

# PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

Western Reserve Transit Authority  
Youngstown, Ohio



*(February 2024 version 1.4)*

## Ohio Department of Transportation (ODOT) Responsibility

According to 49 C.F.R. Part 673, the state is responsible for drafting and certifying the small public transportation providers. Small transportation providers are defined as recipients or subrecipients of Federal financial assistance under 49 U.S.C. 5307 that have one hundred (100) or fewer vehicles in peak revenue service and do not operate a rail fixed guideway public transportation system. Paratransit service provided by the recipient or subrecipient is subject to Part 673.

The Office of Transit administers funds for the Rural Transit Grant Program (FTA Section 5311), the Rural Transportation Assistance Program (FTA Section 5311 (b)(3)), the Rural Intercity Bus Program Section 5311 (f), the Enhanced Mobility of Seniors and Individuals with Disabilities Program (FTA Section 5310) the Rail Fixed Guideway State Safety Oversight Program (FTA Section 5329), the Bus and Bus Facilities Program (FTA Section 5339), the Rural Technical Assistance Program (RTAP), the Ohio Elderly and Disabled Transit Fare Assistance Program, the Ohio Coordination Program, the Ohio Technical Assistance Program (OTAP), the Ohio Transit Partnership Program, and the Metropolitan & Statewide Planning and Non-Metropolitan Transportation Planning Program (FTA Section 5303/5304/5305) . ODOT is not an administering agency for Ohio Urban Transportation Grant Program (FTA Section 5307) funds. Urban transportation providers are direct recipients of 5307 funding.

## Version Tracking Log

According to 49 C.F.R. Part 673.11 (5), each transit agency must establish an annual review and update of the Public Transportation Agency Safety Plan. ODOT is drafting and certifying the plan and coordinates with the transit agency to review and update the plan annually.

Version	Date Issued	Section/Pages Affected	Purpose for Change
1.0	06/10/2020	N/A	Original Document
1.1	05/27/2021	Page 4, 15	Annual update
1.2	06/23/2022	Pages 13,15,16,18,21	Annual Update
1.3	06/15/2023	Pages 4,13,15,24	Annual update
1.4	02/01/2024	Pages 15	Annual update

**Signature Page**

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Dean J Harris, Accountable Executive, WRTA

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Carlton Ingram, WRTA Board of Trustees - President

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Date of Approval

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## Definitions of Special Terms Used in the Safety Plan

Term	Definition
<b>Accident</b>	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.
<b>Accountable Executive</b>	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.
<b>Chief Safety Officer</b>	An adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
<b>Consequence</b>	Potential outcome(s) of the hazard.
<b>Event</b>	Any accident, incident, or occurrence.
<b>Fatality</b>	A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property.
<b>Hazard</b>	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.
<b>Hazard Identification</b>	Formal activities to identify hazards during operations related to provision of services.
<b>Incident</b>	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.

<b>Investigation</b>	The process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
<b>Performance measure</b>	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.
<b>Performance target</b>	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).
<b>Occurrence</b>	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.
<b>Safety Assurance</b>	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.
<b>Safety Management Policy</b>	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.
<b>Safety Management System (SMS)</b>	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.
<b>Safety Performance target</b>	Performance Target related to safety management activities.
<b>Safety Promotion</b>	Combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
<b>Safety Risk Assessment</b>	Formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
<b>Safety Risk Management</b>	Process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
<b>Safety Risk Probability</b>	The likelihood that the consequence might occur, considering the worst foreseeable-but credible-condition.



<b>Safety Risk Severity</b>	The anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable-but credible-condition.
<b>Small Public Transportation Provider</b>	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.
<b>Statewide Transportation Improvement Program</b>	A short-range multi-modal transportation state planning document required by USDOT for use in approving federal funds for transportation projects, typically four years.
<b>Transportation Improvement Program</b>	A short-range multi-modal transportation regional planning document developed and maintained by each MPO and RTPO region in accordance to federal regulations, typically four years.

