Developed by: Connecticut Department of Transportation

Mandated by: Federal Transit Administration

Implemented by: Arrow Line Acquisition, LLC

Effective Date: January 1, 2021

This safety plan makes reference to DOT 49 CFR Part 673.

The web address for the referenced regulations is: <u>49 CFR Part 673 - Public Transportation Agency Safety Plan</u>

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### **EXECUTIVE SUMMARY**

The Federal Transit Administration (FTA) authorized by the Moving Ahead for Progress in the 21st Century Act (MAP–21) is requiring States and certain operators of public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53 to develop Public Transportation Agency Safety Plans (PTASP) based on the Safety Management System (SMS) approach. As a small public transportation provider the requirements outlined in the FTA regulations 49 CFR Part 673 apply to the Arrow Line Acquisition, LLC.

The Connecticut Department of Transportation (CTDOT) and the Arrow Line Acquisition, LLC have collaborated in developing this SMS (§ 673.21) to appropriately scale it to the size, scope, and complexity of this organization. The SMS is comprised of the following four components: Safety Management Policy (§ 673.23), Safety Risk Management (§ 673.25), Safety Assurance (§ 673.27), and Safety Promotion (§ 673.29). This PTASP is being implemented by the Arrow Line Acquisition, LLC, a small public transportation provider that contracts with CTDOT for the provision of public transportation services.

The aim of the PTASP is to help manage safety risks and prioritize capital investments through performance-based planning. The established SMS framework and strategies outlined in this PTASP will ensure necessary procedures are implemented in order to identify, mitigate, and monitor safety risks at the Arrow Line Acquisition, LLC.

This PTASP consists of the following elements:

	Safety Performance Targets and Coordination	The coordination efforts undertaken by the organization to share its safety performance target information (i.e., fatalities, injuries, safety events, system reliability).
	Policy Statement	A written statement signed by the Accountable Executive establishing the organization's commitment to safety.
SAFETY	Employee Safety Reporting Program	A program which protects and allows employees to report safety conditions to senior management.
MANAGEMENT POLICY	Policy Communication	The activities undertaken by the organization to communicate its safety policy throughout the organization.
	SMS Authorities, Accountabilities, and Responsibilities	A list of individuals who play a key role in the development and management of the organization's SMS.
	Safety Hazard Identification	The processes used by the organization to identify hazards and the consequences of those hazards.
SAFETY RISK Safety Risk Assessment MANAGEMENT		The processes used by the organization to assess the safety risks associated with identified hazards.
MANAGEMENT	Safety Risk Mitigation	The processes used by the organization to implement strategies to mitigate or eliminate safety risks associated with identified hazards.
SAFETY ASSURANCE	Safety Performance Monitoring and Measurement	The activities undertaken by the organization to continual monitor its efforts in determining whether it is meeting its safety objectives and safety performance targets.
Safety Training Program		A comprehensive training program for organizational staff directly responsible for safety-related job duties.
SAFETY PROMOTION	Safety Communication	The activities undertaken by the organization to communicate its safety and safety performance information throughout the organization.

# **ORGANIZATION INFORMATION**

Organization Name: Arrow Line Acquisition, LLC

Organization Address: 677 Cromwell Ave, Rocky Hill CT 06067

Name and Title of Accountable Executive: Dennis Solensky, Transportation Public Transportation Administrator,

Bureau of Public Transportation, CTDOT

Name and Title of Chief Safety Officer or SMS Executive: Chris Crean, Vice President Safety & Security

Mode(s) of Service Provided and Covered by this Plan					
Fixed Route Bus Arrow Line Acquisition, LLC Contractor Name					
Motorbus (MB)					
Commuter Bus (CB)	$\boxtimes$				
Trolley Bus (TB)					
Bus Rapid Transit (RB)					
Non-Fixed Route Bus					
Demand Response (DR)					
Demand Response Taxi (DT)					
Vanpool (VP)					

List of FTA Funding Types				
Federal Program	Federal Program Direct Recipient Subrecipient			
Section 5307				
Section 5311				
Section 5339				
Other (please specify)				
Other (please specify)				
Other (please specify)				

Provision of Transit Services on Behalf of another Agency			
No			
Yes	$\boxtimes$		
If yes, please describe the arrangement(s).	Arrow Line Acquisition, LLC contracts with CTDOT to provide state-owned bus services on behalf of CTDOT.		
Name and address of the transit agency(ies) or entity(ies) for which service is provided.	Connecticut Department of Transportation 2800 Berlin Turnpike Newington, CT 06111		

# **CERTIFICATION OF COMPLIANCE**

The Connecticut Department of Transportation (CTDOT) certifies that, on behalf of the Arrow Line Acquisition, LLC, it has established a Public Transportation Agency Safety Plan (PTASP) meeting the requirements of 49 CFR Part 673 which became effective July 20, 2020. Annually thereafter, the CTDOT will certify its compliance with 49 CFR Part 673.

### PLAN DEVELOPMENT, APPROVAL, AND UPDATES

This PTASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan (NSP). This PTASP was approved by CTDOT with a copy of the authorized CTDOT Resolution being maintained on file by the organization's Chief Safety Officer. The Agency Safety Plan (ASP) will be reviewed and updated by the Chief Safety Officer in collaboration with CTDOT by October 31st of each year. The Accountable Executive will review and approve any changes, signing the new ASP then forwarding to the CTDOT Commissioner for review and approval by December 31st of each year.

Fully	Digitally signed by Dennis G Solensky DN: C=US, E=dennis.solensky@ct.gov, O=CT DOT, OU=Transit & Ridesharing, CN=Dennis G Solensky
Accountable Executive	e Signature
Dennis Solensky 1/11/2021	
Date	

Version Number and Updates							
Version Number	Version Number Section/Pages Reason for Change Date Issued						
1		New Document	January 1, 2021				

### RECORDKEEPING

The Arrow Line Acquisition, LLC, at all times, will maintain documents set forth in its PTASP, including those related to the implementation of its Safety Management System (SMS) and results from SMS processes and activities. The Arrow Line Acquisition, LLC will maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that the organization uses to carry out its PTASP. Organizational staff has been made aware that these documents must be made available upon request by the Federal Transit Administration or other Federal entity, or a State Oversight Agency having jurisdiction. The Arrow Line Acquisition, LLC will maintain these documents for a minimum of three years after they are created.

# **SAFETY PERFORMANCE TARGETS**

# **Safety Performance Targets (§ 673.11(a)(3))**

As required this PTASP contains safety performance targets (SPTs) that are based on the safety performance measures established under the National Public Transportation Safety Plan (January 2017). A safety performance target is a quantifiable level of performance or condition expressed as a value for the measure related to safety management activities to be achieved within a set time period (§ 673.5). A safety performance measure is a quantifiable indicator of performance or condition that is used to establish targets related to safety management activities, and to assess progress toward meeting the established targets (§ 673.5).

The Arrow Line Acquisition, LLC uses seven (7) safety performance targets based on four (4) safety performance measure categories (fatalities, injuries, safety events, and system reliability):

- (1) Fatalities (total number of reportable fatalities)
- (2) Fatalities (fatality rate per total vehicle revenue miles by mode)
- (3) Injuries (total number of reportable injuries)
- (4) Injuries (injury rate per total vehicle revenue miles by mode)
- (5) Safety Events (total number of reportable safety events)
- (6) Safety Events (safety event rate per total vehicle revenue miles by mode)
- (7) System Reliability (mean distance between mechanical failures by mode)

# Safety Performance Targets Coordination (§ 673.15(a),(b))

The below safety performance targets were developed in collaboration between the Connecticut Department of Transportation (CTDOT), Arrow Line Acquisition, LLC and the Metropolitan Planning Organization(s) (MPO) listed below:

Safety Performance Targets							
Mode of Fatalities Injuries Safety Events				System Reliability			
Transit Service	total	per 100 thousand VRM <sup>1</sup>	total	per 100 thousand VRM	total	per 100 thousand VRM	VRM / mechanical failures
Commuter Bus (CB)	0	0	0	0	0	0	217,801

МРО	Date SPTs Transmitted to MPO	Date of Consultation with MPO
Southeastern Connecticut	November 13, 2020	November 19, 2020
Capital Region	November 13, 2020	November 25, 2020
South Central Region	November 13, 2020	December 1, 2020

<sup>&</sup>lt;sup>1</sup> VRM - Vehicle Revenue Miles

# **Methodology of SPTs**

The above safety performance targets are based on the review of the previous two-year (state fiscal years 2018 thru 2019) average of the service provider's safety performance data.

