TWIN CITIES AREA TRANSPORTATION AUTHORITY

AGENCY SAFETY PLAN

Accountable Executive _____

Board President _____

Date of Board Approval _____

Transit Agency Information

Transit Agency Name   Twin Cities Area Transportation Authority
275 East Wall Street
Benton Harbor, MI 49022
(269) 927-2268

Name and Title of   Paul Gillespie, Executive Director
Accountable Executive

Name of Chief Safety   TJ Taylor, Assistant Director
Officer (CSO)

Modes of Service   Fixed Route Bus; Demand Response Bus;Paratransit
Covered by this plan

FTA Funding Types   5307; 5339; CMAQ

TCATA does not provide transit services on behalf of another agency or entity.

Safety Performance Targets

According to the *Public Transportation Agency Safety Plan (49 CFR Part 673)* regulation, public transit agencies are required to set safety performance targets. These targets must be specific numerical targets set by agencies themselves. FTA has adopted four safety performance measures that TCATA will initially build a baseline for if none exists, and then set numerical goals for improvement, based on number of incidents per 100,000 vehicle revenue miles. The four areas are:

- **Fatalities**. TCATA has never had a fatality in its 45 years of operation and our target is to maintain this record.
- **Injuries**. TCATA currently has a limited baseline of injuries that are recorded through insurance and worker's compensation claims. Through our Safety Management System we will enhance the tracking of injuries and set future goals based on that data.
- **Safety Events** and **System Reliability.** TCATA does not currently have a system for tracking these two metrics but through our Safety Management System we will develop means to track accidents, incidents, and occurances; as well as equipment breakdowns that require assets to be taken out of service.

Safety Management Policy Statement

The Managers and Board of Trustees of the Twin Cities Area Transportation Authority are committed to providing a safe working environment for all TCATA employees, a safe riding experience for TCATA passengers, and safe interactions with TCATA in all community engagements. Practices, procedures, and policies will be developed and implemented to attain these goals. Continuous evaluation and refinement will allow TCATA to create a culture of safety that extends throughout the agency. TCATA is committed to the following objectives regarding safety:

•   Communication - TCATA management and safety related staff will communicate the purpose and benefit of our Safety Management System (SMS) to all personnel.

•   Reporting - TCATA will establish mechanisms for the open reporting of all safety concerns. We will ensure that no action will be taken against any employee who submits a concern through the TCATA Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond a reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

•   Involvement - TCATA will provide appropriate management involvement and the necessary resources to ensure that the ESRP process achieves its goal of encouraging employees to report and communicate unsafe work conditions, hazards, or at-risk behavior to the management team.

•   Identification – TCATA staff will utilize the ESRP system and other means to identify hazards or unsafe working conditions and take steps to mitigate, improve, or eliminate risky behaviors or unsafe conditions.

•   Improvement – TCATA will establish safety targets that are realistic, measurable, and data driven. Continually analyzing and improving our safety performance will ensure that our safety program is meeting our goals and targets.

Paul Gillespie, Twin Cities Area Transportation Authority, Executive Director and Accountable Executive

Annual Review and Update of the Safety Plan

The TCATA Safety Plan will be reviewed and updated as necessary by the Executive Director and Operations Manager/Chief Safety Officer by July 1st of each year. The Executive Director will approve any changes and sign the new TCATA Agency Safety Plan and forward to the Board of Trustee of TCATA for review and approval.

Safety Performance Target Coordination

The Accountable Executive worked closely with the Transportation Policy Director of the Southwest Michigan Planning Commission to develop the initial Agency Safety Plan (ASP), and will share and coordinate safety performance targets, ongoing staff safety efforts, and any revisons to the ASP with the MPO.The Accountable Executive of TCATA will provide a copy of our ASP to our Program Manager of the MDOT OPT. TCATA personnel will be available to coordinate and collaborate with MDOT or SWMPC staff upon request.

Safety Management Policy Communication

The TCATA Safety Management Policy will be distributed to all TCATA employees upon adoption by the Board. The SMP will be discussed at the annual TCATA in-service day. The SMP will be posted on all employee bulletin boards. The SMP will be incorporated into new-hire training and included in the employee handbook.

Authorities, Accountabilities, and Responsibilities

Accountable Executive-Paul Gillespie

The Executive Director of TCATA serves as the Accountable Executive under the Agency Safety Plan with the following authorities and responsibilities:
- Controls and directs human and capital resources needed to develop and maintain the ASP and SMS.
- Designates and supervises an adequately trained Chief Safety Officer.
- Ensures that TCATA's Safety Management System (SMS) is effectively implemented.
- Ensures action is taken to address substandard performance in TCATA's SMS.
- Assumes utimate responsibility for carrying out TCATA's ASP and SMS.
- Maintains responsibility for carrying out the agency's Transit Asset Management Plan.
- Chairs and leads the TCATA Safety Committee.
- Reviews all ESRP documents.

