meets established safety goals. This data includes injuries to passengers, contractor personnel, public; potentially hazardous equipment failures; unacceptable hazardous conditions, and rules as well as procedure violations. A closed-loop reporting system for identifying and monitoring safety-related items has been established. To close out each incident, safety verification activities and results are reviewed and audited by the General Manager and reviewed by the Safety Manager. The Safety Manager is responsible for providing safety data to the General Manager for review. The Safety Manager monitors Safety Key Performance Indicators utilizing several tools and provides monthly progress updates to the GM.

Tracking of hazard related-data is used to identify trends. These trends are further analyzed and/or investigated to determine causal factors. Tools available to the Safety Manager include Risk-Based Analysis, Monthly Performance reviews, EVR data, and data analysis and trends.

The Safety Manager is responsible for information regarding accidents, incidents, hazardous conditions, and operations which are obtained from different reporting mechanisms. These include but are not limited to: Accident/Injury Reports and Investigations, Incident Reports, Daily Operations Summaries, Operator, and Supervisor Reports; Employee/Occupational Injury reports, mining of maintenance data, analysis of vehicle records, and procurement contracts.

5.1.3 Internal Audits

The purpose of internal system safety audits is to perform an official evaluation of accomplishments, problems, and trends related to safety and to evaluate the effectiveness of the implementation of the Agency Safety Plan. The Safety Manager is responsible for the direction of the safety reviews and audits of its contractors to determine performance related to the Safety goals and objectives.

Organizational functions subject to the safety audit process include:

- Facility inspections
- Maintenance audits/inspections
- Review of rules, standard operating procedures, special bulletins, and orders
- Review of training/re-certification programs
- Emergency response planning, coordination, training
- Configuration Management
- Systems modifications (review and approval)
- Safety data analysis
- Employee safety programs
- Hazardous materials program
- Interdepartmental safety goals and objectives
- Occupational safety and health programs

- Contractor safety
- Procurement and specification engineering
- Drug and Alcohol Testing Program
- Any aspect or responsibility as outlined in this document

BRT/BCAG and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity including documentation, practices, and compliance with the Agency Safety Plan and other requirements. The Safety Manager reviews training, practices, and procedures to correct deficiencies identified during the performance of audits or other safety activities, including inspections and emergency drills.

5.1.3.1 Safety Audit Process

The Safety Manager is responsible for the management of the Internal Safety Audit Program. All *BRT/BCAG* employees and contractors are required to cooperate fully with Safety and Security personnel. Executive and senior managers ensure their areas participate fully in the safety audit process.

5.1.3.2 Integrity of the Process

To maintain the integrity of the review process, an external audit team is used to conduct safety audits. The Safety Manager does not perform audits/reviews of those functions and elements for which it is directly responsible to implement. No team member shall audit a function or activity for which they are responsible.

5.1.3.3 Auditing Cycle

The Internal Safety Audit Process is intended to be an ongoing, continuous safety review process. Over a three-year period, all elements of the ASP must be audited at least once. The Internal Safety Audit Process is intended to be an ongoing, continuous safety review process. It is intended that at least 2 components of the ASP will be audited per year. The schedule is revised as necessary to accommodate schedules for auditors and the audited divisions. The Audit Schedule presented in this section is as follows:

·· Year 1

1. Full SSPP (expected to be the last SSPP Audit)

·· Year 2

1. Safety Promotion:

   a. Training Program
   b. Safety Communication

2. General Requirements

3. Safety Policy

   a. Safety Management Policy
   b. Employee Safety Reporting
   c. Key Management & Responsibilities

·· Year 3

1. Risk Management

   a. Risk Management
   b. Safety Hazard Identification Safety Risk Assessment
   c. Safety Mitigation
   d. Safety Assurance:
   e. Performance Monitoring and Measurement
   f. Management of Change
   g. Continuous Improvement

An annual audit schedule must be developed, reviewed, maintained and updated to ensure all elements are reviewed during the three (3) year audit cycle.

The Safety Manager notifies the division/organization a minimum of 30 days in advance of a scheduled safety audit.

5.1.3.4 Checklists and Performance of Safety Audits

The checklists include the elements on which the department will be audited. Checklists are prepared during the review of the Agency Safety Plan section, documents referenced in the Agency Safety Plan section, previous audits, and corrective actions.

Pre-audit and post-audit conferences are held by the audit team with the entity being audited. The safety audits are comprised of record reviews, interviews, field observations, and inspections and measurements to verify the accuracy of documentation and spot inspections of facilities and equipment to verify compliance with the Agency Safety Plan, procedures, codes, and regulations.

5.1.4 Rule Compliance

All *BRT/BCAG* employees and its contractors are responsible for the prevention of accidents, identification of hazards, and resolution of such hazards. Reports of all accidents, incidents, occurrences, deficiencies, near misses and defects will be maintained by the Manager of the appropriate department.

BRT/BCAG is assigned the responsibility for the safe operation of vehicles.
Responsibilities include:

- Preparation and implementation of safe operating policies, plans, rules and procedures.
- Development of safety policies, plans, rules, and procedures for safe operation and maintenance.
- Personnel are annually re-trained in the proper performance of all applicable safety-related rules and procedures that cover their specific job function.
- Ensure the number of hours worked during a seven-day period does not exceed DOT limits;
- Ensure the number of consecutive days worked does not exceed DOT limits;
- Employees are provided copies of safety and emergency rules, procedures, and policies that affect them;

- Monitoring adherence to safety-related operating and maintenance policies, plans, rules and procedures through periodic in-service evaluations using the "Observation Report Form" by *BRT/BCAG* Supervisors or a Manager. All deficiencies are reported, in written form, for review, re-instruction, or re-training. Supervisor Driver Evaluations, and rule conformance frequency shall follow the requirements outlined in Employee Qualifications & Rule Book;
- When necessary, performance coaching or re-instruction training for Supervisors is performed by *BRT/BCAG*. Supervisors are expected to comply with all rules and enforcement thereof, as they apply to the management of bus service and the management of personnel. Additionally, Supervisor skills are assessed annually from participation in the driver Recertification Program;
- Personnel, whose safety record requires follow-up, additional training or discipline, including discharge, are identified through maintenance of records
- *BRT/BCAG* will be required to develop a preventive maintenance schedule, for each system hardware element, which is designed to maintain system safety. Reported deficiencies and defects in equipment and facilities are corrected and monitored to assure satisfactory resolution. Only equipment known to be free of safety-related defects are placed into service.

