



Statewide Public Transportation Agency

Safety Plan

Virginia Department of Rail and Public Transportation

July 2020



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ACRONYMS AND ABBREVIATIONS

ADA	Americans with Disability Act
AGM	Assistant General Manager
AIP	Accident Investigation Procedure
ARC	Accident Review Committee
BRITE	Blue Ridge Intercity Transit Express
BT	Blacksburg Transit
BTAC	BRITE Transit Advisory Committee
CA-MPO	Charlottesville/Albemarle Metropolitan Planning Organization
CAT	Charlottesville Area Transit
CDL	Commercial Driver's License
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
COO	Chief Operating Officer
CSO	Chief Safety Officer
CSPDC	Central Shenandoah Planning District Commission
DRPT	Department of Rail and Public Transportation
DTGC	District Three Governmental Cooperative
DVIR	Daily Vehicle Inspection Report
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EPM	Employee Performance Memo
FAMPO	Fredericksburg Area Metropolitan Planning Organization
FTA	Federal Transit Administration
GLTC	Greater Lynchburg Transit Company
GM	General Manager
HDPT	Harrisonburg Department of Public Transportation
HR	Human Resources
HRT	Hampton Roads Transit
ICS	Incident Command System
JMU	James Madison University
KPI	Key Performance Indicator
LOTO	Lock-out/Tag-out
MC	Management Contractor
MPO	Metropolitan Planning Organization
NEO	New Employee Orientation
NIMS	National Incident Management System
NRVCS	New River Valley Community Services
NRVMPO	New River Valley Metropolitan Planning Organization
NTD	National Transit Database
O&M	Operations and Maintenance
OEM	Original Equipment Manufacturer
OJT	On-the-job Training
OSHA	Occupational Safety and Health Administration
PAT	Petersburg Area Transit
PIO	Public Information Officer
PM	Preventive Maintenance
PTASP	Public Transportation Agency Safety Plan
RFP	Request for Proposal

RVARC	Roanoke Valley-Allegheny Regional Commission
SMS	Safety Management System
SOP	Standard Operating Procedure
SRP	Safety Review Panel
SVTMC	Southwestern Virginia Transit Management Company
TAPTCO	Transit and Paratransit Company
TED	Transit Employee Database
TSI	Transportation Safety Institute
USDOT	United States Department of Transportation (
VRE	Virginia Railway Express
VRT	Virginia Regional Transit
WATA	Williamsburg Area Transit Authority
WinFred	Winchester/Frederick County Metropolitan Planning Organization
WinTran	Winchester Transit

1 VIRGINIA STATEWIDE PUBLIC TRANSIT AGENCY SAFETY PLAN (PTASP) FOR SMALL PUBLIC TRANSPORTATION PROVIDERS

The Virginia Statewide Public Transportation Agency Plan (PTASP) for Small Public Transportation Providers is a comprehensive plan outlining the Safety Management Systems (SMS) programs at 15 small transit agencies in the Commonwealth. A small transit agency is defined as a non-rail fixed guideway agency that receives federal financial assistance under 49 U.S.C. 5307 and run 100 or fewer vehicles in total during peak revenue service. This comprehensive plan is required by 49 United States Code 5329 and 49 Code of Federal Regulations (CFR) Part 673.

On July 19, 2018, the Federal Transit Administration (FTA) published 49 CFR Part 673, which requires agencies receiving federal assistance under 49 U.S.C. 5307 funding to develop a PTASP. Per 49 CFR Part 673.11(d), States must develop a PTASP for small transit agencies. In Virginia, the Virginia Department of Rail and Public Transportation (DRPT) is the state agency responsible for developing the state-sponsored PTASP for small transit agencies. DRPT is primarily responsible for gathering input from each participating small transit agencies during the development, review, and update of the PTASP. Moving forward, each agency will be responsible for continuing the implementation of its SMS program and other activities described within its respective PTASP sections.

The PTASP is laid out to provide general information on each agency, including its overall structure and services; the agency Safety Management Policy; Safety Risk Management program; Safety Assurance program; and Safety Promotion program. Each section of the plan accurately portrays the current services and programs in place at each agency.



Figure 1: Virginia Statewide PTASP Agencies

The following transit agencies are covered by the Statewide PTASP:

- Blacksburg Transit
- Blue Ridge Intercity Transit Express (BRITE)
- City of Bristol Virginia Transit (Bristol Transit)
- Charlottesville Area Transit (CAT)

- Fredericksburg Regional Transit (FRED Transit)
- Greater Lynchburg Transit Company (GLTC)
- Greater Roanoke Transit Company (Valley Metro)
- City of Harrisonburg Department of Public Transportation (HDPT)
- Jaunt, Inc.
- District Three/Mountain Lynx Transit
- Petersburg Area Transit (PAT)
- Radford Transit
- Suffolk Transit
- Williamsburg Area Transit Authority (WATA)
- Winchester Transit (WinTran)

Each agency PTASP is located in a separate appendix of this document.

2 VIRGINIA DEPARTMENT OF RAIL AND PUBLIC TRANSPORTATION (DRPT)

The mission of DRPT is to facilitate and improve the mobility of the citizens of Virginia and to promote the efficient transport of goods and people in a safe, reliable, and cost-effective manner. To fulfill its mission, DRPT works with various stakeholders including federal, state, regional, and local governments, and private entities. DRPT supports public transportation in the Commonwealth, including the small transit agencies described within this Plan.

3 BACKGROUND OF SAFETY MANAGEMENT SYSTEMS (SMS)

Each agency's appendix is organized according to SMS principles in accordance with the requirements of Part 673. SMS is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards, and consists of four primary elements:

- **Safety Management Policy:** A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety. The policy must be communicated throughout the organization and endorsed by the agency's Accountable Executive.
- **Safety Risk Management:** A process within a transit agency's PTASP for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Safety Assurance:** A process within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information. Safety assurance may involve internal auditing; quality assurance; data collection and analysis and accident reviews.
- **Safety Promotion:** A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system. An agency's safety promotion program could involve outreach such as safety training/educations; risk communication and awareness; and employee reporting and feedback.

The four components of SMS work together in a unified, agency-wide system for management and control of safety hazards.



Figure 2: Safety Management Systems Diagram

3.1 Safety Risk Management

Each small transit agencies will implement a safety risk management program that utilizes a hazard analysis and evaluation methodology. Based on FTA recommendations for small transit provider, agencies will use the below hazard evaluation methodology in order to rate the severity and likelihood of identified hazards.

As shown in Table 1 below, overall safety risk is a composite of the severity and likelihood of a given safety hazard. Severity means the anticipated effects of the consequence of a hazard (table 2), should it materialize, considering the worst credible condition. Probability means the likelihood that hazard consequences might occur, considering the worst foreseeable condition (table 3).

Table 1: Risk Assessment Matrix for small transit providers

Risk Assessment Matrix			
Likelihood/Severity	Catastrophic (1)	Serious (2)	Marginal (3)
Frequent (A)	HIGH (1A)	HIGH (2A)	MEDIUM (3A)
Occasional (B)	HIGH (1B)	MEDIUM (2B)	LOW (3B)
Remote (C)	HIGH (1C)	MEDIUM (2C)	LOW (3C)

Table 2: Severity Categories for hazard assessment

Severity Categories		
Description	Severity Category	Criteria
Catastrophic	1	Could result in death, permanent total disability, loss exceeding \$250,000, system shutdown lasting 4 or more hours, or irreversible severe environmental damage that violates law or regulation.
Serious	2	Could result in permanent partial disability, injury or occupational illness that may result in hospitalization of at least one person, property damage exceeding \$25K but less than \$250,000, system shutdown lasting between 10 minutes and 4 hours, or reversible environmental damage causing a violation of law or regulation.
Marginal	3	Could result in injury or occupational illness resulting in one or more lost workday(s), property damage up to \$25,000, system shutdown of less than 10 minutes, or mitigatable environmental damage without violation of law or regulation.

Table 3: Likelihood Levels for hazard assessment

Likelihood Levels			
Description	Level	Individual item	System or Vehicle Fleet
Frequent	A	Likely to occur often in the life of an item.	Continuously experienced. Potential consequence may occur more than once in 500 operating hours.
Occasional	B	Will occur several times in the life of an item.	Will occur several times. Potential consequence may be experienced once in 500 to 60,000 operating hours.
Remote	C	Unlikely to occur in the life of an item.	Unlikely but possible. Potential consequence may be experienced once in 60,000 to 1,800,000 operating hours.

Based on the combined assessment of severity and likelihood, the resulting hazard rating indicated the overall safety risk: High (Unacceptable – Action Required); Medium (Undesirable – Management Decisions); and Low (Acceptable with Review). See table 4 for the breakdown of safety risks.

Table 4: Safety Risk criteria

Safety Risk Index	Criteria by Index
HIGH	<u>Unacceptable – Action Required:</u> Safety risk must be mitigated or eliminated.
MEDIUM	<u>Undesirable – Management Decision:</u> Executive management must decide whether to accept safety risk with monitoring or require additional action.
LOW	<u>Acceptable with Review:</u> Safety risk is acceptable pending management review.

3.2 Safety Risk Register

Small public transit agencies will use a risk register similar to the one below. This risk register may evolve overtime to meet each agencies' needs.

Hazard	Hazard Type	Identification Date	Identification Source	Analysis Date	Worst Possible, Worst Credible, or Most Common Potential Consequence	Existing Mitigation(s)	Severity of Consequences

Likelihood of Consequences	Safety Risk Index	Further Mitigation Action	Revised Safety Risk Index	Revised Safety Risk Index Date	Department Responsible for Mitigation	Estimated Implementation Date	Contact Person

Each of the agencies uses its own Safety Risk Management process, including Hazard Identification, Analysis, and Mitigation. Each agency's process is described in more detail their respective appendices.

4 SAFETY PERFORMANCE TARGETS

Each individual small transit agency is responsible for working with its local Metropolitan Planning Organizations (MPO) to ensure performance targets are provided to them to aid in the MPO planning process. In accordance with the 3C agreements DRPT coordinates with the MPOs on a quarterly basis through inter agency coordination meetings where DRPT provides continuing updates on transit related performance measures including PTASP related measures. Transit agencies are encouraged to also coordinate with MPOs through regularly scheduled MPO Technical Committee meetings. Per the National Safety Plan and 49 CFR Part 673.11(a)(3), the safety performance targets include: fatalities, injuries, safety events, and system reliability. See specific targets, by agency under *Safety Goals, Objectives, and Targets* within each agency's section. Based on FTA guidance, each safety performance target has been developed based on actual agency and peer agency statistics. The total number of target events are identified based on a baseline rate, such as one reportable event for every 100,000 vehicle revenue miles. The total targets are derived from historic vehicle revenue miles and the baseline rates. Additionally, each mode has its own set of targets, for example fixed route and demand response have been separated into separate categories. DRPT will work with each agency and their MPO as needed to facilitate this process on an annual basis. Further information on how agency safety performance targets are detailed in the [FTA Safety Performance Targets Guide](#).

5 PTASP CONTROL AND UPDATE PROCEDURES

5.1 PTASP Schedule

Per 49 CFR Part 673, PTASPs must be updated annually to address any changes in the agency and respective programs. If necessary, the PTASP may also be updated before the annual update. DRPT will coordinate with each agency annually after the initial publication date to gather any changes and updates and compile signatures from each agency's Accountable Executive and the Board, or similar entity, to help facilitate the review and update process.

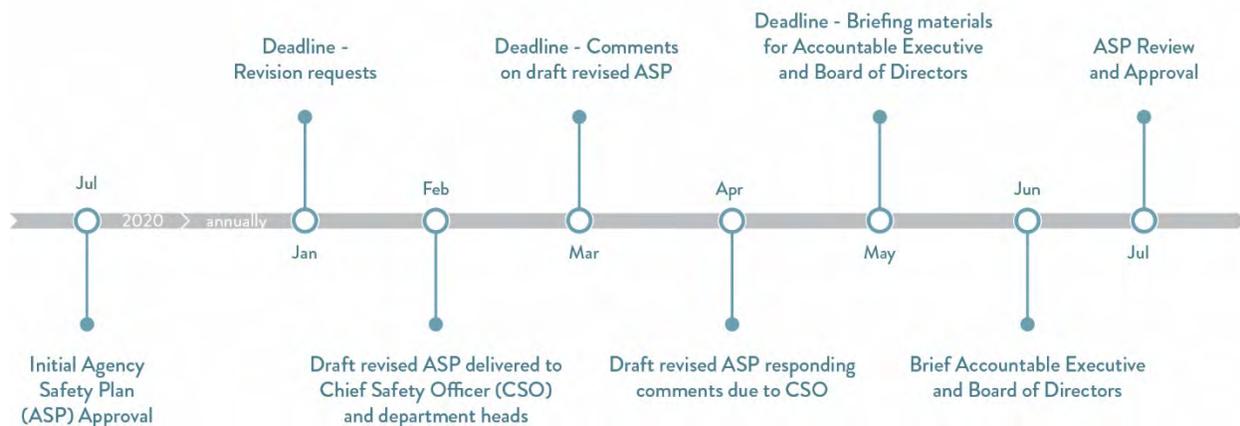


Figure 3: Example Timeline for an Agency Safety Plan Review

APPENDIX

APPENDIX A: BLACKSBURG TRANSIT

A1 ABOUT BLACKSBURG TRANSIT

Blacksburg Transit (BT), is a public transportation agency primarily serving the towns of Blacksburg and Christiansburg. BT provides a combination of fixed-route, deviated fixed-route, and demand response transit services. BT operates fixed-routes and BT Access, a door-to-door paratransit service in the Town of Blacksburg. BT operates deviated fixed-routes and Go Anywhere, a demand response service available to anyone in the Town of Christiansburg. Additionally, BT operates a commuter route, carrying passengers from Christiansburg to Blacksburg in the morning and Blacksburg to Christiansburg in the evening; a route connecting the Town of Blacksburg and a shopping district in the Town of Christiansburg; and numerous event shuttles throughout the year for events sponsored by the Town of Blacksburg and the Virginia Polytechnic Institute and State University (Virginia Tech).

BT is a department of the Town of Blacksburg; all staff of the agency are town employees. Blacksburg is a town-manager form of government, BT is governed by the Town of Blacksburg's Town Council, consisting of seven members. Oversight and day-to-day management is the responsibility of the Town Manager.

BT is headquartered at 2800 Commerce Street, in Blacksburg, Virginia; all administrative and maintenance activities related to agency operations occur at this facility. BT operates a variety of transit vehicles, including transit buses, cutaways, and vans.

BT operates approximately 47 vehicles in peak revenue service.

The Director of BT is the Accountable Executive, and has the ultimate authority to allocate human and financial resources to address safety issues. The Director reports to one of the two Deputy Town Managers for the Town of Blacksburg.

Blacksburg Transit Fleet

- New Flyer 35-ft. transit buses
- New Flyer 40-ft. transit buses
- New Flyer 60-ft. transit buses
- New Flyer 35-ft. transit buses
- Chevrolet cutaways
- Ford cutaways
- Chevrolet vans
- Ford vans

A2 REVISION HISTORY – BLACKSBURG TRANSIT

Each year, Blacksburg Transit will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Blacksburg Transit's PTASP sections.

Table A-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

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A3 SAFETY MANAGEMENT POLICY

A3.1 SAFETY POLICY STATEMENT

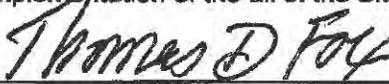
Safety is a core value of Blacksburg Transit (BT). BT is committed to providing safe, reliable transit service to the Town of Blacksburg, Town of Christiansburg, and surrounding areas. BT is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key BT staff. All BT employees are held accountable for the overall safety performance of BT, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, BT managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

BT will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. BT passengers can count on our organization to provide safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all BT plans, policies, and procedures. BT will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, BT has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, BT will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of BT's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of BT personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

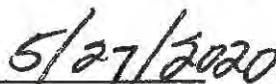
As the Director, I am the Accountable Executive and have ultimate authority and responsibility for the safety of BT. With this plan, all BT staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.



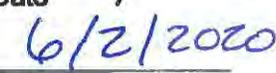
Director/Accountable Executive



Town Manager/Town of Blacksburg



Date



Date

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A3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

BT has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table A-2: Blacksburg Transit Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	5	Less than .5 injuries per 100,000 vehicle revenue miles	10	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	1	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Event (Minor)

Less severe events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of BT policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

BT may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Director is responsible for ensuring that BT managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Town of Blacksburg. Key BT executives and managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, BT is responsible for annually providing its Safety Performance Targets to the New River Valley Metropolitan Planning Organization (NRVMPO) to help aid in the transportation planning process. DRPT will coordinate with NRVMPO and BT in the selection of BT's safety performance targets.

A3.3 EMPLOYEE SAFETY REPORTING

BT employees have the ability to report safety issues using the Non-Collision Incident Card, or by speaking with any managerial personnel. Per BT policy, Non-Collision Incident Cards allow for the reporting of any perceived safety hazard or event that did not result in an accident or injury, but had the potential to do so. BT employees may also report safety issues to the Dispatcher on duty or Supervisors.

The Operator Rules and Regulations describes how BT applies discipline to bus operators in response to safety violations. Safety violations by other BT staff members are governed by the Town of Blacksburg Rules and Regulations.

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A3.4 SAFETY POLICY COMMUNICATION

It is the policy of BT to communicate the safety policies in this PTASP with all affected employees throughout the organization. The Training & Safety Coordinator is responsible for ensuring that BT safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

BT's Safety Policy will be provided to every new employee alongside printed training materials. BT managers and executive staff will have access to the complete BT PTASP in both hard copy and electronically.

BT safety meetings and leadership team meetings include discussion of safety performance objectives, targets, and indicators. The Training & Safety Coordinator, working with the Executive Assistant to the Director, is responsible for compiling data on safety performance, summarizing events including but not limited to collisions and mechanical failures.

The Training & Safety Coordinator is responsible for hosting a monthly safety meeting for operations personnel. In addition to compiling all meeting materials, the Training & Safety Coordinator is responsible for ensuring that all operations personnel attend the meeting, either in-person or through a review of footage afterwards, and acknowledge receipt of any supplementary materials.

A3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Director. The Director of BT is the agency's Accountable Executive. The Director is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all BT personnel. The Director is responsible for ensuring that the SMS is effectively implemented throughout BT as an organization, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Generally, the Director is responsible for the following specific activities:

- Ensuring BT meets the requirements set forth by the Town of Blacksburg
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring BT meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

Training & Safety Coordinator. The Training & Safety Coordinator reports directly to the Director for safety-related functions, and serves as BT's Chief Safety Officer (CSO). The Director has formally designated the Training & Safety Coordinator as the CSO. As a transit executive with extensive knowledge of transit operations and maintenance, the CSO has the authority and responsibility for the day-to-day implementation of BT's SMS. In this role, the Training & Safety Coordinator is responsible for coordinating with individuals throughout the to implement and maintain the agency's SMS, including but not limited to the:

- Operations Manager
- Maintenance Manager
- Finance Manager
- ITS Manager

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- Human Resources Generalist
- Executive Assistant to the Director
- Regulatory/Planning Manager
- CCS Manager

The Operations Manager oversees the transit operations, including all bus operations, dispatch, and supervision functions, as well as an **Operations Specialist**, who helps manage day-to-day operations. The Training & Safety Coordinator reports to the Operations Manager for training-related functions. All operations employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

Operations Supervisors are cross-trained to perform both dispatch and street supervision activities. Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Operations Supervisors oversee shift change, conduct fitness-for-duty checks of all Operators, and routinely observe Operators to manage and enforce operating rule compliance.

Dispatchers are responsible for clearly communicating instructions to Operators, in compliance with all applicable BT rules and procedures. Dispatchers are in direct contact with Operations Supervisors, Operators, and local police, fire, and emergency medical services (EMS).

Operators are responsible for exercising maximum care and good judgment at all times while driving BT vehicles, and for following all BT rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Class B Commercial Driver's License (CDL) with air brakes and passenger endorsements while operating BT vehicles. Specifically, Operator duties include, but are not limited to:

- Performing walk-around inspections prior to vehicle operation
- Adhering to route card directions
- Reporting safety hazards and accidents to dispatch
- Completing and submitting required paperwork and forms
- Attending or reviewing video of safety meetings

The Maintenance Manager is responsible for the maintenance and reliability of BT's fleet, including overseeing mechanics, maintainers, and parts & services staff. Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Mechanics are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

The Human Resources Generalist is responsible for maintaining employee personnel files in coordination with the Town of Blacksburg. Training, disciplinary, and operational data is entered into the Transit Employee Database (TED) by designated Operations management personnel. The Human Resources Generalist is responsible for ensuring the integrity of the data entered in TED.

All BT personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to their immediate supervisor or the Safety & Compliance Officer, completing all training required for the safe performance of their duties, attending safety meetings as required, and for performing their duties in a safe manner.

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A3.6 SAFETY MEETINGS

The Training & Safety Coordinator holds a monthly Safety Meeting for all operations personnel. In addition to facilitating the communication of safety information, these meetings are an opportunity for BT employees to identify and discuss safety concerns with management, and for management to convey information regarding safety performance to employees. The Training & Safety Coordinator is responsible for facilitating these meetings. Video is captured in lieu of meeting minutes and any operations employees not in attendance are required to review video of the meeting under the supervision of a dispatcher.

A Safety Review Panel is regularly convened (generally no less frequent than every other month) to discuss recent accidents; attendees include the Director, Operations Manager, Operations Supervisor, Human Resources Generalist, and Training & Safety Coordinator. During this meeting, the probable cause and contributing factors of accidents that occurred since the previous meeting are discussed to determine if any safety risk mitigations are necessary and to determine the appropriate type of discipline for the employee involved, if warranted.

The Director holds a quarterly Operator Management Group meeting, providing a forum for Operators to regularly interface with the agency's leadership; during this meeting, Operators are encouraged to raise any safety concerns they may have.

A3.7 DOCUMENTATION AND RECORDKEEPING

BT rules are supplementary to the Town of Blacksburg's Personnel Rules and Regulations. In the event they are more stringent, BT's Rules and Regulations supersede the Town of Blacksburg's Personnel Rules and Regulations. BT safety is governed by this PTASP as well as several standalone documents referenced throughout; notably, the **Operator Rules and Regulations** address topics including but not limited to:

- Work Performance
 - Operator Job Specifications
 - Employment Standards
 - When to Work (W2W)
 - Transit Employee Database (TED)
 - Safety meetings
 - Proficiency/Probation Standards
 - Evaluations
 - Shift Picks
 - Work Hours
- Blacksburg Transit Policies and Procedures
 - Customer Service
 - Radio Etiquette
 - Leaving the Bus (10-7)
 - Electronic Devices
 - Secure Parking
 - BT Lot
 - Lost and Found
 - Media
 - Employee Fatigue
 - Game Day
 - Inclement Weather
 - Tobacco and E-Cigarette
 - Substance Abuse

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- Incident
- Collision
- Preventable Collision vs. Non-Preventable Collision
- Collision Classification
- Attendance
- Discipline
 - Grounds for Discipline
 - Violations

BT records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include operations rule compliance checks, accident reports, training records, maintenance records and work orders, and drug and alcohol program testing records. The Regulatory/Planning Manager is responsible for ensuring departmental compliance with agency document retention policies. At a minimum, BT retains all records related to the implementation of SMS for a minimum of three years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

A4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

A4.1 HAZARD IDENTIFICATION

BT management and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator pre-trip inspections
- Operator reports to dispatchers
- Non-Collision Incident Cards submitted by Operators
- Monthly Safety Meetings
- Safety Review Panel meetings
- Operator Management Group Meetings
- Mechanic reports to the Maintenance Manager
- Dispatcher daily logs
- Customer service complaints

Managers are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Training & Safety Coordinator is responsible for working with these managers to track and monitor this safety data.

As appropriate, BT will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

A4.2 HAZARD ANALYSIS AND EVALUATION

BT analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

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- During Safety Meetings, managers and employees have the opportunity to discuss and review safety hazards.
- Individual managers are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Training & Safety Coordinator is responsible for compiling reports on safety performance, including accidents and incidents, with the assistances of the Executive Assistant to the Director and disseminating this information to BT management.
- The Training & Safety Coordinator is responsible for working closely with all department managers to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

BT is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. BT management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. BT will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

BT's Director and Training & Safety Coordinator are responsible for the review of all unacceptable hazards. Through both the safety meetings and informal leadership meetings, senior management, including affected division managers, are responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. BT management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting video, tracking logs, or other means deemed appropriate by BT managers. All such documentation must be preserved in accordance with BT's documentation and recordkeeping requirements for SMS-related documentation.

A4.3 SAFETY RISK MITIGATIONS

BT's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. As noted earlier, BT's Director, Training & Safety Coordinator, and managers are responsible for working together to develop and implement such mitigations. BT management is responsible for obtaining relevant input and feedback from managers, supervisors, and frontline employees and outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be the Safety Review Panel meetings.

A4.4 HAZARD TRACKING AND RECORDKEEPING

BT's Training & Safety Coordinator is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation

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- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Training & Safety Coordinator is responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

BT management is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

A5 SAFETY ASSURANCE

A5.1 SAFETY PERFORMANCE MONITORING

BT uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through leadership team meetings, safety meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. Individual managers are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, department managers are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. Managers are also responsible for communicating information regarding safety performance with the Director, Training & Safety Coordinator, and other affected divisions throughout the agency.

A5.1.1 OPERATIONS

Operations Supervisors are responsible for continually evaluating the safety performance of BT's Operators. Each Operator will receive an unannounced field evaluation of their compliance with BT's Operator Rules and Regulations no less than once each year as part of their employee performance review; however, additional unannounced evaluations may be conducted at any time. Any rule violations documented as part of this evaluation or otherwise observed by and Operations Supervisor, must be documented in the Operator's file and the TED. The Operations Supervisor, in conjunction with the Training & Safety Coordinator or their designee, will determine what follow up is needed with individual employees, such as retraining, or whether there are patterns or trends suggesting more systemic safety issues. In such cases, the Training & Safety Coordinator or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of BT, such as Town of Blacksburg (for example, street markings or stripes, or traffic signal timing or visibility).

Dispatchers are responsible for completing daily logs containing information about unusual occurrences during operations, such as delays or safety events. The Training & Safety Coordinator or their designee is responsible for the regular review of all daily logs for the purpose of identifying safety hazards and monitoring safety performance.

Operators are responsible for completing pre-trip inspection forms before beginning their routes, and for ensuring that the completed form is left on the bus at the end of their shift.

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A5.1.2 MAINTENANCE

The Maintenance Manager is responsible for the overall maintenance of BT facilities, equipment, and vehicles. Facilities maintenance is governed by the Facility and Facility-Related Maintenance Plan, which includes detailed descriptions of scheduled maintenance processes and the individuals responsible for their performance. Vehicle Maintenance is governed by the Vehicle Maintenance Policies and Procedures Standard Operating Procedure (SOP), which includes detailed requirements for preventive maintenance, pre- and post-trip inspections, emergency equipment, vehicle safety and security, and establishes safety rules for maintenance employees.

The Maintenance Manager or their designee is also responsible for regularly reviewing and monitoring BT maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Maintenance Manager or their designee reviews all completed pre-trip inspection forms, inspection checklists completed by the mechanics, and maintenance work orders. The Maintenance Manager or their designee is responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during daily informal “toolbox” discussions, and any formal safety meetings.

A5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

BT administers a United States Department of Transportation (USDOT)-compliant drug and alcohol testing program. The Human Resources Generalist is responsible for the administration of the program, including working with BT’s collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Training & Safety Coordinator is responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to Operations Supervisors and affected managers. BT employees subject to drug and alcohol testing under 49 CFR 655 must sign an Acknowledgement of Employer’s Drug and Alcohol Testing Policy.

The Lead Data Analyst is responsible for reporting safety events, as required, to the National Transit Database, in consultation with BT managers.

A5.3 PROCESS EVALUATION

The Training & Safety Coordinator is responsible for working with individual managers or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Training & Safety Coordinator is also responsible for regularly monitoring the effectiveness of BT’s employee safety reporting program. This includes, but is not necessarily limited to, the effective usage of Non-Collision Incident Cards, and the level of information provided by employees during safety meetings. The Training & Safety Coordinator will, as needed, work with management to evaluate any needed changes to the employee safety reporting program.

A5.4 EVENT INVESTIGATIONS

BT investigates all safety events, including accidents, and incidents. All accidents are discussed by the Safety Review Panel (SRP), consisting of the Director, Operations Manager, Operations

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Supervisor, Human Resources Generalist, and the Training & Safety Coordinator. The SRP is responsible for identifying, analyzing, and reporting the causal factors leading to each event.

Material resulting from investigations may include, but are not necessarily limited to:

- Collision Card
- Collision Report
- Maintenance Report
- Police Report
- Post-Collision Summary
- Town Property Damage Report
- Pictures

Operations Supervisors are primarily responsible for the investigation of safety events, and for performing all investigative activities, both at the scene of the event and post-crash. Operations Supervisors must all complete relevant in-house accident investigation training in order to be qualified to conduct investigations. Other BT managers are responsible for participation in the investigation process, as needed and as may be required. The Maintenance Manager or their designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

The Training & Safety Coordinator or their designee is responsible for logging all safety events into a database that includes, but is not limited to, the following information:

- Data of event
- Vehicle number
- Location
- Description/damage
- Whether EMS was needed

BT does not currently have existing investigation procedures for accidents outside of what is documented in the PTASP.

A5.5 SAFETY PROMOTION

A5.5.1 SAFETY COMMUNICATION

As discussed earlier in Section 3.4, BT uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each BT employee. This PTASP and referenced plans, policies, and procedures are available to all affected employees digitally or in hard copy.

Managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as employee break rooms. If necessary, management will ensure that safety-related materials are distributed using When to Work, electronic mail, or directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

BT front-line employees and managers use the safety meetings described in Section 4 to discuss hazards and safety performance information. Management uses the safety meetings and other

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group meetings such as the Monthly Manager Meeting, Weekly Operations Division Meeting, and Safety Review Panel to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through the employee safety reporting program.

As described in the Operator Rules and Regulations, BT uses a Safety Incentive Program to reward safe driving.

A5.5.2 COMPETENCIES AND TRAINING

BT has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. BT uses a combination of in-house and vendor-created training materials. The Training & Safety Coordinator is responsible for overseeing the training of all BT operations employees, and for working with other division managers and the HR Generalist to arrange outside vendors, as needed, to provide topic-specific training.

All bus Operators are trained on vehicle operation using a combination of materials created by third party vendors and BT. Training consists of classroom time, "closed course" bus operation, and line instruction. Required training/certifications for bus operators include but are not limited to:

- Defensive Driving
- First Aid/CPR/AED
- Bloodborne Pathogens
- ADA Customer Service Training (ACS)
- Workplace Harassment
- Passenger Service and Safety (PASS)

All of the above topics are covered as part of the Operator training program. The duration of this training program depends upon the proficiency of the student. BT also has ongoing observation of its Operators through regular observations, ride checks, and refresher training, provided as needed by Operations Supervisors and Operations Trainers. The Training & Safety Coordinator is responsible for ensuring the completion of all Operator training in a timely manner, and ensuring that training records are documented in the TED and filed with Human Resources. The TED provides qualified employees with access to Operator certification and recertification dates from any BT workstation.

The Maintenance Manager is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are required to complete some of the same initial training as Operators, including Defensive Driving and Bloodborne Pathogens, and are qualified to operate BT revenue vehicles. Mechanics receive informal, on-the-job training from the Maintenance Manager or their designee. If needed, BT may bring in vendors or original equipment manufacturers to provide specific training. Some training on new policies and procedures may be delivered verbally by the Maintenance Manager, Lead Mechanic, Training & Safety Coordinator, or other BT personnel as needed. All front-line maintenance personnel have training records included in their personnel files.

BT Operations Supervisors almost exclusively come from the ranks of existing BT front-line employees; however, there is no prohibition on hiring Operations Supervisors or other managers with the necessary training and competencies from outside of the organization. As is needed and relevant to their job responsibilities, Operations Supervisors and other managers receive training in accident investigation, reasonable suspicion, and other topics.

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Management throughout the agency is responsible for regularly reviewing employee training records to ensure their reports have completed required training.

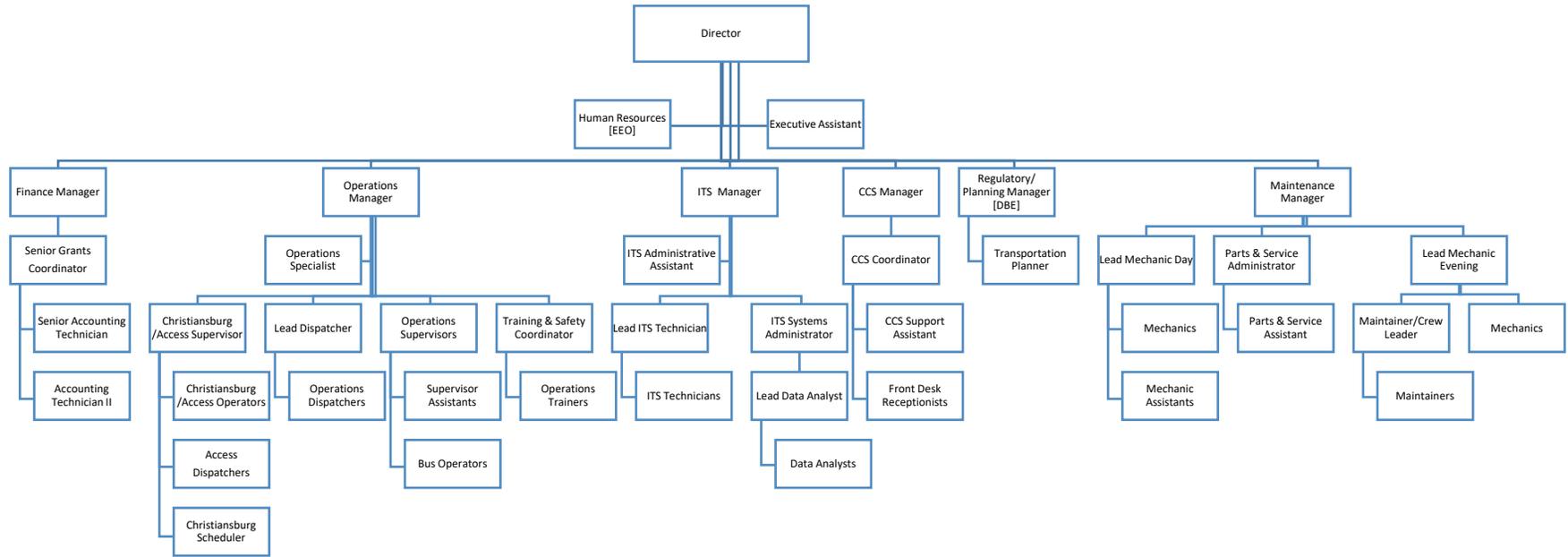
A5.5.3 TRAINING PROGRAM EVALUATION

The Training & Safety Coordinator, alongside the Operations Manager and Maintenance Manager, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of BT job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

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ORGANIZATION CHART



APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE) BUS

B1 ABOUT BRITE BUS

The Blue Ridge Intercity Transit Express, or BRITE Bus, is a service of the Central Shenandoah Planning District Commission (CSPDC), which manages the system. CSPDC contracts operations and maintenance of BRITE Bus to Virginia Regional Transit (VRT). BRITE Bus provides deviated fixed-route bus and paratransit services within the City of Staunton, the City of Waynesboro, and portions of Augusta County. BRITE Bus also has one route that serves Harrisonburg and connects to HDPT service at the Godwin Transit Facility at James Madison University (JMU).

All operations and maintenance of BRITE Bus fixed route and paratransit services are performed by VRT employees, by contractual agreement between the CSPDC and VRT. BRITE Bus's administrative offices, operations base, and maintenance facility are located at the BRITE Transit Facility, 51 Ivy Ridge Lane, in Fishersville. BRITE Bus's transit and paratransit fleet include:

BRITE Bus operates nine deviated fixed routes, with deviations permitted within a ¾-mile radius of any of the BRITE Bus fixed routes, as well as demand-response paratransit service.

The Executive Director of CSPDC will be the BRITE Bus Accountable Executive and will have the ultimate authority to allocate human and financial resources to address safety issues.

BRITE Bus Fleet

- 8 transit cutaways
- 2 paratransit cutaways
- 1 trolley (trolley body on bus chassis)

B2 REVISION HISTORY – BRITE BUS

Each year, BRITE Bus will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for BRITE Bus's PTASP sections.

Table B-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

B3 SAFETY MANAGEMENT POLICY

B3.1 SAFETY POLICY STATEMENT

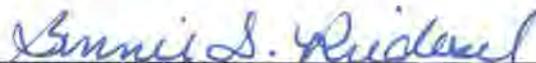
Safety is a core value of Blue Ridge Intercity Express (BRITE) Bus. BRITE Bus is committed to providing safe, reliable transit service to the City of Staunton, the City of Waynesboro, and Augusta County. BRITE Bus is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

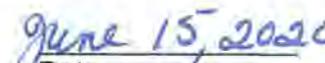
This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key BRITE Bus staff. All BRITE Bus employees are held accountable for the overall safety performance of BRITE Bus, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, BRITE Bus managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

BRITE Bus will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. BRITE Bus passengers can count on our organization to provide the safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all BRITE Bus plans, policies, and procedures. BRITE Bus will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, BRITE Bus has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, BRITE Bus will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of BRITE Bus's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of BRITE Bus personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the Executive Director of the CSPDC, I am the Accountable Executive and have ultimate authority and responsibility for the safety of BRITE Bus. With this plan, all BRITE Bus staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.


CSPDC Executive Director /Accountable Executive


Date


CSPDC Chair, Board of Commissioners


Date

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

B3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

BRITE Bus has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table B-2: BRITE Bus Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	3	Less than .5 injuries per 100,000 vehicle revenue miles	5	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	1	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of BRITE Bus policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

BRITE Bus may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The CSPDC Executive Director is responsible for ensuring that BRITE Bus managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Executive Director and CSPDC. The Executive Director and key BRITE Bus managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, CSPDC is responsible for annually providing its Safety Performance Targets as the region's Metropolitan Planning Organization (MPO) to help aid in the transportation planning process. DRPT will coordinate with CSPDC in the selection of BRITE BUS's safety performance targets.

B3.3 EMPLOYEE SAFETY REPORTING

BRITE Bus employees can report safety issues to their immediate supervisors, the Operations Supervisor, the Fleet & Safety Training Specialist, and the Transit Program Managers. BRITE Bus is evaluating additional methods for facilitating a formal program for employee safety reporting.

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

B3.4 SAFETY POLICY COMMUNICATION

It is the policy of BRITE Bus to communicate the safety policies in this PTASP with all affected employees throughout the agency. The CSPDC Transit Program Manager, working with the Contractor's management, is responsible for ensuring that BRITE Bus safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

BRITE Bus safety policies will be provided to every new employee alongside printed training materials. BRITE Bus managers and executive staff will have access to the complete BRITE Bus PTASP in both hard copy and electronically.

BRITE Bus can also communicate safety messages to employees using message boards and the display screen in the employee lounge area at the BRITE Bus facility at 51 Ivy Ridge Lane in Fishersville, as well as through in-person interactions between the Operations Supervisor, Dispatcher, and Service Advisor with front-line employees.

The CSPDC Transit Program Manager works regularly with the CSPDC Executive Director to provide data for analysis and reporting, particularly on accident and injury trends.

B3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant BRITE Bus positions. Complete position descriptions are maintained for all BRITE Bus positions by the CSPDC for their BRITE Bus staff and VRT for their staff.

CSPDC Executive Director. The CSPDC Executive Director leads BRITE Bus and is the agency's Accountable Executive. The Executive Director is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all BRITE Bus personnel. The Executive Director is responsible for ensuring that the SMS is effectively implemented throughout the department, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Executive Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Overall, the CSPDC Executive Director is responsible for the following specific activities:

- Ensuring BRITE Bus meets the safety requirements set forth by the CSPDC
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring BRITE Bus meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

CSPDC BRITE Bus Program Manager. The CSPDC Transit Program Manager reports to the CSPDC Executive Director, and manages CSPDC's administrative functions, including grants and funding and regulatory compliance. This individual oversees and coordinates with VRT for BRITE Bus service delivery and maintenance.

The CSPDC Transit Manager has been designated by the CSPDC Executive Director as the BRITE Bus Chief Safety Officer. This individual is responsible for overseeing the following activities:

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

- BRITE Bus operations and maintenance
- All safety-related BRITE Bus employee training, which is conducted by VRT for its own employees
- Accident investigation and reporting, which is conducted by VRT
- Reporting safety information to the National Transit Database
- Coordinating with VRT to provide safety data for analysis
- Coordinating with the CSPDC's Finance Director
- Regular review and update of BRITE Bus plans, policies, and procedures related to safety
- Participation in the BRITE Transit Advisory Committee (BTAC)
- Periodic inspection of BRITE Bus facilities and vehicles
- Liaison with local first responder agencies

The VRT General Manager oversees BRITE Bus contracted employees, including, but not limited to the **Operations Supervisor, Dispatcher, Operators** (who operate fixed route and complimentary paratransit services), and the **Vehicle Attendant. The VRT Director of Operations** oversees the **Fleet and Safety Training Specialist, Service Advisor, and Mechanic.** The VRT General Manager manages day-to-day bus operations. They are also in charge of monitoring the performance of preventive and corrective maintenance of the BRITE Bus fleet and ensures work is performed safely by VRT employees. All BRITE Bus employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

The Fleet and Safety Training Specialist is responsible for conducting training for VRT employees, including training pertinent to SMS and hazard awareness.

The Operations Supervisor is responsible for leading on-scene accident investigation activities and for completing associated investigation reports. The Operations Supervisor routinely observes Operators to manage and enforce operating rule compliance. The **Dispatcher** is in direct contact with local police, fire, and emergency medical services (EMS), and is responsible for clear and compliant radio communications. The Operations Supervisor and Dispatcher are trained in "reasonable suspicion" in accordance with 49 CFR Part 655 and are responsible for assessing the fitness-for-duty of Operators as they report for their shifts.

Operators are responsible for exercising maximum care and good judgment at all times while driving BRITE Bus vehicles, and for following all BRITE Bus rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating BRITE Bus vehicles. Operators must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a BRITE Bus vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents to dispatch, and completing pre-trip inspections.

The Service Advisor is responsible for the maintenance and reliability of BRITE Bus's fleet. Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. The Service Advisor is responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

BTAC is a committee of stakeholders from BRITE's service area, as well as DRPT, that advises BRITE Bus on service, administrative, and safety matters. While safety is not BTAC's sole purpose, BTAC is a forum in which BRITE Bus safety issues are raised.

All BRITE Bus personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Operations Supervisor or General

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

Manager. They are also responsible for completing all training required for the safety performance of their duties, and for performing their duties in a safe manner.

B3.6 SAFETY MEETINGS

VRT holds Safety Committee on an as-needed basis. Participants in the Safety Committee Meeting include the four Transit Managers for different VRT-operated transit systems, including BRITE Bus. The Safety Committee primarily meets for accident review in order to determine preventability. VRT Safety Committee meetings are a forum in which employees can report safety concerns. Additionally, BTAC can also discuss specific safety issues as part of the scope of its meetings.

In addition to the safety meetings described above, BRITE Bus personnel interface with the Operations Supervisor, Dispatcher, and Service Advisor in the course of executing their duties, during which safety issues are also discussed as appropriate.

B3.7 DOCUMENTATION AND RECORDKEEPING

BRITE Bus safety is governed by this PTASP as well as referenced stand-alone documents. This includes **The VRT Vehicle Operator's Manual**. This document includes a series of detailed policies, procedures and requirements for VRT Operators, including those operating for BRITE Bus. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. The VRT Fleet and Safety Training Specialist is responsible for representing BRITE Bus specifics when working with VRT to update the VRT Vehicle Operator's Manual.

For BRITE Bus, VRT adheres to its own corporate Record Retention Policy, which include guidelines for document retention timelines for different document types. Please refer to the VRT guidelines accompanying the Record Retention Policy for specific document retention guidelines.

B4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

B4.1 HAZARD IDENTIFICATION

BRITE Bus managers and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator reports to Operations Supervisor or Dispatcher, and/or the VRT General Manager
- Near miss reporting by Operators
- Formal and informal safety meetings
- Informal discussions with Operations Supervisor, Dispatcher, Service Advisor or VRT management staff
- Operator pre-trip inspections, reported via Vehicle Defect Sheets
- Mechanic reports to the Service Advisor
- Monthly BRITE facility (51 Ivy Ridge Lane, Fishersville) inspections performed jointly by CSPDC and VRT transit staff
- Customer service complaints

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

- Feedback from BTAC

The VRT General Manager, Fleet and Safety Training Specialist, Operations Supervisor, and Service Advisor are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The VRT General Manager or designee will be responsible for working with the department managers and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database, as well as submitting safety data to the CSPDC Transit Program Manager. A VRT representative and the CSPDC Transit Program Manager are jointly responsible for direct observation and identification of safety hazards via the monthly facility inspection process.

As appropriate, BRITE Bus will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

B4.2 HAZARD ANALYSIS AND EVALUATION

BRITE Bus analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During VRT Safety Committee meetings, managers and employees have the opportunity to discuss and review safety hazards.
- The CSPDC Transit Program Manager will be responsible for continually monitoring the sources of safety data under his/her authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The CSPDC Transit Program Manager will be responsible for compiling reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to the CSPDC and BTAC.
- The CSPDC Transit Program Manager is responsible for working closely with VRT managers to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

BRITE Bus is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. BRITE Bus management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. BRITE BUS will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The CSPDC Transit Program Manager is responsible for ensuring the review of all unacceptable hazards by VRT Safety Committee members. Through both the safety meetings and informal leadership meetings, BRITE Bus management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. BRITE Bus management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by BRITE Bus managers. All such documentation must be preserved for posterity for a minimum of five years in accordance with CSPDC and VRT requirements.

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

B4.3 SAFETY RISK MITIGATIONS

BRITE Bus's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The CSPDC Transit Program Manager, in conjunction with members of the VRT Safety Committee and input from BTAC as appropriate, will be responsible for working together to develop and implement such mitigations. BRITE Bus management is responsible for obtaining relevant input and feedback from the VRT General Manager, Fleet and Safety Training Specialist, Operations Supervisor, Dispatcher, Service Advisor, Operators, Mechanic, and other outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be the VRT Safety Committee.

B4.4 HAZARD TRACKING AND RECORDKEEPING

The CSPDC Transit Program Manager will be ultimately responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations will be a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database will also capture information related to mitigations developed to address the results of event investigations, inspections, and audits. The CSPDC Transit Program Manager is ultimately responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

BRITE Bus management, typically through coordination between the CSPDC Transit Program Manager and the VRT Safety Committee, is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

B5 SAFETY ASSURANCE

B5.1 SAFETY PERFORMANCE MONITORING

BRITE Bus uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. The CSPDC Transit Program Manager and VRT BRITE Bus management regularly monitors safety performance through leadership team meetings, safety committee meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. The VRT General Manager, Operations Supervisor, Dispatcher, and Service Advisor are responsible for regularly reviewing and monitoring safety-related information that is produced by respective groups employees under their purview. As described in the Safety Risk Management section above, the VRT General Manager, Operations Supervisor, Dispatcher, and Service Advisor are responsible for reviewing safety-related data for

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. These individuals are also responsible for communicating information regarding safety performance with the CSPDC Transit Program Manager, who in turn is responsible for communicating this information to the Accountable Executive and BTAC through meetings and reports.

B5.1.1 OPERATIONS

The VRT Fleet and Safety Training Specialist, working closely with the Operations Supervisor and the VRT General Manager, is responsible for facilitating the continuous evaluation and observation of Operator safety performance and rule compliance. This includes annual ride-alongs, quarterly reviews, and follow-behind observations. Any such observations are documented. The VRT Fleet and Safety Training Specialist reviews the results of all safety performance and rule compliance activities and is responsible for determining what follow up is needed with individual employees. This includes retraining, as well as observing patterns or trends suggesting more systemic safety issues. In such cases, the VRT Fleet and Safety Training Specialist or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of BRITE Bus, such as the City of Staunton, the City of Waynesboro, or Augusta County.

The VRT Vehicle Operator's Manual details Operator's roles and responsibilities, including those safety-related. The Vehicle Operator's Manual also details operating rules and procedures, in lieu of a stand-alone rule book.