# **Effective Period of SPTs**

January 1, 2021 thru December 31, 2021

Each year CTDOT and Arrow Line Acquisition, LLC collaborate in developing safety performance targets which are then transmitted to and discussed with the above-mentioned MPO(s). In addition, the approved Agency Safety Plan including the safety performance targets are shared with the above-mentioned MPO(s).

# **Chapter I. SAFETY MANAGEMENT POLICY**

# Policy Statement and Safety Objectives (§ 673.23(a))

The Arrow Line Acquisition, LLC has adopted this Safety Management System (SMS) which is effective on January 1, 2021. The management team at Arrow Line Acquisition, LLC is committed to implementing a comprehensive safety plan which strongly supports a philosophy of fostering and maintaining a safe working environment for its employees, ensuring safety for its customers and the general public, and providing the necessary resources (i.e., people, processes, and technology) in order to carry out these responsibilities. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

Arrow Line Acquisition, LLC is committed to the following safety objectives:

- Communicating the purpose and benefits of the SMS to all staff, managers, supervisors, and employees.
   This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing safety performance targets that are realistic, measurable, and data driven.
- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

Digitally signed by Dennis G Solensky  NNC-US, E-dennis adlensky@d_gov, O-CT  OU-Transl & Nidesharing, ON-Dennis G Solensky
Accountable Executive Signature
Dennis Solensky 1/11/2021
Date

# **Employee Safety Reporting Program (§ 673.23(b))**

Our organization fully supports an Employee Safety Reporting Program (ESRP) which allows employees to report safety conditions to senior management in good faith without fear of retribution. Individuals are encouraged to be vigilant in their day-to-day duties when safety concerns or potential safety issues are noticed.

### **ESRP Benefits**

The following are several examples of the benefits that our organization gains as safety issues are reported:

<u>Reduction in Injuries</u> – By keeping everyone focused on safety, the number of injuries experienced by the organization will go down.

<u>Increased Productivity</u> – The reduction in injures and other benefits will often lead to an overall increase in the productivity of the organization.

<u>Improved Morale</u> – As safety concerns are reported to and acted upon by the organization, employees' morale will improve knowing that their employer cares about them.

# **Protection of Employees**

No disciplinary action will be taken against any employee who communicates a safety concern through the Arrow Line Acquisition, LLC safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct and/or negligence, or a deliberate or willful disregard of Arrow Line Acquisition, LLC rules, policies, and procedures.

As an organization, it is important that we are able to ask questions and raise concerns about any safety issues freely, and with an expectation that our concerns will be taken seriously and treated fairly. Our organization is committed to protecting employees who raise concerns in good faith and we are committed to protecting the rights of those who:

- Report safety concerns honestly and in good faith.
- Cooperate in safety-related investigations.
- Raise questions about the organization's safety practices and procedures.
- Seek guidance on how to handle a particular safety-related situation.

# **Employee Behaviors That May Result in Disciplinary Action**

Disciplinary action may be taken by the Arrow Line Acquisition, LLC in the following situations when a safety reporting issue involves:

- A deliberate reporting of false safety information,
- An intent not to report a safety concern.
- The willful participation in an illegal activity, such as assault or theft,
- Making false accusations with the intent to retaliate (i.e., harm, intimidate, harass) against another individual.
- Gross negligence, such as knowingly utilizing heavy equipment for the purposes other than intended such that people or property are put at risk,
- The withholding of critical safety information during an investigation of a reported safety concern, or
- The deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

# **Safety Reporting Methods**

There are numerous methods in which an identified safety concern can be reported to senior management:

Hazard Report Form – A Hazard Report Form is available by contacting a Supervisor or Manager.

<u>Safety Hotline</u> – By calling the organization's Safety Hotline 1 (800) 237-8747 ext. 1430 the individual reporting the safety concern remains anonymous.

<u>Safety Email</u> – A safety concern can be reported by sending an email to <a href="mailto:chris@peterpanbus.com">chris@peterpanbus.com</a>

<u>Dispatch</u> – The dispatcher will enter safety reported issues into the organization's dispatch Operations Log.

<u>Driver Meetings</u> – This type of forum allows for an open discussion and informs everyone in attendance of any safety issues that other employees may be encountering.

<u>Direct Reporting</u> – Safety issues can be reported directly to any Dispatcher, Supervisor, Manager, or the Chief Safety Officer.

# **Types of Safety Concerns to Report**

The following are examples of safety concerns that can be reported. This list is not comprehensive, but it covers a wide array of potential safety conditions that could exist:

- Speeding on bus routes
- Failure to complete pre-trip inspections
- Lack of scheduled vehicle maintenance (i.e., cracked tires, worn brake pads)
- Damaged equipment/uncalibrated tools
- · Detours and traffic work zones on route
- Non-working traffic lights or crossing gates
- Damage to terminals and bus stops that might impact safety
- Defective roadways (i.e., potholes, worn striping, crumbling asphalt)
- Clearance issues
- Safety hazards in the operating environment
- Weather conditions (i.e., snow, ice, fog)
- Policies and procedures that aren't working as intended
- Events that senior managers might not otherwise know about (i.e., near misses)
- Information about why a safety event occurred (i.e., radio communication challenges)

# Results of Safety Reporting and Safety Actions Taken

The Chief Safety Officer (CSO) takes the following steps on a daily basis to ensure each reported safety issue is investigated and any resultant actions taken by the organization are communicated to employees:

- (1) The CSO reviews different sources of safety information such as, Safety Event Log, and the dedicated email address, and documents all identified safety conditions into the organization's Safety Risk Register,
- (2) Each reported safety issue is investigated by the CSO who may consult with the relevant Supervisor/Manager to gather additional information on the safety-reported issue,

- (3) The CSO shares this information with the Safety Committee during its guarterly meetings.
- (4) The reported safety issue (i.e., identified hazard and consequences) is addressed, resolved, and managed through the organization's Safety Risk Management (SRM) and Safety Assurance (SA) processes, and
- (5) Upon the recommendation of the Safety Committee, the CSO and/or the relevant Supervisor/Manager communicates any safety mitigations implemented directly to the employee if the reporting employee provided his or her name during the reporting process.

To reinforce the organization's safety message employees are informed of any safety actions taken by the organization in response to a reported safety concern by sharing this safety information through the organization's Weekly Safety Newsletter that is posted on the organization's bulletins boards and common work areas.

All reported safety concerns are collected and categorized into the organization's Safety Risk Register. Evaluating this safety data assists the organization in determining how to improve future processes in order to reduce safety risks across all aspects of our organization. We continuously engage and encourage employees to utilize the ESRP and make necessary changes to the ESRP in order to help support a positive safety culture within our organization.

# Safety Management Policy Communication (§ 673.23(c))

The Arrow Line Acquisition, Safety Management Policy Statement was communicated throughout the organization with each employee being given a copy by their respective supervisors/managers during the month of January 2021. The Statement was also posted on the organization's bulletin boards, common work areas, and website. In addition, the CSO forwarded a copy of the Statement to the contractor(s). The organization has also incorporated review and distribution of the Statement into new hire training and all-staff annual refresher training.

### Authorities, Accountabilities, and Responsibilities (§ 673.23(d))

The Accountable Executive has designated a CSO who will be responsible for the day-to-day implementation and operation of our organization's SMS. The ultimate responsibility for safety at the organization will rest with the Accountable Executive. Each one of us from executive management to frontline employees will be responsible for making our organization safer. Supervisors and managers will be responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established as part of the SMS.