5.1.5 Inspections

BRT/BCAG must be effective to ensure all systems, equipment and facilities operate as required, or in the event of failure or degradation of functionality, operational safety is not compromised. This aspect of maintenance directly pertains to the safety of transit customers, emergency response agencies, the public, employees and subcontractors of transit.

5.1.5.1 Safety Inspections

Safety inspections will be conducted by the Safety Manager and/or the department heads. The inspections will be unannounced and documented with checklists and photos. Safety inspections perform by the contractor will be done in accordance to their company guidelines and procedures.

5.1.5.2 Facilities Inspections

All operating, and maintenance facilities will undergo a complete inspection by the Contractor at least once a year to ensure the safety and health of employees. Individual maintenance shops within the maintenance facilities are inspected monthly. Inspection reports are issued which list the hazards and the safety and health problems found during the inspection. Hazards identified during the inspection process are subject to the hazard management process. Follow-up inspections and reports are completed within 30 days. If the findings of the inspection can't be resolve within 24 hours, a work order will be opened and tracked until the finding is resolved.

5.1.5.3 Equipment Inspections

Inspections of facility equipment are made in accordance with appropriate maintenance manuals and procedures. The Maintenance Manager will ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are entered the Hazard Tracking Log as appropriate and tracked until closure is achieved.

5.1.5.4 Vehicles

All vehicles are maintained at a minimum in accordance with manufacturer recommendations. Most of the maintenance is time driven based maintenance. Maintenance is tracked and coordinated through time schedules, which are maintained by the contractor. All records are currently maintained in a manual database under completed maintenance for each vehicle. All hard copies are kept and in independent books for each vehicle for 1 year. All work completed for each vehicle is tracked through assigned repair order numbers for all repairs, or, designated maintenance inspection intervals. AGENCY is responsible for document control.

Maintenance schedules will follow a progressive preventative maintenance cycle starting with the lowest mileage (routine inspection) through mid-level and major inspections. All vehicle inspections cover the equipment progressing at higher levels of detail for each inspection. Once the highest level of inspection is reached, the cycle starts again. In conjunction with the inspection cycle, mid-level and major overhauls are scheduled. These are time-based overhauls and rebuilds of major equipment per the manufacturer requirements.

The maintenance criteria described above is strictly followed. If a bus is at the mileage or time requirement and the scheduled maintenance is not complete, the bus must be removed from service until the required maintenance is complete. No vehicles can carry passengers in service with any DOT Out OF Service violations/criteria.

5.1.5.5 Resolution of Review/ Inspection Findings

Each facility inspection report is sent to create the appropriate work orders, if applicable It identifies specific areas and targets specific recommendations for corrective action. Unacceptable hazards identified are reported to the Safety Manager.

Work Orders are generated for defects identified during Fleet Maintenance, Facilities Management and Systems Maintenance inspections.

5.1.6 Hazardous Material & Local, State & Federal Regulations

The Occupational Safety and Health program is directed towards achieving a safe working environment for employees and minimizing the likelihood of accidents. The program emphasizes the recognition, evaluation, and control of hazards arising in and from the occupational environment.

5.1.6.1 Facilities Inspections

BRT/BCAG operating, and maintenance facilities undergo a complete inspection by the contractor at least once a month to ensure the safety and health of employees. Individual maintenance shops within the maintenance facilities are inspected monthly. Inspection reports are issued which list the hazards and the safety and health problems found during the inspection. Follow-up inspections and reports are completed within 30 days.

5.1.6.2 Hazardous Materials Control

BRT/BCAG is fully aware of the importance of employee chemical safety programs and the duty to comply with legally mandated hazardous materials rules and regulations.

BRT/BCAG's Hazard Communication Programs complies with Title 29 Code of Federal Regulations Part 1910.1200, Hazard Communication Program. The Hazard Communication

Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections. When necessary, consultants may be hired for special projects such as indoor air quality, chemical vapor and particulate sampling.

The Safety Manager reserves the right to reject a product if it is deemed either too hazardous for employee use or is unable to provide adequate safeguards or protection.

The SDS review/request procedure, which requires SDS review and approval by the Safety Manager or designee is included in the Hazard Communication Program. These programs are the responsibility of the affected division and the Safety Manager. Program effectiveness is reviewed via the Internal Safety Audit Process. Safety Data Sheets (SDS) for all hazardous materials considered for purchase and use are reviewed by the contractor for approval. The user furnishes the manufacturer's SDS for hazardous products and information on the planned use and application methods. Follow-up is conducted on the field use of approved products to ensure safe/proper handling methods are utilized. The Maintenance Manager is responsible for keeping current files of all SDS.

5.1.6.3 Personal Protective Equipment

All personal protective equipment used by *BRT/BCAG* personnel is reviewed and approved by the Safety Manager in accordance with respiratory, hearing conservation, electrical gloves and other applicable safety standards.

5.1.6.4 Safety/Industrial Hygiene Training and Education

BRT/BCAG provides training to employees in basic, safe work practices and hazard identification. Employees exposed to chemicals and/or potentially overexposed to physical agents receive training in industrial hygiene principles, use and care of personal protective equipment and hazards and safe handling methods of chemicals.

5.1.7 Drug & Alcohol Program

BRT/BCAG is certified as a drug-free workplace and complies with all provisions of the U.S. Department of Transportation, Federal Transit Administration, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs.

Covered employees receive a minimum of 60 minutes of training on the effects and consequences of prohibited drug use and additional training on the effects of alcohol on personal health, safety, the work environment, and on the signs and symptoms that may indicate prohibited drug use. Supervisors will, in addition to the covered employee training, receive an additional 60 minutes of training on the physical, behavioral, speech and performance indicators of probable drug use.

