



BOARD OF DIRECTORS REPORT

MEETING DATE: SEPTEMBER 7, 2021 **AGENDA ITEM: #7**
DEPARTMENT: RISK
TYPE: ACTION ITEM
PREPARED BY: MARY GREGG _____
Signature
REVIEWED BY: JERRY ESTRADA _____
Signature
SUBJECT: APPROVAL OF PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

RECOMMENDATION:

Staff recommends the Board approve MTD's Public Transportation Agency Safety Plan.

BACKGROUND:

In 2018, the Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) Final Rule, 49 Code of Federal Regulations Part 673. The PTASP rule requires certain operators of public transportation systems that receive federal funds under FTA's Section 5307 Urbanized Area Formula Grants, to develop an Agency Safety Plan (ASP) that includes the processes and procedures to implement Safety Management Systems (SMS). SMS is comprised of the data driven processes the agency uses to proactively manage risks of our transportation system. SMS is intended to reduce safety events through making safety everyone's responsibility. MTD has rigorous safety programs previously established that meet local, state and Federal compliance regulations which are included in the ASP and address SMS.

- The PTASP rule became effective on July 19, 2019.
- FTA published a Notice of Enforcement Discretion on April 22, 2020 effectively extending the PTASP compliance deadline from July 20, 2020 to December 31, 2020.
- MTD's Board of Directors adopted MTD's ASP on November 3, 2020.
- MTD self-certified the ASP through the FTA Certifications and Assurances on December 3, 2020.
- FTA published a second Notice of Enforcement Discretion on December 11, 2020 effectively extending the PTASP compliance deadline to July 20, 2021.

DISCUSSION:

The Public Transportation Agency Safety Plan (PTASP) rule requires applicable transit agencies to conduct an annual review of their Agency Safety Plan (ASP), and the agency's governing body approve the ASP. Staff has completed review of MTD's ASP utilizing Federal Transit Administration's (FTA) recommendation to consider the following three questions to determine whether the contents of the ASP required revisions:

BOARD OF DIRECTORS REPORT

1. Does our ASP address all relevant requirements in the PTASP regulation?
2. Does our ASP reflect our organization and transit system as it operates today?
3. Are the activities and processes described in our ASP suitable to manage safety at our transit agency?

The answer to all three questions was yes, and resulted in no significant changes to the ASP. Only minor changes were made to update a title change and confirm the annual review scheduled as every July following this initial review, to keep in timing with the FTA Certifications and Assurances process. These changes are reflected in the ASP on page 6, section Agency Safety Plan Version Number and Updates.

ATTACHMENT:

- MTD Public Transportation Agency Safety Plan Version 2.0

MTD PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

The mission of Santa Barbara Metropolitan Transit District is to enhance the mobility of South Coast residents, commuters, and visitors by offering safe, appealing, equitable, environmentally responsible, and fiscally sound transit service.



Public Transportation Agency Safety Plan

Table of Contents

1. DEFINITION OF TERMS USED IN THE AGENCY SAFETY PLAN	2
2. COMMONLY USED ACRONYMS	3
3. PUBLIC TRANSPORTATION AGENCY SAFETY PLAN OVERVIEW	4
4. TRANSIT AGENCY INFORMATION	5
5. PLAN DEVELOPMENT, APPROVAL, AND UPDATES	6
6. SAFETY PERFORMANCE TARGETS	7
7. SAFETY MANAGEMENT POLICY	7
8. SAFETY RISK MANAGEMENT	12
9. SAFETY ASSURANCE	15
10. SAFETY PROMOTION	17
11. ADDITIONAL INFORMATION	18