## List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
AE	Accountable Executive
CEO	Chief Executive Officer
CSO	Chief Safety Officer
DOT	Department of Transportation
ED	Executive Director
FTA	Federal Transit Administration
GM	General Manager
MPO	Metropolitan Planning Organization
NTD	National Transit Database
NTSB	National Transportation Safety Board
ODOT	Ohio Department of Transportation
OSHA	Occupational Safety and Health Administration
PTASP	Public Transportation Agency Safety Plan
RTA	Regional Transit Authority
SA	Safety Assurance
SME	Subject Matter Expert
SMI	Safety Management Inspection
SMS	Safety Management System
SOP	Standard Operating Procedure
SRM	Safety Risk Management
SSO	State Safety Oversight
SSOA	State Safety Oversight Agency
STIP	Statewide Transportation Improvement Program
TA	Transit Agency
TSA	Transportation Security Administration
TSI	Transportation Safety Institute

<b>TSO</b>	Office of Safety and Oversight
<b>TTP</b>	Technical Training Plan
<b>U.S.C.</b>	United States Code
<b>USDOT</b>	United States Department of Transportation
<b>WRTA</b>	Western Reserve Transit Authority

## What is a Public Transportation Agency Safety Plan?

The PTASP is a plan that will help ensure that a public transportation system is safe. With the development and implementation of the SMS, the public transportation system will have the ability to mitigate unacceptable hazards and ensure the mitigation is properly implemented and effective. SMS is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS consists of 4 components: safety management policy, safety risk management, safety assurance, and safety promotion.

On July 19, 2018, FTA published the PTASP Final Rule which is a requirement for recipients of federal funds under the FTA's Urbanized area Formula Grants (5307). The rule became effective July 19, 2019 and the compliance date is July 20, 2020.

FTA is responsible for ensuring that RTAs are in compliance with 49 CFR Part 673. WRTA will maintain documents that are set forth in this Public Transportation Agency Safety Plan, including those related to the implementation of Safety Management System (SMS) and results from SMS processes and activities. WRTA will maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures used to carry out this Public Transportation Agency Safety Plan. These documents will be made available upon request by Federal Transit Administration, other Federal entities, or a State Oversight Agency having jurisdiction. WRTA will maintain these documents for three years after they are created.

## **Agency Background and Information**

Western Reserve Transit Authority provides 21 Weekday and Saturday fixed Routes. WRTA also provide a Curb-to-Curb County-wide paratransit system. We are also providing 6 additional routes in the City of Warren on a demonstration basis. WRTA has approximately 50 large buses and 24 small buses. In 2019 WRTA provided over 1.5 million trips.

Eastgate Regional Council of Governments is a voluntary association of local governments in Northeast Ohio, Ashtabula County, Mahoning County, Trumbull County, and all cities, villages, and townships in the counties are members. Eastgate brings communities together to create a unified voice in areas such as transportation, water and air quality, land use planning, and local infrastructure projects.

### **Mission**

To provide public transportation services in Mahoning County with expanded service in the City of Warren and Trumbull county with the assistance of local, state, and federal funding.

**Accountable Executive:** Dean Harris

**Chief Safety Officer:** Phil DeMarco

**Address:** 604 Mahoning Avenue, Youngstown, OH 44502

**Mode of Service Covered in Plan:** Bus

**FTA Funding:** 5307, 5310, and 5339

**Mode of Service provided by Transit Agency:** Demand Response and Fixed Route

WRTA provides transit on behalf of Mahoning and Trumbull County.

## Plan Annual Update Procedure

49 C.F.R. Part § 673.11(5), states, “Each transit agency must establish a process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan”.

ODOT develops the Statewide Transportation Improvement Program biennially. The STIP references the Transportation Improvement Program drafted by the Metropolitan Planning Organizations and approved by ODOT. MPOs have the ability to update based on their schedule. STIP Amendments are scheduled on a quarterly schedule: July, October, January, and April. The National Public Transportation Safety Plan which is referenced in the 49 C.F.R. Part 673 requires that the safety performance targets are listed in the STIP.

49 C.F.R. Part § 673.11 states,

(4) The Public Transportation Agency Safety Plan must address all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan. Compliance Start Printed Page 34467with the minimum safety performance standards authorized under 49 U.S.C. 5329(b)(2)(C) is not required until standards have been established through the public notice and comment process.