Operators are responsible for completing VRT Vehicle Defect Sheets before beginning their routes, and for providing the completed forms to the Service Advisor.

B5.1.2 MAINTENANCE

The Service Advisor is responsible for the overall maintenance of BRITE Bus vehicles. BRITE Bus vehicles have preventive maintenance (PM) inspections performed every 7,500 miles for gasoline-power vehicles and every 15,000 for diesel-powered vehicles. Vehicle maintenance is performed in accordance with manufacturer specifications. BRITE Bus maintenance staff send a daily report to the CSPDC Transit Program Manager on which vehicles are in for service, as well as which vehicles are due for service. As discussed above, CSPDC and VRT staff perform a joint monthly facility inspection of the BRITE Bus facility at 51 Ivy Ridge Lane in Fishersville; a prescribed checklist is used for this inspection. BRITE Bus retains contractors to inspect lifts; the oil/water separator; heating oil furnaces; generators; and HVAC Contractors performing these inspections will issue inspection reports, of which both CSPDC and VRT keep copies.

B5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

BRITE Bus administers a United States Department of Transportation (USDOT)-compliant drug and alcohol testing program. The CSPDC Transit Program Manager or their designee is responsible for the administration of the program, including working with BRITE Bus's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The VRT General Manager or their designee is responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. BRITE Bus's drug and alcohol testing program is described in detail in the VRT Drug and Alcohol Testing Policy.

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The CSPDC Transit Program Manager is responsible for reporting safety events, as required, to the National Transit Database, in consultation with BRITE Bus managers. The CSPDC Transit Program Manager, or their designee, is responsible for the remaining NTD reporting not related to safety, such as ridership and fare collection data.

B5.3 PROCESS EVALUATION

The CSPDC Transit Manager is responsible for working with the VRT General Manager or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The CSPDC Transit Manager is also responsible for regularly monitoring the effectiveness of BRITE Bus employee safety reporting. These activities include regular coordination with VRT management. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during VRT Safety Committee meetings. The CSPDC Transit Program Manager and VRT General Manager for BRITE Bus will, as needed, work with management to evaluate any needed changes to the employee safety reporting process.

B5.4 EVENT INVESTIGATIONS

BRITE Bus follows VRT's process for the investigation of safety events, including accidents, incidents, and occurrences. The VRT Safety Committee meets as needed to conduct accident reviews, which includes determination of preventability of accidents, as well as remedial actions, if any.

The Operations Supervisor is primarily responsible for responding to and investigating of safety events, and for performing accident investigation activities. The Service Advisor or their designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

The CSPDC Transit Program Manager will be responsible for logging all safety events into a database and reviews VRT's accident investigation reports. The CSPDC Transit Program Manager is responsible for distributing accident investigation reports as appropriate

B6 SAFETY PROMOTION

B6.1 SAFETY COMMUNICATION

As discussed earlier in the *Safety Policy Communication* section, BRITE Bus will use a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities will be provided to each BRITE Bus employee as part of new employee orientation. This PTASP and referenced plans, policies, and procedures are available to all affected employees with digitally or in hard copy.

Individual managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as on television monitors at the BRITE Bus facility (51 Ivy Ridge Lane in Fisherville). If necessary,

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management will ensure that safety-related materials are directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

BRITE Bus front-line employees and managers discuss hazards and safety performance information through formal and informal meetings, including the VRT Safety Committee. Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through employee safety reporting.

B6.1.1 COMPETENCIES AND TRAINING

BRITE Bus has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. BRITE Bus, through VRT, uses a combination of in-house and vendor-created training materials. The Fleet and Safety Training Specialist is responsible for providing safety-related training to all BRITE Bus employees, and for working with outside vendors, as needed, to provide topic-specific training as-needed. For example, VRT provides quarterly training to BRITE Bus employees from materials developed by TAPTCO. In accordance with the CSPDC-VRT contract and VRT policy, BRITE Bus Operators must undergo an annual USDOT physical examination.

All Operators are trained on vehicle operation using a combination of materials created by VRT and the Transit and Paratransit Company (TAPTCO). Training consists of classroom time and on-the-road training with a senior Operator and the Operations Supervisor. New BRITE Bus Operators are trained on:

- Federal Regulations
- Hazards Communication
- Drug and Alcohol Awareness
- Harassment
- Bloodborne Pathogens
- Fatigue Management
- Wellness
- Whistleblower
- Safety Best Practices
- Introduction to the Bus
- Pre-Trip Inspections
- Mirrors
- Defensive Driving
- Driver Distractions
- Following Distance
- Intersections
- Railroad Crossings
- Pedestrian Awareness
- Backing Accidents
- Merging, Lane Changing, And Passing
- Special Driving Conditions
- Map Reading
- ADA
- Customer Service

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

- Conflict Management
- Accident Procedures

New Operators are then given quarterly evaluations and annual recertifications thereafter, with emphasis on topics of BRITE Bus interest. Refresher training on some topics recur annually, such as wheelchair securements. Remedial training to Operators is also delivered in response to accidents and validated customer complaints.

The Service Advisor is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are required to complete the TAPTCO Occupational Health and Safety Administration (OSHA) training. Mechanics also attend vendor-delivered training, such as for wheelchair lifts.

B6.1.2 TRAINING PROGRAM EVALUATION

The CSPDC Transit Program Manager, in coordination with the VRT General Manager, will be responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The CSPDC Transit Program Manager will be responsible for documenting these reviews and reporting to CSPDC, at least annually, on any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of BRITE Bus job functions. Changes or updates could include, but are not limited to:

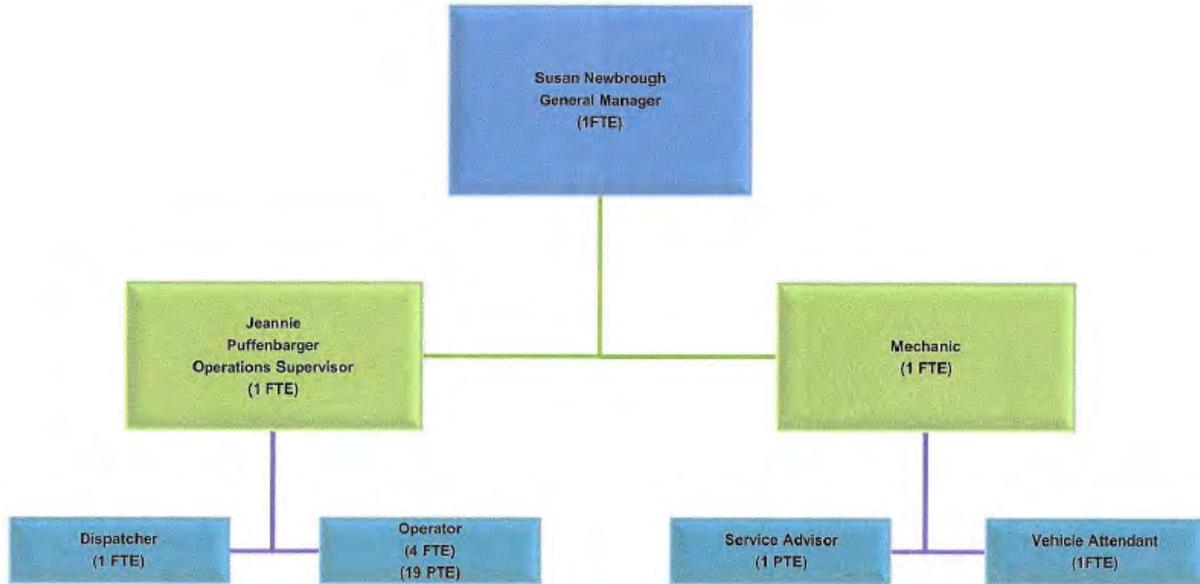
- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX B: BLUE RIDGE INTERCITY EXPRESS (BRITE BUS)

Organization Chart



Virginia Regional Transit BRITE Regional Org Chart



APPENDIX C: CITY OF BRISTOL, VIRGINIA TRANSIT (BRISTOL TRANSIT)

C1 ABOUT BRISTOL TRANSIT

The City of Bristol, Virginia Transit, hereafter referred to as Bristol Transit, is a department of the City of Bristol, Virginia. Bristol Transit operates four fixed route buses and one paratransit van within the City of Bristol, Virginia, as well as to the nearby downtown transfer center in Bristol, Tennessee. Bristol Transit is overseen by the City’s Transportation Planner, who serves as the Accountable Executive. The system operates out of a city-owned garage and fleet maintenance facility. Transit employees work out of a small administrative office adjacent to the garage, with an employee break room and supervisor’s office. The garage is maintained by the Fleet Manager and a small staff of five mechanics, who work for the city’s Public Works department. The Fleet Manager maintains other city-owned vehicles, in addition to Bristol Transit. The Transportation Planner oversees Bristol Transit’s Driver Supervisor, who in turn oversees a staff of six Drivers. For the purposes of this PTASP, the Fleet Manager and Mechanics shall be considered employees of Bristol Transit due to their integral responsibility to maintain the transit fleet, even though they are employed by a separate city department.

The Transportation Planner reports to the City Manager, who is the board-equivalent authority; in addition to Bristol Transit, the Transportation Planner is responsible for all transportation and traffic planning for the city, as well as managing special events.

Bristol Transit Fleet

- Ford Cutaways (Fixed Route)
- Ford Van (Paratransit)

Bristol Transit’s fleet includes four Ford E-Series cutaway buses, and one 8-passenger Ford Transit van used for paratransit service.

C2 REVISION HISTORY – BRISTOL TRANSIT

Each year, Bristol Transit will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Bristol Transit’s PTASP sections.

Table C-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX C: BRISTOL TRANSIT

C3 SAFETY MANAGEMENT POLICY

C3.1 SAFETY POLICY STATEMENT

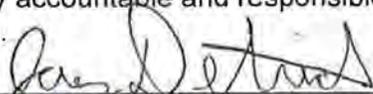
Safety is a core value of Bristol Transit. Bristol Transit is committed to providing safe, reliable transit service to the City of Bristol, and to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key Bristol Transit staff. All Bristol Transit employees are held accountable for the overall safety performance of the transit system, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, Bristol Transit employees are accountable for the delivery of the highest achievable levels of safety performance.

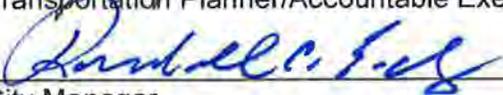
Bristol Transit will establish a culture of safety among its employees, such that safety is at the core of all operational and administrative decisions and actions. Bristol Transit passengers can count on our organization to provide safe and reliable service. Bristol Transit employees must meet or exceed the minimum thresholds and requirements set forth in all agency plans, policies, and procedures. Bristol Transit will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, Bristol Transit has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, Bristol Transit will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of Bristol Transit's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of Bristol Transit employees
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

The Transportation Planner is the Accountable Executive, and has the ultimate authority and responsibility for the safety of Bristol Transit. With this plan, all Bristol Transit employees are hereby accountable and responsible for the implementation of all of the SMS activities described herein.



Transportation Planner/Accountable Executive



City Manager

5/11/2020
Date

5/12/2020
Date

APPENDIX C: BRISTOL TRANSIT

C3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Bristol Transit has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table C-2: Bristol Transit Safety Performance Targets for Fixed Routes

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	1	Less than .5 injuries per 100,000 vehicle revenue miles	1	Less than 1 reportable event per 100,000 vehicle revenue miles	80,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	0	Less than 1 reportable event per 100,000 vehicle revenue miles	80,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

APPENDIX C: BRISTOL TRANSIT

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of Bristol Transit policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

Bristol Transit may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Transportation Planner is responsible for ensuring that Bristol Transit employees are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the City Manager. The Transportation Planner responsible for working with the Driver Supervisor and Fleet Manager to periodically evaluate the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, Bristol Transit is responsible for annually providing its Safety Performance Targets to the Bristol Tennessee-Virginia Urban Area Metropolitan Planning Organization (Bristol MPO) to help aid in the transportation planning process. DRPT will coordinate with Bristol Transit and the Bristol MPO in the selection of Bristol Transit's safety performance targets. The Transportation Planner works closely with the Bristol MPO, and will be responsible for facilitating this coordination process.

C3.3 EMPLOYEE SAFETY REPORTING

Bristol Transit employees have the ability to report safety issues to the Driver Supervisor, Mechanics, the Fleet Manager, or the Transportation Planner. Drivers and Mechanics can submit safety concerns or report safety events in writing to their immediate supervisor or to the Director of Human Resources. The Transportation Planner, Driver Supervisor, and Fleet Manager work together to help employees feel comfortable communicating their safety concerns formally and informally, and no punitive action shall be taken against a City of Bristol employee for reporting a

APPENDIX C: BRISTOL TRANSIT

safety concern related to Bristol Transit except those that are in clear violation of the City of Bristol's existing policies and procedures. The Transportation Planner, Human Resources Director, Fleet Manager, and the Driver Supervisor are responsible for working together as-needed to determine whether discipline is required for employees on a case-by-case basis, and any disciplinary decisions are kept by Human Resources in employee personnel files.

C3.4 SAFETY POLICY COMMUNICATION

It is the policy of Bristol Transit to communicate the safety policies in this PTASP with affected City of Bristol employees. The Transportation Planner is responsible for working with the Driver Supervisor and Fleet Manager to ensure that City of Bristol safety policies are disseminated through training, formal and informal meetings, and verbal and written communications with employees.

Bristol Transit's Safety Policy will be provided to every new employee alongside printed training materials. City of Bristol employees will have access to the complete PTASP in both hard copy and electronically.

The Driver Supervisor is responsible for communicating safety policies and other safety-related information during daily afternoon meet-ups at the transfer station in Bristol, Tennessee. The Fleet Manager is responsible for, in turn, communicating safety policies and other safety information to the mechanics as needed during maintenance shifts. Bristol Transit also provides formal and on-the-job training for its employees, during which the Transportation Planner or their designee clearly communicates the Bristol Transit safety policy.

C3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Transportation Planner. The Transportation Planner is Bristol Transit's Accountable Executive. In accordance with 49 CFR Part 673.23(d), the Transportation Planner has the ultimate authority and responsibility to allocate the human and capital resources needed to implement the SMS and to address safety risks. The Transportation Manager also serves as the Bristol Transit SMS Executive. As the SMS Executive, the Transportation Planner is responsible for overseeing the implementation of Bristol Transit's SMS and for ensuring safe working conditions and practices for all City of Bristol employees who operate and maintain Bristol Transit. The Transportation Planner oversees the Driver Supervisor, and coordinates regularly with the Fleet Manager, the City Manager, and other City of Bristol departments, as needed. The City Manager holds the Transportation Planner responsible and accountable for the day to day management of Bristol Transit, and for its safety performance. In turn, the Transportation Planner holds the Driver Supervisor and Drivers accountable for upholding their respective safety roles and responsibilities, and for their safety performance.

The Transportation Planner is also responsible for the following:

- Communicating safety performance information to the Driver Supervisor, Fleet Manager, Drivers, and Mechanics
- Regularly reporting on and communicating safety performance information with the City Manager
- Maintaining relationships with other city, county, and state agencies, including first responders
- Working with the Bristol MPO to annually evaluate and/or update Bristol Transit's safety performance targets
- Working with DRPT to review and update the Bristol Transit PTASP annually
- Ensuring Bristol Transit employees understand their safety roles and responsibilities

APPENDIX C: BRISTOL TRANSIT

- Instilling a culture of safety throughout the organization

The Transportation Planner works with the **Driver Supervisor** to oversee Bristol Transit Bus Drivers. The Driver Supervisor is generally responsible for:

- Dispatching Drivers
- Monitoring weather reports and other information to ensure conditions are safe and secure before Bristol Transit vehicles are dispatched
- Developing procedures and standards related to employee duties
- Conducting training, orientation, and oversight of employees to ensure policies are enacted
- Hearing and acting on any safety/hazard concerns raised by Drivers and Mechanics
- Reporting any safety concerns to the Transportation Planner
- Working with the Transportation Planner to coordinate and account for all personnel during a safety event
- Investigating bus accidents

Drivers are responsible for exercising maximum care and good judgment at all times while driving Bristol Transit vehicles, and for following all City of Bristol rules and procedures in the execution of their duties. All Drivers are responsible for:

- Completion of all city-required safety and security classes
- Ensuring all safety and security policies are implemented
- Ensuring the transit vehicle is in safe and secure condition through the use of Vehicle Pre-Trip Inspection Form
- Notifying the Driver Supervisor of any security threat or hazard concerns

Drivers must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating Bristol Transit vehicles. Drivers must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a Bristol Transit vehicle.

The Fleet Manager is responsible for the maintenance and reliability of the Bristol Transit fleet, including overseeing the Mechanics. **Mechanics** report to the Fleet Manager, and are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Mechanics are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

The Environmental & Safety Control Officer is responsible for helping ensure environmental and safety compliance for all City of Bristol facilities and property. This includes periodically conducting safety inspections of the Bristol Transit garage and maintenance facility, and for communicating any identified safety hazards to the Transportation Planner, Driver Supervisor, and/or Fleet Manager, as needed.

All City of Bristol personnel involved in the safe operation and maintenance of Bristol Transit are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Driver Supervisor or Transportation Planner, completing all training required for the safe performance of their duties, attending safety meetings as required, and for performing their duties in a safe manner. As needed, Bristol Transit employees may be asked to participate in emergency preparedness drills and exercises in coordination with external first responder and other agencies.

APPENDIX C: BRISTOL TRANSIT

C3.6 SAFETY MEETINGS

Bristol Transit staff hold formal and informal meetings as needed. The Transportation Planner will participate in the city-wide Accident Review Committee (ARC), and work closely with the Director of Human Resources to facilitate the ARC if a Bristol Transit employee is involved in an accident. The Transportation Planner meets regularly with the Driver Supervisor and Fleet Manager to discuss safety issues as they arise. Drivers and Mechanics regularly interface with the Driver Supervisor and Fleet Manager each day, and are responsible for reporting safety hazards, issues, and concerns as they discover them either in person or using the radio. Drivers and the Driver Supervisor are able to share safety messages and information with the Mechanics regarding any safety-related maintenance issues with the Bristol Transit fleet.

C3.7 DOCUMENTATION AND RECORDKEEPING

Bristol Transit safety is governed by this PTASP as well as several referenced standalone documents. This includes:

Drug and Alcohol Testing Program Policy for Transit, CDL, and Safety Sensitive Employees. This document describes the drug and alcohol testing program and requirements for the City of Bristol's Safety-Sensitive employees, in accordance with 49 CFR Parts 40 and 655.

City of Bristol, Virginia Employee Handbook. This document includes numerous safety-related policies and procedures for Bristol Transit employees, including, but not limited to, vehicle accidents and employee injuries.

The Bristol Virginia Transit Rider Code of Conduct. This document establishes regulations and guidelines for Bristol Transit riders, as well as the role and responsibility of the Driver.

Vehicle Maintenance Program. This document describes maintenance requirements for Bristol Transit vehicles and equipment, including maintenance schedules, checklists, and intervals.

For records management, the Transportation Planner is responsible for working with the Human Resources Manager, Driver Supervisor, and Fleet Manager to ensure that documents and records related to the implementation of the SMS are maintained appropriately. Currently, Bristol Transit follows the Library of Virginia document retention policy. The City of Bristol shall retain all records related to the SMS for a minimum of five years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

C4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

C4.1 HAZARD IDENTIFICATION

Bristol Transit employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Driver and/or Mechanic reports to the Driver Supervisor, Fleet Manager, or Transportation Planner
- Employee incident reports
- Formal and informal meetings

APPENDIX C: BRISTOL TRANSIT

- Pre-trip inspections
- Facility and equipment inspections performed by the Transportation Planner, Fleet Manager, the Environmental & Safety Control Officer, or their designees
- Customer service complaints

The Transportation Planner, Driver Supervisor, and Fleet Manager are responsible for regularly monitoring sources of hazard data to determine whether safety hazards require further action or analysis. The Transportation Planner, or their designee, is responsible for systematically tracking safety hazards and other safety information in a spreadsheet or database. The Transportation Planner, or their designee, is also responsible for direct observation and identification of safety hazards via the facility and equipment inspections process.

As appropriate, the Transportation Planner will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

C4.2 HAZARD ANALYSIS AND EVALUATION

Bristol Transit analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During daily Driver meetings at the transfer station, the Driver Supervisor and Drivers have the opportunity to discuss and review safety hazards.
- The Driver Supervisor and Fleet Manager are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards if needed.
- The Transportation Planner or their designee is responsible for compiling reports on safety performance, including each of Bristol Transit's safety performance targets, and for disseminating information on safety hazards to Bristol Transit employees.
- The Transportation Planner or their designee is also responsible for periodically reporting on safety performance to the City Manager and, if required, City Council.
- The Transportation Planner is responsible for working closely with the Driver Supervisor and Fleet Manager to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

Bristol Transit is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. Bristol Transit management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. Bristol Transit will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Transportation Planner, Driver Supervisor, and Fleet Manager are responsible for the review of any unacceptable hazards. These individuals work together and with affected employees to develop and implement mitigations for any unacceptable hazards. In coordination with the Driver Supervisor and the Fleet Manager, the Transportation Planner has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions shall be documented for posterity and kept in accordance with Bristol Transit's documentation and recordkeeping requirements for SMS-related documentation.

APPENDIX C: BRISTOL TRANSIT

C4.3 SAFETY RISK MITIGATIONS

Bristol Transit's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The Transportation Planner is responsible for working with the Driver Supervisor and Fleet Manager to develop and implement such mitigations. The Transportation Planner, or their designee, is responsible for obtaining relevant input and feedback from other Bristol Transit personnel and, if necessary, outside experts in the creation of mitigations.

C4.4 HAZARD TRACKING AND RECORDKEEPING

The Transportation Planner or their designee is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Transportation Planner or their designee is responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

The Transportation Planner is responsible for working with the Driver Supervisor and Fleet Manager to review and evaluate the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

C5 SAFETY ASSURANCE

C5.1 SAFETY PERFORMANCE MONITORING

Bristol Transit uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. The Transportation Planner, Driver Supervisor, and Fleet Manager regularly monitor safety performance through meetings, reporting from employees, observing rule compliance and maintenance compliance, and investigations. The Driver Supervisor and Fleet Manager are responsible for regularly reviewing and monitoring the safety-related information that is produced by their respective employees. Working with the Transportation Planner, these individuals are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. The Transportation Planner is responsible for working with the Driver Supervisor and Fleet Manager to communicate information regarding safety performance to Bristol Transit employees and to the City Manager.

APPENDIX C: BRISTOL TRANSIT

C5.1.1 BRISTOL TRANSIT OPERATIONS

The Driver Supervisor is responsible for continually evaluating the safety performance of Bristol Transit Drivers. The Driver Supervisor uses the policies and procedures in the Employee Handbook, as well as a written policy memorandum to Drivers on schedules, routes, and cleaning, as a series of performance benchmarks. Any rule violations by Drivers must be documented by the Driver Supervisor. The Driver Supervisor works with the Transportation Planner and, if needed, the Director of Human Resources to review Driver rule violations to determine what follow-up is needed with individual employees. If this group determines there may be a more systemic safety issue, then the Transportation Planner is responsible for working with the appropriate parties to evaluate potential alternative mitigations, such as the review and update of written policies, procedures, or training, or addressing physical or operational issues that may be the responsibility of other City of Bristol departments.

The Driver Supervisor is responsible for ensuring the documentation of any unusual occurrences during bus operations, such as delays, collisions, or mechanical failures. The Transportation Planner or their designee is responsible for the regular review of any unusual occurrences for the purpose of identifying potential safety hazards and monitoring safety performance.

Drivers are responsible for completing pre-trip inspections, and for notifying the Fleet Manager or Mechanics of any safety issues. All pre-trip inspections must be documented using the Vehicle Pre-Trip Inspection Form.

C5.1.2 MAINTENANCE

The Fleet Manager is responsible for the maintenance of Bristol Transit vehicles, facility, and equipment. Vehicle maintenance is governed by the Vehicle Maintenance Program, which includes detailed requirements for preventive maintenance inspections for Bristol Transit vehicles. Mechanics are responsible for completing all preventive maintenance inspections and repairs in accordance with the Vehicle Maintenance Program.

The Fleet Manager is responsible for regularly reviewing and monitoring Bristol Transit inspection and maintenance activities to help assess safety performance and to identify and evaluate potential safety hazards. The Fleet Manager or their designee reviews completed Vehicle Pre-Trip Inspection Forms, checklists, and any maintenance work orders. The Fleet Manager or their designee is responsible for communicating any safety hazards identified through maintenance to Mechanics, and to the Driver Supervisor and Transportation Planner. The Fleet Manager is responsible for maintaining up to date maintenance and inspection records in hard copy.

C5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

The City of Bristol administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Director of Human Resources is responsible for the administration of the program, including working with the city's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Director of Human Resources or their designee is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to the Driver Supervisor, Fleet Manager and Transportation Planner. Bristol's Drug and Alcohol Testing Program Policy.

The Transportation Planner or their designee is responsible for reporting safety events, as required, to the National Transit Database.

APPENDIX C: BRISTOL TRANSIT

C5.3 PROCESS EVALUATION

The Transportation Planner or their designee is responsible for regularly evaluating safety performance and the effectiveness of safety mitigations described above in the Safety Risk Management section. The Transportation Planner is responsible for holding Bristol Transit employees accountable for their safety performance, and for evaluating whether safety mitigations are effective. In case the Transportation Planner determines that a particular safety mitigation is ineffective, then they are responsible for working with affected employees to evaluate alternative mitigations or approaches.

The Transportation Planner or their designee is also responsible for regularly monitoring the effectiveness of the Bristol Transit employee safety reporting process. This includes determining whether Drivers and Mechanics are adequately reporting their safety concerns to the Driver Supervisor or the Fleet Manager during meetings, in writing, or verbally during their shifts. The Transportation Planner will work with other Bristol Transit staff as needed to evaluate any necessary changes to the employee safety reporting process.

C5.4 EVENT INVESTIGATIONS

Bristol Transit has a formal process for the investigation of safety events, including accidents, incidents, and occurrences. The Employee Handbook includes detailed instructions for any City of Bristol employee, including Bristol Transit, involved in accidents with City vehicles. Driver Supervisor and Transportation Planner are each on call to respond to serious accidents involving Bristol Transit vehicles. For every accident, the Driver Supervisor must complete a report, including a First Report of Injury, to be submitted to the Director of Human Resources. Bristol Transit also utilizes the Company Nurse incident and injury reporting system through its insurance carrier, VACorp.

All collisions involving Bristol Transit are subject to the review of the city ARC. The ARC includes representatives of the Chief of Police, Fire Chief, Public Works Operations Manager, the Environmental and Safety Control Officer, and is chaired by the Director of Human Resources. The ARC determines preventability of each collision, including probable and contributing causes, and may recommend corrective actions or mitigations to prevent recurrence, such as re-training in driver safety.

The Transportation Planner or their designee is responsible for logging all safety events into a database that includes, but is not limited to, the following information:

- Data of event
- Vehicle number
- Location
- Description/damage
- Whether EMS was needed

The Transportation Planner or their designee is responsible for working with the Director of Human Resources and the City's insurance carrier to ensure the provision of relevant investigation information.

The Transportation Planner or their designee is responsible for producing periodic reports on key performance indicators related to safety events, and for providing these reports to the City Manager, and for disseminating the information to the Driver Supervisor, Fleet Manager, Drivers, and Mechanics, as appropriate.

APPENDIX C: BRISTOL TRANSIT

C6 SAFETY PROMOTION

C6.1 SAFETY COMMUNICATION

Bristol Transit uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, safety performance, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each new Bristol Transit employee upon hiring. This PTASP and referenced plans, policies, and procedures are available to all affected employees in hard copy.

The Transportation Planner or their designee is responsible for posting safety-related bulletins and other messages in areas visible to Drivers and Mechanics, such as the employee break room. If necessary, the Transportation Planner will ensure that safety-related materials are directly distributed to individual employees. The Transportation Planner has the discretion to require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

Bristol Transit employees are able to discuss safety hazards and safety performance during formal and informal meetings with the Driver Supervisor, Transportation Planner, and Fleet Manager. The Transportation Planner is responsible for ensuring that information about safety hazards and safety performance is provided to the employees in a manner relevant to their respective safety responsibilities. The Transportation Planner or their designee is also responsible for explaining why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to employee safety reporting.

C6.1.1 COMPETENCIES AND TRAINING

Bristol Transit has established minimum training requirements for all new hires and is evaluating its refresher training requirements.

All new employees are given copies of various Bristol Transit policies and procedures, including, but not limited to, the Employee Handbook, the Drug and Alcohol Testing Program Policy. The training program includes an onboarding process with the Director of Human Resources, primarily focused on topics in the employee handbook. Safety-related topics include:

- Conflict resolution
- Disciplinary action
- Drug and alcohol policy
- Safety
- Vehicle Accidents
- Workplace violence

For new Drivers, the Driver Supervisor is responsible for providing training and instruction. All new Drivers must have a valid Commercial Drivers License with a Passenger (P) endorsement. Training for Drivers takes place during an initial 90-day probationary period, during which the Driver Supervisor will familiarize each new Driver with detailed information about the transit routes, time stops, rules, and completing pre-trip inspections, among other topics. At the end of the probationary period, the Driver Supervisor is responsible for affirming in writing that the new Driver has successfully completed the training and is no longer on probation, and qualified to operate Bristol Transit vehicles in revenue operations. All Drivers have documentation of the completion of their training in their personnel files, which are kept by Human Resources.

APPENDIX C: BRISTOL TRANSIT

The Fleet Manager is responsible for ensuring that Mechanics are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are required to complete the same initial operator training as Bus Drivers, and are qualified to operate Bristol Transit revenue vehicles. Mechanics receive informal, on-the-job training from the Fleet Manager or their designee. If needed, Bristol Transit may bring in vendors or original equipment manufacturers to provide specific training.

The Transportation Planner is responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to affected employees, the Director of Human Resources, and, if needed, the City Manager .

C6.1.2 TRAINING PROGRAM EVALUATION

The Transportation Planner, in coordination with the Driver Supervisor and Fleet Manager, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The Transportation Planner or their designee is responsible for documenting any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of Bristol Transit job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT (CAT)

D1 ABOUT CAT

Charlottesville Area Transit (CAT) is a small transit provider in the City of Charlottesville, which owns the transit system. CAT provides fixed-route bus service within Albemarle County. The fixed routes are served by a total of 36 buses in the fleet. CAT's 13 fixed route bus service is covered by this PTASP, as this is the only service of CAT receiving 49 USC §5307 grant funds. CAT provides a percentage of its federal funding to support JAUNT paratransit operations, in addition to JAUNT's 49 USC §5311 funding. The CAT Safety, Security, and Training Coordinator oversees JAUNT services along with the Procurement Manager at CAT.

CAT Fleet

- 33 Gillig transit buses
- 4 body on chassis

All operations and maintenance of CAT's fixed routes are performed by city employees, falling under the City Council and City Manager. CAT's administrative offices and operations base are located at the Central Administration Building, 1545 Avon Street, in Charlottesville. CAT's maintenance facility is collocated with the administrative building.

D2 REVISION HISTORY – CAT

Each year, CAT will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for CAT's PTASP sections.

Table D-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

D3 SAFETY MANAGEMENT POLICY

D3.1 SAFETY POLICY STATEMENT

Safety is a core value of Charlottesville Area Transit (CAT). CAT is committed to providing safe, reliable transit service to the area of Charlottesville. CAT is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

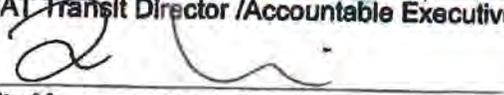
This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key CAT staff. All CAT employees are held accountable for the overall safety performance of CAT, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, CAT managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

CAT will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. CAT passengers can count on our organization to provide the safe and reliable service. Executive personnel and employees must meet or exceed the minimum thresholds and requirements set forth in all CAT plans, policies, and procedures. CAT will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, CAT has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, CAT will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of CAT's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of CAT personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the Transit Director of CAT, I am the Accountable Executive and have ultimate authority and responsibility for the safety of CAT. With this plan, all CAT staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.


CAT Transit Director /Accountable Executive


City Manager, Charlottesville

6/30/2020
Date

7.1.20
Date

APPENDIX D: CHARLOTTEVILLE AREA TRANSIT

D3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

CAT has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table D-2: CAT Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	5	Less than .5 injuries per 100,000 vehicle revenue miles	10	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	1	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of CAT policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

CAT may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The CAT Transit Director is responsible for ensuring that CAT management is performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the City Manager and City Council. The Transit Director and key CAT management are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with CAT, DRPT is responsible for providing CAT's Safety Performance Targets to the Charlottesville/Albemarle Metropolitan Planning Organization (CA-MPO) to help aid in the transportation planning process. DRPT is also responsible for coordination with CA-MPO and CAT in the selection of CAT's safety performance targets.

D3.3 EMPLOYEE SAFETY REPORTING

CAT employees can report safety issues to their Supervisors, Assistant Directors, to the Safety, Security, and Training Coordinator, or and using an anonymous hazard form. CAT is evaluating additional approaches to expand safety reporting by frontline employees, and to ensure awareness of safety hazards across operations and maintenance. CAT is working towards improving preventive hazard reporting with frontline employees.

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

D3.4 SAFETY POLICY COMMUNICATION

It is the policy of CAT to communicate the safety policies in this PTASP with all affected employees throughout the department. The Safety, Security, and Training Coordinator is responsible for ensuring that CAT safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees. CAT safety and employee policies will be provided to every new employee during initial onboarding and orientation. CAT executive staff will have access to the complete CAT PTASP in both hard copy and electronically.

CAT communicates safety-related messages through bulletins and safety newsletters. Safety policies are mandated through the Employee Transit Policy Manual. CAT management can also communicate messages through an electronic board for operations personnel and safety memos which employees are asked to sign-off for understanding. The Safety, Security, and Training Coordinator works with the Assistant Directors of Operations and Maintenance to deploy safety messages throughout the agency.

D3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant CAT positions.

Transit Director. The Transit Director leads CAT as the agency's Accountable Executive and reports to the Charlottesville City Council. The Director is responsible for overseeing the safety and daily operations of the agency. The Director is responsible for ensuring that the SMS is effectively implemented throughout the department, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d).

Overall, the Director is responsible for the following specific activities:

- Ensuring CAT meets the safety requirements set forth by the City of Charlottesville
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring CAT meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

City Risk Manager supports the review and cataloging of all accidents in the City of Charlottesville, including CAT accidents. The Risk Manager coordinates insurance claims for CAT accidents. Annually, CAT representatives coordinate with the Risk Manager to review accidents and identify any potential trends for accidents.

Assistant Director of Operations. The Assistant Director of Operations reports to the Transit Director, and manages CAT's daily operations in the field. The Assistant Director oversees the work of the operations Supervisors, who in turn manage and regulate the work of all Bus Operators. They are responsible for coordinating on accident investigations as necessary and join the Accident Committee meetings.

Assistant Director of Facilities and Maintenance. The Assistant Director of Facilities and Maintenance reports to the Transit Director, and manages the facilities and maintenance performed on the vehicles. They are responsible for coordinating with maintenance Supervisors,

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

who in turn manage frontline maintenance personnel. They are responsible for coordinating on accident investigations as necessary and join the Accident Committee meetings.

The Safety, Security, and Training Coordinator has been designated by the Transit Director as the Chief Safety Officer. This individual is responsible for the following activities:

- All employee training
- Accident investigation and reporting
- Reporting safety information to the National Transit Database (NTD)
- Coordinating with the City Risk Manager
- Regular review and update of CAT plans, policies, and procedures related to safety
- Participation in the Accident Committee
- Periodic inspection of CAT facilities and vehicles
- Liaison with local first responder agencies

The Safety, Security, and Training Coordinator works with CAT Procurement to oversee the JAUNT paratransit services as a recipient of a portion of CAT's federal funding.

Operations Supervisors. Operations Supervisors guide operators in the performance of their duties, answering questions regarding work responsibilities, clarifying policies and procedures, and helping the Assistant Manager of Operations in the daily operation of transit activities

Bus Operators (Drivers) are responsible for exercising maximum care and good judgment at all times while driving CAT vehicles, and for following all CAT rules and procedures in the execution of their duties. Bus Operators must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating CAT vehicles. Bus Operators must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a CAT vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents, and completing pre-trip inspections for the maintenance group.

All CAT personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Safety, Security, and Training Coordinator or to their immediate Supervisor, completing all training required for the safety performance of their duties, and for performing their duties in a safe manner. All Transportation employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

D3.6 SAFETY MEETINGS

The Transit Director, along with the Safety, Security, and Training Coordinator, plan to be responsible for holding Safety Committee meetings. CAT has committed to holding Safety Committee meetings semi-annually, and is evaluating holding additional meetings as appropriate.

CAT currently holds monthly Accident Committee meetings which cover all the safety events that occurred over the previous month. During this meeting the group will determine the preventability of accidents and primary causes.

Management is responsible for holding weekly staff meetings for management and frontline personnel. This is an opportunity for CAT personnel to raise safety concerns and identified hazards in a more formal setting.

The Operations and Maintenance groups also hold separate staff meetings to discuss daily activities and review safety memos for signature by personnel.

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

D3.7 DOCUMENTATION AND RECORDKEEPING

CAT safety is governed by this PTASP as well as referenced standalone documents. This includes **The Employee Transit Policy Manual** and **Operator's Manual**. This document includes requirements and procedures for CAT employees. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. Maintenance employees are also held to the requirements in the **CAT Vehicle Maintenance Policy and Procedures**, which lays out safety requirements; quality control; scheduling; and inspections.

CAT records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include operations and maintenance quality assurance checks, hazard reports, accident reports and log, training records, maintenance records and work orders, and drug and alcohol program testing records. Individual departments are generally responsible for the maintenance of their respective records in accordance with applicable requirements. In accordance with Charlottesville requirements, CAT keeps all documentation for a minimum of five years. Such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

D4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

D4.1 HAZARD IDENTIFICATION

CAT managers and front-line employees are empowered to identify safety hazards using a variety of methods, including but not necessarily limited to:

- Incident report forms
- Hazard report forms/anonymous reporting
- Operator reports by radio for hazards along the route
- In person discussions with supervision or Assistant Director
- In person report to the Safety, Security, and Training Coordinator
- Near miss reporting by Bus Operators
- Employee meetings
- Annual facility checks
- Work orders completed by maintenance personnel
- Bus Operator pre-trip inspections
- Customer service complaints
- Quality assurance checks for operations and maintenance
- Inspections performed by external groups, such as the fire department and the FTA

CAT department managers are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Safety, Security, and Training Coordinator is responsible for working with the department managers and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database. CAT also utilizes the existing accident log to track accidents and identify any trends that may inform hazards.

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As appropriate, CAT will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

D4.2 HAZARD ANALYSIS AND EVALUATION

CAT analyzes and evaluates potential safety hazards based on methods of reporting as listed above. CAT primarily analyzes hazards and mitigates at the time of the report, if possible. The Safety, Security, and Training Coordinator will continue to formalize the process for documenting each hazard and tracking it in a log. Additionally, CAT may also conduct hazard analysis and evaluation through such methods as:

- Individual departmental monitoring of hazards and mitigations.
- Reviews of hazards based on trends of accidents during Accident Committee on a monthly basis.
- Assess pre-trip inspections for repeat issues on vehicles.
- The Safety, Security, and Training coordinator is responsible for tracking and analyzing identified hazards on the hazard log.

CAT is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. CAT management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. CAT will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Safety, Security, and Training Coordinator will be responsible for ensuring the review of all unacceptable rated hazards at CAT. Through both the regular meetings and informal leadership meetings, senior management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. CAT management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by CAT managers. All such documentation must be preserved for posterity for a minimum of five years in accordance with City of Charlottesville requirements.

D4.3 SAFETY RISK MITIGATIONS

CAT's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. This typically occurs when an employee reports an identified hazard to their direct Supervisor and will often be mitigated at that point, whenever possible. If this is a longer-term hazard, management and executive leadership will track the identified mitigation through completion, or identify a new method for mitigation.

D4.4 HAZARD TRACKING AND RECORDKEEPING

The Safety, Security, and Training Coordinator is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The Assistant Directors of Operations and Maintenance also track department-specific hazards identified by employees. The primary method for tracking hazards and corrective actions will be a combined log called the Safety Issues log, which will serve as a central location for safety hazards and mitigations at CAT. Separately, CAT tracks accidents in an accident log which

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describes the accident, cause, location, weather, and if it was preventative. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

D5 SAFETY ASSURANCE

D5.1 SAFETY PERFORMANCE MONITORING

CAT uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through monthly accident meetings, meeting with the City Safety Risk Manager, reviews of employee records, and frequent, ongoing conversations with Supervisory and front-line employees. Annually, CAT and the City Risk Manager review accidents and overall preventability. Through accident investigations, CAT management looks into what may be preventable and nonpreventable accidents and identify areas for improvement, as a part of the Safety Risk Management, described in the previous section. The Safety, Security, and Training Coordinator is also responsible for reviewing performance of Jaunt paratransit services, which is provided by an outside contractor.

Individual department managers are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, department managers are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. The Assistant Directors work with Supervisors to review safety issues and employee records specific to the operations and maintenance departments to assess potential hazards or areas for improvement. Once any mitigations are put into place based on hazard analysis management reviews the mitigations are regularly assessed to review if they were effective or if a new mitigation should be considered.

D5.1.1 OPERATIONS

The Assistant Director of Operations, working closely with Supervisors, Transit Director, Assistant Director of Facilities and Maintenance, and the Safety, Security, and Training Coordinator, is responsible for facilitating the continuous evaluation and observation of Operator safety performance and rule compliance. The CAT Operations group conducts annual employee reviews to ensure employees understand their requirements and allows them to voice any concerns, including hazardous conditions. Supervisors are required to conduct quality assurance checks on Bus Operators, utilizing ride-along forms. This is a randomized program, where Supervisors determine who they will evaluate by various times of day and the day of week.

Accidents are also used as a method to track performance and assess events that may have been preventable. Following an accident, an employee may be required to complete remedial training, as a part of the Safety Promotion program. The Assistant Director of Operations also assists the Safety, Security, and Training Coordinator in conducting accident and incident investigations to identify root causes and mitigate future events through such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may or may not be CAT's responsibility, such as street designs.

Bus Operators are responsible for completing pre-trip inspection forms before beginning their routes, and for providing the completed forms to the maintenance personnel on duty.

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D5.1.2 MAINTENANCE

The Assistant Director of Facilities and Maintenance is responsible for the overall maintenance of CAT transit vehicles and facilities. The CAT Vehicle Maintenance Policy and Procedures details the responsibilities of all CAT maintenance personnel in the following areas:

- Preventive maintenance (PM) inspections and services
 - Pre-Trip Inspections
 - Operator defect reports
 - Inspection tracking
 - Quality checks
 - Scheduling of Mechanics
 - Americans with Disability Act (ADA) Accessibility Features
- Work Orders
- Tools and Equipment
- Servicing and Cleaning

The Assistant Director of Facilities and Maintenance is responsible for regularly reviewing and monitoring CAT maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. Supervisors and the Assistant Director review all completed pre-trip inspection forms and preventive maintenance and inspection checklists completed by the mechanics. The Assistant Director is ultimately responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during informal discussions with maintenance employees. The Assistant Director also reports hazards to the Safety, Security, and Training Coordinator for monitoring.

Preventive maintenance is performed every 6,000 miles, in addition to the annual state inspection. This ensures that vehicles are routinely inspected and checked for critical safety concerns and ultimately addressed. On an ongoing basis the maintenance group assesses components or equipment that routinely fails; in which case Mechanics are empowered to utilize a maintenance tree to troubleshoot issues. If issues aren't resolved they may be taken to a higher level to identify a permanent solution or mitigation. The maintenance group utilizes the pre-trip inspections conducted by Bus Operators to identify any deficiencies and review if the vehicle must be taken out of service to address a safety critical defect. Maintenance is also required to conduct inspections on equipment approximately twice a year, depending on the type of equipment.

Separately, maintenance of facilities is the responsibility of the City of Charlottesville Facilities Management Department through coordination with the Assistant Director of Fleet and Maintenance and the Safety, Security, and Training Coordinator. On an annual basis, the Safety, Security, and Training Coordinator conducts and internal facilities inspections for CAT in addition to fire inspections conducted by the Fire Department.

D5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

CAT administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Transit Director or their designee is responsible for the administration of the program, including working with CAT's collection vendor (University of Virginia Workmed) to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Transit Director or their designee is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable cause/suspicion to Supervisors and affected

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

managers. CAT's drug and alcohol testing program is described in detail in the CAT Policy Manual.

The Safety, Security, and Training Coordinator is responsible for reporting safety events, as required, to the National Transit Database, in consultation with CAT managers. Both the Assistant Directors and the Safety, Security, and Training Coordinator remain involved in the procurement process at CAT by working with the Grants and Procurement Coordinator to ensure safety requirements are included in the Request for Proposal (RFP). The Safety, Security, and Training Coordinator reviews all incoming equipment to ensure it meets safety specifications.

D5.3 PROCESS EVALUATION

The Safety, Security, and Training Coordinator is responsible for working with Individual department managers or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The Assistant Directors are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Safety, Security, and Training Coordinator is also responsible for regularly monitoring the effectiveness of CAT employee safety reporting. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during Departmental Safety Committee meetings. The Safety, Security, and Training Coordinator will, as needed, work with management to evaluate any needed changes to the employee safety reporting process.

D5.4 EVENT INVESTIGATIONS

CAT has a formal process for the investigation of safety events, including accidents, incidents, and occurrences. The investigation process is detailed in the CAT Policy Manual. Accidents are all reviewed at the monthly Accident Committee meeting to assess the investigation, cause, and preventability. Ultimately, the City Safety Risk Manager tracks and manages all accident data for the City of Charlottesville, including CAT accidents.

Supervisors are primarily responsible for responding to an initial investigation of safety events, both at the scene of the event and post-crash. Supervisors complete an on-scene accident checklist and accident report checklist. Other CAT managers are responsible for participation in the investigation process, as needed and as determined by the Transit Director.

The Safety, Security, and Training Coordinator, or designee, is responsible for logging all safety events into the accident log after the investigation report is reviewed and finalized. The CAT accident log includes information such as:

- Time, month, year, season
- Date of event
- Employee information
- Vehicle information
- Location
- Specific notes on the event and description
- Number of passengers
- Costs of accident
- NTD reportable
- Injuries
- Weather

APPENDIX D: CHARLOTTESVILLE AREA TRANSIT

- Personal vehicle movement (if applicable)

D6 SAFETY PROMOTION

D6.1 SAFETY COMMUNICATION

As discussed earlier in Section 4.3, CAT uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each CAT employee as part of new employee orientation and safety training for their specific positions. This PTASP and referenced plans, policies, and procedures are available to all affected employees with digitally or in hard copy.

The Safety, Security, and Training Coordinator is responsible for developing and posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees. The Safety, Security, and Training Coordinator also develops a safety newsletter that highlights relevant safety and emergency preparedness related issues and tips for employees. If necessary, management will ensure that safety-related materials are directly distributed to individual employees. The Safety, Security, and Training Coordinator provides memos to employees, of which they must sign off on for their receipt and understanding of the safety information. CAT is also working towards developing an email system to ensure safety information is provided to all employees regardless of shifts. CAT front-line employees and managers discuss hazards and safety performance information through formal and informal meetings, including the weekly staff meeting.

D6.1.1 COMPETENCIES AND TRAINING

CAT has a formal process to ensure that employees receive the appropriate competencies and training to safely perform their duties. CAT uses a combination of in-house and vendor-created training materials. The Safety, Security, and Training Coordinator is responsible for providing safety-related training to all CAT employees, and for coordinating with management to schedule outside vendors for equipment-specific training.

