

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN (PTASP)



9/1/2023

Valley Regional Transit (VRT)

700 NE 2nd Street, Suite 100
Meridian, ID 83642

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Chapter 1 – Transit Agency Information

Transit Agency Name:	Valley Regional Transit (VRT)			
Transit Agency Address:	700 NE 2 nd Street Suite 100, Meridian, ID 83642			
Accountable Executive:	Chief Executive Officer			
Chief Safety Officer:	Chief Operating Officer			
Modes of Service Covered by This Plan:	Fixed-Route Demand-Response	FTA Funding Types:	5307, 5310, 5307, 5310 SU, 5310 LU, 5310 Rural, 5339 SU, and 5339 LU, 5339	
Modes of Service Provided by VRT:	Fixed-Route - Contracted, Demand Response - Contracted, Low Income Job Access Service - Contracted			
Does the agency provide transit services on behalf of another transit agency or entity?	Yes ☐	No ☒	Description of Arrangement(s)	N/A
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	N/A			

Chapter 2 – Plan development, approval, and updates

This plan is based on a template drafted by Shauna Miller, State Safety Oversight Officer, with the Idaho Transportation Department, Public Transportation Office and reviewed and amended by the VRT Safety Committee.

Valley Regional Transit Accountable Executive (Name)	
Elaine Clegg	
Signature of Accountable Executive	Date of Signature
Valley Regional Transit Board of Directors, Chair (Name)	
Joe Stear	
Signature of Board of Directors, Chair	Date of Approval
VRT Safety Committee, Chairs (Name)	
Leslie Pedrosa, CSO Douglas Buckendorf, President/Business Agent ATU Local 398	
Signature of VRT Safety Committee, Chairs	Date of Certification

Version Number and Updates

Version Number	Section/Pages Affected	Reason for Change	Date Issued
Original	All	Origination of document	11/02/2020
Revision 1	All	Reviewed and updated	2/6/2023
Revision 2	All	Updates and Revisions	9/1/2023

Annual Review and Update of the Public Transportation Safety Plan (PTASP)

Valley Regional Transit's (VRT) plan addresses all applicable requirements and standards as set forth in Federal Transit Administration's (FTA) Public Transportation Safety Program and the National Public Transportation Safety Plan. At VRT, the review of safety practices is an ongoing process, not one limited to scheduled reviews. The Chief Safety Officer and the Compliance Analyst will review and update this plan as needed, or at a minimum by September 1 of each year. The VRT Safety Committee will be the first to review and certify changes. Once certified by the safety committee, the accountable executive will review and approve any changes, sign the new plan and forward to the Board of Directors for final review and approval.

Chapter 3: Safety Performance Targets by Mode of Service

Goals and targets listed below are based on a 3-year rolling average of the data submitted to the National Transit Database (NTD) under section 5355. 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 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 originally written in conjunction with the Idaho Transportation Department's Public Transportation Office (ITD-PT) in coordination with Community Planning Association of Southwest Idaho (COMPASS), the Metropolitan Planning Organization (MPO). Safety performance targets will be submitted to by ITD-PT and COMPASS annually as shown below at the MPO's mid-year Small Urban Balancing Committee meeting.

Target Transmittal Dates:

- Idaho Transportation Department Public Transportation: June 30
- Community Planning Association of Southwest Idaho: June 30

Chapter 4: Safety Management Policy Statement

Safety Management Policy Statement

The management of safety is one of VRT's business functions. VRT is committed to developing, implementing, maintaining, and constantly improving processes to ensure 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 the Chief Executive Officer.

VRT's commitment is to ensure transit contractors:

- 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
 - actively manages safety with the same attention to 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 (including exposure to infectious diseases) 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; this would include utilizing guidelines from the Centers for Disease Control and Prevention (CDC) and/or Idaho Department of Health
- 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
- 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 contractors began with the roll out of the PTASP. The Chief Safety Officer distributed the PTASP to all VRT employees and contractors in November 2020. Each VRT employee and contractor received a copy of the plan. Following dissemination of the policy, a signed acknowledgement was collected. New VRT employees and contractor employees are given a copy of the PTASP and a signed acknowledgement is collected.

Each revision of the PTASP will continue to be provided to VRT employees and contractors once final approval has been received. Anytime changes are made to the PTASP, a signed acknowledgment by VRT employees and contractors will be required.

