Public Transportation Agency Safety Plan (PTASP)

valley regional transit

11/12/2020
Valley Regional Transit (VRT)
700 NE 2nd Street, Suite 100
Meridian, ID 83642
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CHAPTER 1 – TRANSIT AGENCY INFORMATION

<table>
<thead>
<tr>
<th>Transit Agency Name:</th>
<th>Valley Regional Transit (VRT)</th>
</tr>
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<tbody>
<tr>
<td>Transit Agency Address:</td>
<td>700 NE 2nd Street Suite 100, Meridian, ID 83642</td>
</tr>
<tr>
<td>Accountable Executive:</td>
<td>Kelli Badesheim, Executive Director</td>
</tr>
<tr>
<td>Chief Safety Officer:</td>
<td>Leslie Pedrosa, Operations Director</td>
</tr>
<tr>
<td>Modes of Service Covered by This Plan:</td>
<td>Fixed-Route Demand-Response</td>
</tr>
<tr>
<td>FTA Funding Types:</td>
<td>5307, 5310, 5307, 5310 SU, 5310 LU, 5310 Rural, 5339 SU, and 5339 LU, 5339</td>
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<td>Modes of Service Provided by TVT:</td>
<td>Fixed-Route - Contracted, Demand Response - Contracted, Low Income Job Access Service - Contracted</td>
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<tr>
<td>Does the agency provide transit services on behalf of another transit agency or entity?</td>
<td>Yes □ No X</td>
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<tr>
<td>Description of Arrangement(s)</td>
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<tr>
<td>Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided</td>
<td>N/A</td>
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CHAPTER 2 – PLAN DEVELOPMENT, APPROVAL, AND UPDATES

This plan was drafted by Shauna Miller, State Safety Oversight Officer, with the Idaho Transportation Department, Public Transportation Office.

<table>
<thead>
<tr>
<th>Signature of Accountable Executive</th>
<th>Valley Regional Transit Executive Board of Directors Chair (Name)</th>
<th>Date of Signature</th>
<th>Date of Approval</th>
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<tbody>
<tr>
<td>Kelli Badesheim</td>
<td>Tom Dale</td>
<td>11/2/2020</td>
<td>11/2/2020</td>
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<tr>
<td>Signature of Chairman of Executive Board of Directors</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tom Dale</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name of Individual/Entity That Certified This Plan</td>
<td>Date of Certification</td>
<td></td>
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<td>11/2/2020</td>
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CHAPTER 3: SAFETY PERFORMANCE TARGETS BY MODE OF SERVICE

Goals and targets were set based on historical data gathered through reviewing trending information over the past two years. This data is collected monthly and analyzed to ensure VRT is progressing towards set goals. In the event it is found VRT is deviating from identified goals, VRT will comply with the processes outlined later in this document.

MODE OF SERVICE: FIXED-ROUTE

Fatalities:
- Total number of fatalities reported to National Transit Database (NTD): 0
- Rate of fatalities per 100,000 vehicle revenue miles (VRM): 0

Injuries:
- Total number of injuries reported to NTD: 2
- Rate of injuries per 100K VRM: 0.12

Safety Events:
- Total number of safety events reported to NTD: 5
- Rate of safety events per 100K VRM: 0.21

System Reliability:
- Mean distance between major mechanical failures by mode: 1 per 16,643.92 VRM

MODE OF SERVICE: DEMAND-RESPONSE

Fatalities:
- Total number of fatalities reported to NTD: 0
- Rate of fatalities per 100,000 vehicle revenue mile (VRM): 0

Injuries:
- Total number of injuries reported to NTD: 3
- Rate of injuries per 100K VRM: 0.29

Safety Events:
- Total number of safety events reported to NTD: 3
- Rate of safety events per 100K VRM: 0.34

System Reliability:
- Mean distance between major mechanical failures by mode: 1 per 11,151.84 VRM
Safety Performance Target Coordination

This plan is written by the Idaho Transportation Department’s Public Transportation Office in coordination with all of the state Metropolitan Planning Organization (MPO) Targets are submitted by ITD-PT annually at the MPO’s mid-year Small Urban Balancing Committee meeting.