All Bus Operators are trained on vehicle operation using a combination of materials developed by the Transit and Paratransit Company (TAPTCO) and CAT. The CAT training program is composed on classroom training (80 hours) and on the job training with ride alongs on every route. Bus Operator training covers:

- Federal Regulations
- Hazards Communication
- Drug and Alcohol Awareness
- Farebox Procedures
- Harassment
- Bloodborne Pathogens
- Safety Best Practices
- Introduction to the Bus
- Pre-Trip Inspections
- Mirrors
- Defensive Driving
- Bus Operator Distractions

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- Following Distance
- Intersections
- Railroad Crossings
- Pedestrian Awareness
- Backing Accidents
- Merging, Lane Changing, And Passing
- Special Driving Conditions
- Map/Schedule Reading
- On Road Demonstration
- ADA
- Customer Service
- Conflict Management
- Accident Investigation Procedures

Bus Operator training also includes performance standards and maneuvering standards, as described in the TAPTCO materials. All Bus Operators receive both classroom and road training, all of which is the responsibility of the Safety, Security and Training Coordinator, with the assistance of Supervisors. CAT also has regular ongoing evaluation of its Bus Operators through regular check rides. Annually each Bus Operator receives refresher training which covers ADA, defensive driving, hazardous communication, emergency management, harassment, new policy review, and a operator evaluation. Training records are maintained in employee files along with their respective accident reports.

The Assistant Director of Facilities and Maintenance and the safety, Security, and Training Coordinator are responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics receive informal, on-the-job training from senior Mechanics. If needed, CAT may bring in vendors or original equipment manufacturers to provide specific training. Some training on new policies and procedures may delivered verbally by the Assistant Director of Facilities and Maintenance the Safety, Security, and Training Coordinator, or other CAT personnel as needed. Training for Mechanics covers:

- OSHA
- Transmissions
- Engines
- Bloodborne Pathogens
- Forklift Operation
- Fall Protection

The Safety, Security, and Training Coordinator is responsible for documenting the completion of any formal or on-the-job training. Mechanics also receive annual refresher training. All front-line maintenance personnel have training records included in their personnel files.

All employee training files are composed of:

- Training Completion Checklist
- Employee Information
- Signatures from Employee and Trainer
- Final Tests
- Evaluations
- Ride Along (Operators)
- Pre-Trip Evaluation (Operators)

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CAT Supervisors currently all come from the ranks of existing CAT front-line employees. Supervisors receive training in accident investigation, reasonable suspicion, and other topics.

The Assistant Directors and the Safety, Security, and Training Coordinator, or their designees, are responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to the Transit Director. The Assistant Directors ensure that departmental employees receive necessary refresher or remedial training.

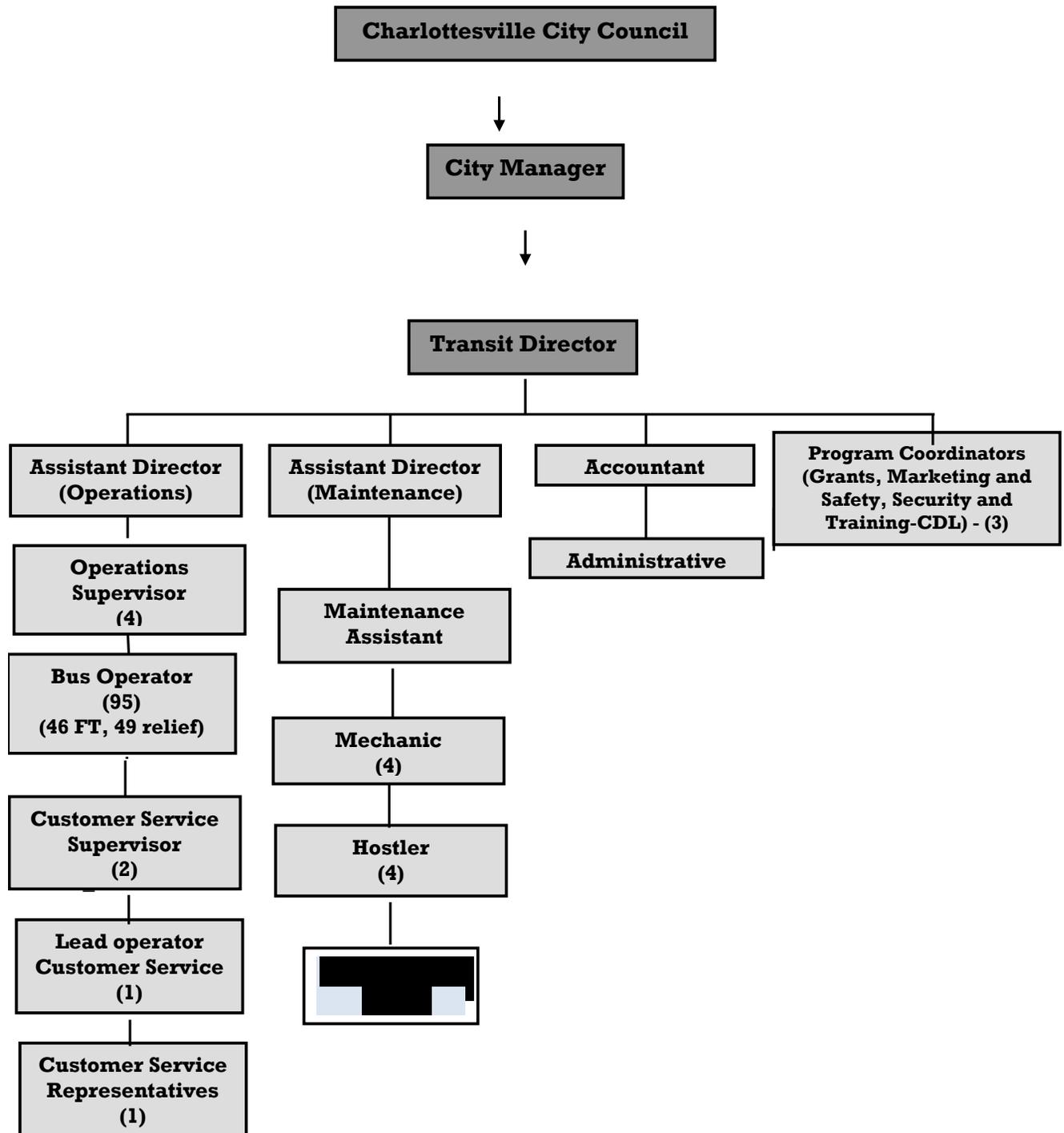
D6.1.2 TRAINING PROGRAM EVALUATION

The Safety, Security, and Training Coordinator, in coordination with the Assistant Directors, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary based on employee proficiency and understanding. Management also meets with Bus Operators quarterly to discuss policies, procedures, and activities, which is also an opportunity to voice any concerns in areas such as training. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of CAT job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

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Organization Chart



APPENDIX E: FREDERICKSBURG REGIONAL TRANSIT (FRED)

E1 ABOUT FRED

Fredericksburg Regional Transit, known as FRED, is a department of the City of Fredericksburg. FRED provides fixed route and route deviation services within the City of Fredericksburg, and the counties of Spotsylvania and Stafford.

FRED Administrative offices are located in the Lawrence A. Davies Transit Center, 1400 Jefferson Davis Highway in Fredericksburg, also known as “FRED Central.” FRED also has an Operations Center and Maintenance Facility located at 11710 Main Street in Spotsylvania County.

FRED operations and maintenance is performed directly by FRED maintenance employees. FRED maintains a 30-vehicle fleet of Chevy, Ford, and Freightliner cutaway buses for fixed route and route deviation service. FRED operates weekday service and express feeder service to and from two Virginia Railway Express (VRE) train stations; in addition, FRED operates weekend and late night service centered on the University of Mary Washington during the academic year.

The Director of Public Transit is the Accountable Executive, and has ultimate authority to allocate human and financial resources to address safety issues within the agency. The City Manager for the City of Fredericksburg serves as the board equivalent authority over the Accountable Executive. FRED is advised by the Public Transit Advisory Board (PTAB), which can make non-binding recommendations to the agency and Fredericksburg City Council.

E2 REVISION HISTORY – FRED

Each year, FRED will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for FRED’s PTASP sections.

Table E-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

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E3 SAFETY MANAGEMENT POLICY

E3.1 SAFETY POLICY STATEMENT

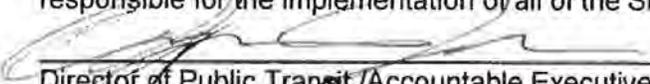
It is Fredericksburg Regional Transit's (FRED) policy to provide its customers with safe and secure public transit at all times. FRED is committed to safety as a core value, and to developing and implementing the necessary processes to effectively manage safety risk in accordance with Safety Management Systems (SMS).

This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. The PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key FRED staff. All FRED employees are held accountable for the overall safety performance of FRED, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, FRED managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

FRED passengers can count on Fredericksburg Regional Transit to provide the safe and dependable transit service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all FRED plans, policies, and procedures. FRED also complies with all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, FRED has established measurable safety performance targets, outlined in this document, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, FRED will continually measure and assess the achievement of its safety performance targets through its Safety Management policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

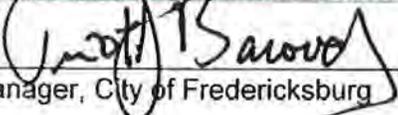
- Clearly defining the safety roles, responsibilities, and accountabilities of FRED personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the Director of Public Transit for the City of Fredericksburg, I am the Accountable Executive and have ultimate authority and responsibility for the safety of FRED. The City Manager for the City of Fredericksburg serves as the board equivalent authority over the Accountable Executive, and is a signatory to this PTASP. With this plan, all FRED staff are hereby accountable and responsible for the implementation of all of the SMS activities described herein.



Director of Public Transit/Accountable Executive

6/4/2020
Date



City Manager, City of Fredericksburg

6/11/20
Date

APPENDIX E: FREDERICKSBURG REGIONAL TRANSIT

E3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Approximately every six months, the Public Transit Advisory Board conducts an evaluation of FRED’s mission, goals, and objectives. During this process, FRED’s Director and managers work with the Advisory Board to evaluate the achievement of FRED’s stated goals and objectives and to establish new or revised goals for the subsequent period. This mission/goals/objectives process has historically included safety performance metrics like accidents and injuries. Moving forward, FRED’s measurable safety performance targets will be established in coordination and compliance with the requirements of the National Public Transportation Safety Plan.

FRED has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table E-2: FRED Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	4	Less than .5 injuries per 100,000 vehicle revenue miles	8	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event

APPENDIX E: FREDERICKSBURG REGIONAL TRANSIT

- An injury requiring immediate medical attention away from the 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

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of FRED policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

FRED may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Director is responsible for ensuring that FRED managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the City Manager, City Council and the Advisory Board. The Director and key FRED managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, FRED is responsible for annually providing its Safety Performance Targets to the Fredericksburg Area Metropolitan Planning Organization (FAMPO) to aid in the transportation planning process. DRPT will coordinate with FAMPO and FRED in the selection of FRED's safety performance targets.

APPENDIX E: FREDICKSBURG REGIONAL TRANSIT

E3.3 EMPLOYEE SAFETY REPORTING

FRED employees are able to report safety concerns to management and supervision without fear of reprisal. FRED Drivers are required to conduct a pre-trip vehicle inspection at the beginning of each shift. Inspection reports are recorded on pre-prepared forms and submitted to the shift supervisor at the end of each shift. All conditions noted that would adversely affect safe operation of the vehicle or passenger access or accommodations are reported to shift supervisors immediately. Any conditions that would affect safe operation are addressed immediately or the vehicle is removed from service and replaced by another vehicle. Drivers are also required to complete a Non-Collision Incident Report to report other safety events to management. At this time FRED is evaluating additional approaches to allow employees to report safety issues. FRED management reserves the authority to take disciplinary action in the event employee behavior violates existing FRED plans, policies, or procedures, including the requirements contained in the City of Fredericksburg Administrative Manual.

E3.4 SAFETY POLICY COMMUNICATION

FRED communicates its safety policies to its employees through a variety of methods. New employees receive training on safety policies as part of their initial training program. Managers hold meetings with Drivers, during which safety is a topic of discussion. Management also holds staff meetings, during which safety items or issues are discussed. It is the policy of FRED to communicate the safety policies in this PTASP with all affected employees throughout the agency. The Assistant Director of FRED is responsible for ensuring that FRED safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with relevant employees across the agency.

This PTASP and any other relevant safety policies will be provided to every new employee alongside printed training materials. FRED managers and executive staff will have access to the complete FRED PTASP in both hard copy and electronically.

FRED can also communicate safety messages to employees using message boards in the employee break room area at FRED Central, the Main Street Operations Center and the Maintenance Facility, as well as in the dispatch area.

E3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant FRED positions.

Director of Public Transit. The Director is the Accountable Executive. The Director reports to the Assistant City Manager, who is, in turn, accountable to City Council. The Director is responsible for the overall development, approval, and implementation of FRED's SMS. The Director holds managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Assistant Director. The Assistant Director serves as FRED's Safety Officer, and reports to the Director. The Assistant Director participates in the review, approval, and update of the SMS, and directly oversees the implementation of the SMS through the Fleet Manager, Operations Manager, and other key FRED staff. The Assistant Director is the primary liaison with the City of Fredericksburg's emergency management activities and other local first responder agencies, and is responsible for overseeing accident investigations involving FRED vehicles. The Assistant Director participates in a city-run Accident Review Board. The Assistant Director works with the Policy and Planning Manager to facilitate reporting to the National Transit Database (NTD).

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Policy and Planning Manager. The Policy and Planning Manager reports to the Director, and is generally responsible for route planning and general regulatory compliance. The Policy and Planning Manager is also responsible for reporting safety information to the NTD, using information provided by the Assistant Director related to accidents and injuries. As part of route planning, this individual works with other FRED managers to review new routes, proposed changes and deviations to routes, to ensure they adhere to established FRED safety requirements, and to identify and address potential safety risks.

Operations Manager. The Operations Manager reports to the Assistant Director, and is responsible for day-to-day transit operations. The Operations Manager oversees all FRED Drivers, Supervisors, and Driver Trainers. The Operations Manager is also responsible for assuring the implementation of all driver safety protocols, and for the administration of the agency's Drug and Alcohol Program in accordance with 49 CFR Parts 655 and 40, including all testing and reporting requirements. The Operations Manager oversees a staff of Security Officers who patrol FRED facilities.

Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Supervisors routinely observe Drivers to manage and enforce operating rule compliance. Supervisors also perform dispatching, and are in direct contact with local police, fire, and emergency medical services (EMS), and are responsible for clear and compliant radio communications.

The Driver Trainer. The Driver Trainer is responsible for preparing training materials, training new drivers, and for conducting periodic refresher classes to ensure that all drivers are aware of all current FRED safety policies and procedures.

Drivers are responsible for exercising maximum care and good judgment at all times while driving FRED vehicles, and for following all FRED rules and procedures in the execution of their duties. Drivers must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating FRED vehicles. Drivers must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a FRED vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents to Supervisors, and completing pre-trip inspections.

The Fleet Manager is responsible for the maintenance and repair of all revenue and non-revenue vehicles, and assures that all vehicles are maintained in accordance with all FRED plans, policies, and procedures. The Fleet Manager oversees a staff of **Mechanics**, who are in turn responsible for adhering to all FRED maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals. All maintenance personnel are responsible for completing required safety training, and for fulfilling their delegated safety and SMS responsibilities.

All FRED personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to their immediate Supervisor, the Director, or the Assistant Director, and for completing all training required for the safe performance of their duties, and for performing their duties in a safe manner.

E3.6 SAFETY MEETINGS

The City of Fredericksburg has a Safety Committee, and the Director or their designee is responsible for regular attendance and reporting of FRED safety information. Within FRED, management holds staff meetings, during which safety is a topic of conversation; this includes accidents and injuries. The Assistant Director or designee is responsible for facilitating regular

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safety meetings with Drivers, during which Drivers, Supervisors, and other FRED staff have the opportunity to discuss safety issues. Safety is also a topic of discussion during route planning meetings, where the Policy and Planning Manager works with other FRED staff to evaluate new and proposed changes and deviations to bus routes to ensure that they adhere to FRED safety standards, and that potential safety risks are identified and addressed.

E3.7 DOCUMENTATION AND RECORDKEEPING

FRED safety is governed by this PTASP as well as referenced standalone documents. This includes:

- **FRED Maintenance Policy and Program**, which includes the Maintenance and Repair Policy, Goals, and Vehicle Maintenance and Repair Objectives.
- **FRED Mission, Goals, and Objectives**, as approved by the Public Transit Advisory Board.
- City of Fredericksburg Employee Safety Manual, which includes:
 - Division of Responsibility
 - Emergency Response Plan
 - Accident Procedures
 - Common Areas
 - Confined Spaces
 - Electrical Safety
 - Preventing Falls
 - Fire Protection/Prevention
 - First Aid
 - Good Housekeeping/Sanitation
 - Hand and Power Tools
 - Hazard Communication
 - Working in Hot Environments
 - Ladders and Scaffolding
 - Landscaping/Grounds Maintenance
 - Lifting and Carrying
 - Lockout/Tagout of Equipment
 - Machine Guarding
 - Motorized Vehicles
 - Office Safety
 - Powered Industrial Trucks/Material Handling Equipment
 - Protective Clothing & Equipment
 - Use of Respirators
 - Roadway and Construction Site Safety
 - Spray Painting
 - Vehicle Operation
 - Welding/Torching
- **City of Fredericksburg FTA/DOT Drug Free Workplace & Test Procedures**, which governs the USDOT-required drug and alcohol testing program requirements for safety-sensitive and non-safety-sensitive employees.
- **City of Fredericksburg Emergency Operations Plan**, which outlines roles, responsibilities, and emergency support procedures.
- **City of Fredericksburg Administrative Manual**, which includes minimum standards for employee behavior, safety and security, accident investigation, and workers compensation.

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- **FRED Procurement Policies, Practices, and Requirements**, which governs purchasing and procurement of professional services, rolling stock, construction, and materials and supplies.

FRED records developed and maintained to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include Route Problems forms, Daily RouteMatch Problems forms, Non-Collision Incident forms, information entered to FRED's TrackIt database, accident investigation reports, maintenance and repair records and work orders, pre-trip inspections, employee training records, and drug and alcohol testing records. The Assistant Director is generally responsible for ensuring that Operations and Fleet are maintaining the respective records in accordance with applicable requirements established by the Library of Virginia Records Retention and Disposition Schedules for County and Municipal Governments or the Federal Transit Administration, whichever is greater. The Assistant Director or Designee is responsible for retaining all records related to the implementation of the SMS in accordance with applicable requirements. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

E4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

E4.1 HAZARD IDENTIFICATION

FRED managers and employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Route planning meetings
- Management meetings
- City Safety Committee meetings
- Driver meetings
- Pre-trip inspection forms
- Non-Collision Incident forms
- Route problems forms
- Mechanic reports to the Fleet Manager
- Facility and equipment inspections performed by the Driver Trainer or Supervisors
- Customer service complaints
- Mission/Goals/Objectives evaluations facilitated between FRED management and the Public Transit Advisory Board

Individual division managers are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Assistant Director is responsible for working with the division managers and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database.

As appropriate, FRED will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

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E4.2 HAZARD ANALYSIS AND EVALUATION

FRED analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During route planning meetings, management and/or staff meetings, and driver meetings
- During Accident Review Committee meetings with other city departments
- During City Safety Committee meetings
- As part of periodic the Mission/Goals/Objectives evaluation process
- Individual division managers are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Assistant Director or designee is responsible for compiling reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to FRED management.
- The Assistant Director is responsible for working closely with all FRED managers to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

FRED is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. FRED management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. FRED will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Assistant Director is responsible for ensuring the review of all unacceptable hazards by FRED management. Through formal and informal meetings, FRED management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. FRED management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by FRED managers. All such documentation must be preserved for posterity for a minimum of five years in accordance with FRED document retention policies.

E4.3 SAFETY RISK MITIGATIONS

FRED's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. FRED managers are responsible for working together to develop and implement such mitigations. FRED management is responsible for obtaining relevant input and feedback from Supervisors, Bus Drivers, Mechanics, and other outside experts as necessary in the creation of mitigations. FRED will discuss safety risk mitigations during management and staff meetings.

The Assistant Director or designee is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information

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- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Assistant Director or designee is responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

FRED managers are collectively responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

E5 SAFETY ASSURANCE

E5.1 SAFETY PERFORMANCE MONITORING

FRED uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through observations of Drivers, facility inspections, maintenance and repairs and associated records, accident investigations, and data provided to the NTD. FRED also evaluates safety performance through periodic evaluations of the agency's Mission/Goals/Objectives, in coordination with the Public Transit Advisory Board. Management discusses safety performance during route planning meetings, management meetings, and driver meetings.

Individual department managers are responsible for reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, individual managers are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. Managers are also responsible for communicating information regarding safety performance with the Assistant Director and other FRED managers through meetings and reports, as needed.

E5.1.1 OPERATIONS

The Operations Manager, working closely with Supervisors and the Assistant Director, is responsible for facilitating the continuous evaluation and observation of FRED Driver safety performance and rule compliance. This includes annual performance reviews and observations, and regular driver Spot Checks. FRED uses the Spot Check forms to document any observed rule violations. The Operations Manager reviews the results of all Spot Checks and other rule compliance activities, and is responsible for determining whether any follow-up is required for individual employees. This could include retraining, as well as observing patterns or trends suggesting more systemic safety issues. In such cases, the Operations Manager is responsible for evaluating potential mitigations, such as training, review or update of policies, procedures, and training programs, or addressing physical or operational issues that may be the responsibility of other City of Fredericksburg departments.

Drivers are responsible for completing pre-trip safety inspection forms before beginning their routes, and for providing the completed forms to their Supervisor at the end of each shift. All conditions that would adversely impact safe operation of the vehicle, passenger access or accommodations must be reported to the Supervisor immediately. Drivers must work with their

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Supervisor and maintenance staff as needed to ensure that vehicles needing repair are removed from service and replaced by another vehicle.

E5.1.2 MAINTENANCE

The Fredericksburg Regional Transit Maintenance Policy and Program details roles and responsibilities of the Fleet Manager, the Operations Manager, and other FRED employees in the maintenance of FRED vehicles and facilities, including FRED Central, the Operations Center, and the Maintenance Facility.

The Fleet Manager is responsible for the overall maintenance of FRED transit vehicles and the maintenance facility. The Fleet Manager, or designee, is responsible for regularly reviewing and monitoring FRED maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Fleet Manager reviews completed pre-trip inspection forms that have noted defects, inspection checklists completed by the mechanics, and maintenance work orders. The Fleet Manager maintains an Excel spreadsheet to track and monitor all vehicle maintenance and repair activities. The Fleet Manager or their designee is responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during informal discussions with maintenance employees, and to other FRED managers through formal and informal discussions and meetings. FRED mechanics are responsible for performing official Virginia State Inspections of the revenue service vehicles and pool vehicles.

The Operations Manager is responsible for ensuring the maintenance and repair of FRED facilities, including FRED Central and the Operations Center.

E5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

FRED administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Operations Manager is responsible for the administration of the program, including working with FRED's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Assistant Director is responsible for ensuring the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. FRED's drug and alcohol testing program is described in detail in the City of Fredericksburg FTA/DOT Drug Free Workplace & Test Procedures.

The Policy and Planning Manager is responsible for reporting safety events, as required, to the National Transit Database, in consultation with other FRED managers.

Operations Supervisors and the Driver Trainer perform and document safety inspections of each of FRED's facilities. The Operations Manager, Assistant Director, and other FRED managers, as appropriate, are informed of the results of the inspections if any safety issues are noted.

E5.3 PROCESS EVALUATION

The Assistant Director is responsible for working with other FRED managers to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

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The Assistant Director is also responsible for regularly monitoring the effectiveness of FRED employee safety reporting. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervisors, managers, and discussion during driver safety meetings. The Assistant Director will, as needed, work with FRED managers to evaluate any needed changes to the employee safety reporting process.

E5.4 EVENT INVESTIGATIONS

The FRED event notification, investigation, and reporting process is outlined in this section, and adheres to the requirements set forth in the City of Fredericksburg Employee Safety Manual. The Employee Safety Manual includes stipulations for contacting police, remaining at the scene, completing reports, and the review of accidents by the City's Accident Investigation Team and Safety Committee.

More detailed policies and procedures for FRED safety events, including accidents, are detailed below:

Supervisory and Management Responsibilities

1. Dispatch or a supervisor takes the incoming call from the driver reporting incident and gathers information regarding the name of the driver, the number of the route and vehicle, the nature of the incident, the extent of any injuries and/or damage and the vehicle's location. Dispatch enters the information in the Incident/Accident Log.
2. Based on information cited above, Dispatch makes initial determination of the extent of response needed (e.g., police, ambulance, etc.)
3. Dispatch notifies external first responder agencies, as appropriate, about the incident and the response needed.
4. Dispatch notifies Operations Manager and Assistant Director, either one of whom will review actions taken by Dispatch and confirm their appropriateness or recommend additional steps.
5. Assistant Director notifies the Director of Public Transit and informs them of pertinent information and of the initial response by FRED and Participating Agencies.
6. Supervisor, Operations Manager and/or Assistant Director of Public Transit travel to scene of incident, as necessary.
7. If necessary and appropriate, Dispatch cedes control of the incident to the Shift Supervisor or attending designee until the scene has been cleared or higher authority relieves that control or issues other instructions. In such cases, Command Control would be Mobile 700.
8. If Dispatch responds to the scene, he or she advises the Operations Manager or Assistant Operations Manager of the incident, provides update(s) and phone contact information.
9. Dispatch keeps all phone and radio lines open for response by incident response personnel.
10. Driver and vehicle must remain at the scene until the situation has been reviewed and cleared by Shift Supervisor or a higher FRED authority in charge at the scene.
11. Incident Supervisor controls FRED personnel involvement at the scene, coordinates in getting passengers to final destination, and cooperates with local first responder agency personnel on the scene.

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12. Supervisor reviews and annotates the incident/accident report and forwards it to the Assistant Operations Manager. The Assistant Operations Manager files the incident/accident report, collects any reports made by Participating Agencies and prepares the insurance report and sends it to City Hall.
13. Operations Manager appears at any follow up investigations or hearings relating to incidents and accidents, as appropriate.

FRED Drivers

1. Immediately contact Dispatch to report any incident and pertinent facts regarding: a) nature of incident; b) extent of injuries, if any; c) extent of vehicle damage; d) location; e) types of assistance required. Initial communication should be by cell phone if available; otherwise use bus radio.
2. Assist passengers as needed.
3. Make certain passengers are in a safe location; this may be a location away from vehicle and traffic or it may be that passengers would be safer staying in the vehicle while awaiting the arrival of police or the incident response team. Keep passengers calm and safe until arrival of incident response team and/or emergency response agencies.
4. Provide updates to Dispatch regarding incident situation.
5. Obtain as much information as possible from passengers (i.e., name, address, contact number, injuries (if any) prior to arrival of management staff and emergency units, if responding.
6. If possible, gather information from witnesses (e.g., names and contact numbers).
7. DO NOT discuss the accident or who may be at fault with other drivers, witnesses or others.

E6 SAFETY PROMOTION

E6.1 SAFETY COMMUNICATION

FRED uses several methods to communicate information about safety performance throughout the organization. FRED holds driver meetings, during which safety is a topic of discussion. Management also holds staff meetings, where safety performance is discussed as applicable. As appropriate, the Assistant Director or their designee may post information about safety performance in the employee break rooms at FRED Central, the Operations Center, and the Maintenance Facility. If necessary, managers will ensure that safety-related materials are directly distributed to applicable employees.

FRED managers are responsible for using the formal and informal meetings and discussions to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through employee safety reporting.

E6.1.1 COMPETENCIES AND TRAINING

FRED has a formal process to ensure that employees receive appropriate competencies and training to safely perform their duties. FRED's Driver Trainer is generally responsible for administering training to new Drivers and periodic refresher training. Every new Driver must have

APPENDIX E: FREDERICKSBURG REGIONAL TRANSIT

at least a commercial driver's license learner's permit before starting employment with FRED. Driver training requirements are outlined in a training workbook and manual maintained by the Driver Trainer, and generally include:

- Drug and alcohol policy
- Policies and procedures
- Americans with Disabilities Act
- Bloodborne pathogens
- Accidents and emergencies
- Evacuations
- Sexual harassment
- Pre-trip inspections
- Daily trip sheet
- Deviations
- Daily paperwork
- Radios
- Rules
- Vehicle Orientation

The Fleet Manager is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are qualified to operate FRED revenue vehicles. Mechanics receive informal, on-the-job training from the Fleet Manager or designee. If needed, FRED may bring in vendors or original equipment manufacturers to provide specific training. Some training on new policies and procedures may be delivered verbally by the Fleet Manager, the Operations Manager, Driver Trainer, or other FRED personnel as needed.

The Driver Trainer is responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on any training program compliance issues to the Operations Manager.

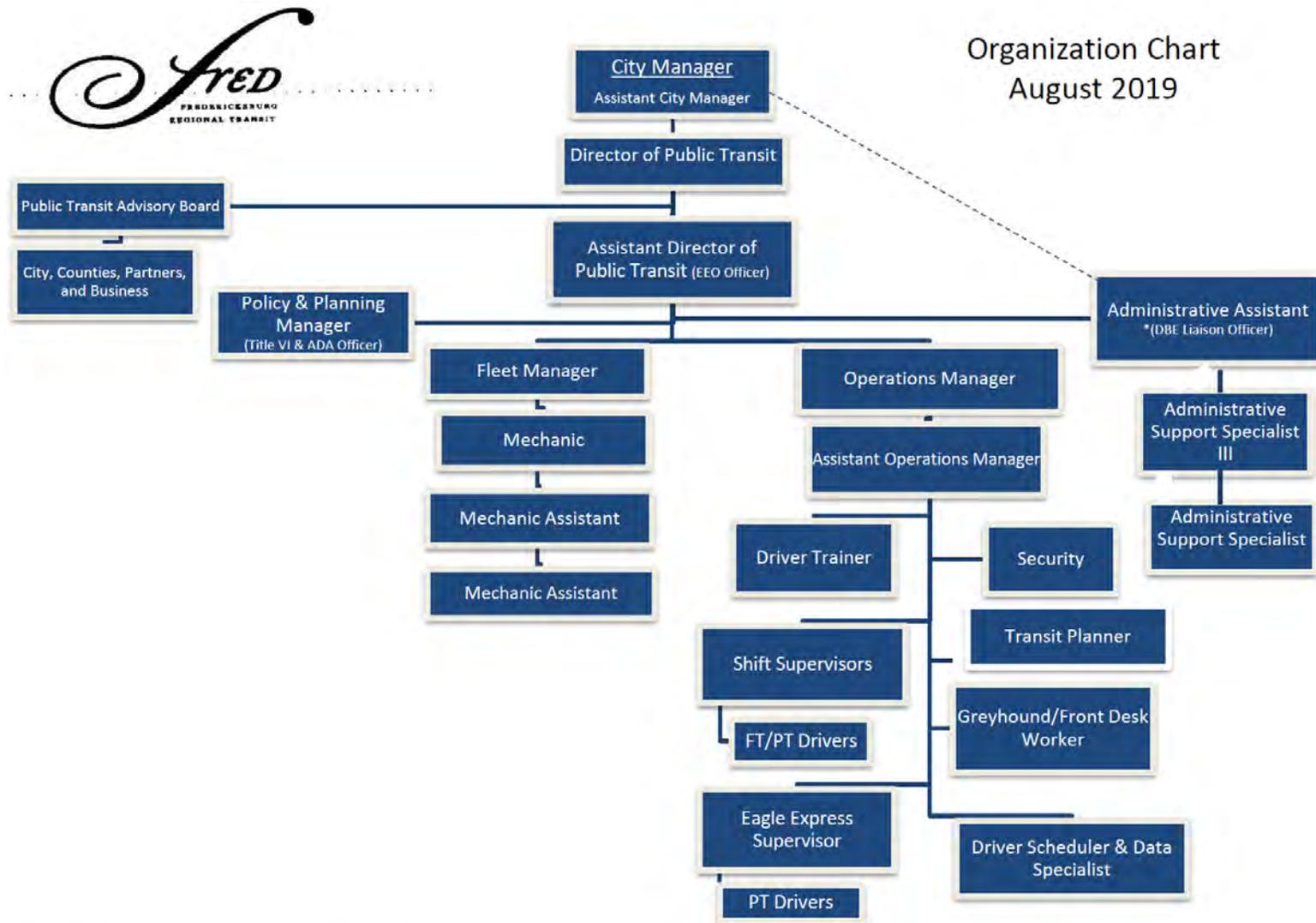
E6.1.2 TRAINING PROGRAM EVALUATION

The Assistant Director, in coordination with the Operations Manager and Fleet Manager, is responsible for periodically analyzing employee training programs to determine whether changes or updates are necessary. The Assistant Director, or designee, is responsible for documenting these reviews and reporting to FRED managers, at least annually, on any proposed changes or updates to training programs. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of FRED job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

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Organization Chart



Reports directly to City Manager as DBE Liaison Officer only. -----

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY (GLTC)

F1 ABOUT GLTC

Greater Lynchburg Transit Company (GLTC) is a public transportation agency providing service primarily within the City of Lynchburg, with limited service in neighboring Madison Heights and Campbell County. There are 14 fixed routes, plus paratransit service. GLTC is governed by a Board of Directors, primarily consisting of political appointees. GLTC utilizes a Management Contractor (MC), First Transit, to operate and maintain the GLTC system. The MC employs the General Manager (GM) and Assistant General Manager (AGM). The MC's wholly-owned subsidiary, Central Virginia Transit Management Company, employs the balance of GLTC, including all other managers and front-line employees.

GLTC is based at the Operations & Maintenance Facility (O&M), located at 419 Bradley Drive in Lynchburg. The O&M is the site of all fleet storage, maintenance, and GLTC administrative offices. The O&M is also the only GLTC operating base, with a dispatch center and employee breakroom. GLTC also owns and operates the Transfer Station, located at 800 Kemper Street in Lynchburg, across from the Lynchburg Amtrak station. The Transfer Station includes a large bus transfer facility, with capacity for all GLTC routes to converge simultaneously. There is also a small two-story building on the site with a passenger waiting area, customer service office, and boardroom.

GLTC's fleet includes mostly Gillig transit buses (40, 35, and 30 feet in length), as well as a single New Flyer 35 foot bus. GLTC also operates 13 cutaway buses for paratransit service and a diesel trolley-style bus for special service.

GLTC Fleet

- Gillig 40 foot buses
- Gillig 35 foot buses
- Gillig 30 foot buses
- New Flyer 35 foot bus
- Chevy cutaway paratransit van
- Trolley-style bus

F2 REVISION HISTORY – GLTC

Each year, GLTC will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for GLTC's PTASP sections.

Table F-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

F3 SAFETY MANAGEMENT POLICY

F3.1 SAFETY POLICY STATEMENT

Safety is a core value of the Greater Lynchburg Transit Company (GLTC). GLTC is committed to providing safe, reliable transit service to the City of Lynchburg and surrounding communities, and to developing and implementing the structures, roles, and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities, accountabilities and responsibilities, as well as the safety management roles and responsibilities for key GLTC staff. All GLTC employees are held accountable for the overall safety performance of GLTC, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, GLTC managers and employees are accountable and responsible for the delivery of the highest achievable levels of safety performance.

GLTC will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. GLTC passengers can count on the organization to provide safe and reliable service. GLTC employees must meet or exceed the minimum thresholds and requirements set forth in all agency plans, policies, and procedures. GLTC will also meet or exceed all local, state and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, GLTC has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, GLTC will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

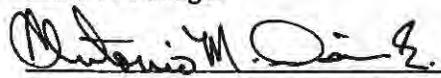
- Ensuring constant communication and awareness of GLTC's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of GLTC employees
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the General Manager, I am the Accountable Executive and have ultimate authority and responsibility for the safety of GLTC. With this plan, all GLTC employees are hereby accountable and responsible for the implementation of the SMS activities described herein.



General Manager

6/3/2020
Date



Chair/President, GLTC Board of Directors

6/3/2020
Date

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F3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

GLTC has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table F-2: GLTC Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	5	Less than .5 injuries per 100,000 vehicle revenue miles	11	Less than 1 reportable event per 100,000 vehicle revenue miles	15,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	1	Less than .75 injuries per 100,000 vehicle revenue miles	2	Less than 1.5 reportable event per 100,000 vehicle revenue miles	65,000 miles	10,000 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one or more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of GLTC policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

GLTC may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The GM is responsible for ensuring that GLTC employees are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Board of Directors. The GM is responsible for working with GLTC management to periodically evaluate the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, GLTC is responsible for annually providing its Safety Performance Targets to the Central Virginia Metropolitan Planning Organization (CVMPO) to help aid in the transportation planning process. DRPT will coordinate with CVMPO and GLTC in the selection of GLTC's safety performance targets.

F3.3 EMPLOYEE SAFETY REPORTING

GLTC employees have the ability to report safety issues to their Supervisor or Manager, during front-line meetings, as well as through completing an incident form. Safety is a regular agenda item during employee meetings. GLTC managers work together to help employees feel comfortable communicating their safety concerns formally and informally, and no punitive action shall be taken against a GLTC employee for reporting a safety concern except those that are in clear violation of existing GLTC policies and procedures as described in the Employee Handbook. The GM or their designee is responsible for determining whether discipline is required for employees on a case-by-case basis, in accordance with GLTC's Employee Handbook and

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Collective Bargaining Agreement with Amalgamated Transit Union Local 1493 and any disciplinary decisions are kept in employee personnel files.

F3.4 SAFETY POLICY COMMUNICATION

It is the policy of GLTC to communicate the safety policies in this PTASP with all affected employees. The GM or their designee is responsible for ensuring that GLTC safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees. GLTC's Safety Policy will be provided to every new employee alongside printed training materials. GLTC employees will have access to the complete PTASP in both hard copy and electronically.

The GM is responsible for working every day with the AGM, Transportation Manager, Maintenance Manager, and other GLTC managers to communicate GLTC safety policies and procedures to transportation and maintenance front-line employees through formal and informal meetings and other communications. The Transportation Manager holds periodic safety discussions with fixed-route and paratransit Operators, as well as Supervisors and Dispatchers.

F3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

General Manager. The GM is GLTC's Accountable Executive. The GM is responsible for overseeing the implementation of GLTC's SMS and for maintaining safe working conditions and practices for all GLTC employees. The GM holds GLTC employees accountable for safety performance, and for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the GM has the authority and responsibility to allocate the human and capital resources within GLTC needed to implement the SMS and to address safety risks.

Overall, the GM is responsible for the following:

- Communicating safety performance information to employees and to the GLTC Board of Directors
- Maintaining relationships with other local and state agencies, including first responder agencies and emergency managers for the City of Lynchburg, Bedford County, and other agencies as appropriate.
- Ensuring local emergency response personnel are notified of safety events requiring outside assistance
- Ensuring that GLTC's PTASP is updated annually in coordination with DRPT
- Ensuring that GLTC employees fully understand their safety roles and responsibilities
- Instilling a culture of safety throughout the organization

Assistant General Manager. The AGM works closely with the GM and is responsible for completing special projects and assignments, such as:

- Performing miscellaneous management tasks on an interim basis during position vacancies
- Collecting, synthesizing, and disseminating safety information throughout the GLTC organization
- Working with GLTC's insurer, Virginia Transit Liability Pool (VLTP), to obtain regular reports on safety and loss performance
- Developing and publishing a monthly newsletter for GLTC employees, including safety information

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

Transportation Manager. The Transportation Manager oversees all fixed-route and paratransit operations, supervision, and dispatching. The Transportation Manager is designated as the GLTC Chief Safety Officer and is responsible for the overall day-to-day implementation of the GLTC SMS. The Transportation Manager has completed the Transportation Safety Institute (TSI) certificate in transit safety and security.

The Transportation Manager oversees all fixed-route and paratransit operations, including operators, supervisors, and dispatchers. All transportation employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

Supervisors/Dispatchers. GLTC Supervisors/Dispatchers are cross-trained to perform both dispatch and street supervision of bus operations. Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Supervisors help manage the safety-critical operations at the Transfer Station multiple times per hour, and routinely observe Operators to manage and enforce operating rule compliance. In the dispatch role, Supervisors are in direct contact with local police, fire, and emergency medical services (EMS), and are responsible for clear and compliant radio communications. Supervisors are trained in “reasonable suspicion” in accordance with 49 CFR Part 655 and are responsible for assessing the fitness for duty of Operators as they report for their shifts at the dispatch window. **Paratransit Dispatchers** are dedicated solely to dispatching paratransit service.

Fixed Route Operators. GLTC Fixed Route Operators are responsible for exercising maximum care and good judgment at all times while driving GLTC vehicles, and for following all GLTC rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Commercial Driver’s License (CDL) with the appropriate endorsement for carrying passengers, as required by law at all times while operating GLTC vehicles. Operators must also maintain and have in their possession a valid Department of Transportation medical examiner’s certificate, as required by law or regulation, at all times while operating a GLTC vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents to Dispatch, completing incident reports, conducting pre-trip inspections, and attending employee meetings. **Paratransit Operators’** duties and responsibilities mirror those of Fixed-Route Operators, with separate procedures specific to paratransit operations.

Maintenance Manager. The Maintenance Manager is responsible for the maintenance and reliability of GLTC’s fleet, including overseeing the Maintenance Technicians, Foremen, Utility Persons, and Parts Clerk. **All Maintenance personnel** are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. This includes adherence to all required **preventive** maintenance and inspection activities specified in GLTC maintenance plans, policies, and procedures.

Manager of Administration and Human Resources. The Manager of Administration and Human Resources is responsible for maintaining employee personnel files, including any records of disciplinary action in accordance with the current Collective Bargaining Agreement. This individual is also responsible for administering the Drug and Alcohol program. Human Resources also oversees Customer Service Representatives, who are responsible for communicating relevant safety information to GLTC managers for evaluation and action, as appropriate, as part of the SMS.

Customer Experience & Marketing Manager. This individual works with a Marketing Specialist, and together they are responsible for working with other GLTC managers to help disseminate important safety information to GLTC riders.

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Finance and Grants Manager. The Finance and Grants Manager oversees the GLTC procurement process and is responsible for working with GLTC managers to ensure that safety is adequately incorporated into the process for procuring new goods and services (such as the specifications of new vehicles for the GLTC fleet).

All GLTC personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to their immediate supervisor, the Transportation Manager, or other GLTC management. All GLTC personnel must also complete all training required for the safe performance of their duties, attend safety meetings as required, and perform their duties in a safe manner. As needed, GLTC employees may be asked to participate in emergency preparedness drills and exercises in coordination with external first responders and other agencies.

F3.6 SAFETY MEETINGS

GLTC holds monthly leadership meetings involving upper management and Supervisors. Safety performance is a regular and ongoing discussion topic during these meetings. The Transportation Manager and Maintenance Manager each hold regular informal meetings with their supervisory and front-line employees. These meetings are an opportunity for GLTC employees to identify and discuss safety concerns with management, and for management to convey safety information to employees.

F3.7 DOCUMENTATION AND RECORDKEEPING

GLTC safety is governed by this PTASP as well as several referenced standalone documents. This includes:

GLTC Substance Abuse – Drug and Alcohol Policy. This document describes the drug and alcohol testing program and requirements for GLTC’s Safety-Sensitive employees, in accordance with 49 CFR Parts 40 and 655.

GLTC Maintenance Policies and Procedures Manual. This document describes maintenance requirements for GLTC vehicles and equipment, including maintenance schedules and intervals.

GLTC/CVTMCI Employee Handbook/Personnel Policies & Procedures. This document contains key safety policies and procedures for GLTC employees, including but not limited to, electronic communications, standards of conduct, ethical and legal business practices, and security/emergency procedures.

GLTC records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include accident and incident reports, pre-trip inspections, drug and alcohol testing records, training records, operator observations, maintenance work orders, safety performance reports and presentations, and logs used to track safety events and safety hazards. GLTC must comply with all relevant GLTC and other local, state, and federal records management requirements. The AGM or their designee is responsible for the maintenance of all documents and records developed in the implementation of the SMS. At a minimum, GLTC retains all records related to the implementation of the SMS for a minimum of three years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

F4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

F4.1 HAZARD IDENTIFICATION

GLTC employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator reports to Supervisors/Dispatchers
- Near-miss reporting by Operators
- Formal and informal meetings facilitated by Transportation and Maintenance
- Operator pre-trip inspections
- Maintenance technician reports to Foremen or the Maintenance Manager
- Facility and equipment inspections performed by the Maintenance Manager or their designee
- Customer service complaints
- GLTC's Customer Advisory Committee
- Random monitoring of Operators by Supervisors and the Transportation Manager
- Discussions during formal and informal meetings

Individual department managers are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Transportation Manager, in their capacity as CSO, is responsible for working with Transportation, Maintenance, and other GLTC departments and regularly monitoring each of the above sources of safety data, and for systematically tracking these data using a log or database. The Transportation Manager or their designee is also responsible for direct observation and identification of safety hazards throughout the GLTC system, such as through compliance checks and facility safety inspections.

As appropriate, GLTC will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

F4.2 HAZARD ANALYSIS AND EVALUATION

GLTC analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During leadership meetings, department managers and supervisors have the opportunity to discuss and evaluate safety hazards.
- During formal and informal employee meetings held by individual departments, front-line employees have the opportunity to discuss and review safety hazards with management.
- Individual department managers are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Transportation Manager, in their capacity as CSO, is responsible for the compilation of reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to GLTC leadership and other department managers.

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

- The Transportation Director is responsible for working closely with the Supervisors to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

GLTC is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. GLTC management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. GLTC will use a hazard assessment process based on Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

GLTC's leadership team, including the GM, AGM, Transportation Manager, Maintenance Manager, and others as needed, are responsible for the review of all unacceptable hazards. Through leadership meetings as well as formal and informal employee meetings, GLTC managers are responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. GLTC managers have the discretion to prioritize hazards of a lower risk and determine if mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by GLTC management for posterity. All such documentation must be maintained in accordance with GLTC's requirements for SMS-related document retention.

F4.3 SAFETY RISK MITIGATIONS

GLTC's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The GM, AGM, Transportation Manager, Maintenance Manager, and other GLTC employees are responsible for working together to develop and implement such mitigations. GLTC management is responsible for obtaining relevant input and feedback from Supervisors, Foremen, frontline employees, and outside experts as necessary in the creation of mitigations. GLTC uses the leadership meetings as a forum for discussion and documentation of such mitigations.

F4.4 HAZARD TRACKING AND RECORDKEEPING

The Transportation Manager or their designee is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a spreadsheet that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This spreadsheet also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Transportation Manager or their designee is responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

The Transportation Manager is responsible for working with GLTC leadership and managers to regularly evaluate the safety mitigations and their effectiveness and to consider alternative approaches as needed.

F5 SAFETY ASSURANCE

F5.1 SAFETY PERFORMANCE MONITORING

GLTC uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. GLTC leadership and management regularly work together to monitor safety performance through leadership meetings, employee meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. Individual department managers are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. Department managers are also responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. Department managers are responsible for communicating information regarding safety performance with GLTC leadership, including the GM and AGM, and with other affected departments through meetings and reports.

F5.1.1 GLTC TRANSPORTATION

Supervisors are responsible for continually evaluating the safety performance of GLTC Operators. Supervisors and the Transportation Manager are responsible for completing Fixed Route Driver Observation Reports and Paratransit Driver Observation Reports. The Transportation Manager or their designee is responsible for keeping and maintaining a log of Observation Reports.

Any rule violations must be documented in the reports. The Transportation Manager reviews all Observation Reports and determines whether follow-up is needed with individual employees, or whether there are trends or patterns suggesting more systemic safety issues. In such cases, the Transportation Manager or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues. Some mitigations may require input or actions by external entities, such as the City of Lynchburg (for example, street markings or stripes, or traffic signal timing or visibility).

During dispatch shifts, Supervisors continually monitor radio traffic and immediately alert the Transportation Manager and GLTC leadership if there is a safety event.

Operators are responsible for completing pre-trip inspection forms before beginning their routes, and for providing the completed forms to Dispatch. All safety-related maintenance issues must be immediately reported to the Maintenance Manager for action.

F5.1.2 MAINTENANCE

The Maintenance Manager is responsible for the overall maintenance of GLTC facilities, equipment, and vehicles. The GLTC Maintenance Policies and Procedures Manual governs all GLTC maintenance activities, including work scheduling, preventive maintenance, general repairs, servicing and cleaning, tires, building and grounds, unit rebuild procedures, and storeroom management. The Maintenance Manager or their designee is responsible for regularly reviewing and monitoring GLTC inspection and maintenance activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Maintenance

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

Manager reviews all completed pre-trip inspections, inspection checklists completed by Maintenance Technicians, and maintenance work orders. The Maintenance Manager or their designee is responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during informal employee meetings, and during GLTC leadership meetings. The Maintenance Manager is also responsible for performing periodic inspections of GLTC facilities and for documenting any safety hazards requiring repair or mitigation.