The 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 for VRT employees. Contractors that VRT does not provide new hire orientation for are required to distribute the PTASP Policy Statement during new hire orientation.

Authorities, Accountabilities, and Responsibilities

Accountable Executive

Chief Executive Officer

The Chief Executive Officer 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 Safety Management System (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)

Chief Operating Officer

The Chief Executive Officer has designated the Chief Operating Officer as the Chief Safety Officer. In addition to their other duties, the Chief Operating Officer has the authority and responsibility for day-to-day implementation and operation of safety and reports directly to the Chief Executive Officer. At minimum, the Chief Operating Officer 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 Analyst as the Agency Lead. The Agency Lead is a single identifiable person who will manage the day-to-day operation of the PTASP, 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 VRT Safety Management team have the following authorities, accountabilities, and responsibilities:

- Meet monthly to review safety suggestions to determine next step to resolve
- 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 VRT Safety Management team includes:

- VRT Chief Financial Officer
- VRT Chief Operating Officer
- VRT Compliance Analyst
- VRT Chief Development Officer
- VRT Transit Services Manager
- VRT Fleet Supervisor
- VRT Facilities Technician

VRT Safety Committee

The VRT Safety Committee purpose is: (I) identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment; (II) identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and (III) identifying safety deficiencies for purposes of continuous improvement.

The committee will be comprised of an equal number of management staff comprised of staff from VRT and its contractors and frontline employees chosen by the plurality union. The Chief Safety Officer and highest-ranking union member will act as chairs for the committee and will jointly prepare agendas for the meetings. Each entity may name alternates for the committee as needed.

The committee will meet quarterly to review and discuss incidents and issues reported and will annually review the plan and recommend updates. The quarterly meetings will be held at 2:15 pm, the second Tuesday of the month, in January, April, July, and October unless otherwise rescheduled. The meetings will be held by teleconference. An agenda for the meetings will be sent to committee members at least 48-hours in advance.

The VRT Safety Committee certifies the plan when edits or updates are made before it can be approved by the VRT Board of Directors. For the plan to be certified, a majority of the committee members must agree on the edits or updates. Updates will be made to the plan as needed, but at a minimum, it will be reviewed annually. If no updates are made, the plan will not need to be recertified.

The VRT Safety Committee will include the following management representatives, comprised of staff from VRT, Transit Management of Canyon County (TMCC), and Transit Management of Ada County (TMAC):

- Three VRT Management representatives, to include the VRT Chief Safety Officer
- Three TMCC management representatives
- Two TMAC management representatives

The VRT Safety Committee will include the following frontline employees that have been selected by the plurality of the union that represents them:

- Five TMAC representatives
- Three TMCC representatives

At each quarterly safety meeting, the safety committee will make recommendations to improve safety and jointly evaluate any safety hazard reported. Each quarterly safety committee meeting will also include discussion of the following:

- Review of safety related incidents to review 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

Driver Safety Meetings

TMAC and TMCC are required to hold monthly safety meetings. Each meeting will include a permanent agenda item dedicated to safety, where safety issues are discussed and documented.

VRT Safety Reporting

VRT issues a newsletter to employees, TMAC and TMCC employees monthly with a section dedicated to safety. VRT will share any hazard reports and mitigations as needed from the previous month in the newsletter, along with a link to report any safety issues or suggestions. VRT employees are also able to email the Compliance Analyst directly to share safety topics or to provide feedback on reported hazards. Any safety issues or suggestions reported by VRT staff will be included on the VRT Safety Management Team agenda.

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 if witnessing unsafe work practices or conditions. In instances 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.

VRT uses safety reporting software called Trackit to identify, track, and resolve reported safety hazards. The software allows VRT employees and contractors to easily report any safety issue that could affect the operation of service. Safety issues can be reported anonymously or reporters can provide contact information to be kept updated on the report using a QR code or an online form.

However, where 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, any member of the safety committee, Chief Safety Officer or Compliance Analyst. Employees and contractors may also anonymously submit 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 against anyone 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 whistleblower 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
- 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, the event should be reported so all may learn from the event and 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 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.

Once the safety issue is submitted, it is reviewed by the Compliance Analyst or the Chief Safety Officer. Following the review, the software will send the report via email to the department responsible to address the reported issue. All activities tied to the safety issue remain within the software.