TARGET TRANSMITTAL DATES:

- Idaho Transportation Department: 06/30/2020
- Community Planning Association of Southwest Idaho (COMPASS): 06/25/2020
CHAPTER 4: SAFETY MANAGEMENT POLICY STATEMENT

Safety Management Policy Statement

The management of safety is one of Valley Regional Transit’s business functions. VRT is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all transit-service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards.

All levels of management and all employees are accountable for the delivery of this level of safety performance, starting with our Executive Director.

Valley Regional Transit’s commitment is to:

- support the management of safety through the provision of appropriate resources, that will result in an organizational culture that fosters:
  - safe practices;
  - encourages effective employee and contractor safety reporting and communication; and
  - actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;

- integrate the management of safety among the primary responsibilities of all managers, employees, and contractors;

- clearly define for all staff, managers, employees, and contractors alike, their accountabilities and responsibilities for the delivery of the organization’s safety performance and the performance of our safety management system;

- establish and operate hazard identification and analysis, and safety risk evaluation activities, including an employee and contractor safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point which is consistent with our acceptable level of safety performance;

- ensure no action will be taken against any employee or contractor who discloses a safety concern through the safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;

- comply with, and wherever possible exceed, legislative and regulatory requirements and standards;

- ensure sufficient skilled and trained human resources are available to implement safety management processes;

- ensure all staff and contractors are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;

- establish and measure safety performance against realistic and data-driven safety performance indicators and safety performance targets;

- continually improve safety performance through management processes that ensure appropriate safety management action is taken and is effective; and
• ensure externally supplied systems and services to support operations are delivered meeting safety performance standards.

Safety Management Policy Communication

VRT’s commitment to the safety of their employees and their full knowledge of the PTASP begins with the roll out of the plan. The Chief Safety Officer distributed the Public Transportation Agency Safety Plan (PTASP) principles to all VRT employees and contractors in November 2020. Each employee and contractor received a handout of the plan. Following the in-person training, a signed acknowledgement statement was collected. Changes are relayed to VRT employees and contractors annually. Changes will require a signed acknowledgment statement by VRT employees and contractors.

The Public Transportation Agency Safety Plan (PTASP) Policy Statement is posted on a bulletin board in all administrative offices. Contractors are expected to post the PTASP Policy Statement in common operating and maintenance areas. The PTASP Policy Statement will also be distributed to all new hires during orientation and annually to VRT employees and contractors at our annual staff workshop.

Authorities, Accountabilities, and Responsibilities

Accountable Executive
Kelli Badesheim, Executive Director

The Executive Director is ultimately responsible for carrying out the PTASP, Transit Asset Management (TAM) Plan, and the allocation of resources needed to develop and maintain both plans. The Accountable Executive is responsible for ensuring the Safety Plan and all SMS components are effectively implemented, and for ensuring action is taken, as necessary, to address substandard performance in the agency’s SMS.

Chief Safety Officer (CSO)
Leslie Pedrosa, Operations Director

The Executive Director has designated the Operations Director as the Chief Safety Officer. In addition to their other duties, the Operations Director has the authority and responsibility for day-to-day implementation and operation of safety and reports directly to the Executive Director. At minimum, the Operations Director is trained in the training outlined in Section 7 under “Requirements for Chief Safety Officer Training.”

Agency Leadership and Executive Management

The Chief Safety Officer has designated the Compliance Officer as the Agency Lead. The Agency Lead is a single identifiable person who will manage the day-to-day operation of the PTASP safety plan, including the following key tasks:
• Establish goals and targets
• Ensure the plan is being followed by all employees
- Report to key management progress of the plan
- Make recommendations to improve the plan after implementation
- Report to any government agency any reporting requirements associated with PTASP

The Executive Management personnel have the following authorities, accountabilities and responsibilities:
- Participate in the VRT Safety Committee
- Oversee day to day operations in their department
- Modify department policies and procedures to be consistent with PTASP, as needed
- Provide subject matter expertise to support implementation of the PTASP as requested by the Accountable Executive or the Chief Safety Officer, including investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness

The Executive Management team includes:
- Finance Controller
- Grants and Compliance Administrator
- Principal Planner
- Transit Services Manager
- Fleet and Facilities Supervisor
- Contractor Management

Key Staff
VRT will use the Safety Committee, driver meetings, and annual staff workshops to support the PTASP and safety programs.