F5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

GLTC administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The HR Manager is responsible for the administration of the program, including working with GLTC's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The HR Manager or their designee is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisory staff. GLTC's drug and alcohol testing program is described in detail in the GLTC Substance Abuse – Drug and Alcohol Policy.

GLTC's insurance company, Virginia Transit Liability Pool (VTLP) regularly assesses and evaluates GLTC safety performance from a loss prevention perspective. VTLP provides reports to GLTC leadership on safety events and injuries. The AGM is responsible for working with VTLP and facilitating their assessments and reporting.

The AGM or their designee is responsible for reporting safety events and other safety-related data, as required, to the National Transit Database, in consultation with relevant GLTC managers.

F5.3 PROCESS EVALUATION

As the CSO, the Transportation Manager is responsible for working with individual department managers or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of any safety mitigations put in place. The managers are responsible for evaluating alternative mitigations or approaches in the event they determine that a given mitigation is ineffective.

The Transportation Manager is also responsible for regularly monitoring the effectiveness of GLTC's employee safety reporting program. This includes, but is not necessarily limited to, the effective use of incident reporting, and the level and quality of information provided by front-line employees during meetings. The Transportation Manager will work with other GLTC managers and leadership as needed to evaluate any needed changes to the employee safety reporting program.

F5.4 EVENT INVESTIGATIONS

GLTC has a formal process for the investigation of safety events, including accidents and near misses. The investigation process is detailed in written investigation procedures. The Transportation Manager, as well as all GLTC Supervisors, have completed the TSI Bus Accident Investigation training course, and GLTC aims to ensure that any future Supervisors will also complete such training.

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

Supervisors are responsible for initially reporting to the scene of a safety event; depending upon the severity of the event, the Transportation Manager, AGM, or GM may also respond to the scene to conduct investigation activities.

Investigations are documented in formal reports. Supervisors complete initial reports, with input from Operators as appropriate. All investigation reports must be reviewed by the Transportation Manager, who is responsible for determining preventability. The Transportation Manager will issue a formal letter to an Operator involved in a preventable accident, documenting the causal factors. GLTC maintains a folder on its V: drive devoted to accident investigation documentation, including reports, photos, and video, as applicable and appropriate. The Transportation Manager or their designee is responsible for logging all safety events into a spreadsheet that includes, but is not limited to, the following information:

- Date of event
- Vehicle number
- Location
- Description/damage
- Whether EMS was needed

The Transportation Manager is responsible for working with other GLTC managers, including the AGM, to coordinate with GLTC's insurance and risk management to ensure the provision of relevant investigation information. The insurance carrier, VLTP, produces reports for GLTC documenting injuries and damage from accidents and other safety events.

F6 SAFETY PROMOTION

F6.1 SAFETY COMMUNICATION

GLTC uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, safety performance, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each new GLTC employee upon hiring. This PTASP and any referenced plans, policies, and procedures are available to all affected employees digitally or in hard copy.

Individual department managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to front-line employees, such as the employee break room. If necessary, management will ensure that safety-related materials are directly distributed to individual employees. Managers may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

F6.1.1 COMPETENCIES AND TRAINING

GLTC has formal processes in place to ensure that employees receive the appropriate competencies and training to safely perform their duties and continues to evaluate its training needs including formal refresher training. GLTC has minimum training requirements for its safety-critical employees, particularly Operators and Maintenance Technicians.

For Operators, GLTC prefers candidates who already possess a CDL with a Passenger endorsement, but has the ability to provide CDL training to new employees if needed. The Operator training program typically lasts 4-6 weeks, depending on the aptitude of the individual, and includes both classroom and behind-the-wheel training. The Transportation Manager is

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responsible for ensuring the completion of all required training for both Fixed-Route and Paratransit Operators. The Transportation Manager, along with designated Supervisors and other GLTC managers, directly administers the training to student Operators. GLTC uses Transit and Paratransit Company (TAPTCO) training workbooks and modules to facilitate Operator training, and all employees are provided copies of these workbooks. At a minimum, each student must undergo 80 hours of classroom training, behind the wheel training with a Supervisor, as well as a senior Operator who will monitor the student in revenue operations. All GLTC operators are required to have completed training checklists in their files, including a signature from the Training Supervisor that the training has been successfully completed. Operators are subject to a minimum annual evaluation, plus any remedial training or performance monitoring, as needed and determined by the Transportation Manager or their designee. These observations evaluate the following:

- Pre-trip inspections
- Acceleration, braking, and stopping distances
- Lane use, lane changes, signals and turns
- Intersections, curves and hills
- Wheelchair operation

Supervisor training is performed on-the-job, including both dispatch and field supervision. The Transportation Manager is responsible for ensuring the completion of any required training for new Supervisors, including training in Reasonable Suspicion.

Maintenance technicians receive on-the-job training from their foremen and the Maintenance Manager. The Maintenance Manager is responsible for ensuring that all Maintenance personnel are proficient with all of the policies and procedures contained in the GLTC Maintenance Policies and Procedures Manual, and for documenting the completion of any formal or on-the-job training through a combination of spreadsheets and sign-off sheets.

The Transportation Manager, Maintenance Manager, and AGM are responsible for working together to regularly review employee training records to ensure training has been completed as required, and completed on-time. Individual department managers are responsible for regularly reporting to GLTC leadership on training program compliance during leadership meetings.

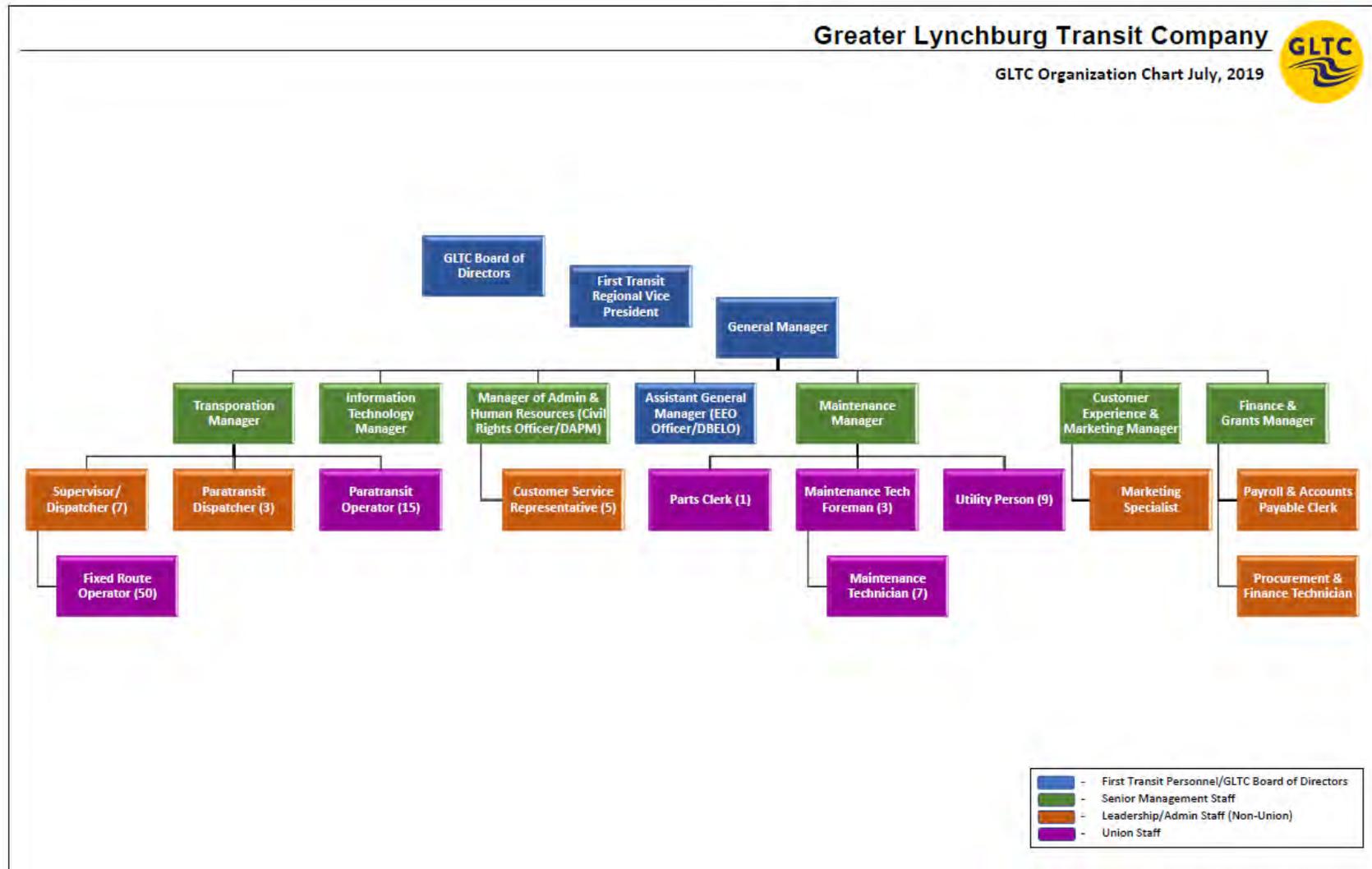
F6.1.2 TRAINING PROGRAM EVALUATION

The Transportation Manager, in consultation with the AGM and Maintenance Manager, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The Transportation Manager is responsible for documenting these reviews and reporting to GLTC leadership, at least annually, on any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of GLTC job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX F: GREATER LYNCHBURG TRANSIT COMPANY

Organization Chart



APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY

G1 ABOUT VALLEY METRO

The Greater Roanoke Transit Company (GRTC), hereafter referred to as “Valley Metro.” Valley Metro is a private, nonprofit, public transportation agency wholly owned by the City of Roanoke. Valley Metro, provides a comprehensive range of transportation services to the residents of the Greater Roanoke Valley Area and outlying areas. Valley Metro provides fixed-route service to the City of Roanoke, the City of Salem, and the Town of Vinton. The current operating times for Valley Metro are six days per week (Monday through Saturday), from approximately 5:45 a.m. until 8:45 p.m. Other services provided by Valley Metro include; The Star Line Trolley, a trolley network that connects downtown Roanoke’s historic Market with the Carilion Roanoke Memorial Hospital; The Smart Way commuter service, a commuter bus service that links the Roanoke Valley to the New River Valley; the STAR complimentary paratransit service, a specialized transportation service provided to passengers unable to use the fixed route service as mandated by the Americans with Disabilities Act.

Valley Metro is managed by a General Manager and an Assistant General Manager that are First Transit employees. First Transit, in turn, works with a subcontractor, the Southwestern Virginia Transit Management Company (SVTMC), to provide management services. SVTMC employs all the individuals that operate the bus system on a day to day basis. Valley Metro contracts its STAR paratransit service with Unified Human Services, Inc. GRTC is governed by a Board of Directors, consisting of seven members.

Valley Metro headquarters are located at the Roy Z. Meador Operations, Maintenance, and Administrative Facility, 1108 Campbell Avenue, S.E. in Roanoke. Valley Metro also owns and operates the Campbell Court Transit Center in downtown Roanoke. Valley Metro operates a variety of transit vehicles, including transit buses, cutaways, trolley coaches, and over-the-road coaches.

Valley Metro operates approximately 38 vehicles in peak revenue service.

Valley Metro Fleet

- Gillig 35-ft. & 40-ft transit buses
- Trolley Coaches
- MCI over-the-road coaches
- Freightliner cutaways
- Chevy cutaways

The General Manager of Valley Metro is the Accountable Executive, and has the ultimate authority to allocate human and financial resources to address safety issues. The General Manager reports to the GRTC Board of Directors.

G2 REVISION HISTORY – VALLEY METRO

Each year, Valley Metro will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Valley Metro’s PTASP sections.

Table G-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

G3 SAFETY MANAGEMENT POLICY

G3.1 SAFETY POLICY STATEMENT

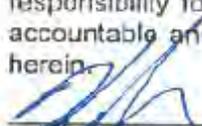
Safety is a core value of Greater Roanoke Transit Company, or Valley Metro. Valley Metro is committed to providing safe, reliable transit service to the Roanoke Valley and surrounding areas. Valley Metro is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key Valley Metro staff. All Valley Metro employees are held accountable for the overall safety performance of Valley Metro, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, Valley Metro managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

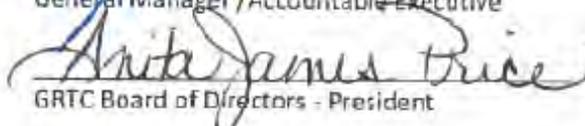
Valley Metro will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. Valley Metro passengers can count on our organization to provide safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all Valley Metro plans, policies, and procedures. Valley Metro will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, Valley Metro has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, Valley Metro will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of Valley Metro's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of Valley Metro personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the General Manager, I am the Accountable Executive and have ultimate authority and responsibility for the safety of Valley Metro. With this plan, all Valley Metro staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.


General Manager / Accountable Executive

8/6/20
Date


GRTC Board of Directors - President

8/5/20
Date

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

G3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Valley Metro has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table G-2: Valley Metro Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	9	Less than .5 injuries per 100,000 vehicle revenue miles	17	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	3	Less than .5 injuries per 100,000 vehicle revenue miles	8	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of Valley Metro policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

Valley Metro may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The General Manager is responsible for ensuring that Valley Metro Directors are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the City of Roanoke and to the Valley Metro Board of Directors. The General Manager and Directors are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, Valley Metro shall annually provide its Safety Performance Targets to the Roanoke Valley-Allegheny Regional Commission (RVARC) to help aid in the transportation planning process. DRPT will coordinate with RVARC and Valley Metro in the selection of Valley Metro's safety performance targets.

G3.3 EMPLOYEE SAFETY REPORTING

Valley Metro employees have the ability to report safety issues using the Near Miss Report form. Per Valley Metro policy, a near miss is an unplanned event that did not result in an accident or injury, but had the potential to do so. The Valley Metro Near Miss/Hazard Reporting Program stipulates that, while it does not replace or supersede existing Valley Metro plans, policies and procedures or collective bargaining agreements, Valley Metro will take no disciplinary action against employees involved in or reporting a near miss event.

Valley Metro's Collective Bargaining Agreement with Amalgamated Transit Union (ATU) Local 1493 includes a Code of Discipline that outlines those employee behaviors that may result in

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

disciplinary action. Further, the GRTC Bus Operator Training Manual lists violations and types of incidents that would be subject to disciplinary action, up to and including discharge.

G3.4 SAFETY POLICY COMMUNICATION

It is the policy of Valley Metro to communicate the safety policies in this PTASP with all affected employees throughout the organization. The Assistant General Manager or their designee is responsible for ensuring that Valley Metro safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

Valley Metro's Safety Policy will be provided to every new employee alongside printed training materials. Valley Metro managers and executive staff will have access to the complete Valley Metro PTASP in both hard copy and electronically.

Valley Metro safety meetings and leadership team meetings include discussion of safety performance objectives, targets, and indicators. The Training and Safety Coordinator, working with the Directors of Transportation and Maintenance, along with the Safety Compliance Officer, is responsible for compiling data on safety performance.

Human Resources is responsible for publishing quarterly newsletters with safety performance reports, and for posting these newsletters in the employee break room. Human Resources, working with Transportation and the Safety Compliance Officer, is responsible for posting additional safety information and initiatives in the break room.

G3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

General Manager (GM). The GM of Valley Metro is the agency's Accountable Executive. The GM is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all Valley Metro personnel. The GM is responsible for ensuring that the SMS is effectively implemented throughout Valley Metro as an organization, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the GM has the authority and responsibility to allocate human and capital resources to address safety risks.

Overall, the GM is responsible for the following specific activities:

- Ensuring Valley Metro meets the requirements set forth by the City of Roanoke
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring Valley Metro meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization
- Finance
- Procurement and Solicitations
- Human Resources

Assistant General Manager (AGM). The AGM reports directly to the GM, and serves as Valley Metro's Chief Safety Officer (CSO). The GM has formally designated the AGM as the CSO. As a transit executive with extensive knowledge of transit operations and maintenance, the CSO has the authority and responsibility for the day-to-day implementation of Valley Metro's SMS. The AGM is responsible for overseeing the following functions, including:

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

- Safety and compliance
- Transportation
- Maintenance
- Facilities
- Information Technology (Network)
- Equal Employment Opportunity (EEO), Title VI, and DBE Compliance

The AGM serves as Valley Metro's Chief Safety Officer (CSO), and has delegated safety and training functions to the Safety Compliance Officer, as well as to the Training and Safety Coordinator, part of the Transportation department. Both of these individuals have received adequate and appropriate training to perform their safety functions, and have both completed the Transit Safety and Security Program (TSSP) Certificate, provided by the Transportation Safety Institute.

The Safety Compliance Officer is responsible for coordinating the implementation, review, and update of Valley Metro's PTASP, and for conducting regular documented safety inspections of Valley Metro facilities and equipment. The Safety Compliance Officer is responsible for overseeing the review and revision of Valley Metro's standard and emergency operating procedures related to safety-critical duties of frontline employees; and enforcing safety requirements.

The Director of Transportation oversees the Transportation Division, which includes all bus operations, dispatch, and supervision functions, as well as an **Assistant Director of Transportation**, who helps manage day-to-day bus operations. All Transportation employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities. The Director of Transportation is responsible for serving as a liaison with external first responder agencies from the City of Roanoke as well as other jurisdictions in the Valley Metro service area, and for communication with the city's Emergency Operations Center (EOC). This includes coordinating Valley Metro participation in any emergency drills or exercises. The Director of Transportation also administers the Drug and Alcohol Program.

The Training and Safety Coordinator is a Supervisor-level employee and is responsible for ensuring the provision of all required training, including safety-related training, to Valley Metro frontline employees.

Supervisors are cross-trained to perform both dispatch and street supervision of bus operators. Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Supervisors manage the safety-critical operations at Campbell Court approximately every hour, and routinely observe Operators to manage and enforce operating rule compliance. In their dispatch role, Supervisors are in direct contact with local police, fire, and emergency medical services (EMS), and are responsible for clear and compliant radio communications. Supervisors are trained in "reasonable suspicion" in accordance with 49 CFR Part 655, and are responsible for assessing the fitness-for-duty of Operators as they report for their shifts.

Information Officers are stationed at Campbell Court and provide customer service and support to transit patrons. They are responsible for contacting dispatch to report and safety-related issues.

Operators are responsible for exercising maximum care and good judgment at all times while driving Valley Metro vehicles, and for following all Valley Metro rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating Valley Metro vehicles. Operators must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation,

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at all times while operating a Valley Metro vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents to dispatch, completing near-miss reports, completing pre-trip inspections, and attending safety meetings.

The Director of Maintenance is responsible for the maintenance and reliability of Valley Metro's fleet, including overseeing bus mechanics, cleaners, and inventory control staff. Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Mechanics are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

The Director of Human Resources is responsible for maintaining employee personnel files, including any records of disciplinary action in accordance with the current Collective Bargaining Agreement. Human Resources also publishes the quarterly newsletter, which includes safety performance data.

All Valley Metro personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Safety Compliance Officer or to their immediate supervisor, completing all training required for the safe performance of their duties, attending safety meetings as required, and for performing their duties in a safe manner.

G3.6 SAFETY MEETINGS

Valley Metro holds a bi-monthly safety meeting involving bus operators, supervisors, mechanics, and management. The safety meetings are an opportunity for Valley Metro employees to identify and discuss safety concerns with management, and for management to convey information regarding safety performance to employees. The Training and Safety Coordinator is responsible for facilitating these meetings, and for compiling and disseminating data on safety performance. The Training and Safety Coordinator is also responsible for documenting these meetings with agendas and attendance sign-in sheets. Additionally, the Valley Metro leadership team, including the GM, AGM, and Directors, hold regular informal meetings where safety is a regular topic of discussion.

G3.7 DOCUMENTATION AND RECORDKEEPING

Valley Metro safety is governed by this PTASP as well as several referenced standalone documents. This includes the Bus Operator Training Manual, which in turn includes a series of policies, procedures requirements regarding the safety of Valley Metro. Some of these policies, procedures and requirements are referenced in this PTASP while others are repeated in this document. The Training and Safety Coordinator is responsible for ensuring the maintenance, review, and update of the Bus Operator Training Manual.

- Management Commitment to Safety
- Safety Program Responsibilities
 - Compliance Responsibilities
 - Safety Incentive Program
- Operators – Initial Hire
 - Minimum Qualifications and Procedures
 - Initial Training
- Operators - Ongoing Supervision and Training
 - Training – Refresher/Retraining
 - Evaluation and Supervision
 - Motor Vehicle Record Checks

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

- Annual Physical Examination
- Safety Meetings
- Seat-Belt Usage
- Discipline/Recognition
- Preventable Accidents/Injuries
- Vehicles and Equipment
 - Preventive Maintenance
 - Pre- and Post-Trip Inspections
- Accident Management
- Day to Day Operations – Monitoring for Safety

Valley Metro records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include operations rule compliance checks, accident reports, training records, maintenance records and work orders, and drug and alcohol program testing records. Individual departments are generally responsible for the maintenance of their respective records in accordance with applicable requirements. At a minimum, Valley Metro retains all records related to the implementation of SMS for a minimum of three years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

G4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

G4.1 HAZARD IDENTIFICATION

Valley Metro managers and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator reports to dispatchers
- Near miss reporting by operators
- Safety meetings
- Operator pre-trip inspections
- Mechanic reports to the Director of Maintenance
- Facility and equipment inspections performed by the Safety Compliance Officer
- Supervisors' daily logs
- Customer service complaints to Dispatch
- Quarterly reports from the RADAR paratransit subcontractor to the Director of Maintenance

Individual department Directors are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Safety Compliance Officer is responsible for working with the department Directors ~~managers~~ and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database. This individual is also responsible for direct observation and identification of safety hazards via the facility and equipment inspections process.

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As appropriate, Valley Metro will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

G4.2 HAZARD ANALYSIS AND EVALUATION

Valley Metro analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During safety and staff meetings, Managers, Directors, Supervisors, and employees have the opportunity to discuss and review safety hazards.
- Individual department Directors are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Training and Safety Coordinator is responsible for compiling reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to Valley Metro management.
- The Safety Compliance Officer is responsible for working closely with all department Directors to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

Valley Metro is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. Valley Metro management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. Valley Metro will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

Valley Metro's GM, AGM, and Safety Compliance Officer are responsible for the review of all unacceptable hazards. Through both the safety meetings and informal leadership meetings, senior management, including affected department directors, is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. Valley Metro management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by Valley Metro managers for posterity. All such documentation must be preserved for posterity in accordance with Valley Metro's documentation and recordkeeping requirements for SMS-related documentation.

G4.3 SAFETY RISK MITIGATIONS

Valley Metro's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. As noted earlier, Valley Metro's GM, AGM, Safety Compliance Officer, and department Directors are responsible for working together to develop and implement such mitigations. Valley Metro management is responsible for obtaining relevant input and feedback from the Training and Safety Coordinator, Supervisors, and frontline employees and outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be the staff meetings.

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G4.4 HAZARD TRACKING AND RECORDKEEPING

Valley Metro's Safety Compliance Officer is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a spreadsheet that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This spreadsheet also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Safety Compliance Officer is responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

Valley Metro management is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

G5 SAFETY ASSURANCE

G5.1 SAFETY PERFORMANCE MONITORING

Valley Metro uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through leadership team meetings, safety meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. Individual department Directors are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, department Directors are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. Directors are also responsible for communicating information regarding safety performance with the GM and AGM, and with other affected departments through meetings and reports.

G5.1.1 OPERATIONS

Supervisors are responsible for continually evaluating the safety performance of Valley Metro's operators. In accordance with the Valley Metro Bus Operator Training Manual, Valley Metro Supervisors, or safety staff are responsible for completing Ride Checks and Road Observations. Any rule violations must be documented using the Employee Performance Memo (EPM). The Director and Assistant Director of Transportation review all EPMS and determine what follow up is needed with individual employees, such as Valley Metro's Safety Retraining process, or whether there are patterns or trends suggesting more systemic safety issues. In such cases, the Director of Transportation or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of Valley Metro, such as City of Roanoke's Department of Public Works (for example, street markings or stripes, or traffic signal timing or visibility).

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During dispatch shifts, Supervisors are also responsible for completing daily logs, which are spreadsheets containing information about unusual occurrences during operations, such as delays or safety events. The Director of Transportation or their designee is responsible for the regular review of all daily logs for the purpose of identifying safety hazards and monitoring safety performance.

Operators are responsible for completing pre-trip inspection forms before beginning their routes, and for providing the completed forms to the Director of Maintenance.

G5.1.2 MAINTENANCE

The Director of Maintenance is responsible for the overall maintenance of Valley Metro, equipment, and vehicles. Vehicle Maintenance is governed by the Vehicle Safety Program, which includes detailed requirements for preventive maintenance, pre- and post-trip inspections, emergency equipment, and vehicle safety and security.

The Director of Maintenance, or their designee, is also responsible for regularly reviewing and monitoring Valley Metro maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Director of Maintenance reviews all completed pre-trip inspection forms, inspection checklists completed by the mechanics, and maintenance work orders. The Director of Maintenance or their designee is responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during daily informal “toolbox” discussions, and during regularly-scheduled safety meetings involving other departments. The Director of Maintenance also is responsible for reviewing overall safety performance of the subcontracted STAR paratransit service through the review of quarterly reports provided by the vendor. The Director of Maintenance or their designee is responsible for performing periodic inspections of the paratransit fleet.

G5.1.3 FACILITIES SUPERVISOR

The Facilities Supervisor is responsible for the overall maintenance of Valley Metro facilities, and equipment. Facilities maintenance is governed by the Facility Maintenance Plan, which includes detailed safety requirements related to chemical hazards, electrical hazards, fire hazards, fire extinguishers, physical hazards, hand and power tool safety, heat stress, as well as required personal protective equipment.

G5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

Valley Metro administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Director of Transportation is responsible for the administration of the program, including working with Valley Metro’s collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Director of Transportation is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. Valley Metro’s drug and alcohol testing program is described in detail in the Southwest Virginia Transit Management Company, Inc. Substance Abuse Policy.

The Director of Transportation or their designee is responsible for reporting safety events, as required, to the National Transit Database, in consultation with Valley Metro Managers.

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G5.3 PROCESS EVALUATION

The Safety Compliance Officer is responsible for working with individual department Directors or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Safety Compliance Officer is also responsible for regularly monitoring the effectiveness of Valley Metro's employee safety reporting program. This includes, but is not necessarily limited to, the effective usage of the Near Miss Reporting form, and the level of information provided by employees during safety meetings. The Safety Compliance Officer will, as needed, work with management to evaluate any needed changes to the employee safety reporting program.

G5.4 EVENT INVESTIGATIONS

Valley Metro has a formal process for the investigation into safety events, including accidents, incidents, and occurrences. The investigation process is detailed in the GRTC Operator Training Manual, and result in a variety of report documentation. All preventable accidents result in the formation of an Accident Review Committee (ARC). The ARC will be made up of equal numbers of bargaining unit members and non-bargaining unit members, and one neutral party. The ARC will consist of not more than five, but not less than three persons. The committee uses the National Safety Council Guide to Determine Accident Preventability to complete the ARC report. The ARC is responsible for identifying, analyzing, and reporting the causal factors leading to each event.

Other documents resulting from investigations may include, but are not necessarily limited to:

- Bloodborne Pathogen Exposure Incident Report
- Incident Report
- Motor Vehicle Crash Report
- Injury Report
- Crash Report Checklist
- Post-Accident Individual Test Summary
- Supervisor's Crash Report

Supervisors are primarily responsible for the investigation of safety events, and for performing all of the activities listed in the Crash Report Checklist, both at the scene of the event and post-crash. Supervisors must all complete relevant accident investigation training in order to be qualified to conduct investigations. Other Valley Metro Supervisors are responsible for participation in the investigation process, as needed and as determined by the Director of Transportation. The Director of Maintenance or their designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

The Training and Safety Coordinator is responsible for logging all safety events into a spreadsheet that includes, but not limited to, the following information:

- Data of event
- Vehicle number
- Location
- Description/damage
- Whether EMS was needed

The Director of Transportation or their designee is responsible for working with Valley Metro's insurance and risk management to ensure the provision of relevant investigation information.

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

Every quarter, the Training and Safety Coordinator is responsible for producing reports on safety performance, including information regarding the following categories of safety events:

- Right and left-side clearance
- Rear-end
- Backing
- Head-on or T-bone
- Bay Door

The reports are disseminated through the safety meetings, as well as through the newsletters published by Human Resources.

G6 SAFETY PROMOTION

G6.1 SAFETY COMMUNICATION

As discussed earlier in Section 3.4, Valley Metro uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each Valley Metro employee. This PTASP and referenced plans, policies, and procedures are available to all affected employees digitally or in hard copy.

Individual department directors, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as the employee break room. If necessary, management will ensure that safety-related materials are directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

HR writes and distributes a quarterly newsletter to all employees. The Training and Safety Coordinator is responsible for providing accident data to HR for inclusion in the newsletter.

Valley Metro front-line employees, supervisors, Directors and managers use the safety meetings and staff meeting to discuss hazards and safety performance information. Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through the employee safety reporting program.

As described in the GRTC Operator Training Manual, Valley Metro uses a Safety Incentive Program to reward safe driving.

G6.1.1 COMPETENCIES AND TRAINING

Valley Metro has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. As described in the GRTC Operator Training Manual, Valley Metro has minimum requirements related to:

- The initial hiring of bus operators, including, but not limited to, physical requirements, criminal background checks, and licensing.
- Initial training requirements, such as:
 - Valley Metro Policies and Procedures
 - Federal and State Guidelines and Regulations

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- Pre- and Post-Trip Inspections
- Vehicle Familiarization
- Bus Operations and Maneuvering
- Special Driving Conditions
- Backing
- Bad Weather
- Boarding and Alighting Passengers
- Transportation Safety Institute Certification
- Passenger Assistance Training
- On-Road Training

All of the above topics are covered as part of the Operator training program. The training typically lasts between eight and eleven weeks, depending upon the proficiency of the student. All Operators receive both classroom and road training, all of which is the responsibility of the Training and Safety Coordinator along with selected Operators, known as Behind the Wheel (BTW) Driver Trainers, who help train and evaluate new students. Valley Metro also has regular ongoing observation of its operators through regular observations, ride checks, and refresher training, provided as needed by the BTWs, Supervisors, the Training and Safety Coordinator, and Directors. All student Operators are provided training materials developed by the Transportation Safety Institute, along with other relevant Valley Metro-specific policies and procedures. At the end of the training process, all new Operators must successfully pass a written exam with a minimum passing score of 80%. The Training and Safety Coordinator is responsible for ensuring the completion of all Operator training in a timely manner, and for maintaining Transportation employee training records. Each training record includes a checklist of all training requirements and whether they have been successfully completed.

The Director of Maintenance is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are required to complete vehicle operator orientation training, in preparation for obtaining a CDL. Mechanics are qualified to operate Valley Metro revenue and Non-revenue vehicles. Mechanics receive informal, on-the-job training from the Director of Maintenance or their designee. If needed, Valley Metro may bring in vendors or original equipment manufacturers to provide specific training. Some training on new policies and procedures may be delivered verbally by the Director of Maintenance, the Safety Compliance Officer, or other Valley Metro personnel as needed. The Director of Maintenance is responsible for documenting the completion of any formal or on-the-job training through a combination of spreadsheets and sign-off sheets. All front-line maintenance personnel have training records included in their personnel files, maintained by HR.

Valley Metro Supervisors currently all come from the ranks of existing Valley Metro front-line employees; however, there is no prohibition on hiring Supervisors or Managers with the necessary training and competencies from outside of the organization. As needed and relevant to their job responsibilities, Supervisors and Managers receive training in accident investigation, reasonable suspicion, and other topics.

The Directors of Transportation, Maintenance, and the Training and Safety Coordinator, or their designees, are responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to the AGM and GM.

G6.1.2 TRAINING PROGRAM EVALUATION

The Training and Safety Coordinator, in coordination with the Directors of Transportation and Maintenance, is responsible for periodically analyzing all employee training programs to

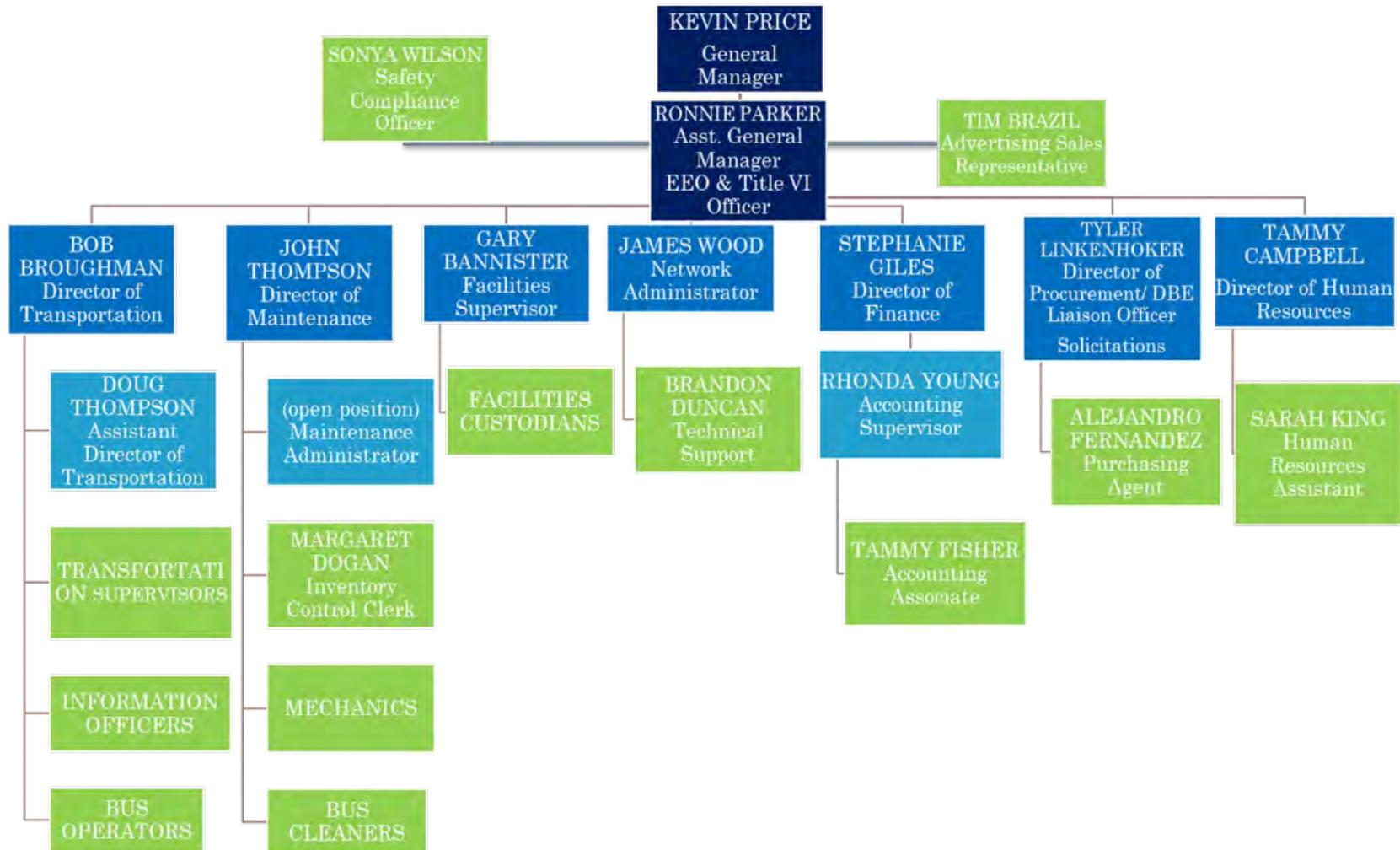
APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

determine whether changes or updates are necessary. The Training and Safety Coordinator is responsible for documenting these reviews and reporting to management, at least annually, on any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of Valley Metro job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX G: GREATER ROANOKE TRANSIT COMPANY (VALLEY METRO)

Organization Chart



APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION (HDPT)

H1 ABOUT HDPT

The Harrisonburg Department of Public Transportation (HDPT) is an agency of the City of Harrisonburg, which owns and operates the system. HDPT provides fixed-route bus and paratransit services within the city limits. HDPT is also responsible for providing school bus services for the city's public school system, and for maintaining other city-owned fleet vehicles, including, but not limited to, fire apparatus, trash trucks, and police cars. Only HDPT's fixed route bus and paratransit services are covered by this PTASP, as these are the only services of HDPT receiving 49 USC §5307 grant funds.

All operations and maintenance of HDPT fixed route and paratransit services are performed by city employees. HDPT's administrative offices and operations base are located at the Central Administration Building, 475 E. Washington Street, in Harrisonburg. HDPT's Central Garage facility is adjacent to the administrative building.

HDPT operates six numbered fixed routes, and 8 colored routes serving off-campus apartment complexes, 10 campus routes, and one bus serving shopping centers. These routes service the University which has over 20,000 students enrolled, along with faculty and staff.

HDPT Fleet

- 39 Gillig 35-ft. transit buses
- 10 paratransit cutaways
- 2 paratransit minivans

The Director of HDPT is the Accountable Executive and has the ultimate authority to allocate human and financial resources to address safety issues.

H2 REVISION HISTORY – HDPT

Each year, HDPT will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for HDPT's PTASP sections.

Table H-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION

H3 SAFETY MANAGEMENT POLICY

H3.1 SAFETY POLICY STATEMENT

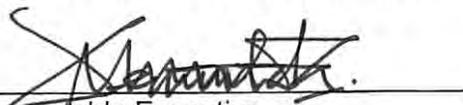
Safety is a core value of Harrisonburg Department of Public Transportation (HDPT). HDPT is committed to providing safe, reliable transit service to the City of Harrisonburg and James Madison University. HDPT is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key HDPT staff. All HDPT employees are held accountable for the overall safety performance of HDPT, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, HDPT managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

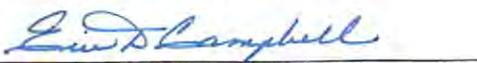
HDPT has established a culture of safety among its managers and employees, with safety at the core of all operational and administrative decisions and actions. HDPT passengers can count on our organization to provide safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all HDPT plans, policies, and procedures. HDPT will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, HDPT has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, HDPT will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of HDPT's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of HDPT personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the Director of HDPT, I am the Accountable Executive and have ultimate authority and responsibility for the safety of HDPT. With this plan, all HDPT staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.

Gerald Gatobu 
HDPT Director /Accountable Executive

04/06/2020
Date

Eric D. Campbell 
City Manager, City of Harrisonburg

04/06/2020
Date

APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION

H3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

HDPT has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table H-2: HDPT Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	3	Less than .5 injuries per 100,000 vehicle revenue miles	7	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	1	Less than .5 injuries per 100,000 vehicle revenue miles	2	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of HDPT policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

HDPT may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The HDPT Director is responsible for ensuring that HDPT managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for monthly reporting on the agency's safety performance to the City Manager or Designee. The Director and key HDPT staff are responsible for annually evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, HDPT is responsible for annually providing its Safety Performance Targets to the Harrisonburg-Rockingham Metropolitan Planning Organization (HRMPO) to help aid in the transportation planning process. DRPT will coordinate with HRMPO and HDPT in the selection of HDPT's safety performance targets.

H3.3 EMPLOYEE SAFETY REPORTING

HDPT employees can report safety issues to their immediate supervisors, to the Safety and Training Coordinator, and using a suggestion box in the employee lounge area at Central Administration. HDPT employees who report safety issues shall not be subject to punitive measures or discipline unless there is a clear violation of HDPT policies or procedures. HDPT is currently evaluating additional methods for facilitating a formal program for employee safety reporting.

APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION

H3.4 SAFETY POLICY COMMUNICATION

It is the policy of HDPT to communicate the safety policies in this PTASP with all affected employees throughout the department. The Safety and Training Coordinator is responsible for ensuring that HDPT safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

HDPT safety policies will be provided to every new employee alongside printed training materials. HDPT managers and executive staff will have access to the complete HDPT PTASP in both hard copy and electronically.

HDPT can also communicate safety messages to employees using message boards in the employee lounge area at Central Administration, as well as through display screens in the dispatch area.

The Safety and Training Coordinator works regularly with the Virginia Transit Liability Pool (VTLP) to provide data for analysis and reporting, particularly on accident and injury trends.

H3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant HDPT positions. Complete position descriptions are maintained for all HDPT positions by the City of Harrisonburg Department of Human Resources.

Transportation Director The Transportation Director leads HDPT and is the agency's Accountable Executive. The Director is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all HDPT personnel. The Director is responsible for ensuring that the SMS is effectively implemented throughout the department, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Overall, the Director is responsible for the following specific activities:

- Ensuring HDPT meets the safety requirements set forth by the City of Harrisonburg
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring HDPT meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

Assistant Transportation Director The Assistant Transportation Director reports to the Director, and manages HDPT's administrative functions, including grants and funding, and regulatory compliance. This individual manages a staff of Program Support Specialists and Administrative Specialists.

The Safety and Training Coordinator has been designated by the Transportation Director as the Chief Safety Officer. This individual is responsible for the following activities:

- All safety-related employee training
- Accident investigation and reporting
- Reporting safety information to the National Transit Database
- Coordinating with VTLP to provide safety data for analysis

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- Coordinating with the city's claims and risk management staff
- Regular review and update of HDPT plans, policies, and procedures related to safety
- Participation in the city's Safety Committee
- Periodic inspection of HDPT facilities and vehicles
- Liaison with local first responder agencies
- Coordinates drug and alcohol testing.

The Transit Superintendent oversees HDPT transit employees, including, but not limited to, **Transit Supervisors, the Paratransit Coordinator, and the Dispatch Supervisor**. These individuals, in turn, oversee **Bus Drivers, Paratransit Drivers, and Dispatchers**. Note that there is significant overlap between the supervisors, dispatchers, and drivers who drive both transit and school buses. The Transit Superintendent manages day-to-day bus operations. All Transportation employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Supervisors routinely observe Bus Drivers to manage and enforce operating rule compliance.

Dispatchers are in direct contact with local police, fire, and emergency medical services (EMS), and are responsible for clear and compliant radio communications. Dispatchers are trained in "reasonable suspicion" in accordance with 49 CFR Part 655, and are responsible for assessing the fitness-for-duty of Bus Drivers as they report for their shifts.

Bus Drivers are responsible for exercising maximum care and good judgment at all times while driving HDPT vehicles, and for following all HDPT rules and procedures in the execution of their duties. Bus Drivers must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating HDPT vehicles. Bus Drivers must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a HDPT vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents to dispatch, and completing pre-trip inspections.

The Fleet Manager is responsible for the maintenance and reliability of HDPT's fleet, including overseeing mechanics, wash bay technicians, and inventory control staff. Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Mechanics are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

All HDPT personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Safety and Training Coordinator or to their immediate supervisor, completing all training required for the safety performance of their duties, and for performing their duties in a safe manner.

H3.6 SAFETY MEETINGS

The Director of Transportation, along with the Safety and Training Coordinator, are responsible for representing HDPT during the city's monthly Safety Committee meetings. The meeting includes participants from relevant city departments. Topics discussed generally include employee injuries and workers' compensation claims, and accidents. VTLP delivers detailed summary reports on injuries and accidents to the Safety/Training Coordinator. The Transportation

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Director, Safety and Training Coordinator, and/or their designee(s) are responsible for regularly attending the safety committee.

HDPT is responsible for holding a Departmental Safety Committee that meets on a regular basis, typically monthly. Topics to be discussed during this meeting include, but are not necessarily limited to:

- Workers compensation and liability claims
- Accidents, injuries, and near misses
- Recommended courses of action in response to safety events

In accordance with the City of Harrisonburg Safety Program, The Transportation Director or their designee is responsible for distributing formal agendas for each meeting, and for posting minutes in work areas for employee viewing, and for distributing the minutes to the Deputy City Manager. Committee members shall observe how safety regulations are enforced in the workplace, act as work area representatives in matters pertaining to safety, and developing and using property self-inspection checklists.

The Transportation Director is responsible for holding weekly meetings with managers across HDPT. Safety is a regular discussion topic during these meetings, including accidents, injuries, and safety hazards. Front-line employees have the opportunity to discuss safety concerns with their direct supervisors or managers, who are in turn responsible for communicating this information to other HDPT managers through the weekly management meetings. At this time, HDPT is in the process of implementing a regular opportunity for drivers and other front-line employees to discuss safety issues with management in a formal meeting setting.

H3.7 DOCUMENTATION AND RECORDKEEPING

HDPT safety is governed by this PTASP as well as referenced standalone documents. This includes **The City of Harrisonburg Safety Program**. This document includes a series of detailed policies, procedures and requirements for all city departments, including HDPT. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. The Safety and Training Coordinator, is responsible for working with the city as part of the maintenance, review, and update of the City Safety Program document. The City Safety Program includes:

- Workplace Safety Committees, including the Departmental Safety Committee
- Accident/Incident Investigation Program for Medical Claims
- Return to Work Program
- Self-Inspections
- Occupational Safety and Health Administration (OSHA) Recordkeeping and Reporting
- Liability Claim Reporting
- Fleet Management and Accident Review Program
- Accident Review Board By-Laws
- Safety-Related Forms

Safety Program Contacts are listed in as Attachment N to the City of Harrisonburg Safety Program.

HDPT records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include operations rule compliance checks, accident reports, training records, maintenance records and work orders, and drug and alcohol program testing records. Individual departments are generally responsible for the maintenance of their respective records

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in accordance with applicable requirements. In accordance with the City of Harrisonburg Safety Program, the HDPT Transportation Director or their designee is responsible for retaining all records related to the implementation of SMS for a minimum of five years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

H4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

H4.1 HAZARD IDENTIFICATION

HDPT managers and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Bus Driver reports to Supervisors or Dispatchers, and/or the Safety and Training Coordinator
- Near miss reporting by Bus Drivers
- Formal and informal safety meetings
- HDPT Suggestion Box
- Bus Driver pre-trip inspections
- Mechanic reports to the Fleet Manager
- Facility and equipment inspections performed by the Safety and Training Coordinator
- Customer service complaints
- Annual safety assessments by VTLP
- Analysis of pedestrian detection system data

Individual department managers are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Safety and Training Coordinator is responsible for working with the department managers and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database. The Safety and Training Coordinator is also responsible for direct observation and identification of safety hazards via the facility and equipment inspections process.

As appropriate, HDPT will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

H4.2 HAZARD ANALYSIS AND EVALUATION

HDPT analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During Departmental Safety Committee meetings, managers and employees have the opportunity to discuss and review safety hazards.
- Individual department managers are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.

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- The Safety and Training Coordinator is responsible for compiling reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to HDPT management.
- The Safety and Training Coordinator is responsible for working closely with all department managers to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

HDPT is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. HDPT management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. HDPT will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Safety and Training Coordinator is responsible for ensuring the review of all unacceptable hazards by the Departmental Safety Committee members. Through both the safety meetings and informal leadership meetings, senior management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. HDPT management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by HDPT managers. All such documentation must be preserved for posterity for a minimum of five years in accordance with the City of Harrisonburg Safety Program.

H4.3 SAFETY RISK MITIGATIONS

HDPT's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. Members of the Departmental Safety Committee are responsible for working together to develop and implement such mitigations. HDPT management is responsible for obtaining relevant input and feedback from the Safety and Training Coordinator, Supervisors, Dispatchers, Bus Drivers, Mechanics, and other outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be the Departmental Safety Committee.

H4.4 HAZARD TRACKING AND RECORDKEEPING

The Safety and Training Coordinator is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Safety and Training Coordinator is

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responsible for the regular, ongoing maintenance and update of this database. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

HDPT management, typically through the Departmental Safety Committee, is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

H5 SAFETY ASSURANCE

H5.1 SAFETY PERFORMANCE MONITORING

HDPT uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through leadership team meetings, safety committee meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. Individual department managers are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, department managers are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. Managers are also responsible for communicating information regarding safety performance with the Transportation Director, the Safety and Training Coordinator, and with other affected departments through meetings and reports.