ODOT submits the 5-year safety performance rolling averages based from the transit agencies' NTD reports. The data in the NTD is reported on a calendar year basis. Based on the NTD reporting cycle, the annual data will be reviewed and updated at the end of the calendar year.

The process will include:

1. CSO requests the safety committee and/or executive management to review current agency safety plan.
2. CSO reviews comments and makes changes as he/she sees necessary. Review and edit the PTASP safety performance measures and targets as a transit agency, e.g., safety committee.
3. CSO will present AE with the revised agency safety plan.
4. If approved, AE will present to the Board for approval. If AE does not approve the PTASP, then CSO will review and revise.
5. Once approved by AE, the AE will present changes to Board of Trustees or City Council for signature.
6. Email PTASP revisions targets with ODOT and MPO.
7. MPO will update their TIP to include the new safety performance targets and submit the updated TIP to the ODOT to be included in the STIP amendment.

## Safety Performance Targets

According to 49 C.F.R. Part 673.11(3) the public Transportation Agency Safety Plan must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan. The safety performance measures are:

- Fatalities
  - o Total Number of reportable fatalities
  - o Rate per total vehicle revenue miles by mode
- Injuries
  - o Total Number of reportable injuries
  - o Rate per total vehicle revenue miles by mode
- Safety Events
  - o Total Number of reportable safety events
  - o Rate per total vehicle revenue miles by mode
- System Reliability
  - o Mean Distance between major mechanical failures by mode

**Methodology:** ODOT Office of Program Management compiled the five-year rolling averages to calculate historical trends for each measure. According to the Ohio Strategic Highway Safety Plan, “a rolling average is used to better predict long-term crash trends by smoothing out short-term year-to-year fluctuations.” The Office of Transit decided to use the five-year rolling average method to determine the baseline and the target for each safety performance measure. ODOT collected 2013-2018 from NTD and the transit agency.

ODOT recommended a 2% reduction target for the four safety performance targets. If the safety performance targets are zero, then WRTA plans to maintain 0 as the safety performance target. Data was presented to WRTA Board of Trustees for reviewal and approval. After approval from the board, an email will be distributed to the MPO and ODOT for their records.

The information provided in the table below is for calendar year 2022. During this time, WRTA met all of the safety performance targets. For calendar year 2023, WRTA plans to maintain zero (0) for all safety performance targets.

Mode of Transit Service	Fatalities	Rate Per Total Vehicle Revenue Miles	Injuries	Rate Per Total Vehicle Revenue Miles	Safety Events	Rate Per Total Vehicle Revenue Miles	System Reliability
DR	0	0	0	0	0	335,196	25,784
MB	0	0	5	384,737	12	384,737	36,839

### Safety Performance Target Coordination

49 C.F.R Part §673.15(b) To the maximum extent practicable, a State or transit agency must coordinate with States and Metropolitan Planning Organization in the selection of State and MPO safety performance targets.

ODOT scheduled and conducted meetings with the transit agency and the MPO. ODOT met with the two entities to gather information about their transit agency safety policies and procedures. At the initial meeting, the SSO Program Manager educated the transit agency and the MPO on the purpose, objectives, and goals of the PTASP. ODOT explained the federal requirements including the safety performance targets. Data was presented to the transit agency for review and approval. An official letter will be issued to the MPOs with the safety performance targets of the transit agencies located within their jurisdiction.

<b>Targets Transmitted to the State</b>	<b>State Entity Name</b>	<b>Date Targets Transmitted</b>
	Ohio Department of Transportation	August 29 <sup>th</sup> , 2022
<b>Targets Transmitted to the Metropolitan Planning Organization(s)</b>	<b>Metropolitan Planning Organization Name</b>	<b>Date Targets Transmitted</b>
	Eastgate Regional Council of Governments	August 29 <sup>th</sup> , 2023



## I. Safety Management Policy

### Safety Management Policy Statement

The Western Reserve Transit Authority (WRTA) is committed to providing safe and reliable public transportation services to all users in the Mahoning Valley. Safety is one of WRTA's primary concerns that affects Operations, Maintenance and Administration.

WRTA stresses the importance of safety in our organization. By promoting a culture where our employees ensure that the safety and security of passengers, employees, and the general public are one of our top priorities.

All employees of WRTA are expected to conduct their duties in a safe manner that will prevent collisions, reduce injuries, and avoid property damage.