The safety issues are also reviewed to determine if they should be presented to the safety committee for discussion. Types of safety issues reported that would be presented for discussion to the safety committee, including issues that a solution would benefit the employees or contractors, are within the scope of the operations for VRT or that require action by VRT to complete.

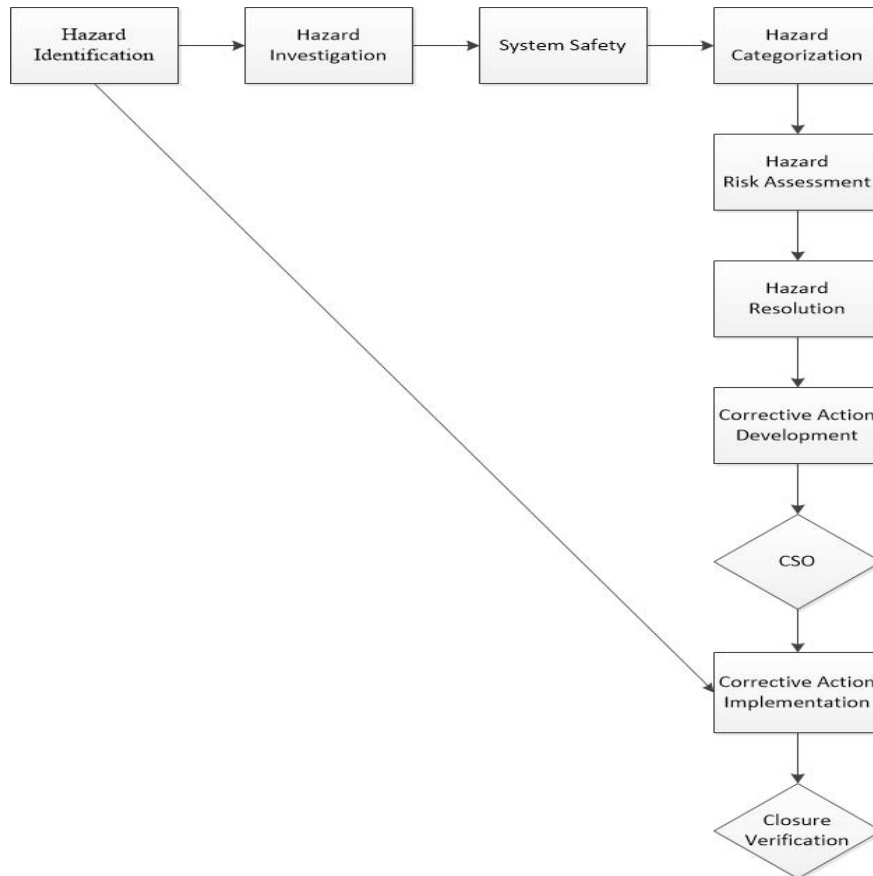
The Chief Safety Officer or designee, supported by the Safety Committee, will review and address reported safety issues at each quarterly Safety Committee meeting. Each safety issue will be reviewed to ensure hazards and their consequences are appropriately identified and resolved through the Safety Risk Management process. All reported deficiencies and non-compliance with rules or procedures are managed through the Safety Assurance process.

The Chief Safety Officer or designee will also notify contractors of all actions taken to address reported safety issues annually. The contractors will be responsible to disseminate the information to their employees. 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 describe earlier, a structure exists to address all safety concerns. To ensure safety, the VRT Safety Committee is responsible for reviewing safety related incidents to review 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
- Review of contractor 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 staff meetings
- Audits and inspections of vehicles and facilities
- Training assessments

- Investigations into safety events, incidents, and occurrences
- Federal Transit Administration (FTA) and other oversight authorities (mandatory information sources)
- Road conditions
- Safety and performance data targets
- Camera footage
- Supervisor or employee observations
- Maintenance reports

When a safety concern is observed, whatever the source, it is reported to VRT's Chief Safety Officer or designee. Procedures for reporting hazards are reviewed during new hire orientation and at the quarterly Safety Committee meetings. The Chief Safety Officer or designee may also enter hazards into Trackit 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 or designee may conduct further analyses of hazards and consequences entered into Trackit 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 or designee 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
- Evaluate tasks and/or processes associated with the reported hazard