Transdev Services, Inc. is responsible for administering the Drug and Alcohol-Free Workplace regulations. *BRT/BCAG and Transdev Services Inc.,* managers are responsible for administering the Substance Abuse Policy.

Drug and alcohol testing are required under the following circumstances:

- Drug testing shall comply with DOT regulations and test for the following substances:
  - Marijuana
  - Cocaine
  - Phencyclidine (PCP)
  - Amphetamines (e.g. racemic amphetamine, dextroamphetamine, and methamphetamine)
  - Opioids (e.g. heroin, morphine, codeine)

- Pre-Employment, including placement of an existing employee in a safety sensitive position (drug test only)
- Reasonable suspicion that an employee has used a prohibited drug or misused alcohol
- Post-accident following certain types of accidents
- Random testing for safety sensitive personnel
- Return to duty following completion of drug/alcohol rehabilitation program
- Follow-up testing for employees who have sought and completed a treatment program. Under the FTA drug testing regulations for employees in safety sensitive positions, laboratory tests on urine specimens are conducted for five types of drugs or their metabolites.

5.1.8 Employee Safety Reporting

Safety reporting is an essential part of SMS. *BRT/BCAG* management must foster an atmosphere of trust that encourages and rewards employees for providing safety-essential information, even if it is self-incriminating, without fear of reprisal. An effective SMS empowers employees with the confidence to raise concerns that may lead to serious safety/quality error and assures them someone will listen to them and investigate their issues or concerns in a professional manner — all without fear they will face unduly harsh penalties for admitting to genuine mistakes.

A robust employee safety reporting system will provide:

- Unique – Information you can't get any other way
- Authentic – Individuals who know best are directly providing the information
- Timely – Direct reporting overcomes time lag of mandatory reporting processes
- Diverse – Information from different individuals with different experiences and perspectives
- Comprehensive – Multiple reports over time reveal patterns, trends, and the scope of an issue
- *Anonymity and Protection – Employees able to report observations or conditions that may require addressing by safety program.*

BRT/BCAG will implement an Employee Self Reporting program that will:

- Incentives employees to report any safety related situation
- Emphasize benefits for safety, not safety record
- Establishes clear guidelines for unacceptable behavior
- Balance learning and accountability

- *Establishes several methods for employees to report safety issues utilizing:*
  1) *direct email contact to the Chief Safety Officer, General Manager or Accountable Executive*
  2) *in person reporting to Chief Safety Officer, General Manager or Accountable Executive*
  3) *Anonymous Comment box in Employee break room*

As we know self-reporting is not a get out of jail free card. It is a process that if what happened was a real mistake, the focus will be on re-education and not on the punitive action.

The following table presents a guideline in cases of safety events:

What is important to emphasis is any cultural change in the organization will take time to be fully implemented and see the results of these changes.

Human Error	At-Risk Behavior	Reckless Behavior
An inadvertent action – slip, lapse, mistake	A choice – risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: > Processes & procedures > Checklists > Training > Design	Manage through: > Increase situational awareness > Remove incentives for at-risk behavior > Create incentives for safe behavior	Manage through: > Remedial action > Punitive action

5.2 Management of Change

Configuration Management requirements will be included in all contracts to ensure changes to the design of equipment and facilities, after design reviews, are adequately documented and approved. The configuration management process uses baseline management to ensure the technical baseline is defined and controlled throughout the maintenance and operation phase, and the end products satisfy the technical and operational requirements derived from the system needs.

Selected documentation, such as as-built drawings, manuals, procedures, and other documents, are formally designated and approved as part of the technical baseline and are under *BRT/BCAG* control for future capital projects, all documents related to the segment/phase that are under the control of a contractor will be turned over for control and maintenance following completion of said phase.

For future capital or Maintenance improvement projects, the designated contractor shall be responsible for quality control testing and inspections if required in accordance with an approved Quality Control Plan.

Additions or modifications to Bus Operations Standard Operating Procedures (SOP), and to the existing configuration of presently operating system fixed facilities, rolling stock, and equipment directly related to operation of rolling stock, are approved by the Regional Vice President of Operations. These reviews are established to ensure system and operational changes are approved prior to implementation, and drawings, manuals, and other related documents, including training programs, are updated to reflect these changes, which are also reflected in the Maintenance Management Plan.

Upon the approval of any system or operations change *BRT/BCAG* will create a Special
Instruction or create and/or revise current Standard Operating Procedure to advise affected
employees. Supervisors will distribute, individually to each employee, the new control
document, ensuring each employee understands the operational change as it applies to their
job. Each employee is required to sign for their copy and place the updated material into their
SOP book.

5.3 Continuous Improvement

Continuous improvement is measured through monitoring safety performance indicators.
Progress is related to the maturity and effectiveness of the SMS. Safety assurance processes
support improvements to the SMS through continual verification and follow-up actions. These
objectives are achieved through the application of internal evaluations and independent audits
of the SMS. Compliance of this requirement is indicated when:

- The Safety Committee has the necessary authority to make decisions related to the
  improvement and effectiveness of the SMS; or

- The SMS is periodically reviewed for improvements in safety performance.

This element is satisfied when the organization routinely monitors the SMS performance to
identify potential areas of improvement and the outcomes of this process lead to improvements
to the safety management system.

Best Practices

- There is evidence of lessons learned being incorporated into the policy and procedures;
- The organization benchmarks its SMS against other organizations and is an active
  promoter of SMS within the transportation industry;
- Best practice is sought and embraced;
- Surveys and assessments of organizational culture carried out regularly and acted upon;
- For safety related services the organization requires contracted organizations not
  required by regulations to have an SMS; and
- Contractors can participate and share information in the SMS

5.3.1 Agency Safety Plan Annual Review Process

BRT/BCAG has the authority for the development, implementation, and management of the
ASP. It also has the primary responsibility of implementing the ASP with oversight and
review by the General Manager. Annual review of the ASP is mandatory and *BRT/BCAG*
specific responsibilities within the ASP framework include, but are not limited to:

a. By September of each year notify the Safety Manager of any recommended changes
   to the ASP for review and approval by the General Manager
b. Revisiting the ASP annually to reflect changes in organizational structure and new
   systems that require significant changes in operation
c. Review progress on goals and objectives
d. Refine and improve on the current goals and objectives of the SMS program
e. Identify new tasks or objectives to respond to system growth or any new regulations
   that effect safety and security

f. Identify any additional or emerging safety or fire/life safety-related tasks and responsibilities.