1. Definition of Terms Used in the Agency Safety Plan

Santa Barbara Metropolitan Transit District incorporates all of the Federal Transit Administration'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; an evacuation for life safety reasons.
- **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the Agency Safety Plan, in accordance with 49 U.S.C. § 5329(d), and the Transit Asset Management Plan, in accordance with 49 U.S.C. § 5326, of said public transportation agency.
- **Agency or transit agency** means Santa Barbara Metropolitan Transit District, located at 550 Olive Street, Santa Barbara, CA 93101, an operator of a public transportation system.
- **Agency Safety Plan** means the documented comprehensive Public Transportation Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- **Board of Directors** means governing body of Santa Barbara Metropolitan Transit District.
- **Chief Safety Officer** means the adequately trained individual who has responsibility for safety and reports directly to the transit agency's Accountable Executive.
- **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 the 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.
- **Part 673** means 49 CFR Part 673.
- **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
- **Public Transportation Agency Safety Plan** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk mitigation** means a method or methods to eliminate or reduce the effects of hazards.

- **Safety Assurance** means processes within the transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Management Policy** means the transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
- **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS is a continuous improvement process that 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 the transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Management** means a process within the transit agency's ASP 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 seven 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 five percent of the body surface.
- **State of Good Repair** means the condition in which a capital asset is able to operate at a full level of performance.
- **Transit Agency** means an operator of a public transportation system.
- **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.

2. Commonly Used Acronyms

Acronym	Word or Phrase
ADA	American's with Disabilities Act of 1990
AE	Accountable Executive
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
BOD	Board of Directors
Caltrans	California Department of Transportation
CSO	Chief Safety Officer
CFR	Code of Federal Regulations
DOT	Department of Transportation

ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SBCAG	Santa Barbara County Association of Governments
SBMTD	Santa Barbara Metropolitan Transit District
SGR	State of Good Repair
SMP	Safety Management Policy
SMS	Safety Management System
SPT	Safety Performance Target
SRM	Safety Risk Management
U.S.C.	United States Code
VRM	Vehicle Revenue Miles
VTT	Verification of Transit Training

3. Public Transportation Agency Safety Plan Overview

Public Transportation Agency Safety Plan
<p>On July 19, 2018, the Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) Rule. The rule applies to all operators of public transportation systems that are recipients and subrecipients of federal financial assistance under the Urbanized Area Formula Program (49 U.S.C. § 5307). The rule requires these transit operators to develop an Agency Safety Plan (ASP) that include the processes and procedures to implement Safety Management System (SMS). FTA has adopted the principles and methods of SMS as the basis for enhancing the safety of public transportation in the United States.</p> <ul style="list-style-type: none"> • The Rule 49 CFR Part 673 became effective on July 19, 2019. • FTA published a Dear Colleague letter on July 19, 2019, to alert the transit industry of the July 20, 2020 safety compliance deadline. • FTA published a Notice of Enforcement Discretion on April 22, 2020, effectively extending the compliance deadline to December 31, 2020 due to the COVID-19 pandemic. <p>SBMTD developed the contents of our Agency Safety Plan to meet all requirements specified in 49 CFR Part 673. SBMTD's ASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.</p> <p>The Agency Safety Plan is based on the four principles or pillars of the Safety Management System (SMS). SMS is defined as the formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety mitigations. It includes systematic policies, procedures, and practices for the management of safety risk.</p>

The four principles or pillars of SMS are: (1) Safety Management Policy; (2) Safety Risk Management; (3) Safety Assurance; and (4) Safety Promotion.

SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to control risk better, detect and correct safety concerns earlier, share and analyze safety data more effectively, and measure safety performance more efficiently. SBMTD's SMS focuses on applying resources to risk and is based on ensuring that the agency has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources. The SMS processes in the ASP are for SBMTD's directly operated fixed route bus service.

Key components of SBMTD's SMS include:

- Strong executive safety leadership;
- Defined roles and responsibilities;
- Formal safety accountabilities and communications;
- Effective policies and procedures; and
- Active employee involvement

SBMTD monitors the contractor providing its ADA/Paratransit service to ensure they are following their SMS as referenced in Appendix A. Contractor's Agency Safety Plan was developed in coordination with SBMTD and meets all requirements specified in 49 CFR Part 673.