The Chief Safety Officer or designee will prepare an agenda to discuss identified hazards and consequences with the VRT Safety Committee during quarterly 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 VRT 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 VRT 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 or designee and VRT Safety Committee will categorize the hazard into the following severity levels. The categorization of hazards is consistent with risk-based criteria for severity, reflecting 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 an event 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:

Likelihood of Occurrence or Event

Description	Frequency for Specific Item	Selected Frequency for Fleet/Inventory
Frequent	Likely to occur frequently	Continuously experienced
Probable	Will occur several times in the life of the item	Will occur frequently in the system
Occasional	Likely to occur sometime in the life of an item	Will occur several times in the system
Remote	Unlikely but possible to occur in the life of an item	Unlikely but can be expected to occur
Improbable	So unlikely it can be assumed occurrence may not be experienced	Unlikely to occur but possible

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.

Frequency	Severity			
	Catastrophic	Critical	Marginal	Negligible
Frequent	High	High	High	Medium
Probable	High	High	Serious	Medium
Occasional	High	Serious	Serious	Low
Remote	Serious	Serious	Medium	Low
Improbable	Medium	Medium	Medium	Low

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

Hazard Risk Index	Criteria by Index
High	Unacceptable
Serious	Undesirable (management decision)
Medium	Acceptable with management review
Low	Acceptable without management review

The Chief Safety Officer or designee schedules safety risk assessment activities on the VRT Safety Committee agenda and prepares a Safety Risk Assessment Package. This package is distributed at least one week in advance of the VRT Safety Committee meeting. During the meeting, the Chief Safety Officer or designee 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 or designee may request support from members of the VRT Safety Committee in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the Chief Safety Officer or designee will facilitate completion of relevant sections of the Trackit report using the Safety Risk Assessment Matrix with the Safety Committee. The Chief Safety Officer or designee will document the VRT Safety Committee's safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Trackit report. The Chief Safety Officer will maintain a file on VRT Safety Committee agendas, Safety Risk Assessment Packages, additional information collection, and the completed Trackit report 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 VRT 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 or designee tracks and updates safety risk mitigation information in the Trackit and makes the reports available to the VRT Safety Committee during quarterly meetings and to VRT staff upon request. In Trackit, the Chief Safety Officer or designee 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 Chief Executive Officer and Chief Safety Officer issues a documented decision to manage the hazard until resources are available for full mitigation.

Acceptable with Review: The Chief Executive Officer 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.

Risk Reduction Program

- TMAC and TMCC are required to provide adequate training to reduce vehicular and pedestrian incidents involving buses. Training will include measures to reduce visibility impairments for bus operators that contribute to incidents, including retrofits to buses in revenue service and specifications for future procurements that reduce visibility impairments
- TMAC and TMCC will ensure assaults on transit workers are mitigated. This will include the deployment of assault mitigation infrastructure and technology on buses, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators, if a risk analysis performed by the safety committee determines they would reduce assaults and injuries to transit workers.

Chapter 6: Safety Assurance

Safety Performance Monitoring and Measurement

Through our Safety Assurance process, VRT will:

- Evaluate TMAC and TMCC 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 of TMAC and TMCC to make sure the mitigations are appropriate and are implemented as intended
- Requires TMAC and TMCC to investigate safety events to identify causal factors
- Ensure TMAC and TMCC analyze information from safety reporting, including data about safety failures, defects, or conditions

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

- Safety audits
- Informal inspections
- Regular review of onboard camera footage to assess 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 VRT 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 by TMAC and TMCC. The Chief Safety Officer or designee maintain a list of safety risk mitigations in Trackit. 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 or designee and VRT Safety Committee review the performance of individual safety risk mitigations during quarterly 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 VRT 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 or designee will approve or modify this proposed course of action and oversee its execution.

The Chief Safety Officer or designee and VRT 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 incident, and occurrence investigations
- Monitoring employee safety reporting
- Reviewing results of internal safety audits and inspections
- Analyzing operational and safety data to identify emerging safety concerns

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

Safety Investigations

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

All incidents, regardless of severity, will be investigated by TMAC or TMCC staff. The investigation will include law enforcement assistance, if needed, photos, accident/incident report, fault determination, incident tracking and retraining when necessary.