All key personnel listed below will visibly demonstrate and communicate a commitment to safety as a top priority of the organization and abide by the organization's safety policies and procedures. In addition, all key personnel will acquire knowledge and keep up to date on safety-related information through attendance at safety training classes. The authorities, accountabilities, and responsibilities under the Agency's Safety Plan (ASP) have been assigned as follows:

**Accountable Executive** - The Accountable Executive's role and responsibilities in overseeing all aspects of the ASP include:

- Controlling and directing human and capital resources needed to develop and maintain the ASP and SMS,
- Designating an adequately trained Chief Safety Officer who is a direct report,
- Ensuring that SMS is effectively implemented.
- Assuming ultimate responsibility for carrying out the ASP and SMS.
- Communicating that employee safety is a performance expectation of all positions,

- Signing SMS implementation planning documents,
- Endorsing SMS implementation team membership,
- Notifying the CTDOT Commissioner of all situations related to safety events, hazards, consequences, risks, and risk mitigation efforts undertaken by the organization, and
- · Recognizing the organization's safety achievements.

**Chief Safety Officer (CSO)** - The CSO designated by the Accountable Executive ensures the policies and procedures of the ASP are implemented and complied with on a daily basis. Duties of the CSO include:

- Developing the ASP including SMS policies and procedures,
- Managing the Employee Safety Reporting Program (ESRP),
- · Ensuring organization policies are consistent with organization safety objectives,
- Chairing the Safety Committee and,
  - Coordinating its activities,
  - Establishing and maintaining the organization's Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents and accidents, and
  - Maintaining and distributing minutes of committee meetings.
- Developing and maintaining SMS documentation,
- · Directing hazard identification and safety risk assessment,
- Monitoring safety risk mitigation activities,
- Providing periodic reports on safety performance and any safety actions taken (i.e., safety reports) to all
  employees, contractors, Executive Management, and the Accountable Executive,
- Briefing the Accountable Executive on SMS implementation progress,
- Ensuring all employees are informed of the organization's safety plan,
- · Communicating regularly with Supervisors/Managers,
- Proactively consulting with Contractors, and
- Planning safety management training.

**Arrow Line Acquisition, LLC Leadership and Executive Management** - Arrow Line Acquisition, LLC's Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of Arrow Line Acquisition, LLC's SMS under this plan. Arrow Line Acquisition, LLC's Leadership and Executive Management include:

- Don Soja, General Manager
- Fred Murphy, Garage Manager
- Nancy Olsen, Office Manager
- · Joe Derosier, Dispatcher

Arrow Line Acquisition, LLC's Leadership and Executive Management personnel help foster a strong work safety culture by providing safety leadership and setting a good example. They have the following authorities, accountabilities, and responsibilities:

- Modifying policies in their departments consistent with implementation of the SMS, as necessary,
- Demonstrating a commitment to safety performance,
- Conducting regular safety meetings with employees to discuss safety issues,
- Participating as members of the organization's Safety Committee,
- Regularly communicating with the CSO,
- · Immediately reporting any safety concerns to the CSO,
- Ensuring safe work procedures are followed,

- Promoting and implementing safety initiatives, and
- Providing subject matter expertise to support implementation of the SMS including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness.

**CTDOT Commissioner** – The CTDOT Commissioner will be responsible for:

- Approving the ASP and any subsequent updates, and
- Meeting with the Accountable Executive to discuss safety-related matters.

**Key Staff and Activities** - Employees will act as frontline safety ambassadors for our organization on a daily basis. All employees must take reasonable care for their own safety while they are at work and take reasonable care that their acts or omissions do not adversely affect the safety of other persons. Employee safety responsibilities will include:

- Taking reasonable care to work safely,
- · Making sure that the work area is safe when leaving it,
- Making proper use of all appropriate safeguards, safety devices, and personal protective equipment,
- Following agreed safe working practices and rules, and
- Reporting safety concerns to senior management.

Additionally, the Arrow Line Acquisition, LLC Safety Committee which supports its SMS and safety programs is comprised of the following members representing different aspects of the organization and will be responsible for meeting on a quarterly basis to discuss safety-related topics, evaluating in coordination with the CSO any identified hazards, and making recommendations to improve safety:

- Chris Crean, Vice President Safety and Security
- Don Soja, General Manager
- Nancy Olsen, Office Manager
- Mike Orsene, Contract Manager

Lastly, contractors will be required to report any safety concerns to senior management, engage in safe work practices, and ensure the safety of the general public and other employees in the workplace, and provide feedback to the organization on safety-related matters by consulting with the organization's CSO.

### **Chapter II. SAFETY RISK MANAGEMENT**

# Safety Risk Management Process (§ 673.25(a))

The Arrow Line Acquisition, LLC has implemented a Safety Risk Management (SRM) process for all elements of its public transportation system. The organization's process involves identifying hazards and consequences, evaluating the risks associated with those hazards, and implementing strategies to decrease those risks. These three core activities help support the organization's efforts to foster a positive and strong safety culture, and ensure the safety of our operations, passengers, employees, vehicles, and facilities.

The organization's Chief Safety Officer (CSO) is responsible for ensuring hazard identification techniques including processes for assessing and mitigating safety risks have been established. The organization's SRM process is periodically reviewed and modified with results being documented in our Safety Risk Register. In its Safety Risk Register the Arrow Line Acquisition, LLC uses the table below to classify the types of hazards identified, assessed, and mitigated:

Hazard Category					
Organizational	Organizational Technical Environmental				
Resourcing	Supervisory	Equipment			
Procedural	Operational	Weather			
Training	Maintenance	Natural			

# Safety Risk Register

The Safety Risk Register maintained by the Chief Safety Officer contains collected information on the organization's Safety Risk Assessment and Safety Risk Mitigation processes. Listed below are the categories of information collected about hazards and their analyses under the organization's Safety Risk Assessment Register:

- A description of the hazard,
- Type of hazard.
- Date the hazard was identified,
- How the hazard was identified (source),
- Date analysis was performed,
- Potential consequences associated with the hazard (worst possible, worst credible, or most common).
- What mitigations are currently in place to address potential consequences associated with hazard,
- The initial safety risk rating, as defined by the severity of the consequences and likelihood of the consequences taking into account existing safety risk mitigations only,
- The revised safety risk index (risk rating with additional safety risk mitigations implemented),
- The department responsible for implementing the safety risk mitigations,
- Estimated due date for the safety risk mitigations to be implemented, and
- Contact person.

The organization's Safety Risk Mitigation Register collects information for status tracking and monitoring the effectiveness of implemented safety risk mitigations. The Safety Risk Mitigation Register includes:

- The safety risk mitigation monitoring parameters (safety performance indicators (SPIs) and targets).
- Associated timeframe.
- Monitoring activities, and

The responsibilities for monitoring.

# **Safety Committee Meetings**

The Arrow Line Acquisition, LLC's Safety Committee which supports its SMS and safety programs is comprised of the CSO and other members representing different aspects of the organization. The CSO is responsible for conducting the meetings and disseminating pertinent safety information to the committee members for their review. The committee meeting minutes are prepared and maintained by the CSO and include the meeting date, time, and location, attendance, a summary of issues discussed, proposed actions to be taken, and the person(s) responsible for follow-up on each item. An agenda and the previous committee meeting minutes are provided to each committee member prior to the next meeting. Agenda items to be discussed during the quarterly Safety Committee meetings may include the following:

- (1) Call to Order
- (2) Old Business
- (3) Safety Risk Management Update
- (4) Safety Risk Mitigation Monitoring Update
- (5) Safety Events Update
- (6) New Business
- (7) Next Meeting Date

Typical duties of the Safety Committee include:

- Meeting on a quarterly basis,
- · Assessing and prioritizing safety risks,
- Reporting unsafe conditions and suggesting corrective actions,
- Reviewing the Safety Event Log which is maintained by the CSO,
- Contributing ideas and suggestions for improvements in safety, and
- Promoting safety.

# Safety Hazard Identification (§ 673.25(b)(1),(b)(2))

A hazard is 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. A consequence is an effect of a hazard and identifies what could happen. The identified potential consequence may be minor or catastrophic, depending on the nature of the hazard.

Hazard identification is the organization's first line of defense against preventing these types of outcomes. Individual and group-based approaches have been put in-place to help the organization identify hazards and potential consequences that could lead to unsafe work conditions. Hazards are identified through the following activities:

<u>Employee Safety Reporting Program (ESRP)</u> – The ongoing ESRP is a vital source of information for the management of safety. Individuals who observe safety concerns in their day-to-day duties are encouraged to report their concerns.