Each employee must operate safely by using equipment, tools, and materials properly, and be familiar with work rules and procedures for their areas of responsibility. Supervisors shall actively participate in the assessment and resolution of hazards.

WRTA management will provide leadership in promoting safety throughout the organization. The Executive Director and the executive staff will be continually and directly involved in formulating, reviewing, and revising the Safety Policy and safety goals.

WRTA management will provide the authority, support, and resources to establish and maintain high safety standards in operations, maintenance, and administration.

Western Reserve Transit Authority's commitment is to:

- Support the management of safety through the provision of appropriate resources, that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- Integrate the management of safety among the primary responsibilities of all managers and employees;
- Clearly define for all staff, managers and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our safety management system;
- Establish and operate hazard identification and analysis, and safety risk evaluation activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point which is consistent with our acceptable level of safety performance;
- Ensure that no action will be taken against any employee who discloses a safety concern through the employee 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 that sufficient skilled and trained human resources are available to implement safety management processes;
- Ensure that all staff 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 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 that appropriate safety management action is taken and is effective; and
- Ensure externally supplied systems and services to support our operations are delivered meeting our safety performance standards.
- Establish a Safety Committee by July 31, 2022, that meets the requirements of 49 U.S.C. § 5329(d)(1)(A) and 49 U.S.C. § 5329(d)(5).
- Per 49 U.S.C. Section 5329(d)(1)(D), all agencies that must have an ASP, whether they serve a small or large UZA, must address in their Agency Safety Plan strategies consistent with guidelines of the Centers for Disease Control and Prevention or a State health authority to minimize exposure to infectious diseases.

**Dean J. Harris, Executive Director**

**Safety Management Policy Communication**

WRTA’s safety management policy statement will be integrated into the annual refresher training and for new hires. Copies of the Safety Management Policy Statement will be posted on bulletin boards in operations and maintenance break areas.

Toolbox Talks are safety-driven information sessions that are provided on at least a monthly basis to front-line maintenance personnel. The purpose of these sessions is to educate employees on important safety topics, such as PPE requirements, wellness incentives, safe equipment operation, workplace illnesses, and hazard awareness, among others.

**Authorities, Accountabilities, and Responsibilities**

Individuals for the development and management of the transit’s Safety Management System (SMS).

<b>Accountable Executive</b>	The Accountable Executive for the Safety Management Policy is responsible for ensuring that the agency’s Safety Management Policy is effectively implemented throughout WRTA. The Accountable Executive holds the Chief Safety Officer accountable for continuously monitoring and improving safety performance and an effective Safety culture.
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	<p>The Accountable Executive provides the Board of Trustees with an accurate and ongoing assessment of safety performance.</p> <p>The Accountable Executive’s authorities, accountabilities and responsibilities include but are not limited to:</p> <ul style="list-style-type: none"> <li>- Ensure that financial resources are available to maintain the PTASP</li> <li>- Establish guidance on the level of safety risk acceptable to the agency</li> <li>- Ensure safety concerns are considered in the agency’s ongoing budget planning process</li> <li>- Ensures that the PTASP is effectively implemented and continually updated</li> </ul>
<p><b>Chief Safety Officer or SMS Executive</b></p>	<p>The Chief Safety Officer is designated by the Accountable Executive, holds a direct line of reporting to the Accountable Executive, and is adequately trained. The Chief Safety Officer oversees the initiatives related to safety culture and safety performance. This individual also provides guidance and leads the Safety Committee.</p> <p>The Chief Safety Officer’s authorities, accountabilities and responsibilities include but are not limited to:</p> <ul style="list-style-type: none"> <li>- Manage the Safety Management Policy on behalf of the Accountable Executive</li> <li>- Direct hazard identification and safety risk evaluation</li> <li>- Monitor mitigation activities</li> <li>- Maintain safety documentation</li> <li>- Plan and organize safety management training</li> <li>- Maintain and keep current all records, including employee records associated with safety and training</li> <li>- Assist in the development and necessary modifications of procedures and ensure they are implemented for the safety and security of personnel, facilities, equipment, other property, and records</li> <li>- Advise the Accountable Executive on PTASP progress and any recommended updates</li> </ul>
<p><b>Agency Leadership and Executive Management</b></p>	<ul style="list-style-type: none"> <li>- Executive Director</li> </ul> <p>The Executive Director is the Accountable Executive for the Safety Management Policy and is responsible for ensuring that the agency’s Safety Management Policy is effectively implemented and continually updated.</p> <ul style="list-style-type: none"> <li>- Director of Maintenance</li> </ul> <p>The Director of Maintenance is responsible for ensuring that the agency’s Safety Management Policy is adhered to in the Maintenance department of WRTA.</p> <ul style="list-style-type: none"> <li>- Director of Human Resources and Safety Officer</li> </ul> <p>The Director of Human Resources is the Chief Safety Officer for WRTA and oversees the initiatives related to safety culture and safety</p>