4. Transit Agency Information

Transit Agency Name	Santa Barbara Metropolitan Transit District		
Transit Agency Address	550 Olive Street, Santa Barbara, CA 93101		
Name and Title of Accountable Executive	Jerry Estrada, General Manager		
Name of Chief Safety Officer	Mary Gregg, Interim Chief Operating Officer		
Mode(s) of Service Covered by This Plan	Fixed Route Bus	List All FTA Funding Types (e.g., 5307, 5337, 5339)	5307, 5339
Mode(s) of Service Provided by the Transit Agency	Directly Operated Fixed Route Bus; Contracted ADA/Paratransit Service		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Description of Arrangement(s) N/A
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	N/A		

5. Plan Development, Approval, and Updates

Name of Person Who Drafted This Plan	Mary Gregg, Interim Chief Operating Officer / Chief Safety Officer	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		August 31, 2021
Approval by the Board of Directors or an Equivalent Authority	Name of Entity That Approved This Plan	Date of Approval
	SBMTD Board of Directors	September 7, 2021
	Relevant Documentation (Title and Location)	
Board agenda and meeting minutes reflecting approval is maintained on file by SBMTD's Chief Safety Officer.		
Certification of Compliance	Name of Entity That Certified This Plan	Date of Certification
	Santa Barbara Metropolitan Transit District	December 3, 2020
	Relevant Documentation (Title and Location)	
	Federal Fiscal Year 2020 Certifications and Assurances, on file at SBMTD's administrative office	

Agency Safety Plan Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1.0	All Pages	New Document	12/03/2020
2.0	5, 6	Staff title change, Annual Review timeline	09/07/2021

Annual Review and Update of the Agency Safety Plan
<p>This plan will be reviewed and updated by the Chief Safety Officer no less than annually by July 20 in perpetuity. All Agency Safety Plan updates shall be signed by the Accountable Executive and approved by SBMTD's Board of Directors.</p> <p>SBMTD updates this ASP when information, processes or activities change within the agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. Data collected by SBMTD through its Safety Risk Management and Safety Assurance processes is shared with the State Department of Transportation, and the local Metropolitan Planning Organization.</p>

6. Safety Performance Targets

Safety Performance Targets							
<p>Safety Performance Targets (SPTs) are specific numerical targets set by SBMTD based on safety performance measures under the <i>National Public Transportation Safety Plan</i> for: (1) Fatalities, (2) Injuries, (3) Safety Events, and (4) System Reliability (State of Good Repair). Rates for the safety performance targets are calculated by SBMTD per 100,000 vehicle revenue miles (VRM) based on a five-year average from 2015-2019 of SBMTD's reportable data to the National Transit Database (NTD).</p>							
Mode of Transit Service	Fatalities (Total)	Fatalities (Rate)	Injuries (Total)	Injuries (Rate)	Safety Events (Total)	Safety Events (Rate)	System Reliability
Fixed Route Bus	0.6	0.02	2.4	0.09	3.0	0.12	8,000
ADA/Paratransit	0	0	1	0.04	4.0	0.17	50,000

Safety Performance Target Coordination		
<p>SBMTD's Accountable Executive shares our ASP, including safety performance targets, with the Metropolitan Planning Organization (MPO) in our service area each year after its formal adoption by the Board of Directors. MTD's Chief Safety Officer also provides a copy of our formally adopted plan to the State Department of Transportation. MTD personnel are available to coordinate with both agencies in the selection of each agency's safety performance targets upon request.</p>		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	California Department of Transportation, Division of Rail and Mass Transportation (Caltrans)	11/03/2020
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Santa Barbara County Association of Governments (SBCAG)	11/03/2020