H5.1.1 TRANSPORTATION

The Transportation Superintendent, working closely with Supervisors and the Safety and Training Coordinator, is responsible for facilitating the continuous evaluation and observation of Bus Driver safety performance and rule compliance. This includes annual performance reviews, observations, “check-rides,” as well as reviews of on-board video, and speed compliance checks using radar. HDPT uses the HDPT Transit Operator Evaluation Form, Attachment H to the City of Harrisonburg Safety Program. Any rule violations must be documented using this evaluation form. The Transportation Superintendent reviews the results of all safety performance and rule compliance activities, and is responsible for determining what follow up is needed with individual employees. This includes retraining, as well as observing patterns or trends suggesting more systemic safety issues. In such cases, the Transportation Superintendent or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of HDPT, such as City of Harrisonburg Department of Public Works (for example, street markings or stripes, or traffic signal timing or visibility).

Bus Drivers are responsible for completing pre-trip inspection forms before beginning their routes. The completed forms are submitted to dispatch. Dispatchers are responsible for distributing the forms to supervisors and technicians.

H5.1.2 MAINTENANCE

The Fleet Manager is responsible for the overall maintenance of HDPT transit vehicles. The City of Harrisonburg Vehicle Maintenance Plan details the roles and responsibilities of HDPT employees for maintaining the fleet, including the transit buses, school buses, and other city

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vehicles maintained by HDPT, including police and fire vehicles, sanitation, public works, and others. The Plan outlines roles and responsibilities for management and frontline employees in the following areas:

- Preventive maintenance (PM) inspections and services
 - Road Calls
 - Warranty Compliance
 - PM Inspections
 - Identified Defects
 - Work Orders
 - Pre-Trip Inspections
 - Virginia Safety Inspections
 - Maintenance Training
 - Equipment Maintenance System (Flagship Fleet Management)
- Americans with Disability Act (ADA) Accessibility Resources
- Management of Maintenance Resources
- Vehicle Management
- Shop Safety
- Chemical and Waste Management

The Facilities Manager is responsible for the overall maintenance of the Central Administration and Central Garage buildings and property. Detailed safety requirements related to chemical hazards and shop safety are included in the Vehicle Safety Plan.

The Fleet Manager, or their designee, is responsible for regularly reviewing and monitoring HDPT maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Fleet Manager reviews all completed pre-trip inspection forms, inspection checklists completed by the mechanics, and maintenance work orders entered into the Flagship Fleet Management system. The Fleet Manager or their designee is responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during informal discussions with maintenance employees, and during regularly-scheduled Departmental Safety Committee meetings involving other departments.

H5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

HDPT administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Safety and Training Coordinator is responsible for the administration of the program, including working with HDPT's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Safety and Training Coordinator is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. HDPT's drug and alcohol testing program is described in detail in the City of Harrisonburg Alcohol and Controlled Substances Testing Policy.

The Safety and Training Coordinator is responsible for reporting safety events, as required, to the National Transit Database, in consultation with HDPT managers. The Transportation Director, or their designee, is responsible for the remaining NTD reporting not related to safety, such as ridership and fare collection data. The Safety and Training Coordinator also works with VTLP to produce reports on employee injuries and accidents. VTLP conducts an annual safety assessment of HDPT transit operations and produces detailed reports on trends and patterns related to safety performance, including:

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- Workers compensation claims and associated injury trends
- Loss rate, severity, and frequency
- Analyses of types of collisions, including backing, broadside, collision with fixed object, door opening/closing, lane change/merging, leaves in the roadway, parked, rear end, and turning.
- Analysis of collision locations, including parking/driveway, intersection, and roadway.

The Safety and Training Coordinator performs and documents regular safety inspections of the Central Garage facility.

H5.3 PROCESS EVALUATION

The Safety and Training Coordinator is responsible for working with individual department managers or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Safety and Training Coordinator is also responsible for regularly monitoring the effectiveness of HDPT employee safety reporting. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during Departmental Safety Committee meetings. The Safety and Training Coordinator will, as needed, work with management to evaluate any needed changes to the employee safety reporting process.

H5.4 EVENT INVESTIGATIONS

HDPT has a formal process for the investigation of safety events, including accidents, incidents, and occurrences. The investigation process is detailed in the City of Harrisonburg Safety Program. All accidents that exceed \$1,000 in damage, or result in personal injury or death, result in the formation of an Accident Review Board (ARB). The ARB's responsibility is to assign responsibility for all accidents meeting the aforementioned thresholds, and to make recommendations to prevent recurrence and improve safety. The by-laws of the ARB are detailed in the City of Harrisonburg Safety Program.

Supervisors are primarily responsible for responding to and investigating of safety events, and for performing all of the activities listed in the City of Harrisonburg Safety Program, both at the scene of the event and post-crash. Supervisors must all complete relevant accident investigation training in order to be qualified to conduct investigations. Other HDPT managers are responsible for participation in the investigation process, as needed and as determined by the Transportation Director. The Fleet Manager or their designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

Documents and reports used during the investigation process are included in the City of Harrisonburg Safety Program as attachments. These may include, but are not necessarily limited to:

- Employee's Report of Injury
- Witness to Incident Form
- Supervisor's Report-Only & Near-Miss Incident Form
- Supervisor's Medical Claim Incident Investigation
- Vehicle Accident Report
- Accident Review Board Recommendation

APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION

The Safety and Training Coordinator is responsible for logging all safety events into a database and for working with VTLP to provide pertinent data on all accidents and incidents at HDPT. VTLP incorporates relevant accident data into its reports produced for HDPT. The Transportation Director or their designee is responsible for distributing these reports during City Safety Committee and Departmental Safety Committee meetings.

H6 SAFETY PROMOTION

H6.1 SAFETY COMMUNICATION

HDPT uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each HDPT employee as part of new employee orientation. This PTASP and referenced plans, policies, and procedures are available to all affected employees either digitally or in hard copy.

Individual department managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as the employee lounge inside Central Administration. If necessary, management will ensure that safety-related materials are directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

HDPT front-line employees and managers discuss hazards and safety performance information through formal and informal meetings, including the Departmental Safety Committee. Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through employee safety reporting.

H6.1.1 COMPETENCIES AND TRAINING

HDPT has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. HDPT uses a combination of in-house and vendor-created training materials. The Safety and Training Coordinator is responsible for providing safety-related training to all HDPT employees, and for working with outside vendors, as needed, to provide topic-specific training as-needed and periodic refresher training. For example, VLTP provides training to HDPT Supervisors in accident investigation.

All Bus Drivers are trained on vehicle operation using a combination of materials created by Gillig, the Transit and Paratransit Company (TAPTCO), and HDPT. Training consists of classroom time, "closed course" bus operation, and "cadetting," which consists of revenue operation by a student Bus Driver under the tutelage of a more experienced Bus Driver, Supervisor, or Transportation Superintendent. Training topics include, but are not limited to:

- Federal Regulations
- Hazards Communication
- Drug and Alcohol Awareness
- Harassment
- Bloodborne Pathogens
- Fatigue Management

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- Wellness
- Whistleblower
- Safety Best Practices
- Introduction to the Bus
- Pre-Trip Inspections
- Mirrors
- Defensive Driving
- Driver Distractions
- Following Distance
- Intersections
- Railroad Crossings
- Pedestrian Awareness
- Backing Accidents
- Merging, Lane Changing, And Passing
- Special Driving Conditions
- Map Reading
- ADA
- Customer Service
- Conflict Management
- Accident Procedures
- Title VI
- HDPT Safety Plan

Bus Driver training also includes performance standards and maneuvering standards, as described in the TAPTCO materials. The training typically lasts approximately 200 hours, depending upon the proficiency of the student. All Bus Drivers receive both classroom and road training, all of which is the responsibility of the Transportation Director, along with Driver Trainers who specialize in instructing new Bus Drivers. HDPT also has regular ongoing evaluation of its Bus Drivers through regular check rides. The Transportation Superintendent, working with the Safety and Training Coordinator, is responsible for ensuring the completion of all Bus Driver training in a timely manner, and for maintaining Transportation employee training records for verification purposes. Training records are kept in accordance with the City of Harrisonburg Safety Program requirements for document retention.

The Fleet Manager is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are required to complete the same operator training as Bus Drivers, and are qualified to operate HDPT revenue vehicles. Mechanics receive informal, on-the-job training from the Fleet Manager or their designee. If needed, HDPT may bring in vendors or original equipment manufacturers to provide specific training. Some training on new policies and procedures may be delivered verbally by the Fleet Manager, the Safety and Training Coordinator, or other HDPT personnel as needed. The Fleet Manager is responsible for documenting the completion of any formal or on-the-job training through a combination of spreadsheets and sign-off sheets. All front-line maintenance personnel have training records included in their personnel files.

HDPT Supervisors currently all come from the ranks of existing HDPT front-line employees; however, there is no prohibition on hiring Supervisors or Managers with the necessary training and competencies from outside of the organization. As needed and relevant to their job responsibilities, Supervisors and Managers receive training in accident investigation, reasonable suspicion, and other topics.

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The Transportation Superintendent, Fleet Manager, Safety and Training Coordinator, or their designees, are responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to the Transportation Director.

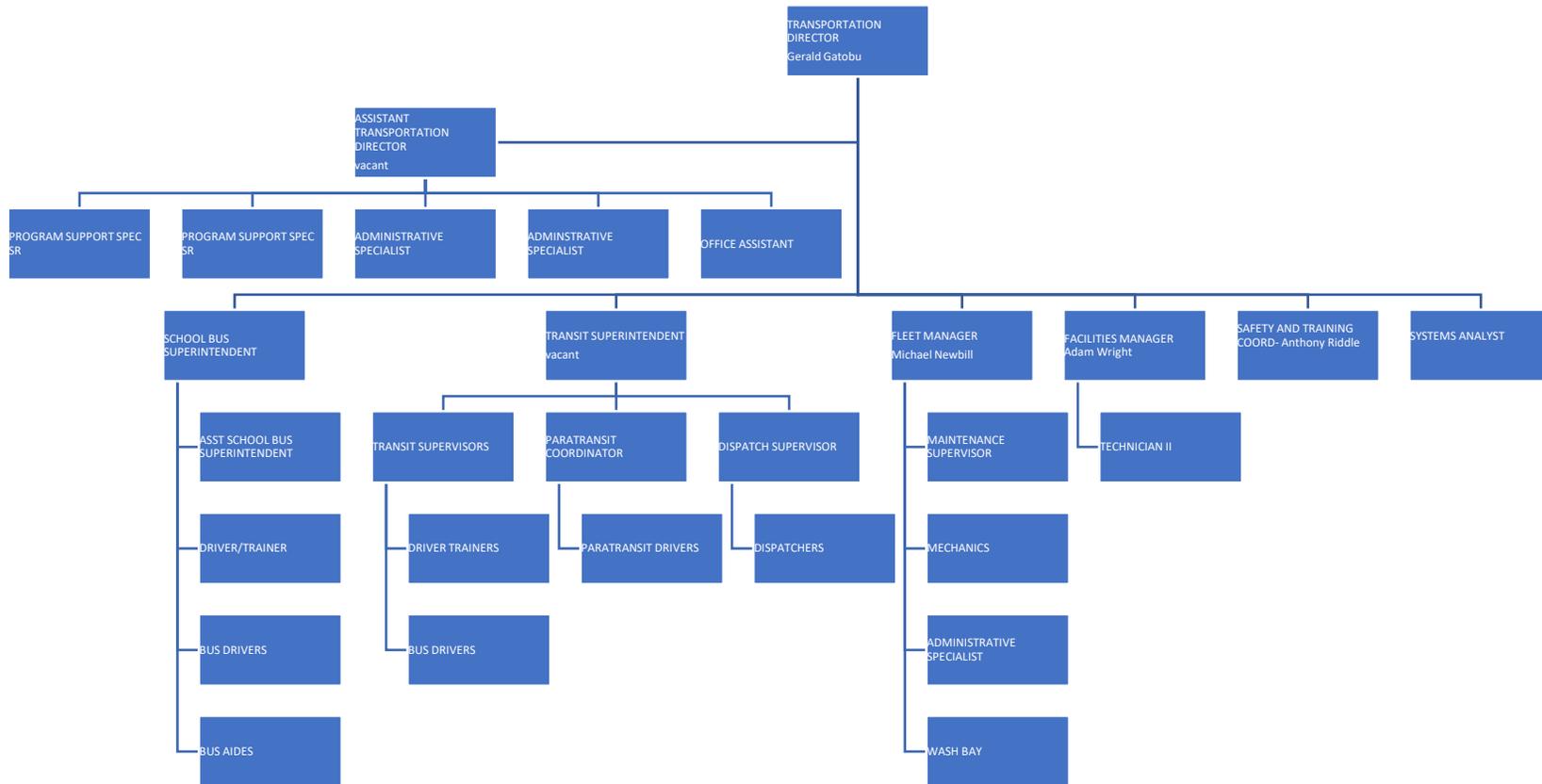
H6.1.2 TRAINING PROGRAM EVALUATION

The Safety and Training Coordinator, in coordination with the Transportation Superintendent and Fleet Manager, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The Safety and Training Coordinator is responsible for documenting these reviews and reporting to management, at least annually, on any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of HDPT job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX H: HARRISONBURG DEPARTMENT OF PUBLIC TRANSPORTATION

Organization Chart



APPENDIX I: JAUNT

I1 ABOUT JAUNT

Jaunt is Central Virginia’s regional public transit system, connecting people to their community. Jaunt delivers convenient and reliable service with its demand response and commuter routes, all through the use of current technology and a customer-focused approach. Jaunt is a public service corporation, owned by the region’s five local governments, and operating with financial assistance from community partnerships, federal and state transit grants, and local government funding support. Jaunt service area includes the City of Charlottesville and Albemarle, Buckingham, Louisa, Fluvanna, and Nelson counties.

All operations and maintenance of Jaunt’s services are conducted by Jaunt employees. Jaunt is directed by the Chief Executive Officer, and overseen by a Board of Directors. Jaunt safety activities are overseen by the Safety Supervisor, as the Chief Safety Officer (CSO). Jaunt’s administrative offices, operations, and maintenance base are located at 104 Keystone Place in Charlottesville.

I2 REVISION HISTORY – JAUNT

Each year, Jaunt will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Jaunt’s PTASP sections.

- Jaunt Fleet**
- 3 Ford Transit Vans
 - 9 Arboc BOC
 - 2 Ford F550 28 pass BOC
 - 75 Chevy/Ford BOC

Table I-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX I: JAUNT

13 SAFETY MANAGEMENT POLICY

13.1 SAFETY POLICY STATEMENT

Safety is a core value of Jaunt. Jaunt is committed to providing safe, reliable transit service to the area of Charlottesville and surrounding counties. Jaunt is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities, accountabilities and responsibilities, as well as the safety management roles and responsibilities for key Jaunt staff. All Jaunt employees are held accountable for the overall safety performance of Jaunt, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, Jaunt managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

Jaunt will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. Jaunt passengers can count on our organization to provide safe and reliable service. Executive personnel and employees must meet or exceed the minimum thresholds and requirements set forth in all Jaunt plans, policies, and procedures. Jaunt will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, Jaunt has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, Jaunt will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

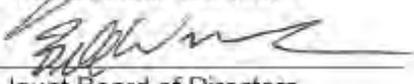
- Ensuring constant communication and awareness of Jaunt's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of Jaunt personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the Chief Executive Officer (CEO) of Jaunt, I am the Accountable Executive and have ultimate authority and responsibility for the safety of Jaunt. With this plan, all Jaunt staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.



Jaunt CEO /Accountable Executive

6/10/2020
Date



President, Jaunt Board of Directors

6/10/2020
Date

APPENDIX I: JAUNT

13.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Jaunt has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table I-2: Jaunt Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	9	Less than .5 injuries per 100,000 vehicle revenue miles	17	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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 reason

APPENDIX I: JAUNT

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of Jaunt policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

Jaunt may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Jaunt CEO is responsible for ensuring that Jaunt management is performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Board of Directors. The CEO and key Jaunt management are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, Jaunt is responsible for providing its Safety Performance Targets to the Charlottesville/Albemarle Metropolitan Planning Organization (CA-MPO) to help aid in the transportation planning process. DRPT will coordinate with Jaunt and CA-MPO in the selection of Jaunt's safety performance targets.

13.3 EMPLOYEE SAFETY REPORTING

Jaunt employees can report safety issues to the supervisors, dispatchers, and supporting executive management, including the Chief Operating Officer (COO). Jaunt bus operators report safety issues formally through pre- and post-checks of the vehicles. The operators submit their pre- and post-trip inspection electronically using their tablets where mechanics can then review concerns and schedule repairs. During meetings, such as the Quarterly Team Meeting and Weekly Management Meetings, staff are encouraged to raise safety concerns. Additionally, the CEO informally meets with approximately three frontline employees each month.

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13.4 SAFETY POLICY COMMUNICATION

It is the policy of Jaunt to communicate the safety policies in this PTASP with all affected employees throughout the department. The Safety Supervisor is responsible for ensuring that Jaunt safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees. Jaunt executive staff will have access to the Jaunt PTASP in both hard copy and electronically in order to deploy safety policies to Jaunt employees.

Jaunt safety and employee policies are provided to every new employee during initial onboarding and orientation. Jaunt communicates safety-related messages through newsletters and bulletins. Safety policies are mandated through the Employee Handbook. Jaunt management can also communicate messages through an electronic board for operations personnel and tablets onboard the vehicles. The COO works with supporting operational personnel to deploy safety messages throughout the agency.

13.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant Jaunt positions.

Chief Executive Officer. The CEO leads Jaunt as the agency's Accountable Executive and reports to the Board of Directors. The CEO is responsible for overseeing the safety and daily operations of the agency. The CEO is responsible for ensuring that the SMS is effectively implemented throughout the department, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d).

Overall, the CEO is responsible for the following specific activities:

- Ensuring Jaunt meets the safety requirements set forth by the Board of Directors and governing policies and procedures
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring Jaunt meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

Safety Supervisor. The Safety Supervisor is the Jaunt Chief Safety Officer (CSO). The Safety Supervisor reports to the COO and also has a direct line of communication to the Accountable Executive. As the CSO, the Safety Supervisor will have authority for overseeing the day to day safety of Jaunt. The Safety Supervisor responsibilities include but are not limited to:

- Coordination of Safety Event Investigations
- Coordination of Safety Training
- Management of the Drug and Alcohol program at Jaunt
- Regular review and update of Jaunt plans, policies, and procedures related to safety
- Leading collision investigations
- Compiling safety performance data throughout the agency
- Preparing reports for Jaunt executive personnel on safety performance

Chief Operating Officer. The COO reports to the CEO, and manages Jaunt's daily operations in the field. The COO oversees the work of the operations Road Supervisors, who in turn manage

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and regulate the work of all Bus Operators. The COO also oversees the **Bus Dispatchers**, the **Data Analyst**, the **Operations Analyst**, the **Schedulers**, and the Training Manager.

Chief Mechanic. The Chief Mechanic reports to the Chief Administration Officer, and manages the inspections and maintenance performed on the vehicles. They are responsible for coordinating with **Mechanics** on maintenance performed on the vehicles. The Chief Mechanic also supports training by coordinating on-the-job training for new Mechanics. The Chief Mechanic is also responsible for assisting in accident investigations, pertaining to vehicle inspections and faults in equipment. The Chief Mechanic is responsible for coordinating with the Safety Supervisor to provide safety performance data related to the maintenance of Jaunt vehicles, facilities, and equipment.

Training Manager. The Training Manager reports to the COO and coordinates most responsibilities related to training at Jaunt. Responsibilities include:

- All employee training
- Refresher training for employees
- Remedial training, as identified as necessary by the Road Supervisors
- Tracking training completion
- Oversees the Quarterly Team Meetings
- Support safety event investigations along with Safety Supervisor and Road Supervisors

The Training Manager also plays a role in the interview process for prospective Jaunt employees.

Road Supervisors. Road Supervisors guide operators in the performance of their duties, answering questions regarding work responsibilities, clarifying policies and procedures, and helping the COO in the daily operation of transit activities. Road Supervisors are responsible for conducting ongoing ride checks of Bus Operators and coordinating remedial training with the Training Manager. Road Supervisors are also required to respond to accidents and conduct investigations with support from other Jaunt personnel, including the Training Manager, Safety Supervisor, Dispatchers, and the Bus Operator.

Bus Operators (Drivers) are responsible for exercising maximum care and good judgment at all times while driving Jaunt vehicles, and for following all Jaunt rules and procedures in the execution of their duties. Bus Operators must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating Jaunt vehicles. Bus Operators must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a Jaunt vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents, completing accident investigation forms, and completing pre- and post-trip inspections for the maintenance group.

All Jaunt personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Safety Supervisor or to their immediate Supervisor, completing all training required for the safety performance of their duties, and for performing their duties in a safe manner. All Transportation employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

I3.6 SAFETY MEETINGS

The CEO holds weekly executive-level meetings with the COO, Chief Administration Officer, and the Chief Financial Officer to discuss any areas of improvement and identify solutions to issues,

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including safety hazards identified and raised by front line, supervisory, and management-level employees.

Jaunt convenes an informal discussion to review safety events as they occur to identify the preventability of an accident. This group may be composed of the Safety Supervisor, Road Supervisor(s), Training Manager, and COO. Jaunt uses this discussion as an opportunity to determine the cause of the accident for tracking purposes.

Jaunt holds a Quarterly Team Meeting for all staff, including for management and frontline personnel. This is an opportunity for Jaunt personnel to raise safety concerns and identified hazards in a more formal setting as well as a forum for management to provide any necessary updates for all employees.

The Operations group also holds separate daily meetings held by the COO to discuss ongoing activities and review safety memos and operating bulletins. The CEO holds informal group meetings with approximately three frontline employees a month.

Separately, Jaunt Board of Directors meetings are an opportunity for the Jaunt executive team to provide an update on operations and safety. The CEO reports operational and maintenance key performance indicators (KPIs) to the Board on a monthly basis. The KPIs include data regarding safety events that occurred.

13.7 DOCUMENTATION AND RECORDKEEPING

The SMS program at Jaunt is governed by this PTASP as well as referenced standalone documents. This includes the **Jaunt Emergency Plan**, the **Drug and Alcohol Policy**, and the **Jaunt Driver Handbook**. The Driver Handbook and supporting policies include requirements and procedures for Jaunt employees. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. Maintenance employees are also held to the requirements in the **Jaunt Vehicle Maintenance Plan** and the **Facility Maintenance Plan**, which describes safety requirements; quality control; scheduling; and inspections.

Jaunt records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include operations and maintenance quality assurance checks, hazard reports, accident reports and log, training records, maintenance records and work orders, and drug and alcohol program testing records. Individual departments are generally responsible for the maintenance of their respective records in accordance with applicable requirements. In accordance with city, state, and federal requirements, Jaunt keeps all documentation for at least a minimum of three years, or as described in the Jaunt **Document Retention Policy, whichever is more stringent**. Such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

14 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

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14.1 HAZARD IDENTIFICATION

Jaunt executive and front-line employees are empowered to identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator reports by radio to Road Supervisors and Dispatchers for hazards along the route
- In person discussions with supervisors and executive personnel
- Near miss reporting by Bus Operators
- Employee meetings
- Annual facility checks
- Work orders for inspections and preventive and corrective maintenance completed by maintenance personnel
- Bus Operator pre-trip inspections
- Bus Operator post-trip inspections
- Customer service complaints
- Ride checks of Bus Operators
- Safety report KPIs
- Inspections performed by external groups, such as the fire department and the FTA

The Safety Supervisor is responsible for working with Jaunt executive staff to regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. Jaunt tracks safety hazards through a site visit/concerns spreadsheet that is a cumulation of safety hazards gathered from numerous sources. The Safety Supervisor is responsible for working with the department managers and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database. Jaunt also utilizes the existing accident log to track accidents and identify any trends that may inform hazards.

As appropriate, Jaunt will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

14.2 HAZARD ANALYSIS AND EVALUATION

Jaunt analyzes and evaluates potential safety hazards based on methods of reporting as listed above. Jaunt primarily analyzes hazards and mitigates at the time of the report, if possible. Currently, Jaunt utilizes a safety concerns tracking log which includes hazards from a myriad of sources. The Safety Supervisor will continue to formalize the process for documenting each hazard and tracking it in a log, as further described below. Additionally, Jaunt may also conduct hazard analysis and evaluation through such methods as:

- Individual departmental monitoring of hazards and mitigations.
- Reviews of hazards based on trends during Board of Directors meetings
- Discussion at Quarterly Team Meetings
- Discussion at the weekly Manager Meetings
- Assess pre- and post-trip inspections for repeat issues on vehicles

Jaunt is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. Jaunt management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. Jaunt will use a hazard assessment process based on Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management

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Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Safety Supervisor, as the CSO, with support from other management staff will be responsible for ensuring that hazards will be reviewed. The Safety Supervisor also reviews all hazards rated as unacceptable rated at Jaunt. Through both the regular meetings and informal leadership meetings, management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. Jaunt management has the discretion to prioritize hazards of a lower risk level and determine whether mitigations are needed. All such decisions will be documented in tracking logs or other means deemed appropriate by Jaunt managers. All such documentation must be preserved for posterity for a minimum of three years or in accordance with the Jaunt Document Retention Policy, whichever is more stringent, as well as local, state, and federal requirements.

14.3 SAFETY RISK MITIGATIONS

Jaunt's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. This typically occurs when an employee reports an identified hazard to their direct Road Supervisor or a Dispatcher and will often be mitigated at that point, whenever possible. If this is a longer-term hazard, management and executive leadership will track the identified mitigation through completion, or identify a new method for mitigation.

14.4 HAZARD TRACKING AND RECORDKEEPING

As the CSO, the Safety Supervisor is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. Executive staff of other Departments, such as the COO, also track department-specific hazards identified by employee support the Safety Risk Mitigation process. The primary method for tracking hazards and corrective actions will be in the Risk Register, included in the DRPT PTASP Section 3.2, which will serve as a central location for safety hazards and mitigations at Jaunt. Separately, Jaunt will also continue to track accidents in an accident log. This log will include information derived from the Master Collision Report and the Incident Form, which describes the accident, cause, location, weather, and if it was preventable.

15 SAFETY ASSURANCE

15.1 SAFETY PERFORMANCE MONITORING

Jaunt uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through actions such as:

- Weekly management meetings
- Quarterly Team Meetings
- Meetings with the Board of Directors
- Reviews of employee records
- Ride checks for Bus Operators
- Review of training records
- Reviews of pre- and post-trip inspections
- Reviews of maintenance and work order records

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- Safety event records reviews
- Risk Register
- reviews and status of mitigations
- Frequent and ongoing conversations with Supervisory and front-line employees

Through accident investigations, Jaunt management may determine preventable and nonpreventable accidents and identify areas for improvement, using the Safety Risk Management tools described in the previous section.

Individual department managers are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, the Safety Supervisor is responsible for working with department managers and executive personnel, including the COO and the Chief Mechanic, to review safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. The COO and Safety Supervisor work with Road Supervisors and the Chief Mechanic to review safety issues and employee records specific to the operations and maintenance departments to assess potential hazards or areas for improvement. Once any mitigations adopted based on hazard analysis management reviews the mitigations are regularly assessed to review if they were effective or if a new mitigation should be considered.

15.1.1 OPERATIONS

The COO, working closely with Road Supervisors and the Safety Supervisor, is responsible for facilitating the continuous evaluation and observation of Bus Operator safety performance and rule compliance. The COO is supported by numerous groups of personnel responsible for ensuring Jaunt operations are conducted safely and efficiently. The Dispatchers provide directions and support via radio while Bus Operators are completing routes. They are also a resource to relay any identified hazards and safety concerns along the bus routes. The Road Supervisors are at the front line of overseeing the daily functions of Bus Operators and are responsible for gathering any identified safety hazards and providing up to date information to front line operational employees. Under the COO, the Data Analyst gathers and reviews data on ridership, including miles and funding, and coordinates schedules for riders. The Operations Analyst also reviews data for scheduling, call center volumes, and staffing. The Mobility Manager assists with outreach and coordinates with human service agencies for mobility services.

The Jaunt Road Supervisors conduct ongoing ride checks of Bus Operators to assess rules compliance and safe operations; each Bus Operator is reviewed at least semiannually. This is a randomized program, where Supervisors determine who they will evaluate by various times of day and the day of week, utilizing ride along forms. Jaunt keeps a database of the completed ride check forms for tracking purposes and KPIs. The operations group use this database to assess safety and operational performance and identify areas of improvement in training with the Training Manager and Supervisors. The Road Supervisors also meet at the beginning of shifts with operations employees to ensure employees understand their requirements and any changes to operations; this is also an opportunity for them to voice any concerns, including hazardous conditions.

The results of accident investigations are also used as a method to track performance and assess events that may have been preventable. Following an accident, an employee may be required to complete remedial training, as a part of the Safety Promotion program. The Safety Supervisor, Road Supervisors, COO, and Training Manager are responsible for conducting accident and incident investigations to identify preventability and mitigate future events through such as training or re-training, review or update of policies, procedures, or training programs, or addressing

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physical or operational issues that may or may not be Jaunt's responsibility, such as street designs.

Bus Operators are responsible for completing pre- and post-trip inspection on their tablet before beginning their routes and after completing operations.

15.1.2 MAINTENANCE

The Chief Mechanic is responsible for the overall maintenance of Jaunt transit vehicles. The Jaunt Vehicle Maintenance Policy details the responsibilities of all Jaunt vehicle maintenance personnel in the following areas:

- Preventive maintenance (PM) inspections and services
 - Pre-Trip inspections
 - Post-Trip inspections
 - Inspection tracking/Work Order (Fleetio) system reviews
 - Quality checks
 - Scheduling of Mechanics
 - Americans with Disability Act (ADA) Accessibility Features
- Corrective maintenance
- Tools and equipment at the facility
- Servicing and cleaning

The Chief Mechanic is responsible for regularly reviewing and monitoring Jaunt maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Chief Mechanic reviews all completed pre- and post-trip inspections and preventive maintenance and inspection checklists completed by the mechanics. The Chief Mechanic is ultimately responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during informal discussions with maintenance employees. The Chief Mechanic is encouraged by the CEO to report any safety hazards and concerns regarding vehicle maintenance and inspection processes.

Jaunt utilizes Fleetio to track and schedule maintenance work order on vehicles. The Chief Mechanic uses Fleetio to review each work order before closing out the inspection. Per the Vehicle Maintenance Policy, comprehensive inspections and preventive maintenance is performed every 4,000 miles, in addition to the annual state inspection. This ensures that vehicles are routinely inspected and checked for critical safety concerns and ultimately addressed. On an ongoing basis the maintenance group assesses components or equipment that routinely fails. If issues aren't resolved they may be taken to a higher level to identify a permanent solution or mitigation. The maintenance group utilizes the pre-trip inspections conducted by Bus Operators to identify any deficiencies and review if the vehicle must be taken out of service to address a safety critical defect. Maintenance is also required to conduct inspections on equipment based on original equipment manufacturer recommendations.

Separately, maintenance and inspections of facilities is the responsibility of Supervisor staff and the Safety Supervisor through coordination with the Chief Financial Officer. On an annual basis, the Supervisors conducts facilities inspections for Jaunt in addition to fire inspections conducted by the Fire Department. Jaunt tracks the completed inspections and forms on an excel file, called the Building Maintenance Checklist.

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15.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

Jaunt administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The COO or their designee is responsible for the administration of the program, including working with Jaunt's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Transit Director or their designee is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable cause/suspicion to Supervisors and affected managers. Jaunt's drug and alcohol testing program is described in detail in the Jaunt Drug and Alcohol Policy.

The Safety Supervisor is responsible for reporting safety events, as required, to the National Transit Database, in consultation with Jaunt executive and supervisor personnel. The executive staff remain involved in the procurement process at Jaunt, which is governed by the Procurement Policy, to ensure safety requirements are included in the Request for Proposal (RFP). The Chief Mechanic and Mechanics assist with inspections of all incoming equipment to ensure it meets safety specifications.

15.3 PROCESS EVALUATION

The Safety Supervisor is responsible for working with individual department managers or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The executive management personnel are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Safety Supervisor is also responsible for regularly monitoring the effectiveness of the employee safety reporting program. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during team and ad hoc meetings. The Safety Supervisor will, as needed, work with management to evaluate any needed changes to the employee safety reporting and overall Safety Risk Management processes.

15.4 EVENT INVESTIGATIONS

Jaunt has a formal process for the investigation of safety events, including accidents, incidents, and occurrences. If an accident occurs, the Bus Operator calls a Road Supervisor or Dispatcher. Either a Road Supervisor, Safety Supervisor, or the Training Manager respond to the scene to complete the initial investigation. After the event, the Bus Operator completes an Incident Report Form, which is also described in the Jaunt Driver Handbook. The Master Collision Report is then completed by the lead investigator – either the Training Manager, Safety Supervisor or a Road Supervisor. Jaunt then convenes an Accident Review Meeting with other key personnel such as the COO and CEO determine the preventability of the accident. Moving forward, Jaunt plans to expand the investigation process to also review probable cause of events.

The Safety Supervisor is responsible for logging all safety events into the accident log after the investigation report is reviewed and finalized. Jaunt gathers the following information from investigations:

- Date/time of event
- Employee information
- Investigator information

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- Vehicle information
- Location
- Specific notes on the event and description
- Number of passengers
- Costs of accident and damage
- Witness responses
- Drug and alcohol testing decision
- Police report (if applicable)
- Injuries
- Weather
- Personal vehicle movement (if applicable)
- Resulting disciplinary actions
- Pictures

Jaunt maintains investigation files in a database in accordance with the Data Retention Policy.

I6 SAFETY PROMOTION

I6.1 SAFETY COMMUNICATION

As discussed earlier in Section 4.3, Jaunt uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each Jaunt employee as part of new employee orientation and safety training for their specific positions. This PTASP and referenced plans, policies, and procedures are available to all affected employees in hard copy.

The Safety Supervisor is responsible for developing and posting safety-related bulletins, newsletter, and other messages in areas visible to frontline operations and maintenance employees. Jaunt utilizes an electronic bulletin board to convey any safety notices or changes to operations, as necessary. The Director of Public Relations (vacant) has also developed a newsletter that highlights relevant safety and emergency preparedness related issues and tips for employees. Additionally, each vehicle is equipped with a tablet for conducting pre- and post-trip inspections, but may also be utilized to distribute important messages to personnel. If necessary, management will ensure that safety-related materials are directly distributed to individual employees. The Road Supervisors also provide memos/bulletins to employees, of which they must sign off on for their receipt and understanding of the safety information. Jaunt front-line employees and managers discuss hazards and safety performance information through formal and informal meetings, including the Quarterly Team Meetings.

I6.1.1 COMPETENCIES AND TRAINING

Jaunt has a formal process to ensure that employees receive the appropriate competencies and training to safely perform their duties. Jaunt uses primarily in-house developed training materials and programs. The Training Manager is responsible for most operations training at Jaunt. The Safety Supervisor is responsible for providing safety-related training to all Jaunt employees. Road Supervisors also assist with the functional and on the job portions of training, such as ride alongs with new Bus Operators.

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All Bus Operators are either hired with a CDL, or Jaunt may provide the CDL training. The Jaunt training program is composed on classroom training and on the job training with ride alongs on every route. Bus Operator training covers:

- Drug and Alcohol Awareness
- Farebox Procedures
- Occupational Safety
- Pre- and Post-Trip Inspections
- Mirrors
- Defensive Driving
- Bus Operator Distractions
- Following Distance
- Intersections
- Railroad Crossings
- Pedestrian Awareness
- Merging, Lane Changing, And Passing
- Special Driving Conditions
- Map/Schedule Reading
- On Road Demonstration
- ADA
- Customer Service
- Conflict Management
- Accident Investigation Procedures

Bus Operator training also includes performance standards and maneuvering standards. During training, Jaunt training personnel also go through specific hazardous conditions for operations, such as low clearance areas; bridges; tight turns; and one-way streets. Each Bus Operator is paired with a job coach (typically a more experienced Operator) to assist the Training Manager. If necessary, the Training Manager may also assist the job coach in conveying important instructions to Bus Operators. At the completion of training, either a Road Supervisor or the Training Manager will conduct a final observation of the Bus Operator on all routes to assess use of mobility devices and safe operations. Jaunt also has regular ongoing evaluation of its Bus Operators through semiannual check rides. Annually Jaunt holds a Rodeo to review operations and safety. This is an opportunity to recognize positive actions and identify any necessary refresher training for employees. Training records and forms are scanned and maintained in employee files by the Training Manager.

The Chief Mechanic is responsible for providing maintenance-specific training to the Mechanics. Mechanics receive informal, on-the-job training on equipment and vehicles. If needed, Jaunt may bring in vendors or original equipment manufacturers to provide specific training. Training for Mechanics covers:

- Transmissions
- Engines
- Fall Protection

All frontline personnel training files are composed of:

- Training Completion Checklist
- Employee Information
- Signatures from Employee and Trainer
- Final Tests

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- Evaluations
- Ride Along (Operators)
- Pre- and post-trip inspection evaluation

Several Jaunt Road Supervisors come from the ranks of existing Jaunt front-line employees, including Bus Operators or Dispatchers, but they may also come from outside of Jaunt. Road Supervisors receive informal training in accident investigation, reasonable suspicion, and other topics. During training, Road Supervisors will shadow other more senior Supervisors through on the job training.

The Safety Supervisor and Training Supervisor are responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to Jaunt executive personnel and the CEO. The Safety Supervisor and Training Supervisor are also responsible for working with departmental managers to ensure that covered employees receive necessary refresher or remedial training.

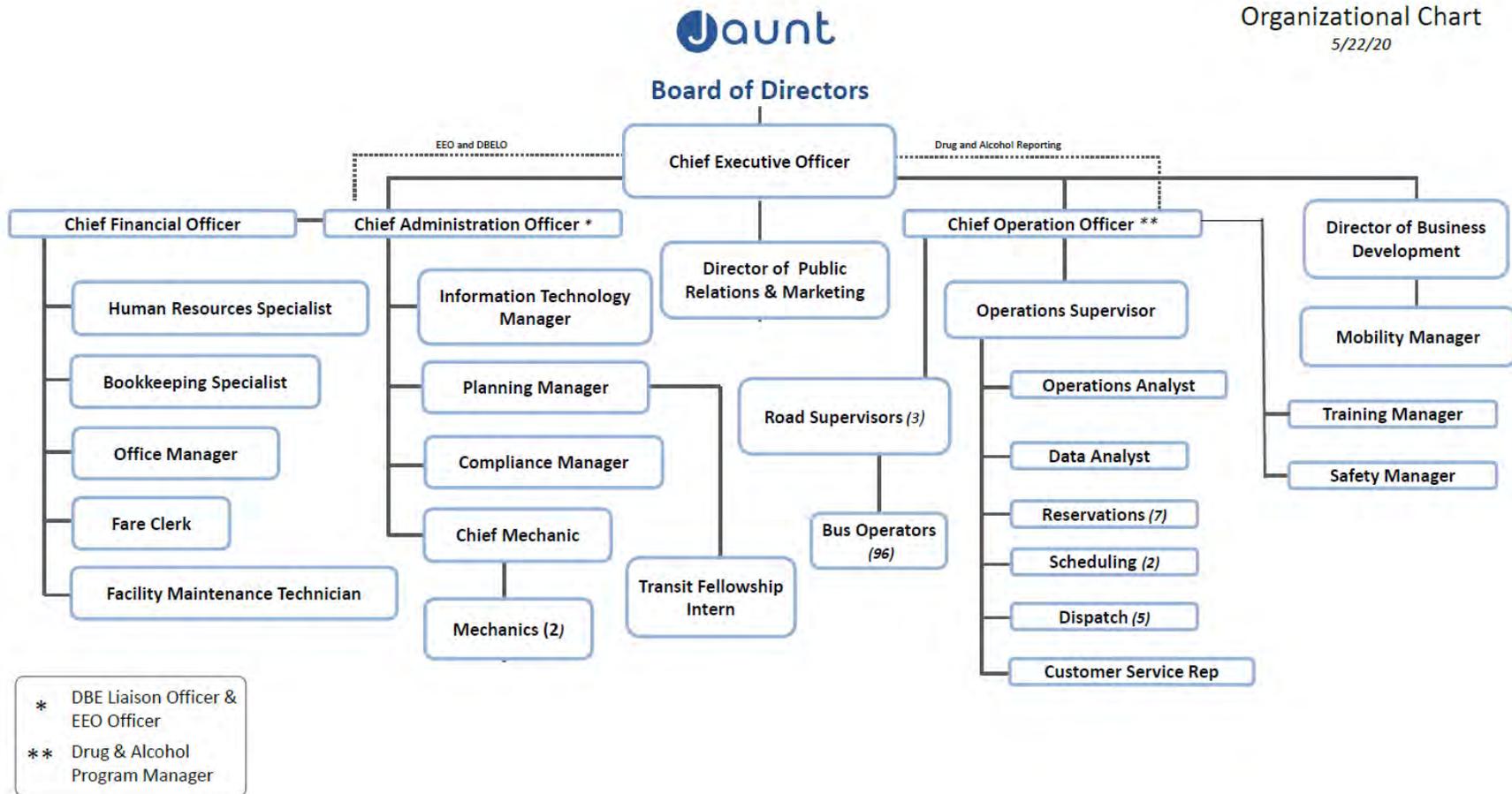
16.1.2 TRAINING PROGRAM EVALUATION

The Training Manager, in coordination with Jaunt executive management, the Safety Supervisor, and others as needed, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary based on employee proficiency and understanding. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of Jaunt job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

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I7 ORGANIZATION CHART



APPENDIX J: DISTRICT THREE GOVERNMENTAL COOPERATIVE/MOUNTAIN LYNX TRANSIT

J1 ABOUT MOUNTAIN LYNX TRANSIT

The District Three Governmental Cooperative (DTGC) owns and operates Mountain Lynx Transit. DTGC is composed of local governments in Bland, Carroll, Grayson, Smyth, Washington, and Wythe counties, and the towns of Wytheville, Marion, and Abingdon, and the City of Galax. Mountain Lynx Transit. Mountain Lynx operates demand response service, which dispatches from two centers: Marion, which serves the counties Wythe, Bland, Grayson, Smyth, Washington and the towns of Wytheville, Marion, and Abingdon; and Galax dispatch center, which serves Carroll County and the City of Galax. Mountain Lynx is centrally managed by the Transit Services Director, who oversees operations and maintenance staff in all four locations. The Mountain Lynx central office is located at DTGC headquarters in Marion. DTGC headquarters, along with each of the other operating locations, include administrative offices for employees to report to work, as well as a maintenance garage. Mountain Lynx transit vehicles are stored in all operating locations.

The Transit Services Director reports to the Executive Director of DTGC, who in turn reports to the DTGC Board of Commissioners, as well as an Advisory Council.

Mountain Lynx operates a fleet of Chevrolet and Ford cutaway chassis buses for the demand response service, as well as modified Dodge Caravan minivans for medical transportation for seniors.

Mountain Lynx Transit Fleet

- Ford Cutaways
- Chevy Cutaways
- Dodge Caravan (Medical Transportation)

J2 REVISION HISTORY – MOUNTAIN LYNX TRANSIT

Each year, Mountain Lynx Transit will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Mountain Lynx Transit's PTASP sections.

Table J-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX J: MOUNTAIN LYNX TRANSIT

J3 SAFETY MANAGEMENT POLICY

J3.1 SAFETY POLICY STATEMENT

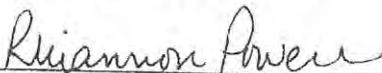
Safety is a core value of Mountain Lynx Transit. Mountain Lynx Transit is committed to providing safe, reliable transit service to the towns of Marion, Wytheville, and Abingdon, the City of Galax, and the surrounding counties. Mountain Lynx Transit is committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key Mountain Lynx Transit staff. All Mountain Lynx Transit employees are held accountable for the overall safety performance of the transit system, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, Mountain Lynx Transit employees are accountable for the delivery of the highest achievable levels of safety performance.

Mountain Lynx Transit will establish a culture of safety among its employees, such that safety is at the core of all operational and administrative decisions and actions. Mountain Lynx Transit passengers can count on our organization to provide safe and reliable service. Mountain Lynx Transit employees must meet or exceed the minimum thresholds and requirements set forth in all agency plans, policies, and procedures. Mountain Lynx Transit will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, Mountain Lynx Transit has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, Mountain Lynx Transit will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of Mountain Lynx Transit's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of Mountain Lynx Transit employees
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

The Executive Director of DTGC is the Accountable Executive, and has the ultimate authority and responsibility for the safety of Mountain Lynx Transit. With this plan, all Mountain Lynx Transit employees are hereby accountable and responsible for the implementation of all of the SMS activities described herein.


Executive Director, DTGC / Accountable Executive

5-1-2020
Date


Chair, DTGC Board of Commissioners

4 May 2020
Date

APPENDIX J: MOUNTAIN LYNX TRANSIT

J3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Mountain Lynx Transit has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table J-2: Mountain Lynx Transit Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Demand Response	0	0	2	Less than .5 injuries per 100,000 vehicle revenue miles	5	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of Mountain Lynx Transit policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

Mountain Lynx Transit may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Transit Services Director is responsible for ensuring that Mountain Lynx Transit employees are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Executive Director. The Transit Services Director responsible for working with the Transit System Area Supervisors and Fleet Manager to periodically evaluate the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, Mountain Lynx Transit is responsible for annually providing its Safety Performance Targets to the Bristol Metropolitan Planning Organization (Bristol MPO) to help aid in the transportation planning process. DRPT will coordinate with Mountain Lynx Transit and the Bristol MPO in the selection of Mountain Lynx Transit's safety performance targets. The Transit Services Director will be responsible for facilitating this coordination process.

J3.3 EMPLOYEE SAFETY REPORTING

Mountain Lynx Transit employees have multiple methods for reporting safety issues. Any employee can report a safety issue directly to their Supervisor, to the Transit Services Director, during a Safety Committee meeting, or by completing and submitting an incident report. If appropriate, employees are able to submit such safety concerns anonymously. The Transit Services Director works with the Area Supervisors and Fleet Manager to help front-line employees feel comfortable communicating safety concerns formally and informally, and no punitive action shall be taken against a Mountain Lynx Transit employee for reporting a safety concern except

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those that are in clear violation of existing DTGC and Mountain Lynx plans, policies, and procedures. The Transit Services Director is responsible for working with other DTGC staff as needed to determine whether discipline is required for employees on a case-by-case basis. All Discipline is in accordance with DTGC's Safety Accountability Policy and other relevant DTGC documentation.

J3.4 SAFETY POLICY COMMUNICATION

It is the policy of Mountain Lynx Transit to communicate the safety policies in this PTASP and other referenced policies with affected employees. The Transit Services Director is responsible for working with the Area Supervisors and Fleet Manager to ensure that DTGC safety policies are disseminated through training, formal and informal meetings, and verbal and written communications with employees.

Mountain Lynx Transit's safety policies will be provided to every new employee alongside printed training materials. Affected DTGC employees will have access to the complete PTASP in both hard copy and electronically.

Any changes to Mountain Lynx Transit safety policies will also be provided to every affected employee, accordingly. The Transit Services Director is responsible for ensuring the communication of any new or updated safety policy information through meetings such as the Safety Committee, and through verbal and written communications as appropriate.

J3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Transit Services Director. The Transit Services Director is Mountain Lynx Transit's SMS Executive. The Transit Services Director is responsible for overseeing the implementation of Mountain Lynx Transit's SMS and for ensuring safe working conditions and practices for all DTGC employees who operate and maintain the Mountain Lynx Transit system. The Transit Services Director oversees the Area Supervisors and Fleet Manager, as well as the Administration and Safety Manager. The Transit Services Director coordinates regularly with managers as well as other DTGC departments as needed. The Executive Director holds the Transit Services Director responsible and accountable for the day to day management of Mountain Lynx Transit, and for its safety performance. In turn, the Transit Services Director holds the Area Supervisors, Fleet Manager, Administration and Safety Manager, and their respective employees, accountable for upholding their respective safety roles and responsibilities, and for their safety performance.

The Transit Services Director is also responsible for the following:

- Communicating safety performance information to the Area Supervisors, Fleet Manager, and front-line employees
- Regularly reporting on and communicating safety performance information with the Executive Director
- Maintaining relationships with other DTGC departments
- Maintaining relationships with local and state agencies, including first responders
- Working with the Bristol MPO to annually evaluate and/or update Mountain Lynx Transit's safety performance targets
- Working with DRPT to review and update the Mountain Lynx Transit PTASP annually
- Ensuring Mountain Lynx Transit employees understand their safety roles and responsibilities
- Instilling a culture of safety throughout the organization

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Executive Director. The Executive Director of DTGC is the Accountable Executive for Mountain Lynx Transit. In accordance with 49 CFR Part 673.23(d), the Executive Director has the ultimate authority and responsibility to allocate the human and capital resources needed to implement the SMS and to address safety risks. The Executive Director has delegated the day to day oversight and management of Mountain Lynx Transit to the Transit Services Director, who serves as the SMS Executive.