- Safety Committee: The Safety Committee will meet monthly. The Safety Committee will review issues and make recommendations to improve safety and jointly evaluate any safety hazard reported. VRT Safety Committee members include the Chief Safety Officer, Transit Services Manager, Compliance Officer, a representative from development, a representative from customer service, and a representative from finance. The Safety Committee members from contractors will include a representative from dispatch/reservations, a representative from fixed-route, a representative from paratransit, a representative from the safety/training department, a representative from maintenance, and a representative from management, where applicable.

- Drivers Meetings: All monthly driver meetings will include a permanent agenda item dedicated to safety, where safety issues are discussed and documented.

- Annual Staff Workshop: During VRT annual staff workshops, hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting will be further encouraged. Information discussed in these meetings will be documented.

Contractors currently included in this plan are First Transit, Supportive Housing & Innovative Partnerships, Meridian Senior Center, Star Senior Center, Eagle Senior Center, Metro Community Transportation, Kuna Senior Center, Parma Senior Center, and Harvest Transit.
Employee Safety Reporting Program

VRT is committed to conducting business with honesty and integrity. Employees and contractors are encouraged to speak up and raise questions and concerns promptly about any situation that may violate safety protocols, policies, procedures, the laws, rules, and regulations that govern business operations.

Employees and contractors are expected to tell others when witnessing unsafe work practices or conditions. When employees and/or contractors are not comfortable discussing these unsafe conditions with fellow employees, they are encouraged to discuss the situation with management or report it in writing anonymously.

However, where the matters are more serious, or the employee or contractor feels management has not addressed the concern, or they are not comfortable reporting to their immediate manager, employees can report the concern to the next level manager, Chief Safety Officer or Compliance Officer. Employees and contractors may also anonymously, directly file, a written or verbal complaint by calling the State Safety Officer with ITD’s Public Transportation office at 208 334-8533 or by email to shauna.miller@itd.gov.

Retaliation against anyone who, in good faith, reports observations of unsafe or illegal activities, or who cooperates in any investigation of such report, is strictly prohibited and is not tolerated, regardless of the outcome of the complaint. In other words, employees and contractors are protected for speaking up in good faith under this policy. Any manager, or coworker who retaliates against a complaining employee, contractor, or anyone involved in an investigation of a complaint is subject to discipline and/or termination.

Managers are charged with assuring that they, their staff, and contractors comply with the whistleblowers protections and that no retaliation occurs because of a reported safety related issue. However, VRT may take disciplinary action if the report involves any of the following:

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

Examples of information typically reported:

- If an employee or contractor is involved in a near miss, or determines something to be a hazard, in the event should be reported so all may learn from the event, and perhaps, prevent a collision or injury from occurring in the future. If the safety hazard requires immediate attention, a supervisor must be notified immediately. If immediate attention is not required, the employee or contractor is encouraged to submit the information to management by the end of their workday. VRT management or contractor’s management then initiates conversations with employees about their observations of both safe and unsafe behaviors.
• If an accident, near miss, or incident has occurred, the vehicle operator must stop the vehicle immediately as it is safe to do so.
• VRT encourages anyone who sees, hears, or learns of any conduct or statement that seems threatening or suspicious, and/or any weapons on company premises or in company vehicles, to immediately report such conduct or statement. If there is an immediate risk or imminent threat of violence, serious harm, or life-threatening conduct, employees should immediately call 911, local police, or other law enforcement.

The Chief Safety Officer will document identified safety hazards in the Accident/Incident Analysis Report workbook as needed. The Chief Safety Officer, supported by the Safety Committee, will review and address employee reports. Each report will be reviewed to ensure hazards and their consequences are appropriately identified and resolved through the Safety Risk Management process and reported deficiencies and non-compliance with rules or procedures are managed through the Safety Assurance process.