7. Safety Management Policy

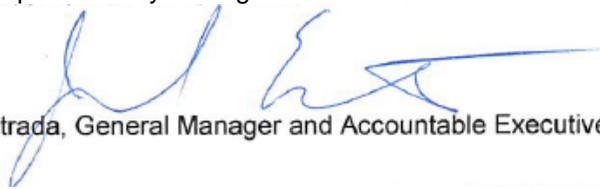
Safety Management Policy
<p>The first component of SBMTD's Safety Management System is Safety Management Policy, which is the foundation the agency's SMS. It states the agency's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish these safety objectives.</p>

Safety Management Policy Statement

Safety is Santa Barbara Metropolitan Transit District's number one priority. We educate, encourage, and endorse a strong culture of safety at every level of the organization. We value the responsibility entrusted in us by the communities that we serve. SBMTD is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our customers, employees, and the public. The agency's overall safety objective is to proactively manage safety hazards and their associated safety risk to achieve the highest level of safety performance, meeting and exceeding established standards for our industry.

All levels of management, employees and contractors are accountable for the delivery of the highest level of safety performance. Our commitment is to:

- **Communicate** the purpose and benefits of the Safety Management System (SMS) to all employees, reaffirming that responsibility for making our operations safer for everyone lies with all employees;
- **Provide** all employees with appropriate safety information and training, to ensure they are competent in safety matters, and assigned only tasks commensurate with their duties and skills;
- **Establish** an effective Employee Safety Reporting Program (ESRP) that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team;
- **Support** a culture of open reporting of all safety concerns, to ensure that no action will be taken against any employee who discloses a safety concern through the ESRP, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- **Identify** hazardous and unsafe work conditions, thoroughly analyzing data from the ESRP, and then developing procedures to mitigate safety risk to an acceptable level;
- **Establish** and measure our safety performance against realistic and data-driven safety performance indicators and safety performance targets.
- **Continually** improve our safety performance through management processes that ensure appropriate safety management action is taken and is effective.



Jerry Estrada, General Manager and Accountable Executive

Safety Management Policy Communication

The Safety Management Policy is communicated throughout the agency, to all employees, managers, and executives, as well as contractors, and to SBMTD's Board of Directors. This is accomplished through various processes, such as:

- New Hire Onboarding – Safety orientation for all new employees regardless of their classifications; training about their roles and responsibilities pertaining to PTASP and the principles of SMS.
- Workshops/training sessions – Conducted for executives, department managers, and supervisors; Verification of Transit Training for bus operators; toolbox safety meetings.
- Safety Communication Board – Newsletters and safety information posted in employee work locations throughout the agency; email blasts to staff, and/or safety committee meetings.

(Signature)

Jerry Estrada, General Manager and Accountable Executive

Authorities, Accountabilities, and Responsibilities

<p>Accountable Executive</p>	<p>The General Manager serves as Santa Barbara Metropolitan Transit District's Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Controls and directs human and capital resources, to support asset management and capital investments needed to develop and maintain SBMTD's Agency Safety Plan and Safety Management System. • Ensures safety concerns are considered and addressed in the agency's ongoing budget planning process. • Designates an adequately trained Chief Safety Officer who is a direct report. • Ensures that the agency's SMS is effectively implemented throughout the organization and safety policy is appropriately communicated throughout the agency. • Ensures action is taken, as necessary, to address substandard performance in the agency's SMS. • May delegate specific responsibilities, but responsibility for carrying out the ASP and SMS, and ultimate accountability for SBMTD's safety performance, rests with the AE. • Maintains responsibility for carrying out the Transit Asset Management Plan.
<p>Chief Safety Officer or SMS Executive</p>	<p>The Accountable Executive designated the Director of Human Resources and Risk as SBMTD's Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Develops the ASP and SMS policies and procedures. • Authority and responsibility for day-to-day implementation and operation of the agency's SMS. • Manages the Employee Safety Reporting Program. • Chairs the SBMTD Safety Committee and <ul style="list-style-type: none"> ○ Coordinates the activities of the committee; ○ Establishes and maintains the agency's Safety Risk Register and Safety Event Log; and ○ Maintains and distributes minutes of committee meetings. • Briefs the Accountable Executive on SMS progress and status. • Identifies substandard performance in SBMTD's SMS and develops action plans for approval by the AE. • Ensures policies are consistent with the agency's safety objectives. • Provides Safety Risk Management expertise and support for other SBMTD personnel who conduct and oversee Safety Assurance activities.