<u>Workplace Walkthroughs</u> – On a daily basis all employees are encouraged to walk around their work area in order to observe and determine if there are any safety concerns worth bringing to the attention of senior personnel. Workplace walkthroughs can help reveal any shortcomings so that they can be addressed before they become a safety concern. Workplace premises covered during walkthroughs may include office space, storage rooms, equipment bays, and the organization's grounds.

<u>Workplace Inspections</u> – Monthly inspections carried out solely by supervisors/managers focus on specific work tasks and workplace locations. Such inspection activities include consulting with employees, observing work being performed, taking photos of problematic areas, and completing an Inspection Report. Inspections are conducted independently of workplace walkthroughs.

<u>Quarterly Safety Committee Meetings</u> – Any safety issue can be discussed and reported during a safety committee meeting.

<u>Driver Meetings</u> – This type of forum allows for an open discussion and informs everyone in attendance of any safety issues that other employees may have encountered.

<u>Brainstorming Sessions</u> – Monthly group meetings facilitated by supervisors/managers with their staff encourages imaginative thinking and offers opportunities for employees to freely discuss their safety concerns.

<u>Data Analysis</u> – The organization collects, organizes, and reviews safety information to determine what types of hazards may exist in which the organization could be potentially exposed to. The organization closely monitors, on a weekly basis, key data sources to determine whether any patterns have emerged showing how hazards have arisen and are likely to happen again. The organization's key safety information is derived from the following sources:

- Records of previous injuries
- Workers' compensation statistics
- · Patterns of frequently occurring injuries
- Employee training records
- Safety Risk Register
- Inspection reports
- Input from surveys

Other hazard identification activities engaged by the organization include:

- Review of vehicle camera footage
- Maintenance reports
- Surveys
- Comments from the general public
- Investigations into safety events
- FTA and other oversight authorities

The organization's hazard identification protocols include:

- (1) Any observed and reported safety issue is reviewed by the CSO who is accountable for logging identified hazards into the organization's Safety Risk Register,
- (2) Further analysis (i.e., investigation) of the identified hazard may be conducted by the CSO in order to validate its existence and the potential consequence associated with it. Such follow-up actions taken by the CSO may include:
  - a. Reaching out to the reporting party, if available, to gather all known information about the reported hazard,

- Conducting a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (i.e., photographs and/or video), and taking any measurements deemed necessary,
- c. Conducting interviews with employees in the area to gather potentially relevant information on the reported hazard,
- d. Reviewing any documentation associated with the hazard (i.e., records, reports, procedures, inspections, technical documents, etc.),
- e. Contacting other departments that may have association with or technical knowledge relevant to the reported hazard,
- f. Reviewing any past reported hazards of a similar nature, and
- g. Evaluating tasks and/or processes associated with the reported hazard.
- (3) Prior to the quarterly Safety Committee meeting the CSO requests Safety Committee members to submit any safety-related topics for discussion,
- (4) The CSO then prepares and disseminates an agenda which includes 'Safety Risk Management Update' as a topic for discussion and forwards the Safety Risk Register containing the list of identified hazards and consequences to the Safety Committee members for review, and
- (5) During the 'Safety Risk Management Update' portion of the quarterly Safety Committee meeting agenda the CSO requests the Safety Committee members to participate by sharing their knowledge and input including any questions regarding the current list of identified hazards and consequences being reviewed.

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

### **Safety Risk Assessment (§ 673.25(c)(1-2))**

Once a hazard has been identified, the organization assesses the safety risk associated with the identified safety hazard. The organization assesses the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritization of the hazards based on the safety risk involved. A risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

The CSO is accountable for logging identified hazards into the organization's Safety Risk Register. These hazards are prioritized using the organization's Safety Risk Assessment Matrix (see table below):

# **Safety Risk Assessment Matrix**

LIKELIHOOD	SEVERITY				
LIKELIHOOD	1 (Catastrophic)	2 (Critical)	3 (Marginal)	4 (Negligible)	
A (Frequent)	1A	2A	3A	4A	
B (Probable)	1B	2B	3B	4B	
C (Occasional)	1C	2C	3C	4C	
D (Remote)	1D	2D	3D	4D	
E (Improbable)	1E	2E	3E	4E	

The matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. This matrix also categorizes risks into levels: High, Medium, or Low based on the likelihood of occurrence and severity of the outcome (see table below):

# **Safety Risk Level Categories**

Safety Risk Index	Criteria by Index
High	Unacceptable – Action Required: The safety risk must be mitigated or eliminated.
Medium	Undesirable – Management Decision: The Safety Committee must decide whether to accept safety risk with monitoring or require additional action.
Low	Acceptable with Review: Safety risk is acceptable 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.

The organization's risk assessment protocols are as follows:

- (1) Prior to the quarterly Safety Committee meeting the CSO prepares and forwards the Safety Risk Register to the Safety Committee members for review,
- (2) During the 'Safety Risk Management Update' portion of the quarterly Safety Committee meeting agenda the CSO requests the Safety Committee members to discuss the likelihood and severity of the consequences of each identified hazard. As each identified hazard is assessed the committee prioritizes the hazard to determine which hazards pose the greater risk allowing action to be taken to resolve the most serious safety issues first, and

(3) After consulting with the Safety Committee on the most recent assessment and prioritization of hazards the CSO then updates the Safety Risk Register accordingly.

# Safety Risk Mitigation (§ 673.25(d))

Upon a hazard being assessed and prioritized, the organization identifies strategies to reduce or eliminate the safety risk associated with the potential consequences of the hazard. Risk mitigation means a method or methods to eliminate or reduce the effects of hazards. The organization's risk mitigation protocols include:

- (1) The CSO periodically conducts on-going research via the internet, communicates with other organizations, and consults with employees and senior management to better understand the established mitigation efforts that have been implemented for similar identified hazards encountered by other organizations,
- (2) Prior to the quarterly Safety Committee meeting the CSO prepares and forwards the Safety Risk Register to the Safety Committee members for review,
- (3) During the 'Safety Risk Management Update' portion of the quarterly Safety Committee meeting agenda the CSO requests the Safety Committee members to discuss their ideas and suggestions on how to mitigate each assessed and prioritized hazard,
- (4) The mitigation strategy for each assessed/prioritized hazard is determined by the committee then the CSO assigns an individual (member) responsible for implementing the necessary steps to mitigate the hazard including an estimated implementation date, and
- (5) After consulting with the Safety Committee on the most recent hazard mitigation strategies the CSO then updates the Safety Risk Register accordingly.

Results from the Arrow Line Acquisition, LLC Safety Risk Management processes are shared by the Chief Safety Officer with the General Manager and Accountable Executive during quarterly Safety Briefings. Also, the Accountable Executive updates the CTDOT Commissioner on all safety-related activities conducted by the organization.

### Chapter III. SAFETY ASSURANCE

# Safety Assurance Process (§ 673.27(a)

The Arrow Line Acquisition, LLC's safety assurance process helps our agency to ensure the safety risk mitigation strategies developed through our safety risk management processes are adequate, effective and implemented as intended. Through the collection of statistical safety data and information, the analysis of safety trends, and the assessment of safety-related information our organization is able to determine what is working well and whether we are meeting or exceeding our safety objectives.

# **Safety Performance Monitoring and Measurement (§ 673.27(b)(1-4))**

Safety performance monitoring and measurement which involves the continual monitoring of our organization's activities allows us to measure the effectiveness of risk controls against our safety objectives. These measurements provide the CSO with valuable information in order to make informed decisions on how to continuously improve safety throughout the organization.

# **Monitoring Operations and Maintenance Procedures**

The Arrow Line Acquisition, LLC monitors its entire transit system for compliance with operations and maintenance procedures by conducting the following activities:

<u>Safety Event Investigations</u> – An investigation into a safety-related matter is a critical factor for preventing future safety events and provides the opportunity for monitoring the effectiveness of hazard mitigations. Further information on this subject can be found within this Chapter under the 'Safety Event Investigations' section.

<u>Internal Safety Audits</u> – An annual safety audit performed by the CSO identifies areas where corrective actions are needed.