The Transit Services Director works with the **Area Supervisors** to oversee Mountain Lynx Transit Drivers. The Area Supervisors are generally responsible for:

- Dispatching Drivers
- Monitoring weather reports and other information to ensure conditions are safe and secure before Mountain Lynx Transit vehicles are dispatched
- Ensuring compliance with procedures and standards related to employee duties
- Conducting training, orientation, and oversight of employees to ensure policies are enacted
- Hearing and acting on any safety/hazard concerns raised by Transit Drivers and Operations Specialists
- Reporting any safety concerns to the Transit Services Director
- Working with the Transit Services Director to coordinate and account for all personnel during a safety event
- Investigating bus accidents

Transit Drivers and Operations Specialists are responsible for exercising maximum care and good judgment at all times while driving Mountain Lynx Transit vehicles, and for following all DTGC rules and procedures in the execution of their duties. All Drivers and Operations Specialists are responsible for:

- Completion of all DTGC-required safety and security classes
- Ensuring all safety and security policies are implemented
- Ensuring the transit vehicle is in safe and secure condition through the use of the BDA Trip Checklist
- Notifying their Area Supervisor of any security threat or hazard concerns

Transit Drivers must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating Mountain Lynx Transit vehicles. Drivers must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a Mountain Lynx Transit vehicle.

The Fleet Manager is responsible for the maintenance and reliability of the Mountain Lynx Transit fleet, including overseeing the Fleet Specialist and Fleet Assistant. **The Fleet Specialist and Fleet Assistant** report to the Fleet Manager, and are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Fleet employees are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

The Administration and Safety Manager reports to the Transit Services Director, and is generally responsible for providing data and records management assistance to the Transit Services Director, as well as other administrative tasks as directed.

All DTGC personnel involved in the safe operation and maintenance of Mountain Lynx Transit are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to their supervisor, manager, or Transit Services Director,

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completing all training required for the safe performance of their duties, attending safety meetings as required, and for performing their duties in a safe manner. As needed, Mountain Lynx Transit employees may be asked to participate in emergency preparedness drills and exercises in coordination with external first responder and other agencies.

J3.6 SAFETY MEETINGS

DTGC staff hold regular, formal Safety Committee meetings biannually. The Transit Services Director chairs these meetings, which also include the Executive Director, as well as Directors and Managers from other DTGC divisions aside from Mountain Lynx Transit, including Aging and Disability Services, Administration, and Finance. Topics discussed during the Safety Committee meetings typically include:

- Reviewing agency safety goals
- Accident/incident review
- Driver training
- Incidents/workers comp
- Safety accountability program

Additionally, the Transit Services Director facilitates Drivers Meetings at each of the four Mountain Lynx Transit operating locations. These meetings include the Area Supervisor and all Drivers and Operations Specialists. The Transit Services Director works closely with each area's staff to communicate and disseminate Mountain Lynx Transit safety policies.

All DTGC and Mountain Lynx Transit Safety meetings are documented in agendas and minutes. The Transit Services Director or their designee is responsible for developing and maintaining all meeting documents.

J3.7 DOCUMENTATION AND RECORDKEEPING

Mountain Lynx Transit safety is governed by this PTASP as well as several referenced standalone documents. This includes:

Drug and Alcohol Policy. This document describes the drug and alcohol testing program and requirements for DTGC's Safety-Sensitive employees, in accordance with 49 CFR Parts 40 and 655.

Driver's Manual. This document includes general operating guidelines and procedures, as well as paperwork and recordkeeping requirements.

Fleet Maintenance Plan. This document references the checklists and databases used to track and monitor the maintenance of Mountain Lynx Transit vehicles. The plan also includes intervals for basic inspection and maintenance activities.

Ride Check Policy. The Ride Check Policy includes detailed requirements for the types of ride checks, when they occur, and who performs them.

Vision and Reaction Testing Policy. This policy sets minimum requirements for visual acuity, field of vision, and reaction time for all personnel who drive agency vehicles.

General Procurement Guidelines. The procurement guidelines include provisions for emergency purchases, including those purchases needed to address emergencies affecting personal safety or property.

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Risk Management Policy. The Risk Management Policy includes goals for client and staff safety assurance and protecting agency assets; action steps to achieve these goals; and requirements for suspension of driving privileges and/or termination of employment.

Safety Accountability Policy. This policy establishes a point system for employee discipline, and provides a list of unsafe practices that may result in discipline.

For records management, the Driver's Manual establishes requirements for paperwork and recordkeeping in Part 3, including the Transit Mileage Log, BDA Trip Checklist, Maintenance Awareness Checklist, Nutrition Route Rider Approval Log, Medical Route Sheet, Special Route Sheet, Staff Car Mileage Log, Incident Report Form, Waiver for Refusal of Emergency Services, and other checklists and forms as appropriate that are related to SMS data collection. The Transit Services Director is responsible for ensuring that all documents and records related to SMS are maintained appropriately. DTGC and Mountain Lynx Transit shall retain all records related to the SMS for a minimum of three years. All such documentation will be made available upon request to FTA, DRPT, or any other entities having jurisdiction.

J4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

J4.1 HAZARD IDENTIFICATION

Mountain Lynx Transit employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Front-line employee reports to their direct supervisor, manager, or the Transit Services Director
- Employee reports of "near-accidents" using the Accident/Incident Report Package and associated requirements
- During Safety Committee Meetings
- During Area Drivers' Meetings
- Using the BDA Trip Checklist
- Through regular inspection and maintenance activities of Mountain Lynx Transit vehicles, facilities, and equipment
- Customer service complaints
- Relevant data and information compiled by DTGC's insurance carrier, Virginia Transit Liability Pool (VTLP)
- Relevant data and/or information provided by DRPT, FTA, and other outside entities

Directors and managers within other DTGC administrative divisions are responsible for informing the Transit Services Director or other appropriate Mountain Lynx Transit staff about any real or potential safety hazards as soon as practical.

The Transit Services Director or their designee is responsible for documenting all identified safety hazards through a variety of methods, such as meeting minutes, inspection checklists for vehicles, facilities, and equipment, and accident/incident reports. The Transit Services Director, Area Supervisors, and Fleet Manager are responsible for regularly monitoring sources of hazard data to determine whether safety hazards require further action or analysis. The Transit Services Director or their designee, is responsible for systematically tracking safety hazards and other

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safety information. The Transit Services Director, or their designee, is also responsible for direct observation and identification of safety hazards via the facility and equipment inspections process.

As appropriate, the Transit Services Director will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

J4.2 HAZARD ANALYSIS AND EVALUATION

Mountain Lynx Transit analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During Area Driver meetings, the Transit Services Director, Area Supervisors, Drivers, and Fleet personnel regularly discuss the implications of identified safety hazards, and determine whether further action or mitigation is needed. These decisions are documented in meeting minutes by the Transit Services Director or their designee.
- During Safety Committee Meetings, DTGC directors and managers discuss systemic safety hazards, and determine whether further action or mitigation is needed at a higher organizational level. As with Area Driver Meetings, the Safety Committee's deliberations are documented in minutes by the Transit Services Director or their designee.
- The Transit Services Director is responsible for continually monitoring the aforementioned sources of hazard and safety data, and/or ensuring that managers and supervisors are performing this task for the functions under their respective authority and responsibility.
- All Mountain Lynx Transit staff are responsible for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards if needed.
- The Transit Services Director or their designee is responsible for compiling reports on safety performance, including each of Mountain Lynx Transit's safety performance targets, and for disseminating information on safety hazards to Mountain Lynx Transit employees.
- The Transit Services Director is responsible for working with DTGC's insurance carrier, VLTP, to ensure the preparation and dissemination of reports relevant to the safety risks of operating and maintaining Mountain Lynx Transit.
- The Transit Services Director or their designee is also responsible for periodically reporting on safety performance to the Executive Director and, if required, the Board of Commissioners.

Mountain Lynx Transit is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. Mountain Lynx Transit management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. Mountain Lynx Transit will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Transit Services Director is responsible for bringing any and all hazards deemed "unacceptable" to the Safety Committee for further discussion and action. The Safety Committee is responsible for reviewing and approving mitigations for any unacceptable hazards. In coordination with management and supervision, the Transit Services Director has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions shall be documented for posterity and kept in accordance with Mountain Lynx Transit's documentation and recordkeeping requirements for SMS-related documentation. The Transit

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Services Director is responsible for ensuring that the evaluation of safety risks takes any existing mitigation measures into account.

J4.3 SAFETY RISK MITIGATIONS

Mountain Lynx Transit's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The Transit Services Director is responsible for working with other DTGC divisions, as well as Mountain Lynx Transit management and supervision, to develop and implement safety risk mitigations. The Safety Committee is required to formally approve any mitigations needed to address "unacceptable" safety risks, and these decisions must be documented in meeting minutes.

J4.4 HAZARD TRACKING AND RECORDKEEPING

The Transit Services Director or their designee is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a spreadsheet that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Transit Services Director or their designee is responsible for the regular, ongoing maintenance and update of this spreadsheet. If needed, the Transit Services Director may also document safety hazards and associated mitigations using other existing Mountain Lynx Transit processes, such as meeting minutes. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

The Transit Services Director is responsible for working with managers and supervisors, as well as other DTGC divisions as needed, to review and evaluate ongoing mitigations to determine their effectiveness, and to consider alternative approaches.

J5 SAFETY ASSURANCE

J5.1 SAFETY PERFORMANCE MONITORING

Mountain Lynx Transit uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. The Transit Services Director is responsible for working with other DTGC divisions and Mountain Lynx Transit managers and supervisors to identify and collect data and information through safety performance monitoring activities, and to examine all such data for potential safety hazards, in accordance with the Safety Risk Management section of this PTASP.

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The Transit Services Director works with managers and supervisors to regularly monitor safety performance through meetings, reporting from employees, observing rule compliance and maintenance compliance, through safety inspections, and through investigations. The Area Supervisors and the Fleet Manager are each responsible for regularly reviewing and monitoring the safety-related information that is produced by their respective employees, and for reviewing this data for potential safety hazards. Any identified safety hazards need to be reported to the Transit Services Director for further review and action in accordance with the Safety Risk Management section above.

The Transit Services Director is responsible for compiling information on safety performance related to transit operations, maintenance, hazards, and safety events, and to use that information to help drive decisions regarding the overall Mountain Lynx Transit SMS, including any needed changes to safety policies, safety risk management activities, and safety promotion strategies. Safety performance is a regular agenda item during the Safety Committee, which is attended by all DTGC directors as well as the Executive Director, and as needed, will be reported periodically to the Board of Commissioners.

J5.1.1 MOUNTAIN LYNX TRANSIT OPERATIONS

The Transit Services Director is responsible for working with the Area Supervisors to continually evaluate the safety performance of Mountain Lynx Transit Drivers and Operations Specialists. The criteria include all of the policies and procedures in the Driver's Manual, as well other standalone policies and checklists. This includes, but is not necessarily limited to:

- Passenger Assistance Competency Testing. This policy requires Mountain Lynx Transit to test whether Transit Drivers can effectively assist or evacuate a disabled person from a transit vehicle in an emergency, and includes requirements for testing prior to employment, annually, in return-to-duty situations, and as deemed appropriate by a supervisor or safety officer.
- Ride Check Policy. This policy governs regular on-board observations of Transit Drivers, and prescribes how and when they must be completed. Mountain Lynx Transit staff performing ride checks must complete the Driver Observation Form.
- Vision and Reaction Testing Policy. This policy sets minimum requirements for visual acuity, field of vision, and reaction time for all personnel who drive agency vehicles.
- Safety Accountability Policy.
- Safety Accountability Policy. This policy establishes a point system for employee discipline, and provides a list of unsafe practices that may result in discipline.

The Transit Services Director or their designee is responsible for maintaining an employee training tracking spreadsheet, which includes data regarding ride checks and any refresher training undertaken in response to ride checks. The Transit Services Director is also responsible for ensuring that Driver Observations Forms are completed for all Transit Drivers, for all ride checks. Any violations must be documented on the form. The Transit Services Director is responsible for working with Area Supervisors, and, as needed, other DTGC divisions, including the Director of Administration and Human Resources, to determine any discipline or other corrective steps in accordance with DTGC policies and procedures. If any Mountain Lynx Transit or other DTGC staff determine, based on collected rule compliance data, that there is a systemic safety hazard, then the Transit Services Director shall work with all affected parties to determine appropriate mitigations or corrective actions, in accordance with the Safety Risk Management section of this PTASP. If needed, the Safety Committee may be called upon by the Transit Services Director to review and approve a safety mitigation in response to a systemic operational

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hazard identified through ride checks and other operational rule compliance and testing processes. Such mitigations could include, but are not necessarily limited to:

- Review and update of written policies and procedures
- Review and update of employee training programs and processes
- Focusing or targeting supervision and enforcement on problem areas
- Engaging with external governmental entities to address physical or operational issues outside the direct control of DTGC, such as the configuration of traffic signals, intersections, lane markings, etc.

Area Supervisors are responsible for dispatching the Transit Drivers in their respective areas, and for documenting any safety events or unusual occurrences during bus operations, such as delays or mechanical failures. These data shall be incorporated into Mountain Lynx Transit's overall safety performance monitoring and measurement processes, and will be routinely reviewed by the Transit Services Director for any potential safety hazards.

Transit Drivers are responsible for completing the BDA Trip Checklist to identify any and all potential safety issues with their vehicles before, during, and after the end of their runs. Transit Drivers must fully complete the BDA Trip Checklist and turn it in to their respective Area Supervisor on duty for review and signature. Any maintenance issue that could affect the ability of the vehicle to provide safe passenger service must be reported immediately to dispatch and/or the Area Supervisor on duty. In turn, the Area Supervisor is responsible for contacting the Fleet Manager in such cases for further evaluation and action

J5.1.2 MAINTENANCE

The Transit Services Manager is responsible for overseeing the Fleet Manager and other Mountain Lynx Transit staff as needed to ensure that all transit vehicles and transit related facilities and equipment are safe to operate. The Fleet Manager is generally responsible for the maintenance of Mountain Lynx Transit vehicles, and adheres to a series of plans, policies and procedures that govern vehicle maintenance:

- Fleet Maintenance Plan. This plan includes the fleet maintenance schedule, associated documentation and reporting, as well as checklists completed by the Fleet Specialist and Fleet Assistant in performing their duties. Vehicle inspections generally include, but are not necessarily limited to:
 - Pre-delivery and delivery inspection checklists, used to inspect new transit buses. These include tests of all critical vehicle systems, a road test, and a walk-around inspection.

The Fleet Manager or their designee is responsible for obtaining information regarding safety or mechanical failures of transit vehicles from the BDA inspection process, and for maintaining the Transit Vehicle Safety Monitoring spreadsheet, which documents specific safety or mechanical issues with individual vehicles. There is a separate Staff Car Safety Monitoring spreadsheet for non-revenue vehicles. The Fleet Manager or their designee is also responsible for maintaining a Microsoft Access database of each vehicle's mileage that indicates when each vehicle is due for preventive maintenance. The Fleet Manager is responsible for reporting any safety hazards, or maintenance trends or patterns affecting safety, to the Transit Services Director for further review and action.

In addition to vehicle maintenance, the Transit Services Director is responsible for overseeing the Fleet Manager and other staff as needed to perform required facilities and equipment inspections and preventive maintenance, as required by the Fleet Maintenance Plan and other DTGC

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checklists and documents. These include the Warehouse Inspection Checklist, Facility Inspection Checklist, and Fire Extinguisher Locations checklist. The Transit Services Director or their designee is responsible for ensuring that all facility and equipment inspections are performed in a timely manner, and that their results are documented using the appropriate checklist. As with vehicle maintenance, any safety hazards identified during facility and equipment inspections or maintenance must be documented and reported to the Transit Services Director for further review and action.

J5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

Mountain Lynx Transit employees designated as Safety-Sensitive are subject to a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Administration and Safety Manager is responsible for the administration of the program, including working with the DTGC's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Transit Services Director or their designee is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to appropriate managers, supervisors, and personnel from other DTGC divisions.

The Transit Services Director or their designee is responsible for reporting safety events, as required, to the National Transit Database.

J5.3 PROCESS EVALUATION

The Transit Services Director or their designee is responsible for regularly evaluating safety performance and the effectiveness of safety mitigations. The Transit Services Director is responsible for holding Mountain Lynx Transit employees accountable for their safety performance, and for evaluating whether safety mitigations are effective. In case the Transit Services Director determines that a particular safety mitigation is ineffective, then they are responsible for working with affected managers, supervisors, or other DTGC divisions to evaluate alternative mitigations or approaches.

The Transit Services Director or their designee is also responsible for regularly monitoring the effectiveness of the Mountain Lynx Transit employee safety reporting process. This includes determining whether Transit Drivers, Operations Specialists, as well as the Fleet Specialist and Fleet Assistant are adequately reporting their safety concerns to their respective supervisor or manager, either during meetings, in writing, or verbally during their shifts. The Transit Services Director will work with other Mountain Lynx Transit staff and other DTGC divisions as needed to evaluate any necessary changes to the employee safety reporting process. If needed, such changes will be reviewed and approved by the Safety Committee.

J5.4 EVENT INVESTIGATIONS

Mountain Lynx Transit has a formal process to investigate safety events, including accidents, incidents, and occurrences. The investigation process and procedure are documented in Section 3.02 of the Driver's Manual. All accidents are subject to investigation by a member of the DTGC Safety Committee, who will determine the responsibility and severity. All finalized investigation report reports must include the identification, analysis, and reporting of causal factors, and must be documented in accordance with the Driver's Manual, as well as the Accident/Incident Report Package requirements, including:

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- Waiver for Refusal of Emergency Medical Services
- Accident/Incident Report Form
- Vehicle Accident Information
- Employee's Accident Report
- Supervisor's Report of Employee Accident
- Witness' Report/Statement of Employee Accident
- Post-Accident Drug and Alcohol Test Decision Documentation Form

The Transit Services Director is responsible for working with the Safety Committee to ensure that every safety event is investigated in accordance with DTGC's plans, policies, and procedures, and for promulgating safety event data to DTGC's insurance carrier for analysis and reporting purposes. The Transit Services Director or their designee is also responsible for tracking and monitoring the status of safety event investigations, and for compiling investigation information into DTGC's larger safety performance and monitoring efforts (for example, to determine whether trends or patterns in safety events warrant safety mitigations, or whether existing mitigations are effective).

J6 SAFETY PROMOTION

J6.1 SAFETY COMMUNICATION

Mountain Lynx Transit uses a variety of formal methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, safety performance, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each new Mountain Lynx Transit employee upon hiring. This PTASP and referenced plans, policies, and procedures are available to all affected employees in hard copy.

The Transit Services Director or their designee is responsible for posting safety-related bulletins and other messages in areas visible to Drivers at each of the four operating areas, as well as for the Fleet employees. If necessary, the Transit Services Director will ensure that safety-related materials are directly distributed to individual employees. The Transit Services Director has the discretion to require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

Mountain Lynx Transit employees are able to discuss safety hazards and safety performance during formal Area Driver's Meetings and through the Safety Committee. Employees can also communicate safety information to management through reporting to their immediate supervisor or manager, or directly to the Transit Services Director. Employees have access to written agendas and minutes from formal meetings. The Transit Services Director or their designee is also responsible for explaining why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to employee safety reporting.

J6.1.1 COMPETENCIES AND TRAINING

Mountain Lynx Transit has a comprehensive safety training program for all agency employees responsible for the safety of the transit service. All new Mountain Lynx Transit employees are given copies of various plans, policies, and procedures relevant to the safe performance of their duties. The training includes the following minimum requirements and milestones:

- Passing the pre-employment drug & alcohol test
- Possessing a valid CDL with the proper endorsement

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- Completing the Department of Transportation (DOT) physical examination
- Completing New Driver Training
- Completing the Evacuation Drill, Skill Session, Vision, and Reaction tests
- Completing ride checks for new hires

Mountain Lynx Transit also requires annual recertification training, and attendance at quarterly Area Driver's Meetings. As determined by the Transit Services Director, individual employees may be required to undergo refresher training if deemed necessary as a result of an event investigation, rules violation, or other circumstance. The Transit Services Director is responsible for the provision of all safety-related training to new Transit and Fleet employees, and for working with other DTGC divisions as necessary to provide other training modules, such as drug and alcohol awareness training. The Transit Services Director or their designee is also responsible for maintaining up to date employee training records, including, but not limited to, completed ride checks, CDLs, as well as an employee training tracking spreadsheet.

Additional training for Fleet employees relevant to their jobs is the responsibility of the Fleet Manager. If needed, the Fleet Manager may provide outside vendors or original equipment manufacturers to provide specialized or technical training to relevant employees.

The Transit Services Director is responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to affected employees, other DTGC divisions such as Administration and Human Resources, and, if needed, the Executive Director.

J6.1.2 TRAINING PROGRAM EVALUATION

The Transit Services Director is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The Transit Services Director or their designee is responsible for documenting any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of Mountain Lynx Transit job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX K: PETERSBURG AREA TRANSIT

K1 ABOUT PETERSBURG AREA TRANSIT

Petersburg Area Transit (PAT), is a public transportation agency primarily serving the City of Petersburg, the City of Colonial Heights, the City of Hopewell, Dinwiddie County, Prince George County, Ft. Lee, and McGuire Hospital. PAT provides a combination of fixed-route, deviated fixed-route, and paratransit services within .75 miles of a PAT fixed route. PAT provides service from 6:15 a.m. to 6:15 p.m., Monday through Friday, and 7:15 a.m. to 6:15 p.m. on Saturdays. PAT is in the process of undergoing major route reconfigurations for service.

PAT is a department of the City of Petersburg; all staff of PAT are considered City employees. PAT is governed by the Petersburg City Council. The PAT Transit Director is the Accountable Executive, and has the ultimate authority to allocate human and financial resources to address safety issues. The Transit Director reports to the Deputy City Manager of Petersburg. The Transit Director will also act as the interim Chief Safety Officer (CSO). A Safety Director will be hired to assume CSO responsibilities. Within PAT, daily activities are managed by the Deputy Director of Mass Transit, the Operations Manager, the Maintenance Manager, and the Facilities Manager. These activities are supported by the two field supervisors, 20 full time and four part time bus operators, six paratransit operators, four bus mechanics, and four custodians.

Petersburg Area Transit Fleet

- 4 - 35-ft. Gillig transit buses
- 2 - 29-ft. Gillig transit buses
- 1 trolley bus
- 3 - Arbox chassis buses
- 4 - Challenger chassis
- 2 - Chevrolet vans
- 5 - Ford vans

PAT is headquartered at 100 West Washington Street, in Petersburg, Virginia; all administrative activities related to agency operations occur at this facility. This facility serves as the transit center, which also hosts external intercity bus routes. Maintenance work is performed out of 309 Fairgrounds Road. PAT operates a variety of transit vehicles, including transit buses, a trolley bus, and vans.

K2 REVISION HISTORY – PETERSBURG AREA TRANSIT

The following table shows the history of revisions solely for Petersburg Area Transit's PTASP sections.

Table K-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX K: PETERSBURG AREA TRANSIT

K3 SAFETY MANAGEMENT POLICY

K3.1 SAFETY POLICY STATEMENT

Safety is a core value of Petersburg Area Transit (PAT). PAT is committed to providing safe, reliable transit service to the City of Petersburg, the City of Colonial Heights, the City of Hopewell, Dinwiddie County, Prince George County, Ft. Lee, McGuire Hospital, and surrounding areas. PAT is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key PAT staff. All PAT employees are held accountable for the overall safety performance of PAT, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, PAT managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

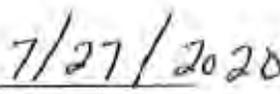
PAT will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. PAT passengers can count on our organization to provide safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all PAT plans, policies, and procedures. PAT will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, PAT has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, PAT will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of PAT's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of PAT personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

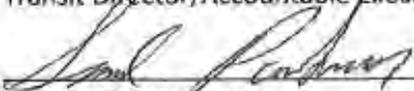
As the Director, I am the Accountable Executive and have ultimate authority and responsibility for the safety of PAT. With this plan, all PAT staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.



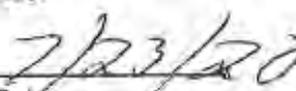
Transit Director/Accountable Executive



Date



Mayor of Petersburg



Date

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K3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

PAT has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table K-2: Petersburg Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	3	Less than .5 injuries per 100,000 vehicle revenue miles	6	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	1	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of PAT policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

PAT may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Transit Director is responsible for ensuring that PAT managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Petersburg City Council. The Transit Director and key PAT executives and managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, PAT is responsible for annually providing its Safety Performance Targets to the Tri-Cities Area Metropolitan Planning Organization (Tri-Cities MPO) to help aid in the transportation planning process. DRPT will coordinate with the Tri-Cities MPO and PAT in the selection of PAT's safety performance targets.

K3.3 EMPLOYEE SAFETY REPORTING

PAT employees have several avenues to report any safety concerns or hazards to management. During daily operations, Bus Operators are capable of reporting hazards along the routes to dispatchers/supervisors. PAT management or supervisors will then identify immediate or long-term actions to take in order to mitigate the hazard. Maintenance and custodial staff may also report hazards to management such as the Maintenance Supervisor or the Facilities Manager.

The PAT maintenance group also holds toolbox meetings on a weekly-basis to conduct brief training and report safety hazards. At the beginning of shifts bus operators meet with supervisors to discuss any safety concerns, changes to conditions, and alterations to routes.

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Verbal notifications as listed above are utilized in addition to the use of reporting mechanisms such as facilities and vehicle preventive maintenance forms and pre-trip inspections performed by bus operators.

PAT management is in the process of implementing a PAT Vehicle Safety Review Board to identify preventable accidents and identify disciplinary actions. This Board is planned to be composed of supervisors, the Safety Coordinator (position vacant at this time) and the Transit Director.

K3.4 SAFETY POLICY COMMUNICATION

It is the policy of PAT to communicate the safety policies in this PTASP with all affected employees throughout the organization. The Transit Director is responsible for ensuring that PAT safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

PAT's Safety Policy will be provided to every new employee alongside printed training materials. PAT managers will have access to the complete PAT PTASP in both hard copy and electronically.

PAT safety meetings and leadership meetings include discussion of safety performance objectives, targets, and indicators on a basis identified by the organizers. The Transit Director, with support from management staff, is responsible for compiling data on safety performance, summarizing events including but not limited to collisions and mechanical failures. Once the position is filled, the Safety Coordinator will take over the responsibility for gathering and analyzing safety data.

Supervisors and management staff are responsible for deploying safety-related information to frontline staff through weekly and daily meetings as well as training.

K3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Transit Director. The Transit Director of PAT is the agency's Accountable Executive. The Transit Director is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all PAT personnel. The Transit Director is responsible for ensuring that the SMS is effectively implemented throughout PAT as an organization, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Transit Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Generally, the Transit Director is responsible for the following specific activities:

- Ensuring PAT meets the requirements set forth by the Petersburg
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring PAT meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

Deputy Director of Mass Transit. The Deputy Director coordinates the review of any hazards received by the public or internally from PAT. The Deputy Director works directly with the Transit Director, Operations Manager, the Maintenance Supervisor, and the Facilities Maintenance

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Manager to oversee PAT's SMS program. The Deputy Director of Mass Transit is also responsible for administering the drug and alcohol testing program at PAT with the vendor.

Safety Coordinator. The Safety Coordinator will report directly to the Transit Director, and will serve as PAT's Chief Safety Officer (CSO). The Transit Director will formally designate the Safety Coordinator as the CSO. The CSO will have the authority and responsibility for the day-to-day implementation of PAT's SMS. In this role, the Safety Coordinator will be responsible for coordinating with individuals throughout the to implement and maintain the agency's SMS, including but not limited to the:

- Deputy Director of Mass Transit
- Maintenance Manager
- Facilities Maintenance Manager
- Operations Manager

The Operations Manager oversees the transit operations, including all bus operations, dispatch, and supervision functions. The Operations Manager also primarily coordinates training for new employees and the ongoing refresher and remedial training of operation employees. The Operations Manager includes components of SMS requirements in training and updates to operations for frontline employees. All operations employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

Operations Supervisors are cross-trained to perform both dispatch and street supervision activities. Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Operations Supervisors oversee shift change, conduct fitness-for-duty checks of all Bus Operators, and routinely observe Bus Operators to manage and enforce operating rule compliance and conduct quality assurance checks. As **Dispatchers**, they are responsible for clearly communicating instructions to Bus Operators, in compliance with all applicable PAT rules and procedures. Dispatchers are in direct contact with management, Bus Operators, and local police, fire, and emergency medical services (EMS).

Bus Operators are responsible for exercising maximum care and good judgment at all times while driving PAT vehicles, and for following all PAT rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Commercial Driver's License (CDL) with air brakes and passenger endorsements while operating PAT vehicles. Specifically, Bus Operator duties include, but are not limited to:

- Performing walk-around inspections prior to vehicle operation
- Adhering to route card directions
- Reporting safety hazards and accidents to dispatch
- Completing and submitting required paperwork and forms
- Attending or reviewing video of safety meetings

The Maintenance Manager is responsible for the maintenance and reliability of PAT's fleet, including overseeing mechanics, maintainers, and parts & services staff. Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Mechanics are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

The Facilities Manager is responsible for the preventive and corrective maintenance of the primary PAT transit facility, which is also shared by other transportation services. The Facilities Manager oversees four **custodians** to perform daily work through the facility. The Facilities

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Maintenance Manager is responsible for addressing any safety issues or hazards brought to their attention.

All PAT personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to their immediate supervisor, completing all training required for the safe performance of their duties, attending safety meetings as required, and for performing their duties in a safe manner.

K3.6 SAFETY MEETINGS

PAT currently holds a monthly Safety Meeting for all PAT employees. This is an opportunity for management and the executive team to report on any existing safety matters agency-wide. Frontline employees are also encouraged to report safety hazards during this meeting. In addition to the agency-wide meeting, PAT convenes a Management Committee, which is composed of the Operations Manager, the Maintenance Supervisor, the Deputy Director of Mass Transit, and the Facilities Maintenance Manager. During this meeting, PAT management has the opportunity to review identified safety deficiencies and develop priorities to address hazards. PAT is also in the process of developing a formal Vehicle Safety Review Board, which will be comprised of Supervisors, the Safety Coordinator (in process of hiring), and the Transit General Manager. This Board will review preventable events and potential disciplinary actions.

At the beginning of operating shifts, Operations Supervisors meet with Bus Operators to review any changes to routes, operating changes, or hazards on the road. On a weekly basis, the bus maintenance employees have toolbox discussions to review tasks for the week and any required safety rules. The Facilities group also hold morning meetings to review necessary tasks for the day. Each of these meetings are opportunities for the frontline employees to report any safety hazards or pose questions to supervisory/management staff.

K3.7 DOCUMENTATION AND RECORDKEEPING

The PAT Professional Driver's Handbook rules are supplementary to the City of Petersburg VA Personnel Policies and Procedures Manual. PAT also employs a Facilities Maintenance Plan, a Hazardous Communications Program, a Maintenance Program, and an Emergency Response Plan that are supplementary to this PTASP.

PAT records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include hazard reporting, operations rule compliance checks, accident reports, training records, pre-trip inspections, maintenance records and work orders, and drug and alcohol program testing records. At a minimum, PAT retains all records related to the implementation of SMS, such as accident data; quality assurance for a minimum of seven years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

K4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment. Generally, the Transit Director and the Operations Manager work together to oversee PAT's Safety Risk Management program throughout the agency.

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K4.1 HAZARD IDENTIFICATION

PAT management and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator pre-trip inspections
- Operator reports to dispatchers/informal communications
- Informal discussions with supervisor/management from frontline personnel
- Accident investigation reports
- Accident log
- Monthly Safety Meetings
- Vehicle Safety Review Board Meetings
- Toolbox Meetings
- Vehicle Maintenance Inspection Forms
- Facilities Maintenance Inspection Forms/maintenance reports
- Dispatcher daily logs
- Customer service complaints/E-Alert System for hazardous concerns and anonymous reporting
- Monthly Facilities Maintenance Reports

Managers for each respective group are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. Through formal meetings or through a documented process, PAT management will work together to review safety data and identify potential trends from information gathered.

As appropriate, PAT will incorporate any relevant outside safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

K4.2 HAZARD ANALYSIS AND EVALUATION

PAT analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During Safety Meetings, managers and frontline employees have the opportunity to discuss and review safety hazards.
- During Management Committee Meetings, the management and executive team have the opportunity to review identified safety hazards and perform hazard assessments based on the existing hazard review program.
- The Operations Manager and Transit Director work together to review accidents and identify preventability and related hazards that may have contributed to the accident.
- Individual managers of respective groups are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Operations Manager is responsible for compiling reports on safety performance, including accidents and incidents, with the assistances of the Transit General Manager and the Deputy Director of Mass Transit and disseminating this information to Petersburg management.
- Conduct annual reviews with frontline employees to assess safety performance, rules compliance and follow-up as necessary to address any workplace hazards.

PAT is committed to the analysis and evaluation of hazards for the purpose of prioritizing the

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management and mitigation of safety risk. PAT management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. PAT will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

PAT's Transit Director and Operations Manager together are responsible for the review of all unacceptable hazards. Through both the meetings and informal leadership meetings, senior management, including affected department directors, are responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. PAT management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting video, tracking logs, or other means deemed appropriate by PAT managers for posterity. All such documentation must be preserved for posterity in accordance with PAT's documentation and recordkeeping requirements for SMS-related documentation.

K4.3 SAFETY RISK MITIGATIONS

PAT's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. As noted earlier, PAT's Transit Director, Operations Manager, Safety Coordinator (once appointed) and managers are responsible for working together to develop and implement such mitigations. PAT management is responsible for training relevant input and feedback from managers, supervisors, and frontline employees and outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be the safety meetings.

K4.4 HAZARD TRACKING AND RECORDKEEPING

PAT's Operations Manager and Safety Coordinator (once appointed) are responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations will be a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. Operations Manager and Safety Coordinator (once appointed) will be responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

PAT management is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

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K5 SAFETY ASSURANCE

K5.1 SAFETY PERFORMANCE MONITORING

PAT uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. Management regularly monitors safety performance through management meetings, safety meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. Individual managers are responsible for regularly reviewing and monitoring safety-related information that is produced by their respective departments and employees. As described in the Safety Risk Management section above, department managers are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. Managers are also responsible for communicating information regarding safety performance with the Transit Director, and other affected departments throughout the agency.

K5.1.1 OPERATIONS

Operations Supervisors are responsible for continually evaluating the safety performance of PAT's Bus Operators. Each Bus Operator receives an annual performance review for their safety, attendance, and rules compliance. The Operations Manager and Operations Supervisors also perform unannounced ride-along quality assurance checks using a Rider Evaluation Form with the bus operators through the year. Quality assurance evaluations are performed throughout different parts of shifts from Monday-Saturday.

Any rule violations documented as part of this evaluation or otherwise observed by an operations supervisor, must be documented in the bus operator's file. The Operations Manager, in conjunction with the Transit Director, or their designee, will determine what follow up is needed with individual employees, such as retraining, or whether there are patterns or trends suggesting more systemic safety issues. In such cases, the Operations Manager or their designee may be responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of PAT, such as property owners and businesses.

As a part of the Safety Risk Management and Assurance program, the Transit Director and the Operations Manager work together to review accidents to assess the preventability of the accidents and identify mitigations or follow-up with bus operators.

Dispatchers are responsible for completing daily logs containing information about unusual occurrences during operations, such as delays or safety events. The Operations Manager or their designee is responsible for the regular review of all daily logs for the purpose of identifying safety hazards and monitoring safety performance. The Deputy Director of Mass Transit also logs and tracks any operational notifications through PAT's E-Alert system and customer service complaints.

Operators are responsible for completing pre-trip inspection forms before beginning their routes, and for ensuring that the completed form is provided to the maintenance group. A Mechanic will then sign off on the form if the vehicle is able to go out for service. See more information under section 5.1.2.

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K5.1.2 MAINTENANCE

The Maintenance Supervisor is responsible for the overall maintenance of vehicles and vehicle maintenance equipment. Vehicle pre-trip inspections are performed every time a vehicle goes out for service. A vehicle mechanic is then responsible for checking if any items in the checklist are condemnable and if the vehicle cannot go out for service. Vehicle preventive maintenance is performed every 6000 miles with corresponding inspection sheets. After inspections are performed, if any anomalies or common issues with vehicles are identified, the maintenance group will make a note of the issue for necessary improvements or mitigations. The Maintenance Supervisor or their designee is responsible for communicating any safety hazards identified through the maintenance process to frontline maintenance employees during weekly toolbox meetings, and any formal safety meetings. The vehicle maintenance group is also responsible for regularly reviewing and monitoring PAT maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Maintenance Supervisor and mechanics also review all completed pre-trip inspection forms, inspection checklists completed by the mechanics, and maintenance work orders. PAT vehicle maintenance group utilizes a program called Fleet Maintenance Pro to track maintenance of vehicles and common faults.

The Facilities Manager is responsible for the maintenance of quality of facilities and corresponding equipment. Facilities maintenance is governed by the Facilities Maintenance Plan, which includes detailed descriptions of scheduled maintenance processes; personal protective equipment (PPE); hazardous materials guidance; on-the-job hazards; and the individuals responsible for their performance. The Facilities Manager is responsible for communicating any safety hazards identified through the maintenance process to front-line maintenance employees during morning discussions, and any formal safety meetings. The Hazard Communication Program also provides the policies and procedures for the handling of materials and chemicals at facilities. Generally, facilities inspections fall under daily, monthly, and annual inspections. Following these inspections, the facilities maintenance groups develop facilities reports every month. Please see the Facilities Maintenance Plan for further details on the frequency of preventive maintenance. Additionally, an outside contractor to Petersburg performs annual inspections on the three lifts in the transit facility.

K5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

PAT administers a United States Department of Transportation (USDOT)-compliant drug and alcohol testing program. PAT utilizes an outside collection vendor to facilitate testing, including post-accident, return-to-duty, and follow-up testing. The City of Petersburg performs the initial medical testing for pre-employment. The Deputy Director of Mass Transit or designee is responsible for randomly selecting and notifying employees of testing and the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to operations supervisors and affected managers. PAT utilizes the Transit and Paratransit Company (TAPTCO) module on testing for training of employees.

The Safety Coordinator, or designee, is responsible of gathering accident data for reporting the National Transit Database (NTD).

K5.3 PROCESS EVALUATION

The Safety Coordinator or their designee will be responsible for working with individual managers or their designees to ensure that they are regularly evaluating safety performance and the

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effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Safety Coordinator or their designee will also be responsible for regularly monitoring the effectiveness of PAT's employee safety reporting program. This includes, but is not necessarily limited to, the effective usage of Pre-Trip inspection, toolbox meetings, and the level of information provided by employees during safety meetings. The Safety Coordinator will, as needed, work with management to evaluate any needed changes to the employee safety reporting program.

K5.4 EVENT INVESTIGATIONS

PAT investigates all safety events, including accidents, incidents, and occurrences. Accidents are reviewed by the Operations Manager and the Transit Director to ensure investigations are complete and tracked by PAT. As the Safety Coordinator is hired, this person will provide overall support to the accident investigation process. Together, this group will identify the root cause of the accidents. The City Risk Manager will then coordinate with PAT to gather relevant accident data and send information to the insurance provider.

Material resulting from investigations may include, but are not necessarily limited to:

- Accident Investigation Form
- Maintenance Report
- Police Report
- Post-accident summary
- Pictures
- Video footage
- Post-Accident Drug and Alcohol Testing Decision Maker Form

Operations supervisors and the Operations Manager are primarily responsible for the investigation of safety events, and for performing all investigative activities, both at the scene of the event and post-crash. Operations supervisors must all complete relevant accident investigation training in order to be qualified to conduct investigations. Other PAT managers are responsible for participation in the investigation process, as needed and as may be required. The vehicle maintenance group is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

The Operations Manager or their designee is responsible for logging all safety events into a database that includes, but is not limited to, the following information:

- Date of event
- Alcohol Testing
- Description/damage
- Preventability
- Injuries

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K6 SAFETY PROMOTION

K6.1 SAFETY COMMUNICATION

As discussed earlier in Section 3.4, PAT uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each PAT employee through policies and procedures. This PTASP and referenced plans, policies, and procedures are available to all affected employees digitally or in hard copy.

Managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as employee break rooms. If necessary, management will ensure that safety-related materials are distributed using When to Work, electronic mail, or directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

PAT front-line employees and managers use the safety meetings described in Section 3.6 to discuss hazards and safety performance information. Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through the employee safety reporting program.

K6.1.1 COMPETENCIES AND TRAINING

PAT has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. PAT uses a combination of in-house and vendor-created training materials. The Operations Manager is responsible for overseeing the training of all PAT employees, and for working with outside vendors, as needed, to provide topic-specific training. The Operations Manager also coordinates any necessary retraining for employees following a safety event and ongoing refresher training of transit topics.

All bus operators are trained on vehicle operation using a combination of materials created by TAPTCO and PAT. Operational training consists of classroom time and practical training on the bus routes with supervisors. PAT classroom training for employees includes:

- Federal Regulations
- Hazards Communication
- Drug and Alcohol Awareness
- Farebox Procedures
- Harassment
- Bloodborne Pathogens
- Safety Best Practices
- Introduction to the Bus
- Pre-Trip Inspections
- Mirrors
- Defensive Driving
- Bus Operator Distractions
- Following Distance
- Intersections
- Railroad Crossings

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- Trail Check Evaluation
- On-Board Operator Evaluation
- Pedestrian Awareness
- Backing Accidents
- Merging, Lane Changing, And Passing
- Special Driving Conditions
- Map/Schedule Reading
- On Road Demonstration
- ADA
- Customer Service
- Conflict Management
- Accident Investigation Procedures

All of the above topics are covered as part of the bus operator training program. The duration of this training program depends upon the proficiency of the student. Classroom training typically lasts for about 120 hours and practical training may tack about a month for fixed routes and a week or more for paratransit training. The Operations Manager also provides monthly ongoing refresher training that covers revolving topics from the TAPTCO training modules. PAT also has ongoing observation of its bus operators through regular observations, ride checks, and refresher training, provided as needed by the Operations Manager. The Operations Manager is responsible for ensuring the completion of all bus operator training in a timely manner, and ensuring that training records are documented.

The Maintenance Supervisor is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics receive initial training from TAPTCO modules, covering similar items as the operations personnel. PAT utilizes training sheets to begin the process for training mechanics. Training for mechanics covers items such as lock-out/tag-out (LOTO), tire depth, use of maintenance equipment and tools, lift checks, ladder safety, and airbrakes. Mechanics receive informal, on-the-job training from the Maintenance Manager or their designee. If needed, PAT may bring in vendors or original equipment manufacturers to provide specific training. Mechanics are trained based on original equipment manufacturer (OEM) maintenance recommendations for the vehicles. Maintenance employees also receive ongoing monthly refresher training on topics surrounding maintenance requirements and safety.

Management throughout the agency is responsible for regularly reviewing employee training records to ensure their reports have completed required training.

K6.1.2 TRAINING PROGRAM EVALUATION

The Operations Manager and Maintenance Manager is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of PAT job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX L: RADFORD TRANSIT

L1 ABOUT RADFORD TRANSIT

Radford Transit is a service of the City of Radford, which owns the system. The City of Radford contracts operations and maintenance of Radford Transit to New River Valley Community Services (NRVCS), a public provider of behavioral health services. Radford Transit provides deviated fixed-route bus service within the City of Radford, as well as connector routes to Pulaski County, Christiansburg, and Blacksburg. Radford Transit does not provide paratransit service.

All operations and maintenance of Radford Transit fixed route service are performed by NRVCS employees, by contractual agreement between the City of Radford and NRVCS. Radford Transit's administrative offices, operations base, and maintenance facility are located at a facility leased by NRVCS, located at 2-B Corporate Drive in Radford.

Radford Transit operates seven deviated fixed routes, with deviations permitted within a ¼-mile radius of any of the Radford Transit fixed routes.

Radford Transit Fleet

- 2 New Flyer 35-foot buses
- 18 transit cutaways

The City Manager of the City of Radford will be the Radford Transit Accountable Executive and will have the ultimate authority to allocate human and financial resources to address safety issues.

L2 REVISION HISTORY – RADFORD TRANSIT

Each year, Radford Transit will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Radford Transit's PTASP sections.

Table L-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX L: RADFORD TRANSIT

L3 SAFETY MANAGEMENT POLICY

L3.1 SAFETY POLICY STATEMENT

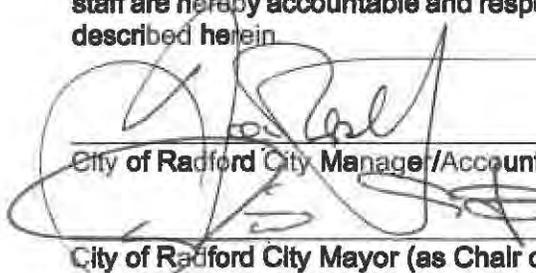
Safety is a core value of Radford Transit. Radford Transit is committed to providing safe, reliable transit service to the City of Radford. Radford Transit is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key Radford Transit staff. All Radford Transit employees are held accountable for the overall safety performance of Radford Transit, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, Radford Transit managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

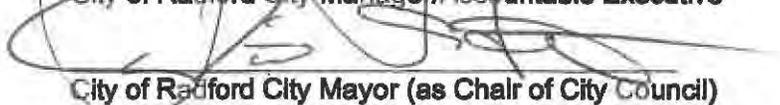
Radford Transit will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. Radford Transit passengers can count on our organization to provide the safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all Radford Transit plans, policies, and procedures. Radford Transit will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, Radford Transit has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, Radford Transit will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of Radford Transit's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of Radford Transit personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the City Manager of the City of Radford, I am the Accountable Executive and have ultimate authority and responsibility for the safety of Radford Transit. With this plan, all Radford Transit staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.


City of Radford City Manager / Accountable Executive

4-20-2020
Date


City of Radford City Mayor (as Chair of City Council)

4-20-2020
Date

APPENDIX L: RADFORD TRANSIT

L3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Radford Transit has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table L-2: Radford Transit Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	2	Less than .5 injuries per 100,000 vehicle revenue miles	3	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of Radford Transit policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

Radford Transit may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The City of Radford City Manager is responsible for ensuring that Radford Transit managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the City Manager and City of Radford. The City Manager and key Radford Transit managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, the City of Radford is responsible for annually providing its Safety Performance Targets to the New River Valley Metropolitan Planning Organization (MPO) to help aid in the transportation planning process. DRPT will coordinate with the City of Radford in the selection of Radford Transit's safety performance targets.

L3.3 EMPLOYEE SAFETY REPORTING

Radford Transit employees can report safety issues to their immediate supervisors, the Operations Supervisor, NRVCS Transit Manager, and the City of Radford Transit Coordinator. Employees may also report safety issues by completing a walk-around card (for issues with vehicles), or placing an anonymous note in the suggestion box. Radford Transit is currently evaluating additional methods for facilitating a formal program for employee safety reporting.

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L3.4 SAFETY POLICY COMMUNICATION

It is the policy of Radford Transit to communicate the safety policies in this PTASP with all affected employees throughout the agency. The City of Radford Transit Coordinator is responsible for ensuring that Radford Transit safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

Radford Transit safety policies will be provided to every new employee alongside printed training materials. Radford Transit managers and executive staff will have access to the complete Radford Transit PTASP both in hard copy and electronically.

Radford Transit can also communicate safety messages to employees using WhenToWork employee scheduling and payroll software, as well as through in-person interactions between the Operations Supervisor, Maintenance Supervisor, Dispatchers, and Transit Manager with front-line employees. Radford Transit also communicates safety messages to employees via bimonthly training/safety meetings.

The City of Radford Transit Coordinator works regularly with the NRVCS Transit Manager to provide data for analysis and reporting, particularly on accident and injury trends.

L3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant Radford Transit positions. Complete position descriptions are maintained for all Radford Transit positions by the City of Radford for their Radford Transit staff and NRVCS for their staff.