Chief Safety Officer-TJ Taylor

The Assistant Director/Operations Manager of TCATA is the Chief Safety Officer of the agency with the following authorities and responsibilities:
- Develops TCATA's ASP and SMS policies and procedures.
- Oversees day-to-day operation of TCATA's SMS.
- Manages the TCATA ESRP.
- Serves on TCATA Safety Committee.
- Advises the Accountable Executive on SMS progress and status, identifies substandard performance in the SMS, and ensures TCATA policies are consistent with safety objectives.
- Provides Safety Risk Management (SRM) expertise and support for TCATA personnel who conduct Safety Assurance activities.

Agency Leadership and Management

Agency leadership and management also have authorities and responsibilities for day-to-day SMS implementation and operation:
- Dispatch Supervisor-Richard Lee
- Maintenance Coordinator-Ryan Douglas
- Office/HR Manager-Veronica Bragg

- Grant/Procurement Manager-Desha King

Authorities, accountabilities, and responsibilities include:
- Participate as members of the TCATA Safety Committee
- Complete training on SMS and ASP
- Oversee day to day operations of the SMS in their departments.
- Provide subject matter expertise to support SMS to the Accountable Executive.

Key Staff

Safety Committee
- TCATA will establish a Safety Committee to meet monthly to consider issues related to the SMS and ASP. Members will include the Accountable Executive, the Chief Safety Officer, and other managers and/or Union representatives as required.

Employee Safety Reporting Program

TCATA encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. Ways to report include:

- Fill out an Employee Safety Reporting Program form and submit it to the Dispatch office, Operations Manager, Executive Director, or Office Manager.
- To report anonymously, fill out ESRP form and drop it in the locked box in the employee break room.
- Report conditions online using their name or anonymously to either the Executive Director at pgillespie@tcatabus.org or the Chief Safety Officer at tjtaylor@tcatabus.org
- Report conditions directly to any supervisor, manager, or director.

Examples of information that might be included in an ESRP form:
- Concerns about safety in the operating environment. (For example, road conditions or vehicle or facility conditions.)
- Policies or procedures that are not working as intended. (For example, not enough time allowed to complete pre-trip inspection.)
- Events that senior managers might not otherwise know about.
- Information about why a safety event occurred.
- Ideas on how to make the agency safer.

Daily, the CSO will check all the different reporting methods. Issues of immediate concern (for instance, a sinkhole in the driveway,) are shared with the AE and are addressed immediately. Each report, whether paper or electronic, will be entered into the TCATA Safety Risk Register. On a monthly basis, the Safety Committee will address each report individually. The committee will recommend actions for the AE or CSO to take to address concerns. If the employee provided his or her name, the CSO or AE will follow up individually, describing what if any actions were taken to address or mitigate the problem.

TCATA encourages participation in the ESRP process by protecting employees that report safety conditions in good faith. However, TCATA may take disciplinary action if the report involves any of the following:
- Willful participation in illegal activity, such as assault or theft,
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk,

- Deliberate or willful disregard of proper work behavior, such as showing up for work intoxicated.

Safety Risk Management Process

The Safety Risk Management process at TCATA is how we ensure the safety of all operations, passengers, employees, vehicles, and equipment. Hazards are identified, assessed, and resolved. The SRM process allows us to examine what could cause harm and whether we have taken the necessary steps to minimize, eliminate, or mitigate the issue.

The CSO and AE work together with the Safety Committee to carry out the SRM process. Actions taken by the Safety Committee are documented in the Safety Risk Register.

In carrying out the SRM process, TCATA 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 TCATA; 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 hazard involving injury, illness, death, or damage to TCATA property or the environment.

Safety Hazard Identification

The TCATA safety hazard identification process offers us the ability to identify hazards and potential consequences in the operation of our agency. Hazards can be identified through a variety of sources, including:
- ESRP forms
- Review of vehicle camera footage.
- Review of monthly performance data and safety performance targets.
- Supervisor observations.
- Maintenance reports.
- Comments from customers, passengers, vendors, and third parties, including the Michigan Transit Pool.
- TCATA safety committee, drivers, and In-service day training.
- Results of audits and inspections of vehicles and facilities.
- Results of training assessments.
- Investigations into safety events, incidents, and occurrences.