The Chief Safety Officer discusses actions taken to address reported safety conditions during the annual staff workshops. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee will follow up directly with the employee when VRT determines if action should be taken and after any mitigations are implemented.
CHAPTER 5: SAFETY RISK MANAGEMENT

Safety Risk Management Process

Safety management is at the core of everything done at VRT. All employees and contractors are responsible for performing their jobs in a safe manner, which includes identifying safety risks and participating in developing and implementing effective mitigation techniques. The process for managing hazards, from identification through corrective action and closure, is illustrated by the following chart.

As described earlier, a structure exists to address all safety concerns. To ensure safety, the Safety Committee is responsible for reviewing safety-related accidents and incidents to determine culpability, to identify the causes associated with each event, and develop mitigation measures to reduce the risk of events occurring in the future. Having this committee provides a way for employees and contractors to report safety risks in a timely manner and to teams that understand the conditions associated with each area. Additionally, the opportunity exists for more timely, appropriate, and effective mitigation measures.
Safety Hazard Identification

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

- Employee Safety Reporting Program;
- Review of the Accident/Incident Analysis Worksheet;
- Review of monthly performance data and safety performance targets;
- Comments from customers, passengers, and third parties, including VRT’s insurance provider and vendors;
- Safety Committee, drivers, and all-staff meetings;
- Results of audits and inspections of vehicles and facilities;
- Results of training assessments;
- Investigations into safety events, incidents, and occurrences; and
- Federal Transit Administration (FTA) and other oversight authorities (mandatory information source).

There is a variety of sources to identify hazards:

- Environment
- Transit service characteristics and policies
- Operator performance
- Road condition
- Safety and performance data targets
- Camera footage
- Supervisor or employee observations
- Maintenance reports
- Customer, vendor or third party comments
- Safety Committee meetings
- Audit findings
- Training assessments
- FTA or other oversight authorities

When a safety concern is observed, whatever the source, it is reported to VRT’s Chief Safety Officer. Procedures for reporting hazards to are reviewed during new hire orientation, annual staff workshop meetings and in the Safety Committee. The Chief Safety Officer reviews these sources for hazards and documents them in Accident/Incident Analysis Workbook. The Chief Safety Officer may also enter hazards into the Accident/Incident Analysis Workbook based on review of results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

The Chief Safety Officer may conduct further analyses of hazards and consequences entered into the Accident/Incident Analysis Workbook to collect information and identify additional
consequences and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, the Chief Safety Officer may:

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

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

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

Safety Risk Assessment:
VRT assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk. Pursuant to 49 C.F.R. Part 673.5, “Risk” is defined as the composite of predicted severity and likelihood of the potential effect of a hazard.

Once a hazard has been identified, the Chief Safety Officer and Safety Committee will categorize the hazard into the following severity levels. The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle that not all hazards pose an equal amount of risk to personal safety.

Category 1
**Catastrophic:** Operating conditions are such that human error, design deficiencies, element, subsystem or component failure, or procedural deficiencies may cause death or major system loss and require immediate termination of the unsafe activity or operation.

Category 2

**Critical:** Operating conditions are such that human error, subsystem or component failure, or procedural deficiencies may cause severe injury, severe occupational illness, or major system damage and require immediate corrective action.

Category 3

**Marginal:** Operating conditions are such that they may result in minor injury, occupational illness or system damage and are such that human error, subsystem or component failures can be counteracted or controlled.

Category 4

**Negligible:** Operating conditions are such that human error, subsystem, or component failure or procedural deficiencies will result in less than minor injury, occupational illness, or system damage.

The next step in assessing the hazard is to determine the likelihood of it occurring. Likelihood is determined based on the analysis of transit system operating experience, evaluation of VRT safety data, the analysis of reliability and failure data, and/or from historical safety data from other passenger bus systems.

The following chart describes the likelihood categories.