<p>Agency Leadership and Executive Management</p>	<p>Agency Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of SBMTD’s SMS under this plan. These personnel include the Director of Finance and Administration, Operations Manager, Fleet and Facilities Manager, Planning and Marketing Manager, and Human Resources Manager. They have the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Oversees day-to-day operations of the SMS and communicates safety accountability and responsibility in their departments. • Supports implementation of the SMS throughout the organization. • Ensures employees in their department are following safety rules and regulations in performing their jobs, and their specific roles and responsibilities in the implementation of this Agency Safety Plan and SMS. • Modifies policies in their departments consistent with implementation of the SMS, as necessary. • Completes training on SMS and the ASP elements. • Provides subject matter expertise to support implementation of the SMS as requested by the AE or the CSO, including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness. • Replaces aging facilities, equipment, and infrastructure. • Participates as members of SBMTD’s Safety Committee as assigned.
<p>Key Staff</p>	<p>The agency Key Staff may include managers, supervisors, specialists, analysts, database administrators and other key employees who are performing highly technical work and overseeing employees performing critical tasks and providing support in the implementation of the ASP and SMS principles in various departments throughout the agency. These personnel include, but are not limited to, Superintendent of Maintenance, Assistant Superintendent of Maintenance, Fleet Maintenance Supervisor, Superintendent of Operations, Operations Safety and Training Administrator, Risk Administrator. Key Staff responsibilities include:</p> <ul style="list-style-type: none"> • Supports implementation of the SMS throughout the organization. • Promotes safety in employee’s respective area of responsibilities and compliance with agency rules and procedures and regulatory requirements. • Ensures employees are complying with the safety reporting program. • Ensures safety of passengers, employees and the public. • Develops and maintains programs to gather pertinent data elements to develop safety performance reports and conduct useful statistical analyses to identify trends and system performance targets. • Establishes clear lines of safety communication and hold accountability for safety performance • Maintains aging facilities, equipment, and infrastructure. • Assists as subject matter experts in safety risk assessment and safety risk mitigation processes.

Employee Safety Reporting Program

The purpose of an Employee Safety Reporting Program (ESRP) is to establish a system for all employees who identify unsafe conditions or hazards in their day-to-day duties to report them to department and executive management in good faith without fear of reprisal.

The ESRP is intended to help the Accountable Executive, Chief Safety Officer, and other executive management get important safety information from across the transit agency.

SBMTD has implemented a process that allows and encourages its employees to report safety conditions through verbal reporting to supervisors and management, paper forms such as accident/incident reports, safety meetings and toolbox talks, and local union representation.

Some examples of voluntary information typically reported include:

- Safety concerns in the operating environment;
- Policies and procedures that may not be working as intended;
- Events that managers might not otherwise know about; and
- Information about why a safety event occurred.

SBMTD's Chief Safety Officer or designee reviews reported safety conditions and documents safety conditions in the Safety Risk Register.

The CSO will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through the agency's Safety Risk Management (SRM) process and that reported deficiencies and non-compliance with rules or procedures are managed through the agency's Safety Assurance process. Findings will be published following mitigation actions, and presented through meetings throughout the year such as those held for Operations Supervisors and VTT for Bus Operators, for example.

Employees may report safety concerns anonymously. If the reporting employee provided his or her name during the reporting process, the CSO or designee follows up directly with the employee when SBMTD determines what action, if necessary, is to be taken and after any mitigations are implemented.