<u>ESRP</u> – The ongoing ESRP is a vital source of information for the management of safety. Additional information on the Arrow Line Acquisition, LLC's ESRP is shown in Chapter I. Safety Management Policy.

<u>Workplace Inspections</u> – Monthly inspections carried out solely by supervisors/managers focus on specific work tasks and workplace locations and provide valuable information on where problematic areas may arise and need to be addressed.

<u>Safety Surveys</u> – Relevant safety-related information received from quarterly surveys allows our organization to further identify and prevent safety events from potentially happening.

<u>Vehicle Inspections and Preventive Maintenance</u> – Regular vehicle inspections and preventive maintenance are conducted to ensure the proper performance and safety of the organization's vehicles. Procedures for regular vehicle inspections and preventive maintenance can be found in the Arrow Line Acquisition, LLC's, Driver Vehicle Inspection Report.

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

# **Monitoring Safety Risk Mitigations**

The Arrow Line Acquisition, LLC continually evaluates safety risk mitigation strategies that have been implemented and conducts a periodic assessment to determine the effectiveness of these strategies. The findings from these activities assist the organization in identifying which mitigations may be ineffective, inappropriate, or may not have been implemented as intended.

The Arrow Line Acquisition, LLC's collection and evaluation of safety information may show whether any adverse safety patterns are emerging and whether any mitigation practices are ineffective. Any mitigation practices would result in the establishment and implementation of new (updated) mitigation strategies. Our organization monitors the effectiveness of its mitigation strategies through the:

- Quarterly activities performed by the Safety Committee which include:
  - Reviewing the current Safety Risk Register,
  - Discussing mitigation strategies,
  - o Determining mitigation strategies that are working, and
  - o Recommending alternative actions to reduce mitigations that are not working as intended.
- Weekly review of safety data by the CSO contained in the:
  - Safety Risk Register, and
  - Safety Event Log.
- Weekly comparison by the CSO of established safety performance indicators and targets including key safety-related metrics.

These key safety-related metrics may include:

- Records of previous injuries
- Workers' compensation statistics
- Employee workdays lost to injuries
- Patterns of frequently occurring injuries
- Bus driver assaults
- Traffic tickets issued to bus drivers
- Bus accidents
- Positive drug/alcohol tests
- Employee training records
- Inspection reports

The organization's safety risk monitoring protocols include:

- (1) During the 'Safety Risk Mitigation Monitoring Update' portion of the quarterly Safety Committee meeting agenda the CSO and the committee members will review the list of safety risk mitigations contained in the Safety Risk Register which is maintained by the CSO,
- (2) The Safety Committee member assigned by the CSO responsible for implementing a specific mitigation strategy provides an update to the committee on the status of the mitigation including the timeframe and the monitoring mechanism used to determine if the mitigation strategy is not implemented or performing as intended,
- (3) As each mitigation strategy is reviewed, the CSO and the Safety Committee determine which mitigation strategies are performing acceptably,

- (4) For those strategies that are not working as intended, the CSO and the Safety Committee will recommend alternative measures (i.e., options) or additional actions to reduce the mitigation to an acceptable level,
- (5) After consulting with the Safety Committee on the most recent hazard mitigation strategies requiring additional actions, the CSO will approve the appropriate course of action for each mitigation strategy and assign it to the individual (safety committee member) to oversee its execution (i.e., implementation), and
- (6) The CSO then updates the Safety Risk Register accordingly.

The CSO works with the Safety Committee, the General Manager and Accountable Executive to carry out and document all monitoring activities.

# **Safety Event Investigation**

Safety event investigations by the Arrow Line Acquisition, LLC are conducted in order to identify the causal factors of any accidents, incidents, or occurrences. Our organization maintains documentation through its Safety Event Reporting and Investigation Program which is intended to support our efforts in:

- Tracking safety events (via the Safety Event Log),
- Determining the pertinent facts surrounding a safety event,
- Determining the causal factors to a safety event, and
- Implementing corrective actions to minimize or eliminate the cause of the safety event.

All employees and new hires receive training on the Safety Event Reporting and Investigation Program. Also, supervisors/managers are appropriately trained on how to conduct safety event investigations and are informed of their roles and responsibilities in carrying out procedures according to the program.

The Arrow Line Acquisition, LLC uses the following definitions when conducting safety event investigations:

<u>Safety Event Investigator</u> – The supervisor/manager responsible for performing the initial portion of the safety event investigation.

<u>Safety Event Report Form</u> – A form completed by the Safety Event Investigator which captures information regarding a safety event or near miss and includes an initial assessment of the causal factors to the safety event.

<u>Safety Investigation Report Form</u> – A form completed by the Chief Safety Officer which captures information regarding a safety event or near miss and includes an initial recommendation on the implementation of corrective actions to minimize or eliminate the cause of the safety event.

*Near Miss* – An event that could have resulted in personal injury or property damage.

<u>Causal Factors</u> – Factors that contributed to a safety event or near miss. Examples include: ineffective or lack of training provided, no job safety analysis, no written procedures, poor management, lack of rule enforcement, or worker distraction.

Minor Injury – An injury or abrasion requiring first aid (i.e., bandage or ice).

The procedures in response to a safety event are outlined in the organization's Public Transportation Agency Safety Plan. The following is a general overview of the organization's initial steps taken which lead up to the investigation of the safety event:

# **Actions Taken by the Safety Event Investigator**

- (1) Upon recognizing a safety event has been reported, the supervisor/manager (Safety Event Investigator) present will evaluate whether the situation is an emergency or non-emergency and secure the scene,
- (2) If a supervisor/manager is not present, the next immediate available supervisor/manager will be notified of the safety event and will be required to conduct the safety event investigation,
- (3) Any employee that is seriously injured and requires medical attention, the Safety Event Investigator will ensure the employee is transported to a medical facility,
- (4) Any employee with a minor injury will be tended to (treated),

The organization's safety event investigation protocols include:

- (5) Within 24 hours of notification of the safety event the Safety Event Investigator will begin the investigation process by:
  - a. Conducting interviews of the affected employee(s) and potential witnesses to gather relevant information on the safety event,
  - b. Conducting a walkthrough of the affected area and generating visual documentation (i.e., photographs and/or video),
  - c. Gathering and reviewing information to determine any potential patterns or trends,
  - Determining the sequence of events that may have led to the safety event in order to discover all the causal factors, and
  - e. Preparing and submitting a completed Safety Event Report Form, within 48 hours of notification of the safety event, to the CSO containing an initial assessment on what may have been the causal factor(s) of the safety event.

# Actions Taken by the CSO

- (6) Upon receipt of the completed Safety Event Report Form the CSO, if necessary, may consult with the Safety Event Investigator and/or the affected employee(s) to gather additional information on the safety event,
- (7) Within 24 hours of receiving the completed Safety Event Report Form, the CSO will prepare and complete a Safety Investigation Report with an initial recommendation on how the agency can implement corrective actions to minimize or eliminate the cause of the safety event,

# **Actions Taken by the Safety Committee**

- (8) Prior to the quarterly Safety Committee meeting the CSO prepares and forwards the Safety Risk Register, Safety Event Log, Safety Event Reports, and Safety Investigation Reports to the Safety Committee members for review,
- (9) During the 'Safety Events Update' portion of the quarterly Safety Committee meeting agenda the CSO requests the Safety Committee members to discuss their ideas and suggestions on how to implement corrective actions to minimize or eliminate the cause for each of the safety events being reviewed, and
- (10) Upon final recommendation of the Safety Committee on how to implement corrective actions to minimize or eliminate the cause for each of the safety events, the CSO will then update the Safety Risk Register accordingly. The CSO will also disseminate the final recommendation to all supervisors/managers who in turn will communicate this information to all employees.

Additionally, any action taken by the organization as a result of a safety event investigation is shared with the organization through its Weekly Safety Newsletter that is posted on the organization's bulletins boards and common work areas.

### **Monitoring Internal Safety Reporting**

The Arrow Line Acquisition, LLC considers information collected through its internal reporting safety programs to be a valuable tool in monitoring and evaluating any potential safety concerns. On a regular basis, the CSO reviewing any safety concern received through our organization's internal reporting safety programs that reveals a pattern or trend requiring further investigation and will be analyzed through the Arrow Line Acquisition, LLC's Safety Risk Management process.