City of Radford City Manager. The City of Radford City Manager leads Radford Transit and is the agency's Accountable Executive. The City Manager is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all Radford Transit personnel. The City Manager is responsible for ensuring that the SMS is effectively implemented throughout the department, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the City Manager has the authority and responsibility to allocate human and capital resources to address safety risks.

Overall, the City of Radford City Manager is responsible for the following specific activities:

- Ensuring Radford Transit meets the safety requirements set forth by the City of Radford
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring Radford Transit meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

City of Radford Transit Coordinator. The City of Radford Transit Coordinator reports to the City of Radford City Manager, and manages Radford Transit's administrative functions, including grants and funding and regulatory compliance. This individual oversees and coordinates with NRVCS for Radford Transit service delivery and maintenance.

The City of Radford Transit Coordinator will be designated by the City of Radford City Manager as the Radford Transit Chief Safety Officer. This individual is responsible for overseeing the following activities:

APPENDIX L: RADFORD TRANSIT

- Radford Transit operations and maintenance
- All safety-related Radford Transit employee training
- Accident investigation and reporting
- Reporting safety information to the National Transit Database
- Coordinating with NRVCS to provide safety data for analysis
- Coordinating with the City of Radford's claims and risk management staff
- Regular review and update of Radford Transit plans, policies, and procedures related to safety
- Periodic inspection of Radford Transit facilities and vehicles
- Liaison with local first responder agencies
- Liaison with Radford University

The **City of Radford Transit Coordinator** reports data for Radford Transit to the National Transit Database (NTD), including safety data. The City of Radford Community Planner also interfaces with NRVCS for the above-listed activities for the City of Radford Transit Coordinator.

The NRVCS Transit Manager oversees Radford Transit employees, including, but not limited to, the **Operations Supervisor**, the **Dispatchers**, and the **Maintenance Supervisor**. These individuals, in turn, oversee the **Bus Drivers** and the **Mechanics**. The NRVCS Transit Manager manages day-to-day bus operations. All Radford Transit employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

The NRVCS Transit Manager is also responsible for conducting training for NRVCS employees, including training pertinent to SMS and hazard awareness. This individual is also in charge of monitoring the performance of preventive and corrective maintenance of the Radford Transit fleet and ensures work is performed safely by NRVCS employees.

The Operations Supervisor is responsible for leading on-scene accident investigation activities and for completing associated investigation reports. The Operations Supervisor routinely observes Drivers to manage and enforce operating rule compliance. The **Dispatchers** are in direct contact with local police, fire, and emergency medical services (EMS), and the Dispatcher on duty is responsible for clear and compliant radio communications. The Operations Supervisor and Dispatcher are trained in "reasonable suspicion" in accordance with 49 CFR Part 655 and are responsible for assessing the fitness-for-duty of Drivers as they report for their shifts.

Drivers are responsible for exercising maximum care and good judgment at all times while driving Radford Transit vehicles, and for following all Radford Transit rules and procedures in the execution of their duties. Drivers must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating Radford Transit vehicles. Other duties include, but are not limited to, reporting safety hazards and accidents to dispatch, and completing pre-trip inspections.

The Maintenance Supervisor is responsible for the maintenance and reliability of Radford Transit's fleet, including overseeing the Mechanics and Maintainer. Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. The Maintenance Supervisor is responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

All Radford Transit personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the NRVCS Transit Manager or to their immediate supervisor, completing all training required for the safety performance of their duties, and for performing their duties in a safe manner.

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L3.6 SAFETY MEETINGS

NRVCS holds safety/training meetings on bi-monthly basis, as well as weekly maintenance meetings. The City of Radford Transit Coordinator, the City of Radford Community Developer, and the NRVCS Transit Manager meet monthly to discuss Radford Transit issues, including safety. Training/safety meetings are a forum in which front-line employees can report safety concerns.

In addition to the safety meetings described above, Radford Transit personnel interface with the Operations Supervisor, Dispatchers, and Maintenance Supervisor in the course of executing their duties, during which safety issues are also discussed as appropriate.

The City of Radford Transit Coordinator, NRVCS, and Radford University meet monthly, and safety issues are discussed in this meeting as appropriate.

L3.7 DOCUMENTATION AND RECORDKEEPING

Radford Transit safety is governed by this PTASP as well as referenced standalone documents. This includes **The NRVCS Transportation Employee Handbook**. This document includes a series of detailed policies, procedures and requirements for NRVCS Transit Drivers, including those operating for Radford Transit. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. The Transit Manager is responsible for representing Radford Transit specifics when working with NRVCS to update the NRVCS Transportation Employee Handbook.

Radford Transit records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include accident reports, pre-trip inspections, drug and alcohol testing program records, training records, and maintenance work orders. Radford Transit must comply with the **City of Radford Records Management Policy**. The City of Radford Transit Coordinator is responsible for the maintenance of all documents and records developed in the implementation of the SMS. At a minimum, Radford Transit retains all records related to the implementation of the SMS for a minimum of three years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

L4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

L4.1 HAZARD IDENTIFICATION

Radford Transit managers and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Transit Driver reports to Operations Supervisor or Dispatcher, and/or the Transit Manager
- Near miss reporting by Transit Drivers
- Formal and informal safety meetings
- Informal discussions with Operations Supervisor, Dispatcher, Maintenance Supervisor, or Transit Manager
- Operator pre-trip inspections, reported via walk-around cards

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- Mechanic reports to the Maintenance Supervisor
- Reports via facility tickets
- Customer service complaints

The City of Radford Transit Coordinator, City of Radford Community Developer, NRVCS Transit Manager, Operations Supervisor, and Maintenance Supervisor are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The NRVCS Transit Manager will be responsible for working with the department managers and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database.

As appropriate, Radford Transit will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

L4.2 HAZARD ANALYSIS AND EVALUATION

Radford Transit analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During NRVCS staff/safety meetings, managers and employees have the opportunity to discuss and review safety hazards.
- The City of Radford Transit Coordinator will be responsible for continually monitoring the sources of safety data under his/her authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The City of Radford Transit Coordinator will be responsible for compiling reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to the City of Radford City Council.
- The City of Radford Transit Coordinator is responsible for working closely with NRVCS managers to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

Radford Transit is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. Radford Transit management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. Radford Transit will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The City of Radford Transit Coordinator is responsible for ensuring the review of all unacceptable hazards the Transit Coordinator and NRVCS managers, including the Transit Manager. Through both the safety meetings and informal leadership meetings, Radford Transit management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. Radford Transit management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by Radford Transit managers. All such documentation must be preserved for posterity for a minimum of three years in accordance with City of Radford and NRVCS requirements for SMS-related documentation.

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L4.3 SAFETY RISK MITIGATIONS

Radford Transit's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The City of Radford Transit Coordinator and NRVCS Transit Manager will be responsible for working together to develop and implement such mitigations. Radford Transit management is responsible for obtaining relevant input and feedback from the Operations Supervisor, Dispatchers, Maintenance Supervisors, Transit Drivers, Mechanics and Maintainer, and other outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be monthly meetings between the City of Radford Transit Coordinator and NRVCS Transit Manager.

L4.4 HAZARD TRACKING AND RECORDKEEPING

The City of Radford Transit Coordinator will be ultimately responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations will be a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database will also capture information related to mitigations developed to address the results of event investigations, inspections, and audits. The City of Radford Transit Coordinator is ultimately responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

Radford Transit management, typically through coordination between the NRVCS Transit Manager, is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

L5 SAFETY ASSURANCE

L5.1 SAFETY PERFORMANCE MONITORING

Radford Transit uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. The City of Radford Transit Coordinator and NRVCS Transit Manager regularly monitor safety performance through monthly, investigations, and frequent, ongoing conversations with supervisory and front-line employees. The NRVCS Transit Manager, Operations Supervisor, Dispatchers, and Maintenance Supervisor are responsible for regularly reviewing and monitoring safety-related information that is produced by respective groups employees under their purview. As described in the Safety Risk Management section above, the NRVCS Transit Manager, Operations Supervisor, Dispatchers, and Maintenance Supervisor are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. These

APPENDIX L: RADFORD TRANSIT

individuals are also responsible for communicating information regarding safety performance with the City of Radford Transit Coordinator, who in turn is responsible for communicating this information to the Accountable Executive through meetings and reports.

L5.1.1 OPERATIONS

The NRVCS Transit Manager, working closely with the Operations Supervisor, is responsible for facilitating the continuous evaluation and observation of Transit Driver safety performance and rule compliance. This includes annual ride-alongs, quarterly reviews, and follow-behind observations. Any such observations are documented. The City of Radford Transit Coordinator will also ride buses to observe operations. The NRVCS Transit Manager is responsible for determining what follow up is needed with individual employees. This includes retraining, as well as observing patterns or trends suggesting more systemic safety issues. In such cases, the NRVCS Transit Manager or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of Radford Transit, such as the City of Radford City Manager, the City of Radford Public Works Department, the Radford City Police Department, the Town of Christiansburg, the Town of Blacksburg, or Pulaski County.

The NRVCS Transportation Employee Handbook details Transit Drivers' roles and responsibilities, including those safety-related. The Transportation Employee Handbook also details operating rules and procedures.

Operators are responsible for completing walk-around cards to document vehicle defects before beginning their routes, as well as after the vehicle leaves revenue service for the day, and for providing the completed forms to maintenance staff.

L5.1.2 MAINTENANCE

The Maintenance Supervisor is responsible for the overall maintenance of Radford Transit vehicles. As stated in Section 2 of the NRVCS Maintenance Plan, Radford Transit vehicles have preventive maintenance (PM) inspections performed in accordance with manufacturer-specified PM schedules and procedures. Facility maintenance issues are tracked on facility tickets that are submitted to the owner of the Radford Transit facility (2-B Corporate Drive in Radford).

L5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

Radford Transit administers a United States Department of Transportation (USDOT)-compliant drug and alcohol testing program. The NRVCS Transit Manager or their designee is responsible for the administration of the program, including working with NRVCS's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The NRVCS Transit Manager or their designee is responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. The Radford Police Department administers a breathalyzer test to Transit Drivers immediately upon all accidents that occur in the City of Radford. Radford Transit's drug and alcohol testing program is described in detail in the NRVCS Drug and Alcohol Testing Policy.

The City of Radford Community Developer is responsible for reporting safety events, as required, to the National Transit Database, in consultation with Radford Transit managers. The City of

APPENDIX L: RADFORD TRANSIT

Radford Transit Coordinator, or their designee, is responsible for the remaining NTD reporting not related to safety, such as ridership and fare collection data. The City of Radford Transit Coordinator oversees NRVCS's issuance of reports on Radford Transit employee injuries and accidents.

L5.3 PROCESS EVALUATION

The City of Radford Transit Coordinator is responsible for working with the NRVCS Transit Manager or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The City of Radford Transit Coordinator is also responsible for regularly monitoring the effectiveness of Radford Transit employee safety reporting. These activities include regular coordination with NRVCS management. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during monthly meetings between the City of Radford Transit Coordinator and the NRVCS Transit Manager. The NRVCS Transit Manager will, as needed, work with management to evaluate any needed changes to the employee safety reporting process.

L5.4 EVENT INVESTIGATIONS

Radford Transit investigates safety events, including accidents, incidents, and occurrences, as Operations Supervisors respond to them. Operations Supervisors typically determine the preventability of accidents at the scene of the event; remedial actions, if any, are determined by the NRVCS Transit Manager and informally monitored. Accident reports are submitted as appropriate to the City of Radford's insurance carrier.

The Operations Supervisor is primarily responsible for responding to and investigating of safety events, and for performing accident investigation activities. The Maintenance Supervisor or their designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

The NRVCS Transit Manager will be responsible for logging all safety events into a database and produces accident investigation reports. The NRVCS Transit Manager is responsible for distributing accident investigation reports as appropriate, including to the City of Radford Transit Coordinator

L6 SAFETY PROMOTION

L6.1 SAFETY COMMUNICATION

As discussed earlier in the *Safety Policy Communication* section, Radford Transit will use a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities will be provided to each Radford Transit employee as part of new employee orientation. This PTASP and referenced plans, policies, and procedures are available to all affected employees with digitally or in hard copy.

APPENDIX L: RADFORD TRANSIT

Individual managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as on bulletin boards at the Radford Transit facility (2-B Corporate Drive in Radford). If necessary, management will ensure that safety-related materials are directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

Radford Transit front-line employees and managers discuss hazards and safety performance information through formal and informal meetings, including the bi-weekly safety/training meeting. Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through employee safety reporting.

L6.1.1 COMPETENCIES AND TRAINING

Radford Transit has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. Radford Transit, through NRVCS, uses a combination of in-house and vendor-created training materials. The NRVCS Transit Manager is responsible for providing safety-related training to all Radford Transit employees, and for working with outside vendors, as needed, to provide topic-specific training as-needed. For example, NRVCS provides annual refresher training to Radford Transit employees from materials developed by the Transit and Paratransit Company (TAPTCO).

All Operators are trained on vehicle operation using materials developed mostly by TAPTCO. Training consists of classroom time with the NVRCS trainer, CDL training and examination, and on-the-road training with a line instructor, who is a senior Transit Driver. New Radford Transit are trained on:

- Bloodborne pathogens
- Drugs in the workplace
- Fire safety
- Information security
- Suicide prevention
- Driving policy
- Personnel policy
- Health and safety
- OSHA exposure control
- Social media policy
- Sexual harassment
- Workplace violence
- HIPAA
- Corporate compliance
- Active shooter
- Human rights
- Incident reporting
- Infections control & prevention

The Maintenance Supervisor is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner.

APPENDIX L: RADFORD TRANSIT

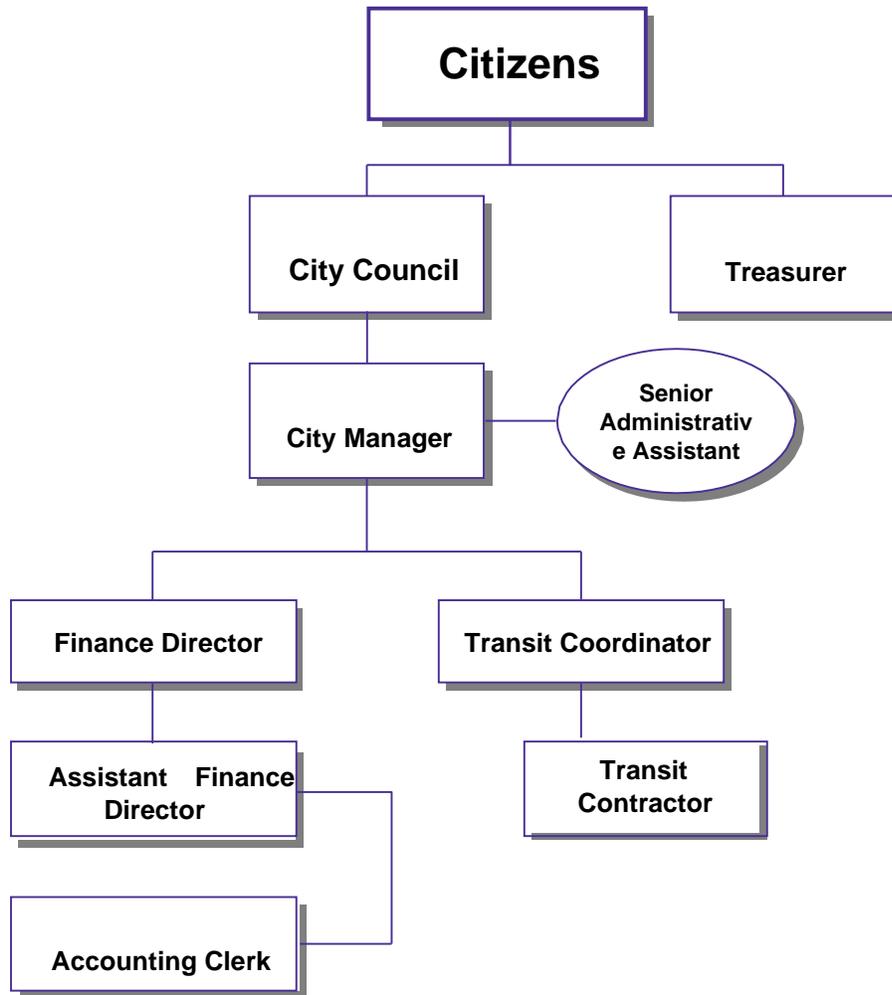
L6.1.2 TRAINING PROGRAM EVALUATION

The City of Radford Transit Coordinator, in coordination with the NRVCS General Manager, will be responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The NRVCS Transit Manager will be responsible for documenting these reviews and reporting to the City of Radford, at least annually, on any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of Radford Transit job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX L: RADFORD TRANSIT

Organization Chart



APPENDIX M: SUFFOLK TRANSIT

M1 ABOUT SUFFOLK TRANSIT

Suffolk Transit is a service of the City of Suffolk, which owns the system. Suffolk contracts operations of transit to Virginia Regional Transit (VRT) and some maintenance is performed by an outside contractor in addition to City fleet services. Suffolk Transit provides deviated fixed-route bus and paratransit services within the City of Suffolk and provides a connector route to Hampton Roads Transit (HRT).

All operations for fixed route and paratransit services are performed by VRT employees, by contractual agreement between the City of Suffolk and VRT. Suffolk Transit's administrative offices are located at 800 Carolina Road, Suffolk, Virginia. Separately, VRT provides the operations facility for dispatching and bus storage.

Suffolk Transit operates seven fixed routes, with deviations permitted within a ¼-mile radius of any of the Suffolk Transit fixed routes, as well as demand-response paratransit service.

Suffolk Fleet

- 12 Ford 25-foot Chassis
- 2 Dodge Minivans

The Suffolk City Director of Public Works will be the Suffolk Transit Accountable Executive and will have the ultimate authority to allocate human and financial resources to address safety issues and the Transit Manager will be the Safety Management System (SMS) Manager.

M2 REVISION HISTORY – SUFFOLK TRANSIT

Each year, Suffolk Transit will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for Suffolk Transit's PTASP sections.

Table M-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

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M3 SAFETY MANAGEMENT POLICY

M3.1 SAFETY POLICY STATEMENT

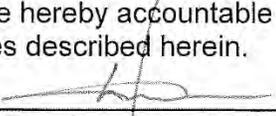
Safety is a core value of Suffolk Transit. Suffolk Transit is committed to providing safe, reliable transit service to the City of Suffolk. Suffolk Transit is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key Suffolk Transit staff. All Suffolk Transit employees are held accountable for the overall safety performance of Suffolk Transit, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, Suffolk Transit managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

Suffolk Transit will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. Suffolk Transit passengers can count on our organization to provide the safe and reliable service. Managers, executives, and contractors must meet or exceed the minimum thresholds and requirements set forth in all Suffolk Transit plans, policies, and procedures. Suffolk Transit will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, Suffolk Transit has established measurable safety performance targets in coordination with the Metropolitan Planning Organization (MPO), outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, Suffolk Transit will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

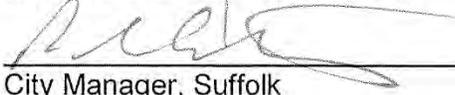
- Ensuring constant communication and awareness of Suffolk Transit's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of Suffolk Transit personnel and contractors
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

As the Suffolk Public Works Director, I am the Accountable Executive and have ultimate authority and responsibility for the safety of Suffolk Transit. With this plan, all Suffolk Transit staff are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.



Suffolk Director of Public Works

6/18/2020
Date



City Manager, Suffolk

8/20/2020
Date

APPENDIX M: SUFFOLK TRANSIT

M3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

Suffolk Transit has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. Suffolk Transit developed these in coordination with the Metropolitan Planning Organization (MPO) and the Hampton Roads Transportation Planning Organization (HRTPO). The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table M-2: Suffolk Transit Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	1	Less than .5 injuries per 100,000 vehicle revenue miles	3	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	0	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

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Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of Suffolk Transit policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

Suffolk Transit may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Suffolk Public Works Director is responsible for ensuring that Suffolk Transit managers and contractors are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the City Manager and City Council. The Suffolk Public Works Director and key Suffolk Transit managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with Suffolk Transit and HRTPO, DRPT is responsible for annually providing its Safety Performance Targets to help aid in the transportation planning process. Suffolk Transit and DRPT will continue to coordinate with HRTPO in identifying any revisions to the safety performance targets.

M3.3 EMPLOYEE SAFETY REPORTING

Suffolk Transit employees and contractors can report safety issues to the Suffolk Transit Manager and their immediate supervisors. The contractor, VRT has a whistleblower policy in place to protect employees. At the beginning of shifts, supervisors will communicate existing hazards and changes to routes; during this time bus operators may also alert the supervisors of any concerns or mitigations to hazards. Additionally, VRT holds companywide safety meetings quarterly which include all of management, supervisors, and operators. Outside of the quarterly meeting, managers from VRT meet biweekly to discuss any hazards companywide and identified mitigations. Employees also undergo an annual review which is an opportunity to raise any safety

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concerns as well as potential improvements to the employee safety reporting program. The City of Suffolk plans to oversee VRT to ensure it upholds their whistleblower policy. Suffolk Transit is currently evaluating additional methods for facilitating a formal program for employee safety reporting.

M3.4 SAFETY POLICY COMMUNICATION

It is the policy of Suffolk Transit to communicate the safety policies in this PTASP with all affected employees throughout the agency. The Suffolk Transit Manager is responsible for working with VRT management in ensuring that safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees. In addition to the City of Suffolk's safety policy and programs, VRT has additional safety requirements for its employees, documented through the Vehicle Operations Manual, Fleet Maintenance Program, and the Drug and Alcohol Policy.

Suffolk Transit safety policies will be provided to every new employee alongside existing training material. Suffolk Transit management staff will have access to the complete Suffolk Transit PTASP in both hard copy and electronically.

Suffolk Transit can also communicate safety messages to employees through in-person bulletins at dispatching locations to review safety considerations, as well as through in-person interactions between the operations supervisors and dispatcher. Additionally, as safety issues are identified, an email goes out to supervisors to convey to each driver. Supervisors are asked to print emails with identified safety issues and have the frontline personnel sign off on the email as a form of accountability and communication.

M3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant Suffolk Transit positions. Complete position descriptions are maintained for all Suffolk Transit positions by the City of Suffolk for their Transit staff. Contract positions are maintained by VRT for their staff.

City of Suffolk Director of Public Works. The Director of Public Works leads Suffolk Transit and is the agency's Accountable Executive. The Director is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all Suffolk Transit personnel. The Director is responsible for ensuring that the SMS is effectively implemented throughout the department, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Executive Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Overall, the Director of Public Works is responsible for the following specific activities:

- Ensuring Suffolk Transit meets the safety requirements set forth by the City of Suffolk
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring Suffolk Transit meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

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Suffolk Transit Manager. The Suffolk Transit Manager reports to the Director of Public Works, and manages Suffolk Transit administrative functions and oversees the contract with VRT. This individual oversees and coordinates with VRT for Suffolk Transit service delivery and maintenance.

The Suffolk Transit Manager has been designated by the Suffolk Director of Public Works as the Suffolk Transit SMS Executive. This individual is responsible for overseeing the following activities:

- Suffolk Transit operations and maintenance
- Accident investigation and reporting
- Reporting safety information to the National Transit Database
- Coordinating with VRT for safety data and updates
- Coordinating with the Suffolk Transit's claims and risk management staff
- Regular review and update of Suffolk Transit plans, policies, and procedures related to safety
- Periodic inspection of Suffolk Transit facilities and vehicles
- Liaison with local first responder agencies
- Coordination for procurement of equipment
- Identify safety performance measures with MPO

The VRT Transit Manager oversees Suffolk Transit contract employees, this individual oversees the Supervisors and Operators (who operate fixed-route and demand-response services). The VRT Transit Manager manages day-to-day bus operations. They are also in charge of monitoring the performance of preventive and corrective maintenance of the Suffolk Transit fleet and ensures work is performed safely by VRT employees. All Suffolk Transit employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities. The VRT Transit Manager is responsible for conducting training for VRT employees. Through resources and guidance from **The Fleet and Safety Training Specialist** the Transit Manager will provide the necessary training for VRT employees on all aspects of operational functions relative to their roles, including training pertinent to SMS and hazard awareness, as required. The Transit Manager is responsible for joining the Accident Review Committee (ARC) meetings and the Manager Meetings within VRT.

Operations Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. The operations supervisors routinely observe operators to manage and enforce operating rule compliance. Operations supervisors are trained in "reasonable suspicion" in accordance with 49 CFR Part 655 and are responsible for assessing the fitness-for-duty of operators as they report for their shifts.

Operators are responsible for exercising maximum care and good judgment at all times while driving Suffolk Transit vehicles, and for following all Suffolk Transit rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating Suffolk Transit vehicles. Operators must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a Suffolk Transit vehicle.

All Suffolk Transit personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Suffolk Transit Manager or VRT Transit Manager, or their immediate supervisor, completing all training required for the safety performance of their duties, and for performing their duties in a safe manner.

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M3.6 SAFETY MEETINGS

VRT holds an Accident Review Committee (ARC) meeting approximately on a monthly-basis. Participants in the ARC include the four Transit Managers for different VRT-operated transit systems, including Suffolk Transit. The ARC primarily meets for accident review in order to determine preventability.

In addition to the safety meetings described above, frontline personnel interface with the operations supervisors, VRT Transit Manager, and the dispatcher, in the course of executing their duties, during which safety issues are also discussed as appropriate. At the frontline, operations supervisors hold briefings at the start of shifts to convey any changes to operations and hazards along the routes.

VRT holds annual reviews with frontline personnel to discuss performance throughout the year. At Suffolk Transit, this is also an opportunity for personnel to raise any safety issues for considerations

M3.7 DOCUMENTATION AND RECORDKEEPING

Suffolk Transit safety is governed by this PTASP as well as referenced standalone documents. This includes **The VRT Vehicle Operator's Manual**. This document includes a series of detailed policies, procedures and requirements for VRT operators, including those operating for Suffolk Transit. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. The VRT Fleet and Safety Training Specialist and VRT Transit Manager are responsible for representing Suffolk Transit specifics when working with VRT to update the VRT Vehicle Operator's Manual.

For Suffolk Transit, VRT adheres to its own corporate Record Retention Policy, which include guidelines for document retention timelines for different document types. VRT meets the retention policies of the City of Suffolk, the Commonwealth, and the federal government as required. Please refer to the VRT guidelines accompanying the Record Retention Policy for specific document retention guidelines.

M4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

M4.1 HAZARD IDENTIFICATION

Suffolk Transit managers and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Operator reports to Operations supervisor, VRT Transit Manager, and Suffolk Transit Manager
- Accident trend analysis
- Near miss reporting by operators
- Formal and informal safety meetings
- Shift safety briefings
- Informal communication between frontline staff and management during or after operation
- Hazards reported to dispatch

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- Operator pre-trip inspections to Suffolk Fleet Maintenance
- Mechanic reports from maintenance contractor and Suffolk Fleet Management
- Capital Maintenance inspections for facilities and downtown transfer station
- Customer service complaints and hazard reports
- Operator performance

The VRT Transit Manager, Fleet and Safety Training Specialist, and Operations supervisors are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The VRT Transit Manager or designee will be responsible for working with the City of Suffolk to regularly monitor each of the above sources of safety data and for systematically tracking them in a database, as well as submitting safety data to the Suffolk Transit Manager. The VRT Transit Manager and the Suffolk Transit Manager are jointly responsible for direct observation and identification of safety hazards via the monthly facility inspection process.

As appropriate, Suffolk Transit will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

M4.2 HAZARD ANALYSIS AND EVALUATION

Suffolk Transit analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During VRT ARC meetings, managers and employees have the opportunity to discuss and review safety hazards and accidents in order to identify safety improvements and preventability.
- The Suffolk Transit Manager will be responsible for continually monitoring the sources of safety data under his/her authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Suffolk Transit Manager and VRT Transit Manager are responsible for receiving operator reports of hazards and customer complaints to analyze and review potential mitigations.
- The VRT Transit Manager will be responsible for compiling reports on safety performance, including accidents and incidents, and for disseminating information on safety hazards to VRT and to the Suffolk Transit Manager, who will supply this information to the City of Suffolk.
- The Suffolk Transit Manager is responsible for working closely with VRT managers to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

Suffolk Transit is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. Suffolk and VRT management are responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. Suffolk Transit will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The Suffolk Transit Manager is responsible for ensuring the review of all unacceptable hazards identified by Suffolk and VRT employees. Through both the ARC meetings and informal leadership meetings, Suffolk Transit management is responsible for overseeing the development

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and implementation of mitigations for such unacceptable hazards. Suffolk Transit management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed appropriate by Suffolk Transit managers. All such documentation must be preserved for posterity for a minimum of five years in accordance with Suffolk, Commonwealth, federal, and VRT requirements (or whichever length of time for retention is the most prohibitive).

M4.3 SAFETY RISK MITIGATIONS

Suffolk Transit's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The Suffolk Transit Manager, in conjunction with members of the ARC and VRT management, will be responsible for working together to develop and implement such mitigations. Suffolk Transit management is responsible for obtaining relevant input and feedback from the VRT staff, Fleet and Safety Training Specialist, operations supervisors, operators, contract mechanics, Suffolk Fleet Maintenance personnel, and other outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be the ARC.

M4.4 HAZARD TRACKING AND RECORDKEEPING

The Suffolk Transit Manager will be ultimately responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations and corrective actions. The primary tracking mechanism for hazards and their associated mitigations will be a tracking log that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

The VRT Transit Manager will gather the necessary hazard information to be provided and overseen by the Suffolk Transit Manager through a monthly log. This log may also capture information related to mitigations developed to address the results of event investigations, inspections, and audits. Suffolk Transit will also track associated documentation such as proof of mitigation; meeting minutes; photos; or other methods to track the hazards. The Suffolk Transit Manager is ultimately responsible for the regular, ongoing maintenance and update of the tracking log. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

Suffolk Transit management, typically through coordination between the Suffolk Transit Manager, VRT Transit Manager, and through the ARC, is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

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M5 SAFETY ASSURANCE

M5.1 SAFETY PERFORMANCE MONITORING

Suffolk Transit uses a variety of formal and informal processes to monitor and measure safety performance and activities to ensure safety, both proactively and reactively. The Suffolk Transit Manager and VRT Suffolk Transit management regularly monitors safety performance through leadership team meetings, biweekly management meetings, monthly VRT meetings, investigations, and frequent, ongoing conversations with supervisory and front-line employees. The VRT management, including the Transit Manager, and operations supervisors are responsible for regularly reviewing and monitoring safety-related information that is produced by respective group employees under their purview. As described in the Safety Risk Management section above, these groups are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. For example, Suffolk Transit tracks accidents by employees, time of day, cause, region, weather conditions in order to assess any potential trends. Moreover, Suffolk Transit will track vehicles to assess if there are similar issues across the fleet or if a single issue comes up for a single vehicle to identify possible improvements. These individuals are also responsible for communicating information regarding safety performance with the Suffolk Transit Manager, who in turn is responsible for communicating this information to the Accountable Executive through meetings and reports.

M5.1.1 OPERATIONS

The VRT Fleet and Safety Training Specialist, working closely with the operations supervisors, VRT Transit Manager for Suffolk, and the VRT General Manager, is responsible for facilitating the continuous evaluation and observation of operator safety performance and rule compliance. This includes annual ride-alongs, annual and quarterly reviews with operators, and follow-behind observations. Field observations are primarily the responsibility of VRT operations supervisors. Any such observations are documented by VRT and can be provided to the Suffolk Transit Manager. The VRT Fleet and Safety Training Specialist and VRT Transit Manager reviews the results of all safety performance and rule compliance activities and is responsible for determining what follow up is needed with individual employees. This includes retraining, as well as observing patterns or trends suggesting more systemic safety issues. In such cases, the VRT Fleet and Safety Training Specialist or their designee is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of Suffolk Transit, such as the City of Suffolk or a private entity.

The VRT Vehicle Operator's Manual details operator's roles and responsibilities, including those safety-related. The Vehicle Operator's Manual also details operating rules and procedures, in lieu of a stand-alone rule book.

Operators are responsible for completing pre trip inspections before beginning their routes, and for providing the completed forms to the Suffolk Fleet Maintenance Group, where after it will decide if corrective maintenance must be performed prior to allowing the vehicle to be operated on the route.

M5.1.2 MAINTENANCE

Inspection, corrective maintenance, and preventive maintenance are conducted by a mix of internal City of Suffolk Fleet Management and an outside contractor, Sonny Merryman. Suffolk

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Fleet Management is responsible for vehicles owned by the City. The Suffolk Fleet Management group is the first line of defense in identifying necessary maintenance and coordinates with Sonny Merryman to have preventive or corrective maintenance performed on the fixed route buses, including annual inspections. Suffolk Fleet Management is responsible for the inspections and maintenance of the minivans for paratransit, including annual state inspections. Inspections on all vehicles, including buses, are performed every 5000 miles. Vehicle maintenance and inspections are performed in accordance with original equipment manufacturer (OEM) specifications. The contractors performing inspection and maintenance will issue inspection forms to Suffolk Transit for retention and tracking. Additionally, Suffolk Capital Maintenance performs inspections on Suffolk Transit facilities, including the Downtown Transfer Station.

M5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

Suffolk Transit administers a United States Department of Transportation (USDOT)-compliant drug and alcohol testing program. The Suffolk VRT Transit Manager or their designee is responsible for the administration of the program, including working with the collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Suffolk VRT Transit Manager or their designee is responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. Suffolk Transit's drug and alcohol testing program is described in detail in the VRT Drug and Alcohol Testing Policy.

The Suffolk Transit Manager is responsible for reporting safety events, as required, to the National Transit Database (NTD), in consultation with Suffolk VRT Transit managers.

M5.3 PROCESS EVALUATION

The Suffolk Transit Manager is responsible for working with the VRT Transit Manager or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The Suffolk Transit Manager is also responsible for regularly monitoring the effectiveness of Suffolk Transit employee safety reporting. These activities include regular coordination with VRT management. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during VRT Safety Committee meetings. The Suffolk Transit Manager and VRT Transit Manager for Suffolk Transit will, as needed, work with management to evaluate any needed changes to the employee safety reporting process.

M5.4 EVENT INVESTIGATIONS

The Suffolk Transit Manager coordinates with VRT for the investigation of safety events, including accidents, incidents, and occurrences. The ARC meets approximately monthly or as needed to conduct accident reviews, which includes determination of preventability of accidents, as well as remedial actions, if any.

Operations supervisors are primarily responsible for responding to and investigating of safety events, and for performing accident investigation activities. The Suffolk Transit Manager directly

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coordinates with Suffolk Fleet Management and Sonny Merryman for any follow-up from accidents vehicles were involved in.

The Suffolk Transit Manager will be responsible for logging all safety events into a tracking log and works with VRT to produce accident investigation reports. The Suffolk Transit Manager is responsible for distributing accident investigation reports as appropriate.

Suffolk Transit does not have formalize investigation procedures outside of the PTASP.

M6 SAFETY PROMOTION

M6.1 SAFETY COMMUNICATION

As discussed earlier in the *Safety Policy Communication* section, Suffolk Transit will use a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities in relation to the Suffolk Transit SMS program. The agency's safety policies and other information related to employee safety and SMS responsibilities will be provided to each Suffolk Transit employee as part of new employee orientation. This PTASP and referenced plans, policies, and procedures are available to all affected employees digitally or in hard copy.

Individual managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as in the Transfer Facility or the VRT office that operations employees are based out of. If necessary, VRT management will ensure that safety-related materials are directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information. For example, if a hazard is identified, VRT management and supervisors receive an email, and are required to have bus operators sign off on the memo for understanding.

Suffolk Transit bus operators, supervisors, and managers discuss hazards and safety performance information through formal and informal meetings. Meetings to discuss hazards and mitigations include:

- Annual employee reviews
- Quarterly employee reviews
- Biweekly management meetings
- Meetings between the Suffolk Transit Manager and the VRT Transit Manager
- Meetings between the Suffolk Transit Manager and the Director of Public Works
- Safety Committee Meetings (held by VRT)
- Accident Review Committees

Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through employee safety reporting.

M6.1.1 COMPETENCIES AND TRAINING

Suffolk Transit has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. Suffolk Transit, through VRT, uses a combination of in-house and vendor-created training materials. The Fleet and Safety Training Specialist is responsible for providing safety-related training to all Suffolk Transit employees, and

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for working with outside vendors, as needed, to provide topic-specific training as-needed. Suffolk Transit and VRT primarily utilize Transit and Paratransit Company (TAPTCO) training modules for safe operations of buses. During initial training, trainees are expected to complete the TAPTCO modules and proceed to a week and a half to three weeks of practical on-the-road training for handling of buses and memorization of routes and detours. VRT also provides quarterly refresher training to Suffolk Transit employees from materials developed by TAPTCO. In accordance with the Suffolk-VRT contract and VRT policy, Suffolk Transit operators must undergo an annual United States Department of Transportation (USDOT) physical examination.

All operators are trained on vehicle operation using a combination of materials created by VRT, City of Suffolk, and TAPTCO. Training consists of classroom time and on-the-road training with a senior operator and the operations supervisor. New Suffolk Transit operators are trained on:

- Federal Regulations
- Hazards Communication
- Drug and Alcohol Awareness
- Harassment
- Bloodborne Pathogens
- Fatigue Management
- Wellness
- Whistleblower
- Safety Best Practices
- Introduction to the Bus
- Pre-Trip Inspections
- Mirrors
- Defensive Driving
- Driver Distractions
- Following Distance
- Intersections
- Railroad Crossings
- Pedestrian Awareness
- Backing Accidents
- Merging, Lane Changing, And Passing
- Special Driving Conditions
- Map Reading
- ADA
- Customer Service
- Conflict Management
- Accident Procedures

New operators are then given quarterly evaluations and annual reviews thereafter, with emphasis on topics of Suffolk Transit interest and hazards identified for the routes and operations. Remedial training to operators is also delivered in response to accidents and validated customer complaints.

The Suffolk Transit Manager is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Suffolk Transit is working toward a method to coordinate with contract maintenance services to assess quality assurance of maintenance activities and ensure that mechanics are adequately trained to safely perform maintenance of vehicles.

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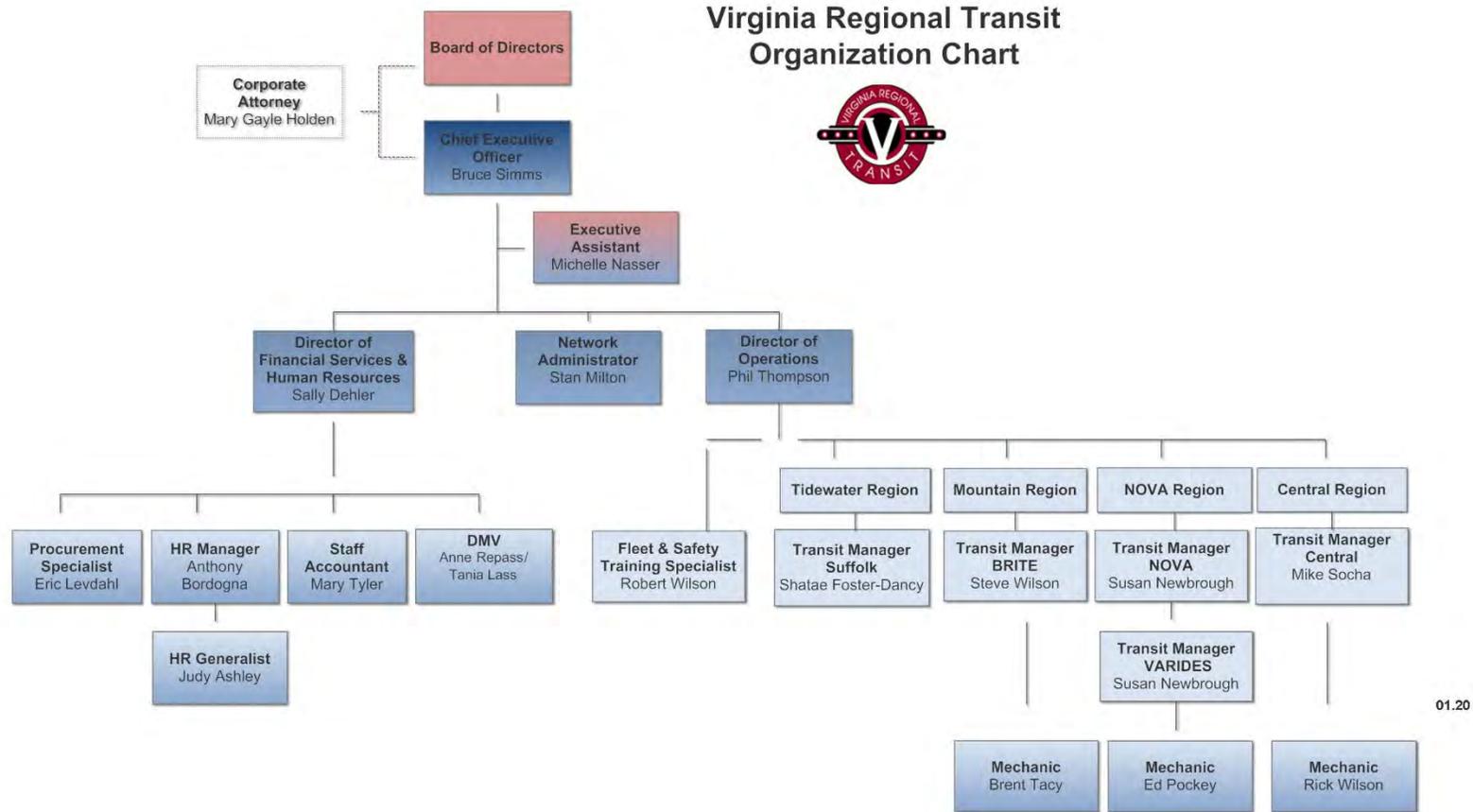
M6.1.2 TRAINING PROGRAM EVALUATION

The Suffolk Transit Manager, in coordination with VRT management, will be responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The Suffolk Transit Manager will be responsible for documenting these reviews and reporting to Suffolk Director of Public Works, at least annually, on any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of Suffolk Transit job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX M: SUFFOLK TRANSIT

Organization Chart



APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

N1 ABOUT WILLIAMSBURG AREA TRANSIT AUTHORITY

The Williamsburg Area Transit Authority (WATA) is a fixed-route public transportation provider, serving the City of Williamsburg, James City County, York County, Surry County, and a portion of the City of Newport News. WATA operates with in-house personnel, while contracting maintenance to First Transit. WATA also provides paratransit service, as well as deviated fixed-route service permitted with a ¼-mile radius along the Route 13, the Surry Line.

WATA’s administrative offices, operations base, and maintenance facility are located at a facility leased by WATA, located at 7239 Pocahontas Trail in Williamsburg.

The Executive Director of WATA will be the WATA Accountable Executive and will have the ultimate authority to allocate human and financial resources to address safety issues. The WATA Safety, Security, and Training Specialist will be the WATA Chief Safety Officer (CSO).

WATA Fleet

- 2 New Flyer 40-foot buses
- 4 New Flyer 35-foot buses
- 4 Gillig 40-foot buses
- 6 Gillig 35-foot buses
- 4 Gillig 29-foot buses
- 1 Hometown trolley body bus
- 1 Supreme trolley body bus
- 2 Rohr paratransit buses
- 4 Supreme paratransit buses

N2 REVISION HISTORY – WILLIAMSBURG AREA TRANSIT AUTHORITY

Each year, WATA will be required to work with DRPT to review and revise its portion of the Statewide PTASP. DRPT will work with each agency to initiate this process prior to release of a new revision of the Plan. The following table shows the history of revisions solely for WATA’s PTASP sections.

Table N-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

N3 SAFETY MANAGEMENT POLICY

N3.1 SAFETY POLICY STATEMENT

Safety is a core value of the Williamsburg Area Transit Authority (WATA). WATA is committed to providing safe, reliable transit service to the City of Williamsburg, James City County, York County, Surry County, and the City of Newport News. WATA is also committed to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This PTASP is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key WATA staff. All WATA employees and contractors are held accountable for the overall safety performance of WATA, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, WATA employees and contractors are accountable for the delivery of the highest achievable levels of safety performance.

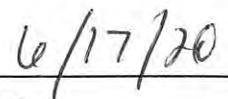
WATA has established a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. WATA passengers can count on our organization to provide the safe and reliable service. Managers and executives must meet or exceed the minimum thresholds and requirements set forth in all WATA plans, policies, and procedures. WATA will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, WATA has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, WATA will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring consistent communication and awareness of WATA's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of WATA personnel
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

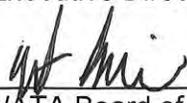
As the Executive Director of the WATA, I am the Accountable Executive and have ultimate authority and responsibility for the safety of WATA. With this plan, all WATA staff and contractors are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.



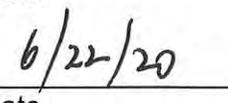
WATA Executive Director/Accountable Executive



Date



Chair, WATA Board of Directors



Date

APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

N3.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

WATA has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table N-2: WATA Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	6	Less than .5 injuries per 100,000 vehicle revenue miles	12	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	1	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of WATA policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

WATA may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The WATA Executive Director is responsible for ensuring that WATA managers are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Executive Director and Board of Directors. The Executive Director and key WATA managers are responsible for periodically evaluating the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, WATA is responsible for annually providing its Safety Performance Targets to the Hampton Roads Transportation Planning Organization (HRTPO), the Metropolitan Planning Organization (MPO) for the region, to help aid in the transportation planning process. DRPT will coordinate with the WATA in the selection of WATA's safety performance targets.

N3.3 EMPLOYEE SAFETY REPORTING

WATA employees can report safety issues to their immediate supervisors; the Operations Director; and the Safety, Security, and Training Specialist (CSO). Employees may also report safety issues by completing a Daily Vehicle Inspection Report (DVIR, for issues with vehicles), or placing an anonymous note in the suggestion box. WATA employees can also raise safety-related concerns, particularly for route-related hazards, to the Transit Planner.

WATA has a formally-constituted Driver's Council that raises concerns to the Operations Director. Employees are also required to attend safety meetings every other month, conducted by the Safety, Security, and Training Specialist (CSO). This is another avenue for reporting safety

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concerns. WATA is currently evaluating additional methods for facilitating a formal program for employee safety reporting.

N3.4 SAFETY POLICY COMMUNICATION

It is the policy of WATA to communicate the safety policies in this PTASP with all affected employees and contractors throughout the agency. The WATA Safety, Security, and Training Specialist (CSO) is responsible for ensuring that WATA safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

WATA safety policies will be provided to every new employee alongside printed training material. WATA managers and executive staff will have access to the complete PTASP both in hard copy and electronically.

WATA can also communicate safety messages to its own employees using email, as well as through in-person interactions between the Operations Director, Transit Supervisors, Transit Dispatchers, with front-line employees. WATA also communicates safety messages to employees via bimonthly safety meetings. First Transit communicates safety messages to employees on-site at WATA in written form; First Transit employees are responsible for reviewing and signing off on safety messages, even for those that are distributed on days off. First Transit employees are empowered to bring safety concerns to the attention of the First Transit General Manager at WATA.

The Safety, Security, and Training Specialist compiles safety data for analysis and reporting, particularly on accident and injury trends.

N3.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Following are detailed safety accountabilities and responsibilities for relevant WATA positions. Complete position descriptions are maintained for all WATA positions by James City County Human Resources for WATA staff and First Transit for their staff. (Note: WATA is an independent authority, though James City County handles human resources functions on WATA's behalf.)

WATA Executive Director. The Executive Director leads WATA and is the agency's Accountable Executive. The Executive Director is responsible for overseeing the safety program and for maintaining safe working conditions and practices for all WATA personnel. The Executive Director is responsible for ensuring that the SMS is effectively implemented throughout the organization, and for holding managers and employees accountable for fulfilling their respective safety roles and responsibilities. In accordance with 49 CFR Part 673.23(d), the Executive Director has the authority and responsibility to allocate human and capital resources to address safety risks.