	<p>performance. This individual also provides guidance and leads the Safety Committee.</p> <ul style="list-style-type: none"> <li>- Transportation Director</li> </ul> <p>The Transportation Director is responsible for ensuring that the agency’s Safety Management Policy is adhered to in the Operations department of WRTA.</p> <ul style="list-style-type: none"> <li>- Director of Finance</li> </ul> <p>The Director of Finance is responsible for ensuring that the agency’s Safety Management Policy has adequate financial resources in the budget for WRTA.</p>
<p><b>Key Staff</b></p>	<ul style="list-style-type: none"> <li>- Maintenance Foreman</li> </ul> <p>The Foreman works with the Director of Maintenance to provide day-to-day responsibility for ensuring that the agency’s Safety Management Policy is adhered to in the Maintenance department of WRTA.</p> <ul style="list-style-type: none"> <li>- Chief Dispatcher</li> </ul> <p>The Chief Dispatcher works with the Transportation Director to provide day-to-day responsibility for ensuring that the agency’s Safety Management Policy is adhered to in the Operations department of WRTA.</p>

### Employee Safety Reporting Program

Employees are encouraged to provide input of safety concerns to WRTA in order to ensure a safe working environment.

WRTA’s employees have several methods of reporting safety conditions to WRTA including:

- Incident Report
- Directly to senior management
- Through Union Representatives
- Anonymously

Employees reporting safety concerns have the protection of working under a Collective Bargaining Agreement that provides protection to employees from any retaliation for reporting their safety concerns.

Employees are also provided a monetary bonus for conducting their work in a safe manner.

The incident form is submitted to a supervisor or to Human Resources and they will distribute to the appropriate party.

## II. Safety Risk Management

**Safety Hazard Identification** will limit the number of fatalities, injuries, safety events, and major mechanical failures. WRTA has several methods of capturing this data:

- Customer complaints (via web, phone, paper)
- Incident and Accident forms
- Vehicle Defect Inspection
- Pre and post trip forms
- Facility Inspections
- Union representatives
- FTA Triennial Reviews

### **Safety Risk Assessment**

Currently, WRTA has several logs that capture identified hazards. The CSO and the supervisor of each department will rate the hazards based on severity and probability.

- “High” hazard ratings will be considered unacceptable and require action to mitigate the safety risk,
- “Medium” hazard ratings will be considered undesirable and require the Safety Committee to make a recommendation regarding their acceptability, and
- “Low” hazard ratings may be accepted by the Chief Safety Officer without additional review.

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

### **Safety Risk Management**

Once “high Level” hazards have been identified they are assigned to a specific department, which responds to the hazard immediately. Because of the size of WRTA and the low number of hazards reported annually, hazards are not prioritized. If the number of “high Level” hazards increased beyond a level that could be handled in a timely manner they would be prioritized based on their safety risk assessment.

For “Medium Level” hazard ratings the safety committee would review and make recommendations to mitigate the hazard. These recommendations would be provided to the Accountable Executive to put the recommendation into use by the affected department.

### **Safety Committee**

The safety committee must consist of an equal number of frontline employee representatives and management representatives and be convened using a joint labor management process. The statute requires frontline employee representatives to be selected by labor organization representing the plurality of the agencies to frontline workforce.

WRTA safety committee is in charge with contributing to the safety and welfare of WRTA employees and customers and the general public by: Identifying potential safety hazards,

Serving as a forum for the resolution of safety concerns, recommending practice and procedures designed to ensure safety. Monitoring WRTA's performance practices and environment to ensure safety.