All employees have the obligation to report immediately any unsafe conditions or hazards to their immediate supervisor/department manager and may do so without fear of reprisal. Further, SBMTD encourages participation in the ESRP by protecting employees that report safety conditions in good faith. However, if the report reveals any of the following, SBMTD may take disciplinary action for:

- Willful participation in or conduct of an illegal act;
- Gross negligence, deliberate or willful disregard of regulations or procedures, including reporting to work under the influence of controlled substances;
- Physical assault of a co-worker, passenger, vendor or any member of the public;
- Theft of agency property;
- Unreported safety events, unreported collisions, and unreported passenger injuries or fatalities;
- Or violation of agency Code of Conduct and employment policies.

8. Safety Risk Management

Safety Risk Management Process

The second component of SMS is Safety Risk Management, which includes the following activities: (1) Safety Hazard identification, (2) Safety Risk Assessment, and (3) Safety Risk Mitigation. SRM is the primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to SBMTD's leadership. SBMTD's SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary. SBMTD's SRM process applies to all elements of our system including our operations and maintenance; facilities and vehicles; and personnel recruitment, training, and supervision. In carrying out the SRM process, SBMTD uses the following terms:

- **Event** – Any accident, incident, or occurrence.
- **Hazard** – Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure belonging to SBMTD; or damage to the environment.
- **Risk** – Composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk Mitigation** – Method(s) to eliminate or reduce the effects of hazards.
- **Consequence** – An effect of a hazard involving injury, illness, death, or damage to SBMTD property or the environment.

(1) Safety Hazard Identification

The safety hazard identification process offers SBMTD 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 but not limited to:

- Employee Safety Reporting Program (ESRP);
- Review of vehicle camera footage and/or property footage;
- Review of monthly performance data and safety performance targets;
- Observations from supervisors;
- Maintenance reports;
- Comments from customers, passengers, vendors, and third parties;
- Safety Committee, Drivers, Maintenance, and 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.

When a safety hazard has been identified, whatever the source, it is reported to the Chief Safety Officer through the procedures established and identified throughout this Agency Safety Plan. The CSO enters the information into the Safety Event Log. The CSO will conduct further analyses of hazards to collect information and identify additional consequences, 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, 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.

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 that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or California State environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further SRM activity.

(2) Safety Risk Assessment

SBMTD assesses safety risk associated with identified safety hazards using its safety risk assessment process. Safety risk assessment defines the level or degree of the safety risk by assessing the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk.

The following matrix, adopted from the TSI Participation Guide – SMS Principles for Transit, facilitates the ranking of hazards based on their probability of occurrence and severity of their outcome. The measuring goes from A to F with A being frequent or likely to occur frequently, E being improbable and F being used when potential hazards are identified and later eliminated.

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

The Safety Risk Severity presents a typical safety risk denoting the level of severity of the occurrence of a consequence. Hazard severity is a subjective measure of the worst credible mishap resulting from personnel error, environmental conditions, design inadequacies and/or procedural efficiencies for system, subsystem or component failure or malfunction. Severity is ranked as shown below:

Safety Risk Severity Levels Table		
Level	Description	Mishap Result Criteria
1	Catastrophic	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M
2	Critical	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M
3	Marginal	Could result in one or more of the following: injuries or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100k but less than \$1M
4	Negligible	Could result in one or more of the following: injuries or occupational illness not resulting in lost work day, minimum environmental impact, or monetary loss less than \$100k.

Safety Risk Probability and Safety Risk Severity are combined into the Safety Risk Index Ranking to help prioritize safety risks according to the table below.