On-going review and revision of the ASP ensures the document remains current.

Part IV - Safety Promotion

Chapter 6 – Safety Promotion

6.1 - Competency & Training Program

6.1.1 Overview

Safety training is conducted on facilities, equipment, and vehicles. Operating rules and standard operating procedures (SOPs) will be prepared by *BRT/BCAG* and provided to all personnel. The Safety Manager oversees the formulation of training programs and records. The General Manager and Manager of Operations maintain SOPs and Rules and maintains all records, which are kept at the facility.

BRT/BCAG periodically completes reviews and oversight activities associated with the training program. Activities or functions judged to be safety-critical may require special training and/or certification. This ongoing training is included in regular safety meetings and all documentation is also kept at the facility.

Refresher training is accomplished at least annually for operations and maintenance employees and when situations related to employee performance warrant it. Emergency responders are also trained during the pre-revenue period and during drills that occur at least annually. These are also documented, and records retained at the facility.

6.1.2 Employee Safety

6.1.2.1 Operations Personnel Training

All bus operators will be required to successfully have completed the *BRT/BCAG* bus operation training program (Operator Development Program). This course covers Standard Operating Procedures and Operator Rules that govern the operation. New Operators are also provided Behind The Wheel training by a certified Instructor.

New Bus Operators are also evaluated by established Operators and Supervisors using an Observation Report Form. New Operators must meet all criteria satisfactorily or they receive additional training. The Safety Manager, on a separate occasion prior to certification, will determine whether each Operator demonstrates safe control of the revenue vehicle or needs additional training. Each Operator is certified with both written and practical testing to validate operational readiness.

Annually, each operator is given a refresher course on the rules and procedures and will re-certify with written and practical testing. The re-certification may consist of one or more of the following: a quiz, a checklist, a test, and a demonstration of troubleshooting techniques. Any person who fails the annual examination is given special retraining.

Updated training materials will be developed under coordination by the Manager of Operations / Safety personnel and Supervisors prior to the opening of any new bus extension or major

modification to the existing routes or introduction of new vehicles. Operations personnel will be certified by either written or practical testing.

BRT/BCAG operators are subject to periodic in-service evaluation or Operators by Route Supervisors who monitor their compliance to rules and procedures outlined in the Rule Book and SOPs. Route Supervisors shall complete a Driver Evaluation Form after completion of the in-service evaluation and will review the information in the report with the Operator. Positive reinforcement is given as warranted. Operators observed violating rules or procedures may be subject to progressive discipline.

BRT/BCAG will maintain a Rule Violation Log that chronicles violations each month and administers all disciplinary actions, retraining, re-instructions, and determines the consequence of any rule violations. Supervisors are provided training periodically and also receive Operational Safety Leadership courses on-line through a *BRT/BCAG* E-Learning portal.

6.1.2.2 Maintenance Personnel Training

Maintenance requirements, methods, and procedures for the facility equipment and systems will be described in manuals, handbooks, and other documentation developed for the training and certification of maintenance personnel. Use of personal protective equipment, emergency equipment, and safety instructions are included within the training program.

Maintenance personnel are required to operate buses, heavy equipment, or other specialized vehicles/equipment/apparatus and will be certified by both written and practical testing to document the employee's knowledge of safety and operating procedures and skill in the proper and safe operation and procedures. Annually, each employee will re-certify in the proper and safe use of the equipment/vehicles with written and practical testing. Any person who fails the annual examination will be given special retraining.

6.1.2.3 Safety Training

Safety information on approved methods and procedures are used in manuals, handbooks, and other documentation developed for the training and certification of operators and maintenance personnel. Identification of protective devices and emergency equipment are included in the training documentation and instruction. In addition, safety posters and notices are used, as appropriate, to enhance awareness during all phases of system operations. Proficiency demonstrations and certifications are required of all operators and maintenance personnel. Safety concerns are incorporated in briefings given to personnel prior to their working with hardware or facilities. The Safety Manager will make reviews of the safety training program every six months to ensure training materials and programs remain consistent with employee needs.

6.1.2.4 Emergency Response Personnel Training

Training to familiarize fire, police, and emergency service personnel with facility requirements is coordinated through and conducted by *BRT/BCAG*. Emergency preparedness and response drills are developed by *BRT/BCAG*. Training classes, drills, and after-action reviews are then conducted with emergency service personnel and AGENCY personnel to:

- Ensure the adequacy of emergency plans and procedures
- Ensure readiness of the *BRT/BCAG*'s personnel to perform under emergency conditions

- Ensure effective coordination between the *BRT/BCAG* and emergency response personnel and outside agencies.

6.1.3 Contractor Safety

Contractors, not part of operations activities associated with the facility must seek approval, in writing, from *BRT/BCAG* to perform work on property and infrastructure.
BRT/BCAG must ensure the requesting party abides by AGENCY safety requirements. Requirements include but are not limited to: reflective safety vests, safety signaling to operators, and an understanding of all unsafe conditions. *BRT/BCAG* may require contractors to attend safety classes prior to approval and issuance of an Access Permit; this requirement depends on the work request. *BRT/BCAG* will determine which contractors shall attend such classes and receive certification prior to the approval and issuance of an Access Permit when necessary.

6.1.4 Record Keeping

Personnel records of all training activity by employees are maintained by *BRT/BCAG*.

6.1.5 Compliance with Training Requirements

The internal audit process includes the means of determining that all necessary training is conducted and documented including the proper qualification of operating and maintenance personnel. Training materials, testing, and grading processes are reviewed and evaluated for completeness and accuracy.