### **III. Safety Assurance**

#### **Procedure Compliance**

WRTA monitors compliance with procedures on a daily basis. The Operations department does pre-trip procedures before putting any vehicle into revenue service to ensure the vehicle is operating safely. The Operations department can also provide “defect” slips to provide the Maintenance department with notification of any item that needs addressed on the revenue vehicles.

The Maintenance department maintains a standard inspection and maintenance plan for all vehicles to ensure the vehicles are in a good state of repair. The Maintenance department also addresses any issues that are brought to their attention by the Operations department that are mission critical to the safe operation of the vehicle.

The Maintenance department also provides the same review and inspection of equipment and facilities.

#### **Ineffective, Inappropriate Mitigation Procedures**

WRTA monitors the hazard mitigations to ensure they are effective, appropriate, and implemented as intended. WRTA works with Ohio Transit Risk Pool (OTRP), which tracks the accident trends for all of the transit agencies that have OTRP as their “insurance/risk share” in the state of Ohio. WRTA analyzes the data for trends that may impact safety.

WRTA has several ways to ensure that mitigations are effective and appropriate. All work orders are logged and filed in their appropriate category. If a hazard is identified that was previously mitigated, the subject matter experts reevaluate mitigation options. The CSO tracks the hazards to ensure that mitigations are not repeated, and new mitigations are implemented.

#### **Investigations of Safety Event**

In the event of an accident the Operator of the revenue vehicle notifies Dispatch. Depending on the severity of the accident, Dispatch calls 911 to report the accident. Dispatch also calls the Safety Officer (and Transportation Director, Director of Maintenance, shop Foreman or Chief Dispatcher) who go to the scene of the accident to perform an investigation. This includes but not limited to interviewing witnesses, taking pictures of the accident and talking with the police.

The Operator will also complete an accident/incident form.

After the on-site investigation is completed the Safety Officer will review the video from the vehicle, complete a report and submit that information to our Risk Pool for insurance purpose. The report will also be reviewed by the Transportation Director.

### **Internal Safety Reporting Program**

The CSO and Safety Committee routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the CSO and the Safety Committee ensure that the concerns are investigated or analyzed through the review process.

## **IV. Safety Promotion**

### **Safety Training Program**

#### **New Hires**

Safety training is included in the New Hire Training program. Also, the continuing safety education and training. The safety training consists of the following topics:

All employees:

- Bloodborne Pathogens

Bus Operators:

- Emergency Driving Procedures

- Passenger Safety

- Accident Management

- Management Commitment

- Safety Program Responsibilities

- De-escalation Training

Maintenance employees:

- Tow Motor

- Hazard Communication

- Personal Protection

#### **Existing Employees**

All existing Bus Operators and staff receive a refresher of each topic throughout a three-year cycle. The topics each year are based on interest or need. Maintenance staff receive monthly training on various safety and work best practices.

### **Safety Communication**

WRTA acknowledges their operations and maintenance employees by providing safety bonuses. This incentive creates a good safety culture by encouraging safety practices and for reporting safety hazards.

Quarterly, WRTA has safety campaigns that are posted on the bulletin boards throughout the facility. Any hazard mitigations are reported to employees through the safety committee reports. A “High” risk hazard mitigation or other safety related incident that needs to be distributed to employees immediately would be reported through WRTA’s text alerts to provide immediate notification.



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## Appendix 1 - FTA 49.C.F.R 673 Rule

### Subpart A—General

#### § 673.1 Applicability

(a) This part applies to any State, local governmental authority, and any other operator of a public transportation system that receives Federal financial assistance under 49 U.S.C. Chapter 53.

(b) This part does not apply to an operator of a public transportation system that only receives Federal financial assistance under 49 U.S.C. 5310, 49 U.S.C. 5311, or both 49 U.S.C. 5310 and 49 U.S.C. 5311.