- Federal Transit Administration (FTA), Michigan Department of Transportation (MDOT), and other oversight authorities.
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All safety concerns no matter the source are reported to the CSO. The procedures for reporting are reviewed by the Safety committee. All hazards identified are entered into the Safety Risk Register. In following up on identified hazards, the CSO may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard.
- Conduct a walkthrough of the identified area, assessing the possible hazardous condition, generating visual documentation such as photos or videos, and taking any measurements deemed necessary.
- Conduct interviews to gather relevant information on the hazard.
- Review any documents associated with the hazard.
- Contact other departments that may have association with or knowledge of the reported hazard.
- Review any past reported hazards of a similar nature.

Any identified hazard that poses a real threat to life, property, or the environment must be immediately brought to the attention of the AE and addressed either with or without the Safety committee for assessment and mitigation. In these cases the CSO believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of EPA or any State of Michigan environmental protection standards.

Safety Risk Assessment

TCATA assesses all identified safety hazards based on the likelihood (how often) and severity (how bad) of the consequences of the hazard.

Safety Risk Matrix:

Likelihood - High (1) Medium (2) Low (3)

Severity - High (A) Medium (B) Low(C)

- "High" hazard ratings will be considered unacceptable and require action from TCATA to mitigate the risk.
- "Medium" hazard ratings will be considered undesirable and require the TCATA safety committee to make a decision regarding their acceptability.
- "Low" hazard ratings may be accepted by the safety committee without further action or review.

The TCATA CSO schedules safety risk assessment of identified hazards at the monthly safety committee meeting. The CSO will facilitate completion of relevant sections of the Safety Risk Register. Relevant safety documents will be kept on file for a period of three years from the date of generation.

Safety Risk Mitigation

TCATA's AE and CSO review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk based on recommendations of the Safety Committee. Prioritization of mitigation is based on safety risk assessment. In the Safety Risk Register, the CSO will document any specific measures or activities that will be conducted to monitor the effectiveness of mitigations once implemented.

Safety Assurance

The TCATA Safety Assurance process is intended to:
- Evaluate our compliance with our own procedures.
- Assess the effectiveness of our mitigation strategies.
- Investigate safety events to identify causes.
- Analyze information from all sources.

TCATA has a variety of sources to monitor and measure our safety performance.
- Safety audits
- Informal inspections
- Onboard camera footage.
- ESRP reports
- Regular vehicle inspections and preventative maintenance

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

Safety Promotion

Safety Promotion involves the training, awareness, and communication that support safety. Part 673 requires each transit agency to establish competencies and training for all agency personnel directly responsible for safety, and to establish and maintain the means for communicating safety performance and safety management information.

In 2021, all TCATA employees will participate in the TAPTCO (Transit and Paratransit Company) *Transit Operator Development Course.* The 33 subjects are as follows:

1. Introduction to Professional Driving
2. Federal Regulations
3. Safety Best Practices
4. LLLC Defensive Driving
5. Hazard Identification and Mitigation
6. Introduction to the Bus
7. Pre and Post Trip Inspections
8. Mirror Adjustment and Reference Points
9. Preventing Rear End Collisions
10. Preventing Intersection Accidents
11. Railroad Crossings
12. Pedestrian and Bicycle Awareness
13. Preventing Backing Accidents
14. Merging, Lane Changing, and Passing
15. Adverse Driving Conditions
16. Operating Electric Powered Buses
17. Preventing Driver Fatigue
18. Preventing Driver Distractions
19. Hazards Communications
20. Injury Prevention-Slips, rips, and Falls
21. Using Maps and GPS
22. Employee Safety Reporting Program
23. Health and Wellness
24. Professionalism and Customer Service
25. Conflict and Aggression Management
26. ADA Compliance and Sensitivity
27. Mobility Devices
28. Whistleblower
29. Preventing Harassment

Definition of Terms Used in the Safety Plan

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

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

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

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

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

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

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

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

• **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

• **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

• **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).

• **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

• **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

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

• **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.

• **Risk mitigation** means a method or methods to eliminate or reduce the effects of hazards.

• **Safety Assurance** means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

• **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and res• Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

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

• **Safety performance target** means a Performance Target related to safety management activities.

• **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

• **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

• **Safety Risk Management** means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

• **Serious injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

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

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

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

• **Transit agency** means an operator of a public transportation system.

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

Commonly Used Acronyms

ADA	Americans with Disabilities Act of 1990
CEO	Chief Executive Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MDOT	Michigan Department of Transportation
MPO	Metropolitan Planning Organization
PTASP	Public Transportation Agency Safety Plan
SA	Safety Assurance
SMP	Safety Management Policy
SMS	Safety Management System
SRM	Safety Risk Management
SWMPC	Southwest Michigan Planning Commission
TCATA	Twin Cities Area Transportation Authority
U.S.C.	United States Code
VRM	Vehicle Revenue Miles