# **Chapter IV. SAFETY PROMOTION**

# Competencies and Training (§ 673.29(a))

### Safety Culture

The Arrow Line Acquisition, LLC's primary goal of safety promotion is to develop a positive and strong safety culture, which empowers its employees at all levels to understand and proactively control safety risks. Our organization creates and maintains a positive and strong safety culture by:

- Communicating safety is a top priority,
- Establishing and providing a safety training program to employees,
- · Empowering and involving employees in safety-related activities,
- Motivating employees to accept their safety responsibilities, and
- Communicating safety and safety performance information.

### **Safety Training Program**

Through our organization's comprehensive safety training program employees develop and maintain the necessary skills and knowledge to perform their jobs in an efficient and safe manner. More importantly, an effective safety training program teaches employees to learn their jobs properly, improve their performance, reinforces existing ideas and best practices, and puts the safety program into action.

The safety training program which includes new-hire and refresher training has been developed to support and educate key personnel in fulfilling their safety-related roles and responsibilities for the organization. Each employee as part of new hire training receives the Arrow Line Acquisition, LLC's Employee Handbook which includes safety policies and procedures. It is the organization's objective to ensure employees receive specific training to become familiar with, experienced in, and maintain their set of skills to safely perform their job duties so that a safe work environment can be achieved.

The table in <u>Appendix A - Safety Training Program</u> illustrates the safety training sessions that cover a range of topics currently making up the organization's comprehensive safety training program for all key personnel. Additional details (i.e., training provider, delivery method, length, etc.) on each training course can be found in <u>Appendix B - Training</u> Courses (Summary) and Appendix C - Training Courses (Description).

We recognize the safety-critical functions performed daily by our organization's personnel and have made it a priority to provide safety-related skill training in the following areas:

- Bus Operations
  - New-hire bus vehicle operator classroom and hands-on skill training,
  - Bus vehicle operator refresher training.
  - Bus vehicle operator retraining (recertification or return to work),
  - Vehicle inspections training,
  - o Defensive driver training,
  - Classroom and on-the-job training for dispatchers,
  - Classroom and on-the-job training for operations supervisors and managers, and
  - Accident investigation training for operations supervisors and managers.
- Vehicle Maintenance

- Ongoing vehicle maintenance technician skill training,
- Ongoing skill training for vehicle maintenance supervisors,
- Accident investigation training for vehicle maintenance supervisors,
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
- Training provided by vendors.

As the organization's SMS evolves, we consult with employees and supervisors/managers to evaluate and identify our safety training needs and modify the organization's safety training program to ensure appropriate safety practices and procedures are consistent and up to date.

The following list provides a brief description of key personnel who are directly responsible for safety and their roles in carrying out the organization's safety policies:

<u>All Employees</u><sup>2</sup> - All employees receive safety training to become familiar with the basic principles of the organization's SMS. Training assists employees in understanding the importance of the Employee Safety Reporting Program and acquiring the skills and techniques to effectively communicate with organizations and passengers when a crisis occurs. All employees receive training to learn their safety responsibilities in order to comply with the organization's safety policies.

<u>Drivers</u> – Drivers act as front-line ambassadors of the organization when interacting with the general public in providing safe transportation services. Training assists drivers in acquiring the vital skills and knowledge in order for them to recognize the many safety tasks they perform on a daily basis in a demanding position. In addition to receiving SMS Awareness training, other training activities include, but are not limited to, opportunities to learn the skills and strategies necessary to reduce the likelihood of bus operator assault incidents from occurring and the fundamentals of defensive driving.

<u>Mechanics</u> – Mechanics have an utmost responsibility to ensure the proper performance and safety of the organization's vehicles. Mechanics have an advanced knowledge of engine maintenance and repair and perform many of their job duties under physical demanding conditions. Safety training reinforces safety practices that establish a safe working environment.

<u>Supervisors/Managers</u> – It is imperative that the organization's supervisors/managers are committed to ensuring employees are aware and understand the organization's safety procedures and policies. Each supervisor/manager has a pivotal role in conveying a consistent safety message throughout their respective work area and the entire organization.

<u>Chief Safety Officer (CSO)</u> – The CSO is responsible for carrying out the numerous safety obligations of the organization's SMS. The CSO ensures safety responsibilities and activities are being carried out by all key personnel.

<u>Contractors</u> – Contractors representing the organization are accountable for engaging in safe work practices. Meaningful dialogue with contractors only strengthens the organization's implementation of best practices to mitigate and eliminate safety risks.

Also, the Accountable Executive including the Arrow Line Acquisition, LLC's Leadership and Executive Management team must complete FTA's SMS Awareness online training which is offered through the USDOT Transportation Safety Institute.

PTASP EFFECTIVE DATE: JANUARY 1, 2021

<sup>&</sup>lt;sup>2</sup> All Employees include all personnel, the agency's drivers, mechanics, supervisors/managers, chief safety officer, and contractors.

# Safety Communication (§ 673.29(b))

Arrow Line Acquisition, LLC recognizes the importance of having open communication across all levels of the organization. We make personnel aware of any recognized hazards and safety risks relevant to employees' roles and responsibilities. Our organization focuses on the exchange of ideas and information to improve workplace safety and prevent accidents so that personnel knows that leadership is looking out for their safety. We continually share pertinent safety-related information including safety actions taken in response to reports submitted through our ESRP.

Safety information typically communicated throughout the organization includes safety alerts, safety performance statistics, recent hazard mitigation efforts implemented by the organization, safety achievements, and Safety Committee minutes. The following activities describe how the Arrow Line Acquisition, LLC communicates its safety and safety performance information throughout the organization:

<u>Staff Meetings</u> – These open forums allow employees to communicate their safety concerns to their coworkers and management and ask any pertinent questions related to the organization's current safety performance.

<u>Bulletin Boards</u> – Flyers containing safety-related information are posted and regularly updated on the organization's bulletin boards.

<u>Common Work Areas</u> – Signs are strategically posted throughout the organization (i.e., office reception areas, break rooms, equipment areas, etc.) in order for employees to visibly see and be informed of safety-related information.

<u>Weekly Safety Newsletter</u> – The newsletter containing updates on safety-related information and activities undertaken by the organization may also include pictures showing examples of proper safety actions being demonstrated.

APPENDIX A – SAFETY TRAINING PROGRAM	NY.					
Training	All Employees <sup>3</sup>	Drivers	Mechanics	Supervisors/ Managers	CSO	Contractors
Advanced Mobility Device Securement	×					
All-Hazards Awareness and Preparedness for Transit Employees	×					
Assault Awareness and Prevention for Transit Operators	×					
Bus Maintenance and Bus Testing Program Peer-to-Peer Exchange						
Certified Community Transit Supervisor (CCTS)						
Certified Safety and Security Officer (CSSO)  Program						
Crisis Communication for Transit Employees	$\boxtimes$					
Curbing Transit Employee Distracted Driving		$\boxtimes$				
Defensive Driving		$\boxtimes$				
2 the Point - Defensive Driving		$\boxtimes$		$\boxtimes$		

<sup>3</sup> All Employees include all personnel, the organization's drivers, mechanics, supervisors/managers, chief safety officer, and contractors.