<table>
<thead>
<tr>
<th>Description</th>
<th>Frequency for Specific Item</th>
<th>Selected Frequency for Fleet/Inventory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frequent</td>
<td>Likely to occur frequently</td>
<td>Continuously experienced</td>
</tr>
<tr>
<td>Probable</td>
<td>Will occur several times in the life of the item</td>
<td>Will occur frequently in the system</td>
</tr>
<tr>
<td>Occasional</td>
<td>Likely to occur sometime in the life of an item</td>
<td>Will occur several times in the system</td>
</tr>
<tr>
<td>Remote</td>
<td>Unlikely but possible to occur in the life of an item</td>
<td>Unlikely but can be expected to occur</td>
</tr>
<tr>
<td>Improbable</td>
<td>So unlikely it can be assumed occurrence may not be experienced</td>
<td>Unlikely to occur but possible</td>
</tr>
</tbody>
</table>
Identified hazards are placed into the following Risk Assessment Matrix to enable the decision maker to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

<table>
<thead>
<tr>
<th>Severity</th>
<th>Frequent</th>
<th>Probable</th>
<th>Occasional</th>
<th>Remote</th>
<th>Improbable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frequency</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>Serious</td>
<td>Medium</td>
</tr>
<tr>
<td>Catastrophic</td>
<td>High</td>
<td>High</td>
<td>Serious</td>
<td>Serious</td>
<td>Low</td>
</tr>
<tr>
<td>Critical</td>
<td>High</td>
<td>High</td>
<td>Serious</td>
<td>Medium</td>
<td>Low</td>
</tr>
<tr>
<td>Marginal</td>
<td>High</td>
<td>High</td>
<td>Serious</td>
<td>Medium</td>
<td>Low</td>
</tr>
<tr>
<td>Negligible</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Low</td>
<td>Low</td>
</tr>
</tbody>
</table>

Based on the company policy and the analysis of historical data, VRT has made the following determinations regarding risk acceptance.

<table>
<thead>
<tr>
<th>Hazard Risk Index</th>
<th>Criteria by Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td>Unacceptable</td>
</tr>
<tr>
<td>Serious</td>
<td>Undesirable (management decision)</td>
</tr>
<tr>
<td>Medium</td>
<td>Acceptable with Management Review</td>
</tr>
<tr>
<td>Low</td>
<td>Acceptable without Management Review</td>
</tr>
</tbody>
</table>

The Chief Safety Officer schedules safety risk assessment activities on the Safety Committee agenda and prepares a Safety Risk Assessment Package. This package is distributed at least one week in advance of the Safety Committee meeting. During the meeting, the Chief Safety Officer reviews the hazard and its consequence(s) and reviews available information distributed in the Safety Risk Assessment Package on severity and likelihood. The Chief Safety Officer may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the Chief Safety Officer will facilitate completion of relevant sections of the Accident/Incident Analysis Workbook, using the CT Safety Risk Assessment Matrix, with the Safety Committee. The Chief Safety Officer will document the Safety Committee’s safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Accident/Incident Analysis Workbook. The Chief Safety Officer will maintain a file on Safety Committee agendas, Safety Risk Assessment Packages, additional information collection,
and the completed Accident/Incident Analysis Workbook for a period of three years from the date of generation.

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

Prioritization of safety risk mitigations is based on the results of safety risk assessments. The Chief Safety Officer tracks and updates safety risk mitigation information in the Accident/Incident Analysis Workbook and makes the Workbook available to the Safety Committee during monthly meetings and to VRT staff upon request. In the Accident/Incident Analysis Workbook, the Chief Safety Officer will also document any specific measures or activities, such as reviews, observations, or audits, that will be conducted to monitor the effectiveness of mitigations once implemented. The follow-up actions will be implemented as follows.

- **Unacceptable:** The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development.

- **Undesirable:** A hazard at this level of risk must be mitigated unless the Executive Director and Chief Safety Officer issues a documented decision to manage the hazard until resources are available for full mitigation.

- **Acceptable with Review:** The Executive Director and Chief Safety Officer must determine if the hazard is adequately controlled or mitigated as is.

- **Acceptable without Review:** The hazard does not need to be reviewed by the management team and does not require further mitigation or control.
CHAPTER 6: SAFETY ASSURANCE

Safety Performance Monitoring and Measurement

Through our Safety Assurance process, VRT, in coordination with contractors:

- evaluate compliance with operations and maintenance procedures to determine whether existing rules and procedures are sufficient to control safety risk;
- assess the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;
- investigate safety events to identify causal factors; and
- analyze information from safety reporting, including data about safety failures, defects, or conditions.