The audit process is guided by the following criteria related to training compliance:

- Identify training requirements for all personnel related to safety. This encompasses initial and refresher training of procedures, equipment uses, and manufacturers' training. Also reviewed is retraining requirements identified due to accident or incident investigations.
- Review all training programs identified for safety adequacy.
- Assess the effectiveness of the training programs and on-the-job experience by the conducting emergency scenarios, drills, audits, and evaluations. These job evaluations are based on job performance, statistical trends, and public feedback.
- Review employee performance, including employee records and conduct in-person interviews to confirm technical knowledge and issues.
- Evaluate training provided to operations personnel and emergency response personnel when substantive operational changes are made, or with the introduction of new equipment, facilities, or specialty vehicles

6.2 Safety Communication

BRT/BCAG has a robust Safety Communications program consisting of:
- Monthly Safety Meetings Initiative
- Topic-specific videos, posters, bulletins addressing risk-prioritized defensive driving and injury prevention topics
- Safety Campaigns
- Local management communications
- Intranet Communications
- Safety Posters and Bulletins

APPENDICES

Appendix 1 – Authority:

Appendix II – Transit Agency

Appendix III – Vehicle Descriptions:

Appendix IV – Maintenance Facility:

In November of 2016, BCAG/BRT began delivering Fixed Route and Paratransit services from a newly constructed 10 - acre campus facility at **326 Huss Drive in Chico, CA** composed of the following facilities and buildings:

- 15,200-square foot Administration and Operations Building:
  The Butte County Association of Governments/Butte Regional Executive and Staff operate on the north side of this building directly overseeing Transdev Services, Inc. performing management, operations and maintenance of Butte Regional Transit BLine services in Butte County on the south side of the building.

- 16,800-square foot maintenance building:
  All fixed route and paratransit vehicles are serviced and repaired in the six (6) bay maintenance building. Services performed are routine oil and Preventative Maintenance (PM) services. Also performed are repairs to bus chassis, mechanical and electrical components along with some engine and transmission repairs as needed.

- 5,222-square foot fueling facility (20,000 - gallon Renewable Diesel underground tank & 12,000 - gallon Gasoline underground tank), Money Room, Vault, Storage and Lubrication Station
  All fixed route and paratransit vehicles are cleaned and fueled daily upon return from daily routing. Oil and lubrication can be performed at the fueling island as needed. All fares are counted and collected in the secure money room daily.

- 3,968-square foot bus wash facility:
  All fixed route and paratransit vehicles are washed weekly or as needed to maintain a clean appearance of all BLine vehicles used in fixed route and dial a ride services.

- 9,000-square foot Board Chambers, conference rooms and additional office space
  The BCAG/BRT Board meets monthly in the Board Chambers to carry out all functions and policies of a dual - purpose Executive Board executing the functions of the Joint Powers Agency Agreement for the region of Butte County as the Regional Transportation Agency Planning Agency (RTPA), Metropolitan Planning Organization (MPO) and Transit Agency Policy Board.

Appendix V – Safety Performance Indicators:

1. **Total number of Fatalities:** _____
2. **Total number of Fatalities per vehicle revenue mile, by mode:** _____
3. **Total number of reportable injuries:** _____
4. **Total number of reportable injuries per vehicle revenue miles, by mode:** _____
5. **Total number of reportable events:** _____
6. **Total number of reportable events per vehicle revenue mile, by mode:** _____
7. **Mean Distance between Failures (breakdowns):** _____

Note: Rates evaluated, calculated and reported in incidents per 100,000 vehicle revenue miles and reported annually to the BCAG/BRT Board of Directors.

Fatalities: Total number of fatalities occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a transit maintenance facility or rail yard, during a transit related maintenance activity or involving a transit revenue vehicle that results in one or more of the following conditions and summarized per total vehicle revenue miles by mode annually.:

Reportable injury
An injury resulting from a Reportable Event requiring immediate off-site medical attention and summarized per total vehicle revenue miles by mode annually.

Reportable/Safety Event
A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a transit maintenance facility or rail yard, during a transit related maintenance activity or involving a transit revenue vehicle that results in one or more of the following conditions and *summarized per total vehicle revenue miles by mode annually.:*

Non-Rail Modes:

• A fatality confirmed within 30 days of the event
• An injury requiring immediate medical attention away from scene for one or more person
• Property damage equal to or exceeding $25,000
• Collisions involving transit revenue vehicles that require towing away from the scene for a transit roadway vehicle or other non-transit roadway vehicle
• An evacuation for life safety reasons

System Reliability: Safety Performance Indicators and their measurement per a given criteria and quantified reporting will establish a level of reliability which can be compared against an industry standard. There is no established metric or benchmark defining reliability. For qualitative purposes it is accepted that "per 100,000 vehicle revenue miles" reporting as established by the National Transit Database (NTD) requirement will rank our system with others which in and of itself draws conclusions about system reliability.

Performance Targets 2020:

Transdev Chico Safety Goals					
Preventable Vehicle Collisions	Preventable Vehicle Collision Frequency Rate	Preventable Employee Injuries	Preventable Employee Injury Rate	Passenger Injuries	Passenger injury Frequency Rate
17	0.96	4	3.83	13	0.73

Appendix VI –Annotated Revisions per FTA TAC review

Agency Name	Plan Version	Review Version	Submitted to FTA
Butte Regional Transit/Butte County Association of Governments	Draft 3/20	01	04/15/2020

Agency type: ☒ Transit agency ☐ State DOT ☐ Other	Document type: ☒ Full ASP ☐ Partial ASP ☐ Other

Review of Draft Public Transportation Agency Safety Plan — *Bus Transit*

Notes

This document pertains to the voluntary participation of a public transportation agency or State DOT in the review of its draft Agency Safety Plan (ASP) (or related document) and is provided for technical assistance purposes only.

FTA based this review of the voluntarily-submitted draft ASP or other document listed above, on the guidance contained in the Public Transportation Agency Safety Plan Checklist and the Public Transportation Agency Safety Plan Template for Bus Transit and on the requirements in 49 C.F.R. Part 673 (Part 673). The completed checklist contained on the following pages is intended to be used strictly by the participating agency as a tool for further development of an ASP that meets these requirements. Neither the "completed" checklist items (i.e., items marked with an "X") nor any comments provided by the reviewer(s) constitute a "verification" or "certification" of "compliance" with Part 673.