Safety Risk Index Ranking		
1A, 1B, 1C, 2A, 2B	High	Unacceptable
1D, 2C, 3A, 3B	Serious	Undesirable - with management decision required
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B,	Medium	Acceptable - with review by management
4C, 4D, 4E	Low	Acceptable - without review

Safety Risk Assessment Matrix				
Severity → Probability ↓	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
A-Frequent	1A	2A	3A	4A
B- Probable	1B	2B	3B	4B
C-Occasional	1C	2C	3C	4C
D- Remote	1D	2D	3D	4D
E- Improbable	1E	2E	3E	4E
F- Eliminated				

The Chief Safety Officer documents recommendations regarding hazard rating and mitigation options and reports this information to the Accountable Executive, including assessment activities outcomes documented from Safety Committee meetings. During Safety Committee meetings, the CSO reviews the hazard and its consequence(s) and reviews available information distributed to the committee on severity and likelihood. The CSO may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment. All Safety Committee risk assessment outcomes will be documented and maintained by the CSO for a period of three years from the date of generation.

(3) Safety Risk Mitigation

The Chief Safety Officer, assisted by Key Staff subject matter experts, reviews current safety risk mitigations and establishes procedures to 1) eliminate; 2) mitigate; 3) accept specific risks. Prioritization of safety remediation measures is based on risk analysis and a course of action acceptable to SBMTD management. The safety risk must be mitigated if ranked as Unacceptable (High-Red). Those safety risks that have been mitigated, even those mitigated risks shown as Acceptable status (Low-Green), undergo regular and consistent monitoring to ensure the mitigation strategy is effective.

Key strategies to minimize the types of risks that potentially exist include:

- Development and deployment of policies and procedures that address known hazards and risks,
- Discussion of other actions, strategies and procedures that might help safeguard against unknown/unforeseen risks,
- Training of drivers and other agency staff on all safety policies and procedures,
- Training of drivers and other agency staff on methodologies for handling emergencies, and
- Training of drivers and staff on proper and effective use of emergency equipment and communication technologies and protocol.

Safety risk mitigations are tracked and updated in the Safety Event Log by the Chief Safety Officer.

9. Safety Assurance

Safety Assurance

The third component of SBMTD's SMS is Safety Assurance, which ensures the performance and effectiveness of safety risk controls established under safety risk management. Through our Safety Assurance process, SBMTD:

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

Safety Performance Monitoring and Measurement

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

- Safety audits,
- Informal inspections,
- Regular review of onboard camera footage to assess drivers and specific incidents,
- Safety surveys,
- ESRP,
- Investigation of safety occurrences,
- Safety review prior to the launch or modification of any facet of service,

- Daily data gathering and monitoring of data related to the delivery of service, and
- Regular vehicle inspections and preventative maintenance.

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

SBMTD monitors the agency's operations identifying safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended through:

- 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.

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 SBMTD processes and activities before assigning new information collection activities.

SBMTD's CSO reviews the performance of individual safety risk mitigations, based on the reporting schedule determined for each mitigation, and determines if a specific safety risk mitigation is not implemented or performing as intended. Such reviews may be included as a function of the Safety Committee. If the mitigation is not implemented or performing as intended, a proposed course of action to modify the mitigation or take other action to manage the safety risk is determined by the Safety Committee, and/or Key Staff subject matter experts, and the CSO will approve or modify this proposed course of action and oversee its execution.

SBMTD also conducts investigations of safety events, to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established by California Department of Motor Vehicles, including accident reporting requirements under California Vehicle Code §16002 subdivision (a) and subdivision (b).

The Chief Safety Officer maintains all documentation of SBMTD's investigation policies, processes, forms, checklists, activities, and results, and records of any report filed with FTA and/or DMV.

In the event that an incident and/or accident has been determined by the CSO to be preventable, SBMTD will include processes outlined in a Collective Bargaining Agreement for employees represented by a union, in so much as language in the CBA does not conflict with FTA legal requirements under PTASP and as so indicated in this Agency Safety Plan.

The Chief Safety Officer routinely reviews information reported through all internal safety reporting programs (e.g., safety data captured in employee incident/accident reports, safety meeting minutes, customer complaints, and other safety communication channels). When necessary, the CSO ensures that the issues and concerns are investigated or analyzed through the SRM process.