TMAC and TMCC will maintain documented procedures for conducting safety investigations of events (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. TMAC and TMCC maintain all documentation of the investigation policies, processes, forms, checklists, activities, and results. TMAC and TMCC are expected to document the following information for each incident:

- Whether the incident was preventable or non-preventable
- Personnel requiring discipline or retraining
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event
- The incident appears to involve underlying organizational causal factors beyond just individual employee behavior

VRT has zero tolerance for preventable injuries and collisions. Elimination of preventable injuries and collisions is our number one goal. TMAC and TMCC are expected to follow VRT requirements for safety event investigations.

The Chief Safety Officer or designee maintains all documentation of VRT audits of TMAC and TMCC's investigation policies, processes, forms, checklists, activities, and results. As detailed in VRT's procedures, an investigation report is prepared and sent to the VRT Safety Committee for integration into their analysis of the event at each quarterly meeting.

TMAC and TMCC will hold monthly staff meetings 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.

Internal Safety Reporting Program Monitoring

The VRT Safety Management Team routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels, including safety incident reporting software. When necessary, the Chief Safety Officer and VRT Safety Committee ensure the concerns are investigated or analyzed through the Safety Risk Management process.

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

Continuous Improvement

VRT will continuously assess the safety performance of the PTASP. If VRT identifies safety deficiencies as part of its safety performance assessment, VRT will develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies.

Chapter 7: Safety Promotion

Competencies and Training

The education and training programs provided by TMAC and TMCC are to be 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, but not limited to:

- Vehicle operators
- Dispatchers
- Road Supervisors
- Maintenance personnel
- Managers and supervisors

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 skill building are used to support the learning process. Learning is evaluated through written quizzes, driving tests, observation, and customer service evaluations.

Basic training requirements including refresher training, are to be documented in the Transit Management Service Agreement, or the VRT Subrecipient/Contractor Monitoring and Oversight Procedures.

Safety related training will include:

- New hire training for vehicle operators and maintenance personnel
- Continued refresher training for vehicle operators and maintenance personnel
- Retraining for vehicle operators and maintenance personnel
- De-escalation training for vehicle operators and maintenance personnel
- Classroom and on the job training for dispatchers/road supervisors
- Ongoing skill training for maintenance personnel and supervisors
- Ongoing vehicle maintenance training for maintenance personnel
- OSHA standards for vehicle maintenance personnel and supervisors
- Accident investigation training for managers and supervisors
- Ongoing hazardous material training for vehicle maintenance personnel and supervisors
- Ongoing maintenance training provided by vendors
- Classroom and on the job training for operations supervisors and managers
- Reasonable suspicion determination and reporting training for supervisors and managers
- Accident investigation training for supervisors and managers

The education and training programs provided by TMAC and TMCC are to be 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, but not limited to:

- Agency Leadership
- Chief Safety Officer
- Accountable Executive

Agency leadership safety related training includes:

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

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

Establishing and maintaining a culture that demands safe behavior at all times 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.

Safety Awareness Communications

VRT's Chief Safety Officer or designee, TMAC and TMCC will coordinate safety communication by:

- Communicating information on safety and safety performance in monthly staff reports
- Posting safety bulletins and flyers on the bulletin boards located on all administrative bulletin boards
- Providing safety policies and procedures as part of new-hire training to all VRT staff and contracted vehicles operators
- Issuing memos or messages to employees that are reinforced by supervisors, for newly emerging issues or safety events
- Providing 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 and supervisors
- 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.

Accountable Executive means a single, identifiable person who has ultimate responsibility for carrying out the PTASP 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 PTASP, 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.

Contractor means one that contracts or is party to a contract, that performs work or provides supplies.

Accident/Incident 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; 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.

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 PTASP.

Event means any 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.

Safety Investigation means the process of determining the causal and contributing factors of an 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.

Public Transportation Agency Safety Plan (or 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 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

Acronym	Word or Phrase
CSO	Chief Safety Officer
FTA	Federal Transit Administration
GM	General Manager
ITD	Idaho Transportation Department
ITD-PT	Idaho Transportation Department Public Transportation Office
NTD	National Transit Database
OSHA	Occupational Safety & Health Administration
SMS	Safety Management System
SOP	Standard Operating Procedure
TMAC	Transit Management of Ada County
TMCC	Transit Management of Canyon County
VRM	Vehicle Revenue Miles
VRT	Valley Regional Transit

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN ACKNOWLEDGEMENT FORM

I have received a copy and have reviewed the Public Transportation Agency Safety Plan.

Printed Name: _____

Signature: _____ Date: _____

Employer: _____