This checklist has been modified to facilitate the review of the submitted draft ASP. The original template is available at https://www.transit.dot.gov/regulations-and-guidance/safety/public-transportation-agency-safety-program/guidance-and-templates.

The full text of Part 673 is available at http://www.transit.dot.gov/PTASP.[1]

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[1] Version 1, 10/1/19

The guidance in this document is not legally binding in its own right and will not be relied upon by the Federal Transit Administration 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

The Agency Safety Plan specifies:

☒	Checklist Item	ASP Page Number	Comments
☒	Name(s) and address(es) of the transit agency(ies) that the Agency Safety Plan applies to.	2	
☒	Mode(s) of transit service covered by the Agency Safety Plan.	2	
☒	Mode(s) of service provided by the transit agency (directly operated or contracted service).	8	
☒	FTA funding types. (e.g., 5307, 5337, 5339)	2	
☐	Transit service provided by the transit agency on behalf of another transit agency or entity, including a description of the arrangement(s).		***Observation(s)*** *The ASP should state if the transit agency is providing transit service on behalf of another transit agency or entity. If applicable, the ASP should include a description of the service that is provided.* ***RESPONSE/REVISION 5-21-20). Additional text has been added: "Butte Regional Transit is owned solely by BCAG/BRT" to the second paragraph of Executive Summary - Definitions***

Note to Reviewer(s): Please verify that the two individuals listed below meet the requirements in Parts 673.5 and 673.23(d). May require review of additional documentation as necessary.

☒	Checklist Item	ASP Page Number	Comments
☐	An Accountable Executive who meets requirements in § 673.5 and § 673.23(d)(1).	2, 10	<u>*Observation(s)*</u> *The ASP should specify that the Accountable Executive must meet the requirements specified in §673.5 and §673.23(d)(1).* *The ASP should include clear authorities, accountabilities, and responsibilities. In addition, this should be presented graphically with an organizational chart to denote lines of reporting and the relationship between the various agency and the contractor personnel.* <u>*Reference Material*</u> • *PTASP Frequently Asked Questions* • *Transit Asset Management State of Good Repair* • *PTASP Refresher Webinar* ***RESPONSE/REVISION: (5-21-20). Added language per stated Section and Codes for Accountable Executive and CSO and included an organization chart describing lines of communication and responsibility hierarchy.***

☒	Checklist Item	ASP Page Number	Comments
☐	A Chief Safety Officer or SMS Executive who meets requirements in § 673.5 and § 673.23(d)(2).	2, 10, 17	***Observation(s)*** *The ASP should specify that the Chief Safety Officer/SMS Executive must meet the requirements specified at §673.5 and §673.23(d)(2).* **See above RESPONSE/REVISION** *Part 673.23(d)(2) requires that the Accountable Executive must designate a Chief Safety Officer (CSO) or SMS Executive who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS. The Chief Safety Officer or SMS Executive must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer or SMS Executive.* *On page 14, the ASP states: "The General Manager accepts overall responsibility for safety at BRT/BCAG". The Safety Manager is listed as the CSO and is listed as reporting to the General Manager. Part 673 states, "…the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive."* *On page 6, the ASP lists a SMS Executive and a CSO. Part 673 states, "The Accountable Executive must designate a*

☒	Checklist Item	ASP Page Number	Comments
			Chief Safety Officer or SMS Executive who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS". *On page 10, the ASP states: "(2) Chief Safety Officer (CSO) or Safety Management System Executive (SMSE). The Manager of Safety, who reports directly to the General Manager, or other designee assigned by the ED, will serve as the CSO and the Accountable Executive when the ED or DD position is vacant or unavailable". The ASP permits the CSO to serve as the AE in the absence of the AE or DD position when vacant or unavailable. As stated in Part 673, the AE can serve as the CSO, but the rule does not extend to allowing the CSO to serve as the AE.* *The ASP should include clear authorities, accountabilities, and responsibilities. In addition, this should be presented graphically with an organizational chart to denote lines of reporting and the relationship between the various agency and the contractor personnel.* *<u>**Enhancements**</u>* *Consider strengthening the list of Authorities, Accountabilities, and Responsibilities for the Chief Safety Officer by aligning with or*

☒	Checklist Item	ASP Page Number	Comments
			incorporating by reference FTA's definitions at §673.5 and §673.23(d)(2). **_Reference Material_** • *CSO SMS Executive Fact Sheet* • *The Role of the Chief Safety Officer in Public Transportation Agency Safety Plan Implementation* ***RESPONSE/REVISION: (5-21-20) A single stamen has been added as follows under Part 1 – Safety Management Policy 1.0 General Safety Policy – "The General Manager accepts direction from the Accountable Executive and implements safety through direction to the CSO. Ultimate responsibility for the implementation of safety trough the SMS and CSO lies with the Accountable Executive. For clarification, any contradicting statements of authority and communication it this PTASP shall be superceded by this section."*** ***The purpose of this statement is to clear up any confusion presented in the remainder of the document. It is expressly understood that accountability goes from the Accountable Executive to the SMS to the CSO to the Staff. Our organization is very small and this hierarchy of established communication and authority is what we have been doing since 2005.***

2. Plan Development, Approval, and Updates

The Agency Safety Plan specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☒	Name of the entity that drafted the Agency Safety Plan (e.g., State Department of Transportation).	9	
☐	The Accountable Executive's signature on the Agency Safety Plan and date of signature.	6	***Observation(s)*** *On page 6 of the ASP, the Accountable Executive's (AE) name and title is provided. In addition, there is a placeholder for the AE's signature and date of approval.* *The final version of the ASP should include the signature and date.* ***RESPONSE/REVISION – (5-21-20) A signature will be provided on the final version***
☐	The Board of Directors' or Equivalent Authority's approval of the Agency Safety Plan and date of approval.	6	***Observation(s)*** *On page 6 of the ASP, the Board of Director's name and title is provided. In addition, there is a placeholder for the Board of Director's signature and date of approval.* *The final version of the ASP should include the signature and date.*