#### § 673.3 Policy

The Federal Transit Administration (FTA) has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation in the United States. FTA will follow the principles and methods of SMS in its development of rules, regulations, policies, guidance, best practices, and technical assistance administered under the authority of 49 U.S.C. 5329. This part sets standards for the Public Transportation Agency Safety Plan, which will be responsive to FTA's Public Transportation Safety Program, and reflect the specific safety objectives, standards, and priorities of each transit agency. Each Public Transportation Agency Safety Plan will incorporate SMS principles and methods tailored to the size, complexity, and scope of the public transportation system and the environment in which it operates.

#### § 673.5 Definitions

As used in this part:

*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.

*Chief Safety Officer* means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

*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.

*FTA* means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

*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.

*Rail fixed guideway public transportation system* means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction. Rail fixed guideway public transportation systems include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway.

*Rail transit agency* means any entity that provides services on a rail fixed guideway public transportation system.

*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 responsibilities of its employees in regard to safety.

*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.

*State Safety Oversight Agency* means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

*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.

## **Subpart B—Safety Plans**

### **§ 673.11 General requirements**

(a) A transit agency must, within one calendar year after July 19, 2019, establish a Public Transportation Agency Safety Plan that meets the requirements of this part and, at a minimum, consists of the following elements:

- (1) The Public Transportation Agency Safety Plan, and subsequent updates, must be signed by the Accountable Executive and approved by the agency's Board of Directors, or an Equivalent Authority.
- (2) The Public Transportation Agency Safety Plan must document the processes and activities related to Safety Management System (SMS) implementation, as required under subpart C of this part.
- (3) The Public Transportation Agency Safety Plan must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.
- (4) The Public Transportation Agency Safety Plan must address all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan. Compliance with the minimum safety performance standards authorized under 49 U.S.C. 5329(b)(2)(C) is not required until standards have been established through the public notice and comment process.
- (5) Each transit agency must establish a process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.
- (6) A rail transit agency must include or incorporate by reference in its Public Transportation Agency Safety Plan an emergency preparedness and response plan or procedures that addresses, at a minimum, the assignment of employee responsibilities during an emergency, and coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the transit agency's service area.

(b) A transit agency may develop one Public Transportation Agency Safety Plan for all modes of service, or may develop a Public Transportation Agency Safety Plan for each mode of service not subject to safety regulation by another Federal entity.

(c) A transit agency must maintain its Public Transportation Agency Safety Plan in accordance with the recordkeeping requirements in subpart D of this part.

(d) A State must draft and certify a Public Transportation Agency Safety Plan on behalf of any small public transportation provider that is located in that State. A State is not required to draft a Public Transportation Agency Safety Plan for a small public transportation provider if that agency notifies the State that it will draft its own plan. In each instance, the transit agency must carry out the plan. If a State drafts and certifies a Public Transportation Agency Safety Plan on behalf of a transit agency, and the transit agency later opts to draft and certify its own Public Transportation Agency Safety Plan, then the transit agency must notify the State. The transit agency has one year from the date of the notification to draft and certify a Public Transportation Agency Safety Plan that is compliant with this part. The Public Transportation Agency Safety Plan drafted by the State will remain in effect until the transit agency drafts its own Public Transportation Agency Safety Plan.

(e) Any rail fixed guideway public transportation system that had a System Safety Program Plan compliant with 49 CFR part 659 as of October 1, 2012, may keep that plan in effect until one year after July 19, 2019.

(f) Agencies that operate passenger ferries regulated by the United States Coast Guard (USCG) or rail fixed guideway public transportation service regulated by the Federal Railroad Administration (FRA) are not required to develop agency safety plans for those modes of service.

### **§ 673.13 Certification of compliance**

(a) Each transit agency, or State as authorized in § 673.11(d), must certify that it has established a Public Transportation Agency Safety Plan meeting the requirements of this part one year after July 19, 2019. A State Safety Oversight Agency must review and approve a Public Transportation Agency Safety Plan developed by rail fixed guideway system, as authorized in 49 U.S.C. 5329(e) and its implementing regulations at 49 CFR part 674.

(b) On an annual basis, a transit agency, direct recipient, or State must certify its compliance with this part.

### **§ 673.15 Coordination with metropolitan, statewide, and non-metropolitan planning processes**

(a) A State or transit agency must make its safety performance targets available to States and Metropolitan Planning Organizations to aid in the planning process.

(b) To the maximum extent practicable, a State or transit agency must coordinate with States and Metropolitan Planning Organizations in the selection of State and MPO safety performance targets.