The Chief Safety Officer also analyzes internal and external reviews, including audits and assessments, with findings affecting the agency's safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations. The CSO discusses relevant safety issues and concerns with the Accountable Executive and executive management and documents the results of these reviews in the Safety Event Log.

10. Safety Promotion

Safety Promotion

The fourth component of SBMTD's SMS is Safety Promotion, which includes a combination of training and communication of safety information to employees to enhance the agency's safety performance. There are two parts to Safety Promotion: Competencies and Training; and Safety Communication. Together, these set the tone for the SMS and helps to establish and maintain a robust safety culture.

Competencies and Training

SBMTD's comprehensive safety training program applies to all SBMTD employees directly responsible for safety and the agency dedicates resources to conduct safety training, as well as training on SMS roles and responsibilities.

All Employees, understanding of:

- Safety Performance Targets
- Fundamental principles of SMS
- Employee Safety Reporting Program
- Their individual roles and responsibilities under SMS

Managers and Supervisors, understanding of:

- Safety Risk Management
- Safety Assurance
- Safety Promotion
- Their individual roles and responsibilities for SMS

Executive Management, understanding of:

- Management commitment to and support of all SMS activities.

All employees are required to acquire the competencies and knowledge for consistent application of their skills as they relate to safety performance objectives. SBMTD dedicates resources to conduct effective safety-related skill training, the scope of which, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS.

Operations safety-related skill training includes the following:

- New-hire bus operator classroom, behind the wheel, and in-service skill training,
- Bus operator refresher training, and annual ride-check/in-service evaluation,
- Bus operator new bus type familiarization training,
- Bus operator retraining (recertification or return to work),
- Classroom and on-the-job training for operations supervisors and managers
- Accident investigation training for operations supervisors and managers.

Vehicle maintenance safety-related skill training includes the following:

- New-hire Commercial Drivers' License classroom and behind the wheel skill training,
- Ongoing mechanic skill training and mechanic supervisor training,
- Ongoing training for all maintenance personnel, to include Heat Illness Training, Hazard Communications, PPE, High Voltage Safety and Fall Protection,
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
- Training provided by vendors.

SBMTD's Accountable Executive and Agency Leadership and Executive Management team must complete FTA's SMS Awareness online training, and Transportation Safety Institute training as assigned by the Chief Safety Officer.

Safety Communication

SBMTD's Chief Safety Officer and the Human Resources and Risk Department coordinate safety communication activities for the SMS. SBMTD's activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- i. Communicating safety and safety performance information throughout the agency
- ii. Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency
- iii. Informing employees of safety actions taken in response to reports submitted through the ESRP

Ongoing safety communication is critical and SBMTD ensures communication occurs up, down, and across all levels of the organization. Any lessons learned are communicated to all concerned. Management commitment to address safety concerns and hazards is communicated on a regular basis.

Management encourages and motivates employees to communicate openly, authentically, and without concern for reprisal; ensures employees are aware of SMS principles and understand their safety-related roles and responsibilities; conveys safety critical information such as accident data, injuries, and reported safety concerns and hazards and their resolutions to employees. SBMTD's tools to support safety communication include:

- Safety bulletins and notices
- Posters
- Web based safety training
- Employee Newsletters
- Briefings or Toolbox talks
- Seminars and workshops
- New-hire onboarding and training
- Refresher and Return to Work training
- Safety Committee Meetings

11. Additional Information

Supporting Documentation

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

- Injury and Illness Prevention Plan (IIPP)
- Emergency Response Plan
- Driver Training Manual 2020
- SBMTD Training Manual Gillig Transit Buses
- SBMTD Training Manual Articulated Transit Buses

- SBMTD Training Manual BYD Transit Buses
- Employee Handbooks – Staff
- Employee Manual - Represented
- Operators Manual
- Maintenance Manual
- Code of Conduct Policies
- SBMTD Drug & Alcohol Testing Policy
- Drug Free Workplace Policy
- Policy Against Sexual Harassment
- Easy Lift Agency Safety Plan Version 1.0