APPENDIX A – SAFETY TRAINING PROGRAM	M					
Training	All Employees <sup>3</sup>	Drivers	Mechanics	Supervisors/ Managers	CSO	Contractors
<u>Developing a Transit Emergency</u> <u>Management Plan</u>	$\boxtimes$					
2 the Point - Distracted Driving		$\boxtimes$		$\boxtimes$		
Fatigue and Sleep Apnea Awareness for Transit Employees		$\boxtimes$				
Passenger Assistance and Sensitivity (PASS) - Driver Certification						
Passenger Assistance and Sensitivity (PASS) - Trainer Certification	$\boxtimes$					
Post-Accident Testing		$\boxtimes$		$\boxtimes$		
Pre-Trip and Post-Trip Inspections		$\boxtimes$	$\boxtimes$			
Reasonable Suspicion Testing		$\boxtimes$	$\boxtimes$	$\boxtimes$		
SMS Awareness	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	
Safety Training and Rural Transit (START)						

APPENDIX A – SAFETY TRAINING PROGRAM	W					
Training	All Employees <sup>3</sup> Drivers	Drivers	Mechanics	Supervisors/ Managers	oso	Contractors
Transit Bus System Safety	$\boxtimes$					
Transit Maintenance Leadership Workshop						
Transit Safety and Security Audit Course	$\boxtimes$					
Violence in the Transit Workplace - Prevention, Response and Recovery	$\boxtimes$					

Training   Training Provider	Training Provider	Delivery Method	Cost	Length	Refresher	Website
Advanced Mobility Device Securement	National Transit Institute (NTI)	Instructor-led (direct delivery)	Free	2 days		www.ntionline.com
All-Hazards Awareness and Preparedness for Transit Employees	National Transit Institute (NTI)	Instructor-led (direct delivery)	Free	4 hours		www.ntionline.com
Assault Awareness and Prevention for Transit Operators	National Transit Institute (NTI)	Instructor-led (direct delivery)	Free	3 hours		www.ntionline.com
Bus Maintenance and Bus Testing Program Peer-to-Peer Exchange	National Transit Institute (NTI)	Instructor-led	Contact Training Provider	1 day		www.ntionline.com
Certified Community Transit Supervisor (CCTS)	Community Transportation Association of America (CTAA)	Instructor-led	\$8,375 (class size: minimum 10, maximum 25 persons)	2 days	3 years	www.ctaa.org
Certified Safety and Security Officer (CSSO)	Community Transportation Association of America (CTAA)	Instructor-led	\$6,500 (class size limited to 20 persons)	2 days		www.ctaa.org
Crisis Communication for Transit Employees	National Transit Institute (NTI)	Instructor-led (direct delivery)	Free	4 hours		www.ntionline.com
Curbing Transit Employee Distracted Driving	Transit Safety Institute (TSI)	Online	Free	30 minutes		www.transportation.gov/transportation-safety-institute
Defensive Driving	National Safety Council (NSC)	Instructor-led	Contact Training Provider	4, 6, or 8 hour sessions	$\boxtimes$	www.nsc.org
2 the Point - Defensive Driving	National Rural Transportation Assistance Program	Training Cards	Free	Individual Pace		www.nationalrtap.org/Training/Training- Overview

APPENDIX B – TRAINING COURSES (Summary)	S COURSES (Summar	(/				
Training	Training Provider	Delivery Method	Cost	Length	Refresher	Website
Developing a Transit Emergency Management Plan	National Transit Institute (NTI)	Instructor-led	Free	1 and ½ days		www.ntionline.com
2 the Point - Distracted Driving	National Rural Transportation Assistance Program	Training Cards	Free	Individual Pace		www.nationalrtap.org/Training/Training- Overview
Fatigue and Sleep Apnea Awareness for Transit Employees	Transit Safety Institute (TSI)	Online	Free	50 minutes		www.transportation.gov/transportation-safety-institute
Passenger Assistance Safety and Sensitivity (PASS) - Driver Certification	Community Transportation Association of America (CTAA)	Instructor-led	\$7,500 (\$500 per participant, class size limited to 16 persons)	2 days		www.ctaa.org
Passenger Assistance Safety and Sensitivity (PASS) - Trainer Certification	Community Transportation Association of America (CTAA)	Instructor-led	\$7,500 (\$500 per participant, class size limited to 16 persons)	3 days	$\boxtimes$	www.ctaa.org
Post-Accident Testing	Connecticut Statewide Drug and Alcohol Testing Consortium	Instructor-led	Free	2 hours	$\boxtimes$	www.hartfordtransit.org
Pre-Trip and Post-Trip Inspections	Organization	Supervisor/Manager- led	Free		$\boxtimes$	
Reasonable Suspicion Testing	Connecticut Statewide Drug and Alcohol Testing Consortium	Instructor-led	Free	2 hours		www.hartfordtransit.org
SMS Awareness	Transit Safety Institute (TSI)	Online	Free	1 hour	$\boxtimes$	www.transportation.gov/transportation- safety-institute

APPENDIX B – TRAINING COURSES (Summary)	3 COURSES (Summar	у)				
Training	Training Provider	Delivery Method	Cost	Length	Refresher	Website
	National Rural					
Safety Training and	Transportation	Online	Д 20 20 20 20 20 20 20 20 20 20 20 20 20	Individua		www.nationalrtap.org/Training/Training-
Rural Transit (START)	Assistance	<u> </u>	D D	Pace	]	Overview
	Program					
Transit Bus System	Transit Safety	pol actoriated	\$115.00 per	4 and 1/2		www.transportation.gov/transportation-
Safety	Institute (TSI)	IIIsti detoi -led	participant	days		safety-institute
Transit Maintenance	National Transit	المراء والمرادة	\$2,095.00 per	4 and ½		accocilacita muni
Leadership Workshop	Institute (NTI)	IIIsti uctol -lea	participant	days		Www.figofffffe.coff
Transit Safety and	Transit Safety	pol actoriated	\$60.00 per	2 0000	Σ	www.transportation.gov/transportation-
Security Audit Course	Institute (TSI)	IIIsii acioi -lea	participant	o uays	$\leq$	safety-institute
Violence in the Transit	tionor Innetion	tocaile) bol actoriated				
Workplace - Prevention,	Inetituto (NITI)	msinacioi-rea (ameci	Free	4 hours		www.ntionline.com
Response and Recovery	IIIsiitute (INTI)	delivery)				

# **APPENDIX C – TRAINING COURSES (Description)**

Advanced Mobility Device Securement – Transit agencies have the responsibility to provide safe transportation and respect the civil rights of all passengers, including those who use mobility devices. In order to fulfill this responsibility, bus operators secure mobility devices and place seat belts on the passengers who use mobility devices as transit seating. This important task is becoming increasingly challenging as operators are confronted with a variety of powered mobility devices that often lack traditional securement points and may not have been addressed in basic securement training. This workshop gives transit professionals responsible for preparing operators an opportunity to address these securement challenges, explore related issues with peers, and enhance their knowledge and skills. <a href="https://www.ntionline.com">www.ntionline.com</a>

<u>All-Hazards Awareness and Preparedness for Transit Employees</u> – All-Hazards Awareness and Preparedness for Transit Employees is designed to help transit employees develop the observation, communication, and response skills needed to address all-hazards incidents while ensuring their own safety and that of their customers. The objectives of the course are to describe the importance of taking an all-hazards approach to transit incidents and events, explain their responsibilities and priorities during all-hazards incidents and events, distinguish between notice and no-notice incidents and events and select appropriate response and reporting strategies for all-hazards incidents and events. <a href="https://www.ntionline.com">www.ntionline.com</a>

Assault Awareness and Prevention for Transit Operators – The goal of this course is to give bus operators in the transit industry the knowledge and skills needed to reduce the likelihood of assault incidents from occurring. Prevention methods covered include defining assault, discussing the types of incidents that could be considered assault and recognizing key vulnerability factors. Prevention strategies focus on communication and response skills, and the value of reporting incidents. In addition, the training includes information on the importance of seeking assistance to recover from assault incidents. <a href="https://www.ntionline.com">www.ntionline.com</a>

<u>Crisis Communication for Transit Employees</u> – Effective communication is essential to the management of transit crises - whether they are derailments, power outages or prolonged service delays. Crisis Communication Training for Transit Employees will equip frontline and supervisory transit personnel with the skills and techniques they need to communicate effectively within their organizations and with passengers throughout a crisis to enable successful response and recovery. <a href="https://www.ntionline.com">www.ntionline.com</a>

<u>Curbing Transit Employee Distracted Driving</u> – This 30-minute on-line course is designed to raise awareness of distracted driving with the desired outcome of reducing the risk of distracted driving by public transportation professionals. The training covers the definition of the term "distracted", risks of driving while distracted, typical distractions, tips for preventing distracted driving, and regulations, laws, and company policies using wireless devices. <a href="https://www.transportation.gov/transportation-safety-institute">www.transportation.gov/transportation-safety-institute</a>

<u>Defensive Driving</u> – The Defensive Driving Course is the fundamental driver safety training program of the National Safety Council providing learners with core defensive driving knowledge and techniques. The Defensive Driving