Safety Performance Monitoring and Measurement

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

- Safety audits
- Informal inspections
- Regular review of onboard camera footage to assess drivers and specific incidents
- Safety surveys
- Employee Safety Reporting Program
- Investigation of safety occurrences
- Safety review prior to the launch or modification of service
- Data gathering and monitoring of data related to the delivery of service
- Regular vehicle inspections and preventative maintenance

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the Safety Risk Management process for reevaluation by the Safety Committee. This information is also utilized to impact operational and budget decisions.

Monitoring for Ineffective, Inappropriate, or Unimplemented Safety Risk Mitigations

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

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities. The Chief Safety Officer will endeavor to make use of existing processes and activities before assigning new information collection activities.
The Chief Safety Officer and Safety Committee review the performance of individual safety risk mitigations during monthly Safety Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the Safety Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution.

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

- reviewing results from accident, incident, and occurrence investigations;
- monitoring employee safety reporting;
- reviewing results of internal safety audits and inspections; and
- analyzing operational and safety data to identify emerging safety concerns.

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

**Investigations**

Any occurrence involving a passenger, while under the care, custody and control of VRT or a contracted operator, is considered an incident. Any contact between a VRT vehicle and another person, vehicle or object is considered an incident, whether or not there was damage or injury.

All VRT or contractor incidents, regardless of severity will be investigated by the Specialized Transit Coordinator or contractor staff. The investigation will include law enforcement assistance, if needed, photos, accident report, fault determination, incident tracking and retraining when necessary.

VRT or contractors maintain documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event. The Specialized Transportation Coordinator or contractor staff maintain all documentation of the investigation policies, processes, forms, checklists, activities, and results. The Specialized Transportation Coordinator or contractors are expected to document the following information for each incident:

- The accident was preventable or non-preventable
- Personnel require discipline or retraining
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.
SAFETY INVESTIGATIONS
VRT has a “zero” tolerance for preventable injuries and collisions. Elimination of preventable injuries and collisions is our number one goal. Contractors are expected to follow VRT requirements for safety event investigations.

VRT maintains documented procedures for conducting safety investigations of events to find causal and contributing factors and review the existing mitigations in place at the time of the event.

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

Monthly staff meetings are held to discuss concerns and progress in the area of safety and safety related concerns. Recommendations are considered, and necessary changes implemented. All complaints are addressed immediately and reviewed monthly.

Safety Committee

- Consists of, at minimum, Chief Safety Officer and relevant safety staff (as applicable).
- Discussion include:
  - Review of safety related accidents and incidents to determine culpability
  - Identify the causes associated with each event
  - Develop mitigation measures to reduce the risk of events occurring in the future
  - Review of policy and procedures
  - Training
  - Safety awareness

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

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

CHAPTER 7: SAFETY PROMOTION

Competencies and Training
The education and training programs at VRT and with contractors is a highly regimented and professionally developed program built around a curriculum featuring learning opportunities in knowledge and skills. This training applies to all employees directly responsible for safety, including:

- Operations
  - Contracted vehicle operators
  - Contracted dispatchers
  - Contracted maintenance technicians
Contracted manager and supervisors

- Agency leadership
- Chief Safety Officer
- Accountable Executive

Upon hire, all new employees will receive an orientation to include review of policies and procedures. Continuing training for all employees will occur at regular intervals to promote a high degree of safety, skill, performance, and morale. Retraining may be required following a leave of absence or if the need is otherwise determined by an employee’s supervisor.

Various delivery mechanisms for driver training, such as classroom, multimedia presentations, closed course, observation, and behind-the-wheel-skills building are used to support the learning process. Learning is evaluated through written quizzes, driving tests, observation, and customer service evaluations.

Basic training requirements for VRT employees and contractors, including refresher training, are documented in the VRT Operator Handbook, a Transit Management Service Agreement or the VRT Subrecipient/Contractor Monitoring and Oversight Procedures.