☒	Checklist Item	ASP Page Number	Comments
			RESPONSE/REVISION – (5-21-20) A signature will be provided on the final version ***Enhancement(s)*** *If the approval is recorded in another document, consider including the title and location of any relevant documentation, such as a resolution, memorandum, or meeting minutes that record the approval.*
☒	Certification of compliance with Part 673, including the name of the individual or entity that certifies the Agency Safety Plan and date of certification.	6, 8, 9	
☒	Process and timeline for conducting an annual review and update of the Agency Safety Plan, including the Agency Safety Plan version number and other relevant information.	6, 46	
☒	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.	6, 8, 9	

3. Safety Performance Targets

Note:

The *Public Transportation Agency Safety Plan Template for Bus Transit* specified that <u>seven</u> individual safety performance targets be set in this section but only included space for <u>four</u> safety performance targets. Please consider updating the section to include all seven safety performance targets as required, where both total numbers <u>and</u> rates per total vehicle revenue miles are considered for each of the first three safety performance indicators—fatalities, injuries, and safety events.

The Agency Safety Plan specifies performance targets, as defined in § 673.5, for:

☒	Checklist Item	ASP Page Number	Comments
☐	*Fatalities:* Total number of reportable fatalities and rate per total vehicle revenue miles, by mode.	54	<u>*Observation(s)*</u> *The ASP should specify rates for performance targets (e.g., rates for safety performance targets are calculated per 100,000 vehicle revenue miles).* ***RESPONSE/REVISION – (5/21/20) – Standard practice is to report ALL incidents on a per 100,000 basis and is reported annually to the Board. A note has been added to Appendix V.*** *The ASP should identify the time frame for evaluating performance targets (e.g., the safety performance targets will be evaluated over a fiscal year period with a baseline year of Fiscal Year 2021 [7/1/2020-6/30/2021]).* ***See above RESPONSE/REVISION*** <u>*Reference Material*</u>

⊠	Checklist Item	ASP Page Number	Comments
			• *National Public Transportation Safety Plan*. • *Safety Performance Targets Guide* • *Safety Performance Targets Webinar*
☐	*Injuries:* Total number of reportable injuries and rate per total vehicle revenue miles, by mode.	54	<u>*Observation(s):*</u> *Please reference comments provided above in the "Fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by mode" section of this checklist.* **RESPONSE/REVISION – (5-21-20) Section revised**
☐	*Safety Events:* Total number of reportable events and rate per total vehicle revenue miles, by mode. (Event, as defined in § 673.5)	54	<u>*Observation(s):*</u> *Please reference comments provided above in the "Fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by mode" section of this checklist.* **RESPONSE/REVISION – (5-21-20) Section revised**
☐	*System Reliability:* Mean (or average) distance between major mechanical failures, by mode.	54	<u>*Observation(s):*</u> *Please reference comments provided above in the "Fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by mode" section of this checklist.* **RESPONSE/REVISION – (5-21-20) – Section Added to Appendix V**

The Agency Safety Plan specifies or references documentation that specifies:

☒	Checklist Item	ASP Page Number	Comments
☐	Performance targets are made available to the State to aid in the planning process.		***Observation(s)*** *The ASP should describe the process for making performance targets available to the State and MPO (e.g., the agency officially transmits its targets in writing to the MPO by July 15 of each year).* ***Reference Material*** • *Best Planning Practices: Metropolitan Transportation Plans* • *FTA Circular 8100.1C, Program Guidance for Metropolitan Planning and State Planning and Research Program Grants* ***RESPOINSE/REVISION: (6/2/20) Performance Targets Table has been added to the end of Appendix V.***
☐	Performance targets are made available to the Metropolitan Planning Organization(s) (MPOs) to aid in the planning process.		***Observation(s)*** *The ASP should describe the process for making performance targets available to the State and MPO (e.g., the agency officially transmits its targets in writing to the MPO by July 15 of each year).* ***Reference Material*** • *Best Planning Practices: Metropolitan Transportation Plans* • *FTA Circular 8100.1C, Program Guidance for Metropolitan Planning and State Planning and Research Program Grants*.

⊠	Checklist Item	ASP Page Number	Comments
			RESPONSE/REVISION: (6/2/20). The Butte County Association of Governments is the Butte County Metropolitan Planning Organization (MPO)
☐	Coordination with the State and MPO(s) in the selection of State and MPO safety performance targets, to the maximum extent practicable.	9	<u>**Observation(s)**</u> *The ASP should state that the agency will coordinate to the fullest extent possible with the State and MPO to facilitate the selection of State and MPO transit safety performance targets.* <u>**Reference Material**</u> • *Best Planning Practices: Metropolitan Transportation Plans* • *FTA Circular 8100.1C, Program Guidance for Metropolitan Planning and State Planning and Research Program Grants* ***RESPNSE/REVISION: (6/2/20) The establishment of Safety Performance Targets was developed by Transdev and is derived from multiple agencies and properties currently under contract with Transdev across the United States.***

4. Safety Management Policy

The Agency Safety Plan describes or references documentation that describes:

☒	Checklist Item	ASP Page Number	Comments
☒	Written statement of Safety Management Policy (SMP), including the agency's safety objectives.	14 15	*On page 15, the ASP states: "This policy applies to all employees of Transdev North America".* *The TAC recommends revising the scope on page 15. The ASP is written and implemented by BRT/BCAG; therefore, the scope applies to all employees of BRT/BCAG and their contractors.* **RESPONSE/REVISION: (6/2/20). Statement revised as suggested. Scope: This policy applies to all employees of BRT/BCAG and their Contractors.**
☐	Employee safety reporting program, that includes: • A process that allows employees to report safety conditions to senior management; • Protections for employees who report safety conditions to senior management; and • A description of employee behaviors that may result in disciplinary action, and therefore are excluded from protection.	44 - 45	**<u>Observation(s)</u>** *The ASP should describe, or reference a procedure that describes, how employees report safety conditions. For example, using a safety hotline or email or a locked box in the employee breakroom.* *The ASP should identify protections provided to employees who report safety conditions.* **<u>Reference Material</u>**