Course can be delivered in 8-hours, 6-hours or 4-hours based on the participant's needs and the organization's training requirements. <a href="https://www.nsc.org">www.nsc.org</a>

2 the Point – Defensive Driving – National RTAP 2 the Point Training Cards have been designed to be quick refresher trainings for transportation drivers that can be reviewed in the break room, while parked and waiting for a passenger to finish an appointment, or at the beginning of the day before beginning a route. Each card has training information on the front and a set of questions on the back. After the driver finishes reviewing the information, he/she can answer the short quiz. There is space at the bottom of the card for both the driver's and his/her supervisor's signature. <a href="https://www.nationalrtap.org/Training/Training-Overview">www.nationalrtap.org/Training/Training-Overview</a>

Defensive Driving covers: en-route inspection, personal preparedness risk factors, I.P.D.E. driving method, unintentional skids, night driving, reduced visibility, driving through water, winter driving, summer driving, speed and following distance, braking distance, mirror and blind spots, backing, passing, freeway safety, yielding, pedestrians and bicyclists. <a href="https://www.nationalrtap.org/Training/Training-Overview">www.nationalrtap.org/Training/Training-Overview</a>

<u>Developing a Transit Emergency Management Plan</u> – To be able to safely and efficiently resolve emergencies and interact successfully with emergency responders, transit agencies need to have plans in place before an emergency occurs. This workshop is designed to equip transit employees who are responsible for developing or updating emergency management plans with the skills they need to do so effectively. Participants will learn what elements to include in a plan, how emergency management ties into the activities that their agency and employees already perform, and useful strategies for developing, implementing, and updating their plans. www.ntionline.com

<u>2 the Point - Distracted Driving</u> – National RTAP 2 the Point Training Cards have been designed to be quick refresher trainings for transportation drivers that can be reviewed in the break room, while parked and waiting for a passenger to finish an appointment, or at the beginning of the day before beginning a route. Each card has training information on the front and a set of questions on the back. After the driver finishes reviewing the information, he/she can answer the short quiz. There is space at the bottom of the card for both the driver's and his/her supervisor's signature.

Distracted Driving covers: what distractions are, facts about distracted driving, and how to be distraction free. <a href="https://www.nationalrtap.org/Training-Overview">www.nationalrtap.org/Training-Overview</a>

<u>Fatigue and Sleep Apnea Awareness for Transit Employees</u> – This 50-minute course is designed to inform and guide transit operators and systems regarding the identification and treatment of individuals at high risk for obstructive sleep apnea and other sleep disorders, as well as general concepts about sleep and fatigue.

<u>www.transportation.gov/transportation-safety-institute</u>

<u>Passenger Assistance Safety and Sensitivity (PASS) Driver Certification</u> – The Passenger Assistance Safety and Sensitivity (PASS) Trainer and Driver Certification program ensures that community transportation drivers have

current expertise in passenger assistance techniques and sensitivity skills appropriate for serving persons with disabilities. www.ctaa.org

<u>Passenger Assistance Safety and Sensitivity (PASS) Trainer Certification</u> – The Passenger Assistance Safety and Sensitivity (PASS) Trainer and Driver Certification program ensures that community transportation drivers have current expertise in passenger assistance techniques and sensitivity skills appropriate for serving persons with disabilities. www.ctaa.org

<u>Post-Accident Testing</u> – The core objective of this on-site training is to provide a concise review of pertinent regulations governing the FTA post-accident testing determination process and incorporate experience and expertise from consortium members who are confronted daily with this challenging responsibility.

Each attendee will learn regulation requirements, gain insight from peers about ideas and practices they have put in place to overcome scheduling and logistical challenges. This will serve to encourage members to formulate/formalize post-accident testing practices based on their own specific needs and unique allocation of resources. This training will instill confidence to make good decisions that enhance safety and ensure compliance with DOT/FTA regulations. www.hartfordtransit.org

<u>Pre-Trip and Post-Trip Inspections</u> – This training will focus on assisting the driver in identifying and documenting any vehicle defects prior to the movement of the vehicle and at the end of the trip. These vehicle inspections are essential to the safe and efficient operation of the fleet and will improve the agency's fleet maintenance by reducing costly repairs.

Reasonable Suspicion Testing – Individuals authorized to determine when it is appropriate to administer reasonable suspicion testing will become aware of the impact of drug abuse and alcohol misuse on society and the transportation industry, understand the effects of drug abuse and alcohol misuse, identify the at-risk employee, and learn how to encounter and refer an employee to the Employee Assistance Program and the rehabilitation process. www.hartfordtransit.org

<u>SMS Awareness</u> – This course will introduce the participant to Safety Management Systems (SMS), describe the four components of FTA's SMS Framework, and identify the importance of Employee Safety Reporting Systems to the success of SMS. <u>www.transportation.gov/transportation-safety-institute</u>

<u>Transit Bus System Safety</u> – Study the four pillars of Safety Management Systems (SMS) and how SMS and System Safety work together to help create a safer working environment. Discover how the application of engineering and management principles, criteria and techniques can help to lower safety risk to acceptable levels. Explore the concepts of safety climate, safety risk management, the hazard reduction matrix as well as the hazard reduction precedence. <a href="https://www.transportation.gov/transportation-safety-institute">www.transportation.gov/transportation-safety-institute</a>

<u>Transit Safety and Security Audit Course</u> – Discover what makes an effective audit. Prepare for and conduct a simulated safety audit of operational processes to verify safety performance. Evaluate the effectiveness of and conformance to safety risk controls. Learn the expectations for planning and conducting audits, reporting audit results and maintaining records. <a href="www.transportation.gov/transportation-safety-institute">www.transportation.gov/transportation-safety-institute</a>

<u>Violence in the Transit Workplace – Prevention, Response and Recovery</u> –The goal of this course is to provide participants with knowledge and skills to prevent, respond to and recover from workplace violence. Prevention methods covered include implementing system and personal security measures, recognizing and reporting the warning signs of potentially violent behavior and using effective interpersonal skills for dealing with different, difficult and dangerous people. Response strategies focus on self-preservation and the importance of accurate reporting. The recovery module addresses the stress associated workplace violence and what employees can do to address the impact of it on themselves and co-workers. <a href="https://www.ntionline.com">www.ntionline.com</a>

# **DEFINITIONS**

<u>Accident</u> 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 (TAM) 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.

<u>Chief Safety Officer</u> 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 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.

<u>Equivalent Authority</u> 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.

<u>FTA</u> means the Federal Transit Administration, an operating administration within the United States Department of Transportation (USDOT).

<u>Hazard</u> 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.

<u>Incident</u> 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.

<u>Investigation</u> 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.

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

<u>Occurrence</u> 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).

<u>Performance measure</u> 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.

<u>Performance target</u> 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).

<u>Public Transportation Agency Safety Plan</u> 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.

<u>Risk mitigation</u> means a method or methods to eliminate or reduce the effects of hazards.

<u>Safety Assurance</u> 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.

<u>Safety Management Policy</u> 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.

<u>Safety Management System (SMS)</u> 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.

<u>Safety Performance Target</u> means a Performance Target related to safety management activities.

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

<u>Safety Risk Assessment</u> means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

<u>Safety Risk Management</u> 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:

- Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;
- Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
- Causes severe hemorrhages, nerve, muscle, or tendon damage;
- Involves any internal organ; or
- 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.

<u>State</u> 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.

<u>State Safety Oversight Agency</u> 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.

<u>Transit agency</u> means an operator of a public transportation system.

<u>Transit Asset Management Plan</u> 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.

# **ACRONYMS**

<u>Acronym</u>	<u>Definition</u>
AE	Accountable Executive
ASP	Agency Safety Plan
CFR	Code of Federal Regulations
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
NSP	National Public Transportation Safety Plan
PTASP	Public Transportation Agency Safety Plan
SA	Safety Assurance
SMP	Safety Management Policy
SMS	Safety Management System
SP	Safety Promotion
SPI	Safety Performance Indicator
SPT	Safety Performance Target
SRM	Safety Risk Management
TAM	Transit Asset Management
TSSP	Transit Safety and Security Program
USDOT	United States Department of Transportation
VRM	Vehicle Revenue Miles