Operations safety related training includes:

- New Hire training for contracted vehicle operators
- Refresher training for contracted vehicle operators
- Retraining for contracted vehicle operators
- Classroom and on the job training for dispatchers
- Ongoing skill training for contracted maintenance technicians and supervisors
- Ongoing vehicle maintenance training for contracted maintenance technicians
- OSHA standards for contracted vehicle maintenance technicians and supervisors
- Accident investigation training for contracted vehicle maintenance supervisors
- Ongoing hazardous material training for contracted vehicle maintenance technicians and supervisors
- Ongoing maintenance training provided by vendors
- Classroom and on the job training for contracted operations supervisors and managers
- Reasonable suspicion determination and reporting training for contracted operations supervisors and managers
- Accident investigation training for contracted operations supervisors and managers

Agency leadership safety related training includes:

- Classroom and on the job training for coordinators
- SMS Awareness online training for coordinators and managers
- Accident investigation training for coordinators and managers

The Chief Safety Officer will be trained, at minimum, in
- Reasonable Suspicion Determination and Reporting
- OSHA requirements

VRT's Accountable Executive, agency leadership and Chief Safety Officer must complete FTA's SMS Awareness online training.

**Safety Communication**

**Safety Awareness Programs**

VRT’s Chief Safety Officer will coordinate safety communication as follows:

- Communicate information on safety and safety performance in monthly staff reports. VRT’s Compliance Officer posts safety bulletins and flyers on the bulletin boards located on all administrative bulletin boards. Contractors are asked to post bulletins and flyers in common areas for bus operators and maintenance technicians, advertising safety messages and promoting awareness of safety issues.
- As part of new-hire training, safety policies and procedures are provided to all contracted vehicles operators. Contractors are required to provide company required policies and procedures to newly hired vehicle operators. For newly emerging issues or safety events at the agency, the Chief Safety Officer issues memos or messages to employees that are reinforced by supervisors, coordinators or contractors.
- Provide targeted communications to inform employees or contractors of safety actions, which include handouts, flyers, updates to bulletin boards, or one-on-one discussions between employees, supervisors, and contractors.

**Safety Awareness Programs:**

Establishing and maintaining a culture that demands safe behavior at all time is at the core of VRT’s safety plan. This is done, in part, by providing a regular flow of positive information and recognizing those who are performing safely.

This program inspires safe behavior among employees at all levels by:

- Generating system-wide participation in safety issues through positive reinforcement
- Encouraging all employees to “take ownership” for safety results
- Communicating safety policies, procedures and processes
- Engaging executives and managers at all levels, encouraging their active participation in safety management and communication
- Sharing safety results at the individual, departmental, and project levels by celebrating success stories
CHAPTER 8: ADDITIONAL INFORMATION

Supporting Documentation

Numerous standard operating procedures (SOPs), in addition to those mentioned in this plan, have been developed and incorporated into operational practices at VRT. Documents are maintained for three years after they are created and are made available upon request by FTA or ITD-PT.

The SOPs have been designed to create operational consistency, increase awareness of risks and hazards, and provide easily duplicated processes for identifying and mitigating the risks associated with providing transit services.

Definitions of Terms

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

- **Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

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

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

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

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

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

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

- **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
- **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
- **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time-period required by the FTA.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- **Safety Assurance** means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
- **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- **Safety performance target** means a performance target related to safety management activities.
- **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
- **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Management** means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Serious injury** means any injury which:
  
  (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when the injury was received;
  
  (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
  
  (3) Causes severe hemorrhages, nerve, muscle, or tendon damage;
  
  (4) Involves any internal organ; or
(5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

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

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Word or Phrase</th>
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<tbody>
<tr>
<td>CSO</td>
<td>Chief Safety Officer</td>
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<tr>
<td>FTA</td>
<td>Federal Transit Administration</td>
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<td>GM</td>
<td>General Manager</td>
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<tr>
<td>ITD</td>
<td>Idaho Transportation Department</td>
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<td>ITD-PT</td>
<td>Idaho Transportation Department Public Transportation Office</td>
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<tr>
<td>OSHA</td>
<td>Occupational Safety &amp; Health Administration</td>
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<tr>
<td>SMS</td>
<td>Safety Management System</td>
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<td>SOP</td>
<td>Standard Operating Procedure</td>
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<td>VRM</td>
<td>Vehicle Revenue Miles</td>
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<td>VRT</td>
<td>Valley Regional Transit</td>
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I have received and reviewed the Public Transportation Agency Safety Plan.

Name: _______________________________________

Signature: ______________________________ Date: ___________________

Title: ________________________________