## **Subpart C—Safety Management Systems**

### **§ 673.21 General requirements**

Each transit agency must establish and implement a Safety Management System under this part. A transit agency Safety Management System must be appropriately scaled to the size, scope and complexity of the transit agency and include the following elements:

(a) Safety Management Policy as described in § 673.23;

(b) Safety Risk Management as described in § 673.25;

(c) Safety Assurance as described in § 673.27; and

(d) Safety Promotion as described in § 673.29.

### **§ 673.23 Safety management policy**

- (a) A transit agency must establish its organizational accountabilities and responsibilities and have a written statement of safety management policy that includes the agency's safety objectives.
- (b) A transit agency must establish and implement a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.
- (c) The safety management policy must be communicated throughout the agency's organization.
- (d) The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals within its organization, as they relate to the development and management of the transit agency's Safety Management System (SMS):
  - (1) *Accountable Executive.* The transit agency must identify an Accountable Executive. The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented, throughout the agency's public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive.
  - (2) *Chief Safety Officer or Safety Management System (SMS) Executive.* The Accountable Executive must designate a Chief Safety Officer or SMS Executive who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS. The Chief Safety Officer or SMS Executive must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer or SMS Executive.
  - (3) *Agency leadership and executive management.* A transit agency must identify those members of its leadership or executive management, other than an Accountable Executive, Chief Safety Officer, or SMS Executive, who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.
  - (4) *Key staff.* A transit agency may designate key staff, groups of staff, or committees to support the Accountable Executive, Chief Safety Officer, or SMS Executive in developing, implementing, and operating the agency's SMS.

### **§ 673.25 Safety risk management**

- (a) *Safety Risk Management process.* A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process must be comprised of the following activities: Safety hazard identification, safety risk assessment, and safety risk mitigation.
- (b) *Safety hazard identification.* (1) A transit agency must establish methods or processes to identify hazards and consequences of the hazards.
  - (2) A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA.
- (c) *Safety risk assessment.* (1) A transit agency must establish methods or processes to assess the safety risks associated with identified safety hazards.
  - (2) A safety risk assessment includes an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations, and prioritization of the hazards based on the safety risk.
- (d) *Safety risk mitigation.* A transit agency must establish methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences.

### § 673.27 Safety assurance

(a) *Safety assurance process.* A transit agency must develop and implement a safety assurance process, consistent with this subpart. A rail fixed guideway public transportation system, and a recipient or subrecipient of Federal financial assistance under 49 U.S.C. Chapter 53 that operates more than one hundred vehicles in peak revenue service, must include in its safety assurance process each of the requirements in paragraphs (b), (c), and (d) of this section. A small public transportation provider only must include in its safety assurance process the requirements in paragraph (b) of this section.

(b) *Safety performance monitoring and measurement.* A transit agency must establish activities to:

- (1) Monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- (2) Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- (3) Conduct investigations of safety events to identify causal factors; and
- (4) Monitor information reported through any internal safety reporting programs.

(c) *Management of change.* (1) A transit agency must establish a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance.

(2) If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process.

(d) *Continuous improvement.* (1) A transit agency must establish a process to assess its safety performance.

(2) If a transit agency identifies any deficiencies as part of its safety performance assessment, then the transit agency must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies.

### § 673.29 Safety promotion

(a) *Competencies and training.* A transit agency must establish and implement a comprehensive safety training program for all agency employees and contractors directly responsible for safety in the agency's public transportation system. The training program must include refresher training, as necessary.

(b) *Safety communication.* A transit agency must communicate safety and safety performance information throughout the agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through an employee safety reporting program.

## Subpart D—Safety Plan Documentation and Recordkeeping

### § 673.31 Safety plan documentation

At all times, a transit agency must maintain documents that set forth its Public Transportation Agency Safety Plan, including those related to the implementation of its Safety Management System (SMS), and results from SMS processes and activities. A transit agency must maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that the agency uses to carry out its Public Transportation Agency Safety Plan. These documents must be made available upon request by the Federal Transit Administration or other Federal entity, or a State Safety Oversight Agency having jurisdiction. A transit agency must maintain these documents for a minimum of three years after they are created.