Overall, the Executive Director is responsible for the following specific activities:

- Ensuring WATA is moving towards Safety Targets set by the organization
- Ensuring the development of plans, policies, and procedures throughout the organization that clearly define management and employee safety roles and responsibilities
- Ensuring WATA meets or exceeds minimum local, state, and federal regulatory requirements
- Holding managers and employees accountable for safety performance
- Ensuring compliance with the safety activities described in this PTASP
- Instilling a culture of safety throughout the organization

WATA Safety, Security, and Training Specialist. The Safety, Security, and Training Specialist reports to the WATA Executive Director and has primary day-to-day responsibility for safety,

APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

security, and training at WATA. This individual has been designated by the WATA as its Chief Safety Officer (CSO). This individual is responsible for overseeing the following activities:

- Monitoring operational and maintenance safety hazards
- All safety-related WATA employee training
- Accident investigation and reporting
- Collecting safety data for WATA operations for analysis
- After collection from First Transit, analyzing safety data for WATA maintenance (Note: First Transit submits safety data for its WATA work to the WATA Operations Director)
- Manages Workers' Compensation program and insurance claims
- Regular review and update of WATA plans, policies, and procedures related to safety
- Periodic inspection of WATA facilities and vehicles
- Liaison with local first responder agencies
- Security liaison with the William & Mary
- Reporting safety data to the National Transit Database (NTD) data
- Reporting drug and alcohol testing program data to FTA for WATA, Colonial Williamsburg bus operations, and the Yorktown Trolley (York County)

The WATA Deputy Executive Director oversees WATA employees, including, but not limited to, the **Operations Director** and **Transit Planner**. The **Operations Director** manages day-to-day bus operations and oversees the **Transit Supervisors** and the **Customer Service** staff. The Transit Supervisors, in turn, oversee the **Transit Operators** and **Transit Dispatchers**. All WATA employees are responsible for understanding their SMS responsibilities, including Safety Risk Management and Safety Assurance activities.

The **First Transit General Manager** is in charge of monitoring the performance of preventive and corrective maintenance of the WATA fleet and ensures work is performed safely by First Transit employees. The First Transit General Manager oversees First Transit **Maintenance Technicians**, who perform all of the preventive and corrective maintenance of the WATA fleet.

Transit Supervisors are responsible for leading on-scene accident investigation activities and for completing associated investigation reports. Transit Supervisors routinely observe Transit Operators to manage and enforce operating rule compliance. The **Transit Dispatchers** are in direct contact with local police, fire, and emergency medical services (EMS), and the Dispatcher on duty is responsible for clear and compliant radio communications. The Transit Supervisors and Dispatcher are trained in "reasonable suspicion" in accordance with 49 CFR Part 655 and are responsible for assessing the fitness-for-duty of Transit Operators as they report for their shifts.

Transit Operators are responsible for exercising maximum care and good judgment at all times while driving WATA vehicles, and for following all WATA rules and procedures in the execution of their duties. Operators must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating WATA vehicles. Drivers must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a WATA vehicle. Other duties include, but are not limited to, reporting safety hazards and accidents to dispatch or a supervisor, and completing pre-trip inspections and DVIRs.

WATA operations personnel can give safety-related feedback to the **Operations Director, Chief Safety Officer, Transit Supervisors, and Transit Planner**. In some cases, the Transit Planner will work with operations personnel to make adjustments as necessary to WATA routes to account for safety issues or concerns.

All WATA personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Operations Director, CSO, or to their immediate

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supervisor, completing all training required for the safety performance of their duties, and for performing their duties in a safe manner.

N3.6 SAFETY MEETINGS

WATA holds safety meetings with its operations staff every other month; CSO conducts the meeting. Required attendees include transit operators, transit dispatchers, the Operations Director. The Deputy Executive Director and Transit Planner attend as needed. First Transit holds safety meetings as needed, and First Transit employees are required to sign off on safety notices that have been distributed, even if the meeting took place on their day off.

In addition to the safety meetings described above, WATA personnel interface with the CSO, Operations Director, Transit Supervisors, and Transit Dispatchers in the course of executing their duties, during which safety issues are also discussed as appropriate.

WATA also has a Drivers' Council that meets monthly to discuss topics that include safety, among other issues affecting operations. Quarterly the CSO attends and the Council devotes the meeting entirely to safety.

N3.7 DOCUMENTATION AND RECORDKEEPING

WATA safety is governed by this PTASP as well as referenced standalone documents. This includes **WATA Professional Driver's Handbook**. This document includes a series of detailed policies, procedures and requirements for WATA Transit Operators. Some of these are referenced in this PTASP, while others may be repeated in the PTASP. First Transit maintenance employees at WATA are governed by First Transit policies and procedures.

WATA records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include accident reports, pre-trip inspections, drug and alcohol testing program records, training records, and maintenance work orders. WATA must comply with its own document retention policy. The WATA Safety, Security, and Training Specialist is responsible for the maintenance of all documents and records developed in the implementation of the SMS. At a minimum, WATA retains all records related to the implementation of the SMS for a minimum of three years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

N4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

N4.1 HAZARD IDENTIFICATION

WATA managers and front-line employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Transit Operator reports to CSO; Transit Supervisor; Dispatcher; Operations Director; and/or the Deputy Executive Director
- Near miss reporting by Transit Operators
- Formal and informal safety meetings

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- Informal discussions with CSO; Transit Supervisors; Transit Dispatchers; Operations Director; and/or the Deputy Executive Director
- Bus driver pre-trip inspections, reported via DVIRs
- Maintenance Technician reports to the First Transit General Manager
- Public complaints
- Informal reporting from Transit Operators to the Transit Planner

The WATA CSO; Operations Director; and Deputy Executive Director are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The CSO will be responsible for working with Operations and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database.

As appropriate, WATA will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

N4.2 HAZARD ANALYSIS AND EVALUATION

WATA analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During WATA staff/safety meetings, managers and employees have the opportunity to discuss and review safety hazards.
- During First Transit staff/safety meetings, the General Manager and employees have the opportunity to discuss and review safety hazards.
- The WATA Safety, Security, and Training Specialist will be responsible for continually monitoring the sources of safety data under his/her authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The WATA Safety, Security, and Training Specialist will be responsible for compiling reports on safety performance, including accidents and incidents, for disseminating information on safety hazards, and key performance indicators to the WATA Executive Director and Board of Directors.
- The WATA CSO is responsible for working closely with WATA employees and the First Transit General Manager to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

WATA is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. WATA management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. WATA will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

The WATA CSO is responsible for ensuring the review of all unacceptable hazards reported by WATA employees and the First Transit General Manager. Through both the safety meetings and informal leadership meetings, WATA management is responsible for overseeing the development and implementation of mitigations for such unacceptable hazards. WATA management has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions are documented in meeting minutes, tracking logs, or other means deemed

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appropriate by WATA managers. All such documentation must be preserved for posterity for a minimum of three years in accordance with WATA requirements for SMS-related documentation.

N4.3 SAFETY RISK MITIGATIONS

WATA's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. The CSO will be responsible for developing and implementing such mitigations. WATA management is responsible for obtaining relevant input and feedback from Transit Supervisors, Transit Dispatchers, Transit Operators, the Transit Planner, First Transit, and other outside experts as necessary in the creation of mitigations. The primary forum for the formal discussion and documentation of such mitigations will be quarterly at the WATA Safety Committee meetings.

N4.4 HAZARD TRACKING AND RECORDKEEPING

The WATA Safety, Security, and Training Specialist will be ultimately responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations will be a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database will also capture information related to mitigations developed to address the results of event investigations, inspections, and audits. The CSO is ultimately responsible for the regular, ongoing maintenance and update of this spreadsheet.

A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

WATA management, including through coordination with the First Transit General Manager, is responsible for regularly reviewing and evaluating the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

N5 SAFETY ASSURANCE

N5.1 SAFETY PERFORMANCE MONITORING

WATA uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. The WATA CSO and Executive Director regularly monitor safety performance through monthly meetings; the CSO also conducts investigations, and frequent, ongoing conversations with supervisory and front-line employees. The Operations Director and Transit Supervisors are responsible for regularly reviewing and monitoring safety-related information that is produced by the respective groups and employees under their purview. As described in the Safety Risk Management section above, the CSO; Operations Director; and First Transit General Manager are responsible for reviewing safety-related data for potential

APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

safety hazards, and for evaluating those hazards to determine whether mitigation is needed. These individuals are also responsible for communicating information regarding safety performance to the Accountable Executive through meetings and reports.

The CSO submits a Safety and Security Report to the WATA Board of Directors twice a year. The CSO also submits a monthly written safety update to the Executive Director, who in turn submits the update to the Board of Directors.

N5.1.1 OPERATIONS

The Operations Director is responsible for ongoing evaluation and observation of Bus Driver safety performance. The Operations Director assigns transit supervisors to monitor assigned groups of Transit Operators via a variety of methods. This includes periodic ride-alongs and follow-behind observations. Any such observations are documented. The Operations Director is responsible for determining what follow up is needed with individual employees. This includes working with the CSO to deliver retraining, as well as observing patterns or trends suggesting more systemic safety issues. In such cases, the Operations Director or their designee, working with the CSO, is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of entities outside of WATA, such as the City of Williamsburg Public Works and Utilities, or James City County, York County, or the Virginia Department of Transportation.

The WATA Professional Driver's Handbook details Transit Operators' roles and responsibilities, including those safety-related. The WATA Professional Driver's Handbook also details operating rules and procedures.

Transit Operators are responsible for completing DVIRs to document vehicle defects before beginning their routes, as well as after the vehicle leaves revenue service for the day, and for providing the completed forms to First Transit maintenance staff.

N5.1.2 MAINTENANCE

The First Transit General Manager is responsible for the overall maintenance of WATA vehicles. As stated in WATA vehicles have preventive maintenance (PM) inspections performed in accordance with manufacturer-specified PM schedules and procedures. Facility maintenance issues are tracked by First Transit on facility tickets and then either remediated by First Transit or are submitted to the owner of the WATA facility (7239 Pocahontas Trail, Williamsburg, VA).

N5.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

WATA administers a United States Department of Transportation (USDOT)-compliant drug and alcohol testing program. The WATA CSO is responsible for the administration of the program for WATA employees, working with WATA's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The CSO also works with a third-party vendor and James City County Human Resources to receive the names of employees selected for random testing. The CSO is responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to supervisors and affected managers. WATA's drug and alcohol testing program is described in detail in the WATA Drug and Alcohol Testing Policy. The CSO reports

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WATA drug and alcohol testing program data to FTA for WATA, as well as on behalf of Colonial Williamsburg bus operations and the Yorktown Trolley (York County).

The CSO is responsible for reporting safety events, as required, to the National Transit Database, in consultation with WATA managers and First Transit. The CSO is responsible for issuance of reports on WATA employee injuries and accidents.

N5.3 PROCESS EVALUATION

The CSO is responsible for working with the Operations Director or their designees to ensure that they are regularly evaluating safety performance and the effectiveness of the safety mitigations described above in the Safety Risk Management section. The managers are responsible for evaluating alternative mitigations or approaches in the event that they determine a given mitigation to be ineffective.

The CSO is also responsible for regularly monitoring the effectiveness of WATA employee safety reporting. These activities include regular coordination with WATA management. This includes, but is not necessarily limited to, the effective and candid reporting of safety concerns to supervision, management, and discussion during monthly meetings between the CSO and the Executive Director. The CSO will, as needed, work with management to evaluate any needed changes to the employee safety reporting process.

N5.4 EVENT INVESTIGATIONS

WATA investigates safety events including accidents, incidents, and injuries. Transit Supervisors are primarily responsible for responding to and investigating safety events, and for performing accident investigation activities, in accordance with the WATA Accident Investigation Standard Operating Procedure (SOP). The First Transit General Manager or his/her designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations. Transit Supervisors administer the post-accident drug and alcohol testing protocol to the involved Transit Operator. Transit supervisors complete a James City County/James City Service Authority-issued accident report form and submit to the CSO.

The CSO logs all safety events into a database and produces accident investigation reports. The CSO is responsible for distributing accident investigation reports as appropriate, including to the Operations Director and Deputy Executive Director.

N5.5 SAFETY PROMOTION

N5.6 SAFETY COMMUNICATION

As discussed earlier in the *Safety Policy Communication* section, WATA uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities will be provided to each WATA employee as part of new employee orientation. This PTASP and referenced plans, policies, and procedures are available to all affected employees either digitally or in hard copy.

Individual managers, or their designees, are responsible for posting safety-related bulletins and other messages in areas visible to frontline operations and maintenance employees, such as on bulletin boards and video monitors at the WATA facility (7239 Pocahontas Trail, Williamsburg). If

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necessary, management will ensure that safety-related materials are directly distributed to individual employees. Management may require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

WATA front-line employees and managers discuss hazards and safety performance information through formal and informal meetings, including the safety meetings with operations personnel every other month. Management uses the safety meetings to discuss hazard and safety risk information relevant to employees' responsibilities, and to explain why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to reports received through formal employee safety reporting or informal safety reporting and discussions with WATA management.

N5.6.1 COMPETENCIES AND TRAINING

WATA has a formal process in place to ensure that employees receive the appropriate competencies and training to safely perform their duties. WATA uses a combination of in-house and vendor-created training materials. The CSO is responsible for providing safety-related training to all WATA employees, and for working with outside vendors, as needed, to provide topic-specific training as-needed. For example, WATA provides initial training to operations employees from materials developed by the Transit and Paratransit Company (TAPTCO), the National Transit Institute (NTI), and in-house training modules (e.g. wheelchair securements). In accordance with WATA policy, Transit Operators must undergo an annual USDOT physical examination.

Operations training consists of classroom time with the CSO, CDL training and examination, and on-the-road training with an incumbent operator. New WATA employees are also trained on:

- Bloodborne pathogens
- Drugs in the workplace
- Fire safety
- Information security
- Driving policy
- Personnel policy
- Health and safety
- OSHA exposure control
- Social media policy
- Sexual harassment
- Workplace violence
- HIPAA
- Active shooter
- Human rights
- Incident reporting
- Infections control & prevention

First Transit delivers its own training for its employees. First Transit maintenance technicians are required to earn two certifications within their first year of employment (e.g. compressed natural gas [CNG]; and heating, ventilation, and air conditioning [HVAC]). The First Transit General Manager is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner.

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N5.6.2 TRAINING PROGRAM EVALUATION

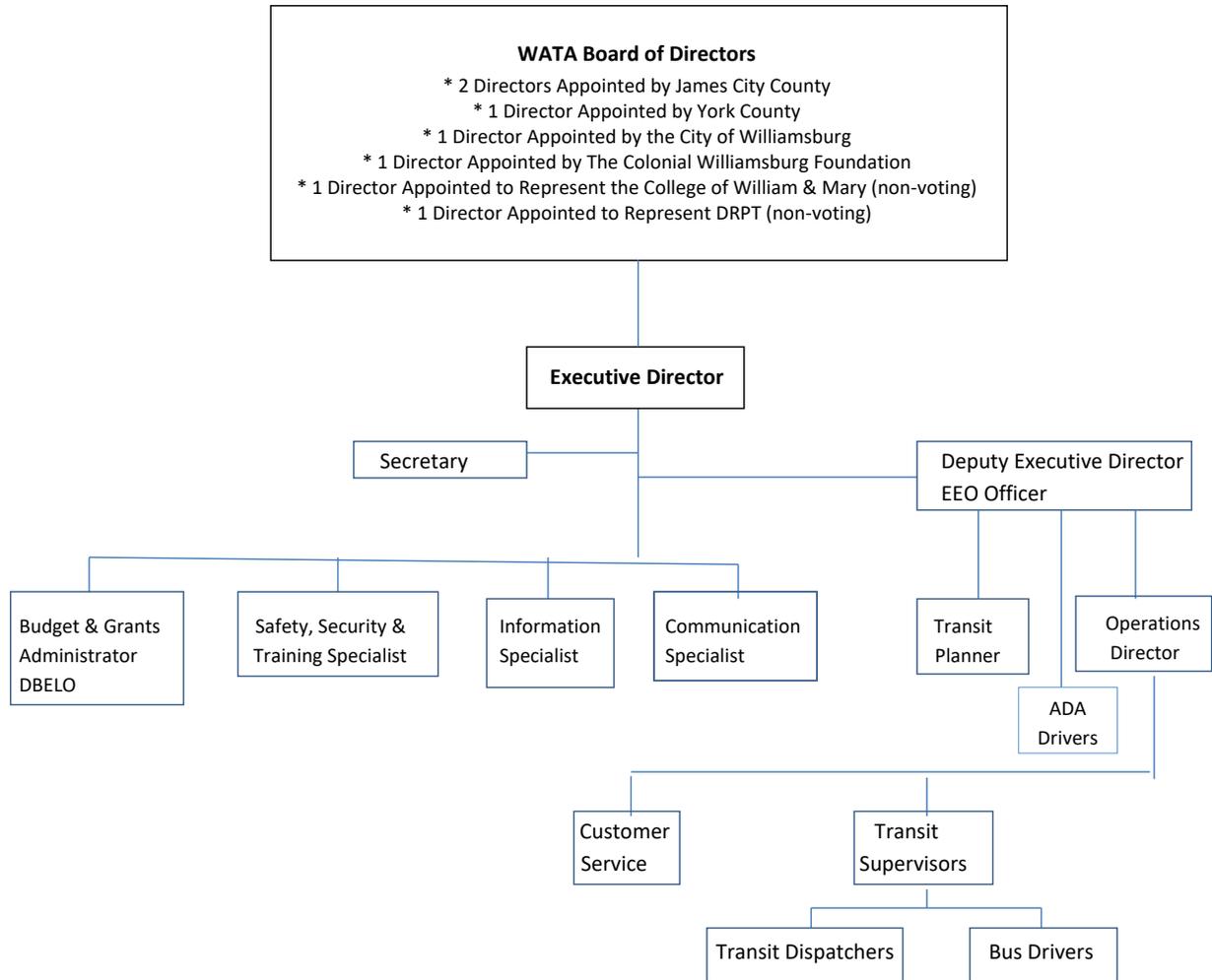
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- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance

APPENDIX N: WILLIAMSBURG AREA TRANSIT AUTHORITY

Organization Chart

Williamsburg Area Transit Authority (WATA) Organizational Chart



APPENDIX O: WINCHESTER TRANSIT

O1 ABOUT WINCHESTER TRANSIT

Winchester Transit, hereafter referred to as “WinTran,” is a department of the City of Winchester. WinTran operates three fixed-route buses, three paratransit buses, and one trolley route within the city limits. WinTran is based within a large city-owned property that houses several city departments. WinTran facilities currently include a small administration building with offices, a reception area, and an employee break room, as well as a storage garage for its fleet, and a maintenance garage for WinTran buses, shared with other city departments. WinTran also maintains a bus transfer area along East Boscawen Street in Downtown Winchester. There are approximately 15 full and part-time WinTran employees.

WinTran is led by the Transit Director, who in turn reports to the city’s Public Services Director. The Public Services Director reports to the City Manager.

WinTran Fleet

- Chevy Cutaways
- Trolley Coach

WinTran’s fleet consists of three Chevy cutaway buses and two medium-duty International buses for fixed route service, one trolley coach, and four Chevy cutaway buses and one Ford E-Series van for its paratransit service.

O2 REVISION HISTORY – WINTRAN

The following table shows the history of revisions solely for WinTran’s PTASP sections.

Table O-1: Revision Table

Version	Notes
Rev. 0	Initial PTASP developed for all required bus agencies

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O3 SAFETY MANAGEMENT POLICY

O3.1 SAFETY POLICY STATEMENT

Safety is a core value of WinTran. WinTran is committed to providing safe, reliable transit service to the City of Winchester, and to developing and implementing the structures, roles and responsibilities, and providing the resources needed to effectively manage safety risk using the principles of Safety Management Systems (SMS).

This Public Transportation Agency Safety Plan (PTASP) is written in accordance with the requirements set forth by 49 CFR Part 673, the National Public Transportation Safety Plan, and the Commonwealth of Virginia. This PTASP defines the authorities and accountabilities and responsibilities, as well as the safety management roles and responsibilities for key WinTran staff. All WinTran employees are held accountable for the overall safety performance of the transit system, and for carrying out their individual safety roles and responsibilities. With the execution of this PTASP, WinTran managers and employees are accountable for the delivery of the highest achievable levels of safety performance.

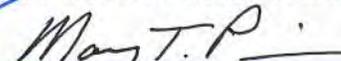
WinTran will establish a culture of safety among its managers and employees, such that safety is at the core of all operational and administrative decisions and actions. WinTran passengers can count on our organization to provide safe and reliable service. WinTran employees must meet or exceed the minimum thresholds and requirements set forth in all agency plans, policies, and procedures. WinTran will also meet or exceed all local, state, and federal regulations and requirements related to the safety of the transit system. To achieve these safety goals, WinTran has established measurable safety performance targets, outlined in this PTASP, in accordance with the National Public Transportation Safety Plan. Using the SMS processes described in this PTASP, WinTran will continually measure and assess the achievement of its safety performance targets through its Safety Management Policies, Safety Risk Management processes, Safety Assurance activities, and Safety Promotion, including, but not limited to:

- Ensuring constant communication and awareness of WinTran's safety policies throughout the organization
- Clearly defining the safety roles, responsibilities, and accountabilities of WinTran employees
- Communicating safety policies and safety information throughout the organization
- Identifying, analyzing, and mitigating safety risks
- Measuring and monitoring safety performance
- Providing employees with key safety competencies and training
- Providing all employees with the ability to identify and report safety concerns

The Public Services Director is the Accountable Executive and will have ultimate authority and responsibility for the safety of WinTran. With this plan, all WinTran employees are hereby accountable and responsible for the implementation of the all of the SMS activities described herein.


Public Services Director/Accountable Executive

5/28/2020
Date

Interim

City Manager, City of Winchester

6/1/2020
Date

APPENDIX O: WINCHESTER TRANSIT

03.2 SAFETY GOALS, OBJECTIVES, AND TARGETS

WinTran has established the following measurable Safety Performance Targets as a benchmark for the overall safety performance of the agency. The activities used to measure the achievement of these targets generally include information collected and provided to the National Transit Database (NTD).

Table O-2: WinTran Safety Performance Targets

	Fatalities (total number of reportable fatalities per year)	Fatalities (rate per total vehicle revenue miles by mode)	Injuries (total number of reportable injuries per year)	Injuries (rate per total vehicle revenue miles by mode)	Safety events (total number of safety events per year)	Safety events (rate per total vehicle revenue miles by mode)	Distance between Major Failures	Distance between Minor Failures
Fixed Route	0	0	1	Less than .5 injuries per 100,000 vehicle revenue miles	2	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles
Paratransit/ Demand Response	0	0	0	Less than .5 injuries per 100,000 vehicle revenue miles	0	Less than 1 reportable event per 100,000 vehicle revenue miles	10,000 miles	3,200 miles

NTD defines the above categories as follows:

Reportable Event (Major)

A safety or security event occurring on a transit right-of-way or infrastructure, at a transit revenue facility, or at a transit maintenance facility during a transit-related maintenance activity or involving a transit revenue vehicle that results in one of more of the following conditions:

- A fatality confirmed within 30 days of the event
- An injury requiring immediate medical attention away from the 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

APPENDIX O: WINCHESTER TRANSIT

Non-Major Summary Incident/Event (Minor)

Less severe incidents or events that do not meet the requirements of Reportable Events listed above, such as:

- Other injuries or safety occurrences not otherwise classified
- Fires

Major Mechanical System Failures

NTD defines these as failures that limit actual vehicle movement or create safety issues, including but not limited to:

- Brakes
- Doors
- Engine cooling systems
- Steering, axles, and suspension

Minor Mechanical System Failures

Minor failures could include some other mechanical element of a revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of WinTran policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service, such as, but not limited to:

- Fareboxes
- Wheelchair lifts
- Heating, ventilation, and air conditioning (HVAC) systems

WinTran may elect to add additional measurable safety performance targets in the future, depending on data trends collected through its Safety Assurance and Safety Risk Management activities. The Transit Director is responsible for ensuring that WinTran employees are performing the SMS activities needed to collect and analyze the safety data needed to measure safety performance, and for periodically reporting on the agency's safety performance to the Public Services Director and the City Manager. The Transit Director responsible for working with the Transit Supervisor and Maintenance Supervisor to periodically evaluate the safety performance targets and determining whether they require revision, alongside all of the other SMS processes as part of the annual PTASP review and revision process, alongside DRPT.

Working with DRPT, WinTran is responsible for annually providing its Safety Performance Targets to the Winchester/Frederick County Metropolitan Planning Organization (WinFred) to help aid in the transportation planning process. DRPT will coordinate with WinFred and WinTran in the selection of WinTran's safety performance targets.

O3.3 EMPLOYEE SAFETY REPORTING

WinTran employees have the ability to report safety issues to their Supervisor or directly to the Transit Director. Drivers and Mechanics can fill out the Employee Report of Injury, City Vehicle Accident, or Property Damage Incident Report forms. The Transit Supervisor, Maintenance Supervisor, and Transit Director work together to help employees feel comfortable communicating their safety concerns formally and informally, and no punitive action shall be taken against a WinTran employee for reporting a safety concern except those that are in clear violation of WinTran's existing policies and procedures. The Transit Director is responsible for determining

APPENDIX O: WINCHESTER TRANSIT

whether any discipline is required for employees on a case-by-case basis, and any disciplinary decisions are kept in employee personnel files.

03.4 SAFETY POLICY COMMUNICATION

It is the policy of WinTran to communicate the safety policies in this PTASP with all affected employees. The Transit Director or their designee is responsible for ensuring that WinTran safety policies are disseminated through training, formal and informal meetings, and verbal and written communication with employees.

WinTran's Safety Policy will be provided to every new employee alongside printed training materials. WinTran employees will have access to the complete PTASP in both hard copy and electronically.

The Transit Director is responsible for working daily with the Transit Supervisor and Maintenance Supervisor, and for communicating WinTran's safety policies to the Supervisors, Drivers, and Mechanics through formal and informal meetings. The Transit Supervisor leads periodic meetings with Drivers to discuss safety and operational issues. WinTran also provides formal and on-the-job training for its employees, during which the Transit Director or their designee clearly communicates the WinTran safety policy.

03.5 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

Public Services Director. The Public Services Director is the Accountable Executive for WinTran and is ultimately responsible for the agency's SMS. The Public Services Director has the authority and responsibility to allocate the human and capital resources within WinTran needed to implement the SMS and to address safety risks. The Public Services Director has delegated the authority of overseeing the day-to-day implementation of WinTran's SMS to the Transit Director.

Transit Director. The Transit Director is the agency's Chief Safety Officer. The Transit Director is responsible for overseeing the implementation of WinTran's SMS and for maintaining safe working conditions and practices for all WinTran employees. The Transit Director holds WinTran employees accountable for safety performance, and for fulfilling their respective safety roles and responsibilities.

Overall, the Transit Director is responsible for the following:

- Communicating safety performance information to employees and to the Public Services Director
- Maintaining relationships with other city and county agencies, including public safety and Winchester Emergency Management
- Notifying local emergency response personnel of safety events requiring outside assistance
- Communicating with Drivers on duty to give instructions during emergencies
- Working with DRPT to update the WinTran PTASP annually
- Ensuring that WinTran employees fully understand their safety roles and responsibilities
- Instilling a culture of safety throughout the organization

The Transit Director is responsible for working with the **Transit Supervisor and Maintenance Supervisor** to oversee WinTran employees, including the full and part-time Bus Drivers and Mechanics. The Supervisors are generally responsible for:

APPENDIX O: WINCHESTER TRANSIT

- Monitoring weather reports and other information sources to ensure conditions are safe and secure before transit vehicles are dispatched
- Developing procedures and standards related to employee duties
- Conducting training, orientation, and oversight of employees to ensure policies are enacted
- Listening and acting on any safety/hazard concerns raised by Bus Drivers and Mechanics
- Reporting any safety concerns to the Transit Director
- Working with the Transit Director to coordinate and account for all personnel during a safety event
- Dispatching Bus Drivers
- Investigating bus accidents
- Assessing the fitness for duty of Bus Drivers when they report for their shifts

Bus Drivers are responsible for exercising maximum care and good judgment at all times while driving WinTran vehicles, and for following all WinTran rules and procedures in the execution of their duties. All full-time Bus Drivers are responsible for:

- Completion of all city-required safety and security classes, including the Safety Manual, workplace violence, fire extinguisher, defensive driving, etc.
- Ensuring all safety and security policies are implemented
- Ensuring the transit vehicle is in safe and secure condition through the use of the daily inspection form
- Notifying the Supervisor of any security threat or hazard concerns
- Being available for emergency recall as per agency guidelines
- Following the direction of the Supervisor or a designated backup In the case of a security event or emergency

Bus Drivers must maintain and have in their possession a valid Virginia operator's license or Commercial Driver's License (CDL) as required by law at all times while operating WinTran vehicles. Bus Drivers must also maintain and have in their possession a valid Department of Transportation medical examiners certificate, as required by law or regulation, at all times while operating a WinTran vehicle.

The Maintenance Supervisor is responsible for the maintenance and reliability of WinTran's fleet, including overseeing the Mechanics. **Mechanics** report to the Maintenance Supervisor, and are responsible for

- Using the checkout form to certify that vehicles released for service have been inspected, including security checklist items
- Ensuring hazardous materials are stored safely and securely

Maintenance personnel are responsible for completing required safety training and for fulfilling their delegated safety and SMS responsibilities. Mechanics are responsible for adhering to all maintenance plans and procedures, and for completing inspections and repairs in accordance with established maintenance intervals.

The Public Services Safety Manager reports to the Public Services Director and is responsible for the investigation of accidents involving all City of Winchester vehicles, including WinTran. The Transit Services Director is responsible for working with the Public Services Safety Manager to facilitate investigations involving WinTran vehicles.

All WinTran personnel are responsible for performing key SMS activities, including, but not limited to, immediately reporting safety hazards to the Transit Director or to their immediate

APPENDIX O: WINCHESTER TRANSIT

supervisor, completing all training required for the safe performance of their duties, attending safety meetings as required, and for performing their duties in a safe manner. As needed, WinTran employees may be asked to participate in emergency preparedness drills and exercises in coordination with external first responder and other agencies.

O3.6 SAFETY MEETINGS

WinTran staff hold formal and informal meetings as needed. The Transit Director also holds regular meetings with the Transit Supervisor and Maintenance Supervisor to discuss safety in an ongoing manner. Bus Drivers and Mechanics regularly interface with the Supervisors and the Transit Director daily, and are responsible for reporting safety hazards, issues, and concerns as they discover them either in person or using the radio. The Bus Drivers and Supervisors have the ability to share safety messages and information with the Bus Mechanics regarding safety and maintenance related issues on the vehicles.

O3.7 DOCUMENTATION AND RECORDKEEPING

WinTran safety is governed by this PTASP as well as several referenced standalone documents. This includes:

The Winchester Transit System Safety and Security Program. This comprehensive document was most recently updated in May 2014 and includes a series of individual sections that function as standalone documents. This PTASP contains some information that overlaps with that which is already contained in the System Safety and Security Program; however, this PTASP is specifically written to comply with 49 CFR Part 673, and to describe WinTran's safety risk management activities in accordance with the principles of SMS. Further, the System Safety and Security Program includes some process assessments and recommendations, rather than a codification of current practice. Therefore, this PTASP is designed to capture current safety practice using the SMS framework. While this PTASP is complementary to the Safety and Security Program, it is not intended to fully replace or supersede it. Rather, please refer as appropriate to the Winchester Transit System Safety and Security Program, which includes:

- Section 1: Winchester Transit System Security and Emergency Preparedness Plan. This document describes an assessment and recommendations for a WinTran security and emergency preparedness program, including activities, roles and responsibilities of its employees with regard to maintaining the plan, training, exercises, hazard identification and resolution (discussed further in the Safety Risk Management section of this document, below), emergency preparedness and coordination, and security planning.
- Section 2: Winchester Transit System Driver Selection Process. This section includes an assessment and recommendations for detailed requirements for hiring new Bus Drivers, including hiring standards, and a description of the training requirements.
- Section 3: Winchester Transit Driver Training Program. This document includes an assessment and recommended practices for a training program for Bus Drivers, including documentation and training aids, supplementary/complementary training, and instructors' outlines.
- Section 4: Winchester Transit System Vehicle Maintenance Program. This document includes an assessment and recommendations related to requirements for driver inspections, vehicle inspection reports, certification of repair, and other maintenance requirements such as licensing, brakes, windows, emergency doors, and emergency lights, wheelchair lifts, and the Automotive Service Excellence (ASE) program.
- Section 5: Winchester Transit Drug and Alcohol Program. This section includes an assessment and recommendations related to WinTran's drug and alcohol testing program.

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- Section 6: Winchester Transit System Safety Performance Measurement System. This document includes an assessment and recommendations for WinTran to develop a Safety Performance Measurement System. It includes detailed recommendations for improving safety for passengers, vehicles, property/facilities, and employees. There are recommendations for safety performance metrics across multiple variables, including:
 - Passenger incidents per 100,000 miles driven
 - Customer perception of safety
 - Transit vehicle crashes per 100,000 miles driven
 - Percent of preventive maintenance work performed within 10 percent of the specified interval
 - Mileage between road calls
 - Incidents of vandalism
 - Percent of bus stops meeting Americans with Disabilities Act (ADA) requirement
 - Employee work days lost to injury

The plan includes recommendations for next steps, including pilot testing, setting targets, monitoring performance and evaluating results, reporting the results, agency decision making, and sustaining the Safety Performance Measurement System.

With this PTASP, WinTran is formally adopting the Safety Performance Measurement System described in Section 6 of the System Safety and Security Program. Refer to the Safety Assurance section below for additional description of safety performance monitoring and measurements activities at WinTran.

The Winchester Transit System Substance Abuse Policy. This document describes the drug and alcohol testing program and requirements for WinTran's Safety-Sensitive employees, in accordance with 49 CFR Parts 40 and 655.

The Winchester Transit Procurement Manual. This document includes minimum safety standards for the requisition, purchase, and procurement of equipment, products, and services

The Winchester Transit Vehicle Preventive Maintenance Plan. This document describes maintenance requirements for WinTran vehicles and equipment, including maintenance schedules and intervals.

The Winchester Transit Employee Handbook. This document includes administrative policies and procedures, operating procedures, accident procedures.

WinTran records developed and maintained by the agency to document the SMS and to measure its effectiveness are described in the Safety Risk Management and Safety Assurance sections below, and generally include accident reports, pre-trip inspections, drug and alcohol testing program records, training records, and maintenance work orders. WinTran must comply with the **City of Winchester Records Management Policy**. The Transit Director is responsible for the maintenance of all documents and records developed in the implementation of the SMS. At a minimum, WinTran retains all records related to the implementation of the SMS for a minimum of three years. All such documentation will be made available upon request to the FTA, DRPT, or any other entities having jurisdiction.

O4 SAFETY RISK MANAGEMENT

This section of the PTASP establishes formal processes for the identification, analysis, and mitigation of safety hazards. Safety hazards are any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, vehicles, or infrastructure of a public transportation system; or damage to the environment.

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04.1 HAZARD IDENTIFICATION

WinTran employees identify safety hazards using a variety of methods, including but not necessarily limited to:

- Bus Driver reports to the Supervisor or Transit Director
- Employee incident reports
- Formal and informal staff meetings
- Pre-trip inspections
- Mechanic reports to the Maintenance Supervisor or Transit Director
- Facility and equipment inspections performed by the Transit Director or their designee
- Customer service complaints

The Transit Director and the Supervisors are responsible for regularly monitoring these sources of hazard data to determine whether safety hazards require further action or analysis. The Transit Director, or their designee, is responsible for working with the Supervisors and regularly monitoring each of the above sources of safety data and for systematically tracking them in a database. The Transit Director, or their designee, is also responsible for direct observation and identification of safety hazards via the facility and equipment inspections process.

As appropriate, WinTran will incorporate any relevant safety data provided by local, state, and federal oversight and regulatory bodies into the safety risk management process.

04.2 HAZARD ANALYSIS AND EVALUATION

WinTran analyzes and evaluates potential safety hazards identified through the above-listed information sources using a variety of methods:

- During meetings, the Transit Director, Supervisors, Bus Drivers, and Mechanics have the opportunity to discuss and review safety hazards.
- The Supervisors are responsible for continually monitoring the sources of safety data under their respective authority and responsibility, and for using the principles of Safety Risk Management to help evaluate and prioritize the mitigation of those safety hazards.
- The Transit Director or their designee is responsible for compiling reports on safety performance, including each of WinTran's safety performance targets, and for disseminating information on safety hazards to WinTran employees.
- The Transit Director or their designee is also responsible for periodically reporting on safety performance to the Public Services Director, to the City Manager.
- The Transit Director is responsible for working closely with the Supervisors to review and evaluate potential safety hazards in accordance with Safety Risk Management principles.

WinTran is committed to the analysis and evaluation of hazards for the purpose of prioritizing the management and mitigation of safety risk. WinTran management is responsible for receiving and evaluating hazards based on severity and probability through a formal hazard analysis process. WinTran will use a hazard assessment process based off of Military Standard 882E to evaluate identified hazards as described in the DRPT PTASP section 3.1: Safety Risk Management Processes. See more detail on the process for rating hazards for all small transit providers covered by the DRPT PTASP in section 3.1 of the Statewide PTASP introduction.

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The Transit Director and the Supervisors are responsible for the review of all unacceptable hazards. The Transit Director is responsible for working with the Supervisors and affected employees to develop and implement mitigations for unacceptable hazards. The Transit Director has the discretion to prioritize hazards of a lower risk level and determine whether mitigation is needed. All such decisions shall be documented in meeting minutes, tracking logs, or other means deemed appropriate by the Transit Director for posterity. All such documentation must be kept in accordance with WinTran's documentation and recordkeeping requirements for SMS-related documentation, and the City of Winchester Records Management Policy.

04.3 SAFETY RISK MITIGATIONS

WinTran's safety risk mitigation strategies include the development of corrective or preventive actions to help reduce the likelihood that safety hazards will reappear in the future. As noted earlier, the Transit Director and Supervisors are responsible for working together to develop and implement such mitigations. The Transit Director, or their designee, is responsible for obtaining relevant input and feedback from the Supervisors, frontline employees, and outside experts as necessary in the creation of mitigations. WinTran will discuss and document these mitigations as part of staff meetings.

04.4 HAZARD TRACKING AND RECORDKEEPING

The Transit Director or their designee is responsible for the documentation, tracking, and monitoring of safety hazards and any associated mitigations or corrective actions. The primary tracking mechanism for hazards and their associated mitigations is a database that serves as a central repository of information that captures, at a minimum, the following information:

- Date of identification or discovery of the safety hazard
- Source of the information
- Brief description of the hazard
- Potential Consequence
- Description of any associated mitigations or corrective actions to address the hazard
- Person(s) responsible for implementation of the mitigation
- Current status

This database also captures information related to mitigations developed to address the results of event investigations, inspections, and audits. The Transit Director or their designee is responsible for the regular, ongoing maintenance and update of this spreadsheet. A sample Risk Register for tracking hazards has been included in the DRPT PTASP section 3.2: Safety Risk Register.

The Transit Director is responsible for working with the Supervisors to review and evaluate the safety mitigations to determine their effectiveness, and to consider alternative approaches as needed.

05 SAFETY ASSURANCE

05.1 SAFETY PERFORMANCE MONITORING

WinTran uses a variety of formal and informal processes to monitor and measure safety performance, both proactively and reactively. The Transit Director and Supervisors regularly monitor safety performance through meetings, reporting from employees, observing rule

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compliance and maintenance compliance, and investigations. The Transit Supervisor and Maintenance Supervisor are responsible for regularly reviewing and monitoring the safety-related information that is produced by their respective employees. The Supervisors, working with the Transit Director, are responsible for reviewing safety-related data for potential safety hazards, and for evaluating those hazards to determine whether mitigation is needed. The Transit Director is responsible for working with the Supervisors to communicate information regarding safety performance to WinTran employees and to the Public Services Director, and, as needed, the City Manager.

05.1.1 TRANSIT OPERATIONS

The Transit Supervisor is responsible for continually evaluating the safety performance of WinTran Bus Drivers. The Transit Supervisor uses the policies and procedures in the WinTran Employee Handbook as performance benchmarks for Bus Drivers. Any rule violations by Bus Drivers must be documented. The Transit Supervisor and Transit Director work together to review any Bus Driver rule violations and determine what follow up is needed with individual employees, or whether there is a more systemic safety issue. In such cases, the Transit Director is responsible for evaluating potential alternative mitigations, such as training or re-training, review or update of policies, procedures, or training programs, or addressing physical or operational issues that may be the responsibility of other Winchester city departments (for example, street markings or stripes, or traffic signal timing or visibility).

The Transit Supervisor is responsible for documenting any unusual occurrences during bus operations, such as delays, collisions, or mechanical failures. The Transit Director or their designee is responsible for the regular review of any unusual occurrences for the purpose of identifying potential safety hazards and monitoring safety performance.

Bus Drivers are responsible for completing pre-trip and post-trip inspections, and for notifying WinTran maintenance of any safety issues. All pre- and post-trip inspections must be documented using the Winchester Transit Pre-Trip Inspection Form.

05.1.2 MAINTENANCE

The Transit Director is responsible for working with the Facilities Maintenance Supervisor to coordinate the maintenance of WinTran Facilities, and with the Maintenance Supervisor to coordinate the maintenance of equipment, and vehicles. WinTran facilities are maintained by the City of Winchester Public Services department, not a part of WinTran. Vehicle maintenance is governed by the Winchester Transit Vehicle Maintenance Plan, which includes detailed requirements for preventive maintenance inspections for all WinTran vehicles. Mechanics are responsible for completing a Transit Inspection Checklist for every inspection.

The Maintenance Supervisor is responsible for regularly reviewing and monitoring WinTran maintenance and inspection activities for the purpose of monitoring safety performance and evaluating potential safety hazards. The Maintenance Supervisor, or their designee, reviews all completed pre- and post-trip inspection forms, Transit Inspection Checklists completed by the Mechanics, and maintenance work orders. The Maintenance Supervisor or their designee is responsible for communicating any safety hazards identified through the maintenance process to Mechanics during daily informal meetings, and during meetings with the Transit Director and Transit Supervisor and Bus Drivers.

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05.2 OTHER SAFETY PERFORMANCE MONITORING ACTIVITIES AND DATA COLLECTION

WinTran administers a United States Department of Transportation (USDOT) compliant drug and alcohol testing program. The Transit Director is responsible for the administration of the program, including working with WinTran's collection vendor to facilitate all types of testing, including pre-employment, random, post-accident, return-to-duty, and follow-up testing. The Transit Director or their designee is also responsible for the administration of required drug and alcohol awareness training to covered employees, as well as training in reasonable suspicion to the Supervisors. WinTran's drug and alcohol testing program is described in detail in the Winchester Transit System Substance Abuse Policy.

The Transit Director or their designee is responsible for reporting safety events, as required, to the National Transit Database.

05.3 PROCESS EVALUATION

The Transit Director or their designee is responsible for regularly evaluating safety performance and the effectiveness of safety mitigations described above in the Safety Risk Management section. The Transit Director is responsible for holding the Supervisors, Bus Drivers, and Mechanics accountable for their safety performance, and for evaluating whether safety mitigations are effective. In case the Transit Director determines that a particular safety mitigation is ineffective, then they are responsible for working with affected employees to evaluate alternative mitigations or approaches.

The Transit Director or their designee is also responsible for regularly monitoring the effectiveness of the WinTran employee safety reporting process. This includes determining whether Bus Drivers and Mechanics are adequately reporting their safety concerns to the Supervisors or the Transit Director during meetings, in writing, or verbally during their shifts. The Transit Director will work with other WinTran employees as needed to evaluate any necessary changes to the employee safety reporting process.

05.4 EVENT INVESTIGATIONS

WinTran has established a formal process for the investigation of safety events, including accidents, incidents, and occurrences. The Winchester Transit Employee Handbook section on Accidents includes detailed policies and procedures for responding to and investigating safety events. All accidents must result in the completion of reports and forms, including, but not limited to, the Employee Report of Injury Form, Property Damage Incident Report Form, City Vehicle Accident Report.

The Transit Director is responsible for working with the Public Services Safety Manager on all vehicle accidents. The Public Services Safety Manager in conjunction with the Transit Director or Transit Supervisor is responsible for identifying, analyzing, and reporting on the causal factors that led to an event. Absent the Safety Manager, the Transit Director is responsible for working with the Supervisors as needed to complete the investigation process and determine preventability and causal factors.

The Transit Director and Transit Supervisor work together to respond to the scene of bus accidents. The Transit Director and Transit Supervisor have each received formal accident investigation training from the Transportation Safety Institute. The Maintenance Supervisor may also be responsible for participation in the investigation process, as needed and as determined

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by the Transit Director. The Maintenance Supervisor or their designee is responsible for evaluating the condition of vehicle maintenance and damage during investigations.

The Transit Director or their designee is responsible for logging all safety events into a database that includes, but is not limited to, the following information:

- Data of event
- Vehicle number
- Location
- Description/damage
- Whether EMS was needed

The Transit Director or their designee is responsible for working with WinTran's insurance and the city's risk management to ensure the provision of relevant investigation information.

The Transit Director or their designee is responsible for producing periodic reports on key performance indicators related to safety events, and for providing these reports to the Public Services Director, the City Manager, and for disseminating the information to the Supervisors, Bus Drivers, and Mechanics as appropriate.

O6 SAFETY PROMOTION

O6.1 SAFETY COMMUNICATION

As discussed earlier in Section [x], WinTran uses a variety of methods to communicate safety information to ensure that all employees are aware of the Safety Management Policy, safety performance, as well as the processes, activities, and tools that are relevant to their responsibilities. The agency's safety policies and other information related to employee safety and SMS responsibilities are provided to each new WinTran employee upon hiring. This PTASP and referenced plans, policies, and procedures are available to all affected employees digitally or in hard copy.

The Transit Director or their designee is responsible for posting safety-related bulletins and other messages in areas visible to Bus Drivers and Mechanics, such as the employee break room. If necessary, the Transit Director will ensure that safety-related materials are directly distributed to individual employees. The Transit Director has the discretion to require employees to acknowledge, in writing, their receipt and understanding of safety-related information.

WinTran employees are able to discuss safety hazards and safety performance during formal and informal meetings with the Supervisors and the Transit Director. The Transit Director is responsible for ensuring that information about safety hazards and safety performance are provided to the employees in a manner relevant to their respective safety responsibilities. The Transit Director is also responsible for explaining why safety actions have been taken, or why safety procedures may have been introduced or changed, in response to employee safety reporting.

O6.1.1 COMPETENCIES AND TRAINING

WinTran has established minimum training requirements for all new hires. All new employees are given copies of various WinTran policies and procedures, including, but not limited to, the Employee Handbook and Driver's Handbook. The training program includes:

- New employee orientation

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- Workplace violence
- Customer service
- Ethics
- Safety manual
- Emergency Medical Services (EMS)
- Wheelchair lift
- Substance abuse
- Fire extinguisher
- First aid/CPR
- Defensive driving
- Accident/incident reporting

Training and instruction is primarily provided by the Transit Director and Transit Supervisor, with assistance from senior front-line employees as needed. The completion of individual employees' training is documented on the New Hire Check-Off List, and kept in each employee's personnel file. The Transit Director or their designee is responsible for maintaining employee training records.

Working with the Maintenance Supervisor, the Transit Director is responsible for ensuring that maintenance employees are sufficiently trained and competent to perform their job duties in a safe manner. Mechanics are required to complete the same initial operator training as Bus Drivers, and are qualified to operate WinTran revenue vehicles. Mechanics receive informal, on-the-job training from the Director of Maintenance or their designee. If needed, WinTran may bring in vendors or original equipment manufacturers to provide specific training.

The Transit Director is responsible for regularly reviewing employee training records to ensure training has been completed as required, and completed on time, and for regularly reporting on training program compliance to affected employees, and to the Public Services Director.

WinTran is currently evaluating alternative approaches to its employee training program including formal refresher training, including the implementation of the recommendations and initiatives described in the System Safety and Security Program document.

06.1.2 TRAINING PROGRAM EVALUATION

The Transit Director, in coordination with the Transit Supervisor and Maintenance Supervisor, is responsible for periodically analyzing all employee training programs to determine whether changes or updates are necessary. The Transit Director or their designee is responsible for documenting any proposed changes or updates. These analyses are intended to ensure that the agency has identified and provided all necessary skills and competencies related to the safe performance of WinTran job functions. Changes or updates could include, but are not limited to:

- New training techniques or technology
- Changes based on the results of accident investigations
- Changes based on identified safety hazards or deficiencies
- Changes based on local, state, or federal regulations or guidance