☒	Checklist Item	ASP Page Number	Comments
			• *Sample ASP for Small Public Transportation Providers:* *https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/sample-small-public* ***RESPONSE/REVISION: (6/2/20): Section 5.1.8 Employee Safety Reporting has been expanded. Employess of BCAG/BRT Contractor afre employed under a Collective Bargaining Agreement (CBA) under which reporting and Protection are addressed and described.***
☒	Communication of the safety management policy throughout the agency's organization.	15	
☐	Authorities, accountabilities, and responsibilities necessary for the management of safety, as they relate to the development and management of the transit agency's Safety Management System (SMS), for the following individuals: • The Accountable Executive • The Chief Safety Officer or SMS Executive • Agency leadership and executive management • Key staff	10, 23 - 27	<u>*Observation(s):*</u> *Please reference comments provided above in the following sections of this checklist:* *An Accountable Executive who meets requirements in § 673.5 and § 673.23(d)(1).* *A Chief Safety Officer or SMS Executive who meets requirements in § 673.5 and § 673.23(d)(2).* ***RESPONSE/REVISION: (6/2/20). No revision made. It appears clear enough within our organization what the authorities and lines of communication are with whom they lay..*** <u>*Enhancement(s)*</u>

⊠	Checklist Item	ASP Page Number	Comments
			Consider listing all transit agency and contractor personnel responsible for the implementation of this ASP in a single section of the ASP with a single title for the job responsibility they hold. This will add clarity to avoid confusion and promote consistency.

5. Safety Risk Management

The Agency Safety Plan describes or references documentation that describes a Safety Risk Management process for all elements of the transit agency's public transportation system, to include:

☒	Checklist Item	ASP Page Number	Comments
☐	*Safety hazard identification:* Methods or processes to identify hazards and consequences of hazards, which includes data and information provided by an oversight authority and the FTA as sources for hazard identification.	31	***Observation(s)*** *The ASP should describe how you include FTA and other oversight authorities as a source of hazard information.* **RESPONSE/REVISION: (6/2/20). No revision made. BCAG/BRT documents are available for review at any times if requested.**
☐	*Safety risk assessment:* Methods or processes to assess the safety risks associated with identified safety hazards. This must include assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations, and prioritization of the hazards based on the safety risk.	32 - 34	***Observation(s)*** *The ASP should describe how the agency assesses likelihood and severity of the consequences of hazards, including existing mitigations when applicable, and note relevant authorities, accountabilities, and responsibilities of key positions.* ***Enhancement(s)*** *Consider using the word "likelihood" to be consistent with the language used in the §673.5 or provide a crosswalk between the terms you use and the terms defined in Part 673.*

☒	Checklist Item	ASP Page Number	Comments
			RESPONSE/REVISION: (6/2/20). Likliehood added in the first sentence of 4.1.1 Hazard Analysis Methods
☒	*Safety risk mitigation:* Methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences of hazards.	34 - 35	

6. Safety Assurance

The Agency Safety Plan describes or references documentation that describes:

☒	Checklist Item	ASP Page Number	Comments
☒	Activities to monitor the transit agency's system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance. (*safety performance monitoring and measurement*)	40 – 41	
☒	Activities to monitor the transit agency's operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. (*safety performance monitoring and measurement*)	11, 31, 33	
☒	Activities to conduct investigations of safety events, including the identification of causal factors. (*safety performance monitoring and measurement*)	36 - 38	
☒	Activities to monitor information reported through any internal safety reporting programs. (*safety performance monitoring and measurement*)	38 – 45	
☒	*Management of change:* A process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. These proposed changes must be evaluated through the agency's Safety Risk Management process. [Not Required for Small Public Transportation Providers]	11, 45 - 46	*Although Management of Change is not required for Small Public Transportation Providers, the APS includes a process for identifying and assessing change.* ***Enhancement(s)*** *The ASP could be strengthened by establishing a change control board for all configuration modifications with a safety impact or that could potentially introduce additional hazards into the system. The*

⊠	Checklist Item	ASP Page Number	Comments
			change control board should include all stakeholders for the change including the CSO.
⊠	*Continuous improvement:* A process to assess the transit agency's safety performance. If the agency identifies safety deficiencies as part of its safety performance assessment, the agency must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies. [Not Required for Small Public Transportation Providers]	12, 46	*Although Continuous Improvement is not required for Small Public Transportation Providers, the APS includes a process for assessing safety performance.* **Enhancement(s)** *The ASP could be strengthened by listing the safety performance indicators that are measured through monitoring.*

7. Safety Promotion

Note: Please consider including in the description of the agency's "comprehensive safety training program" the technical training programs that employees and contractors must receive beyond "SMS training." For example, this typically would include defensive driver training, behind-the-wheel training, on-the-job training for maintenance functions (OJT), occupational safety, and other forms of training required for employees and contractors designated as "directly responsible for safety."

The Agency Safety Plan describes or references documentation that describes:

☒	Checklist Item	ASP Page Number	Comments
☒	A comprehensive safety training program for all transit agency employees and contractors designated as directly responsible for safety in the agency's public transportation system. This program must include refresher training, as necessary.	47 - 49	
☒	Communication of safety and safety performance information throughout the transit agency's organization that conveys, at a minimum: • Information on hazards and safety risks relevant to employees' roles and responsibilities; and • Safety actions taken in response to reports submitted through an employee safety reporting program.	49	

Additional Information

The Agency Safety Plan specifies or references:

⊠	Checklist Item	ASP Page Number	Comments
⊠	Documentation not included or referenced elsewhere in the Agency Safety Plan, related to: • The implementation of the transit agency's Safety Management System; • The programs, policies, and procedures that the agency uses to carry out its Agency Safety Plan; and • Results from Safety Management System processes and activities. *The documents must be maintained for three years after they are created and must be made available upon request by the FTA or other Federal entity, or a State Safety Oversight Agency having jurisdiction.*	13	
⊠	Definitions of terms used in the Agency Safety Plan.	17 - 21	
⊠	List of acronyms used in the Agency Safety Plan.	17 – 21	

PTASP Technical Assistance Available Now

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https://www.transit.dot.gov/PTASP-TAC