METRO BUS

Public Transit Agency Safety Plan
(PTASP)

**It is our mission to provide
safe, reliable, and friendly public transportation services.**

Revised and Issued April 2023

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Public Transit Agency Safety Plan

St. Cloud Metropolitan Transit Commission (Metro Bus)

Board Adopted:	*11/17/2020*	*Last Revision Date:*	*3/14/2023*
Last Board Approval:	*3/20/2023*	*Effective Date of Last Revisions:*	*4/01/2023*

The purpose of this Public Transit Agency Safety Plan (PTASP) is to provide consistent, systematic and integrated program guidance. This guidance will enable Metro Bus to properly identify and address safety concerns or hazardous conditions while evaluating processes to mitigate those risks with the least amount of impact on our employees, passengers and equipment.

Transit Agency Information

1) **Transit Agency Name and Address**
   St. Cloud Metropolitan Transit Commission (Metro Bus)
   665 Franklin Ave NE
   St. Cloud, MN 56304

2) **Name and Title of Accountable Executive**
   Ryan I. Daniel, Chief Executive Officer

3) **Name and Title of Chief Safety Officer**
   Scott Stark, Training and Safety Manager

4) **Modes of service provided and directly operated by the transit agency and covered by this plan**
   a) City Bus
   b) Demand Response
   c) Commuter Bus

5) **FTA Funding Types (identify ALL)**
   a) 5307
   b) 5339
   c) FHWA

6) **Transit services on behalf of other entities:**
   Metro Bus provides daily Commuter Bus service for four Regional Rail Authorities between St. Cloud, MN and the Northstar Rail train station in Big Lake, MN with a stop in Becker, MN. On Fridays, additional service is provided to the Target Field train station, in Minneapolis, MN with multiple stops along the way.
   Regional Rail Authorities:
   a) Sherburne County Rail Authority
   b) Stearns County Rail Authority
   c) Anoka County Rail Authority
   d) Hennepin County Rail Authority

7) **Plan Creation and Revisions**
   a) This PTASP was created by the Metro Bus Training & Safety Manager.
   b) The PTASP will be reviewed annually by the Chief Safety Officer, Safety Committee and Executive Management Team.
   c) Revisions will be brought to the Board of Commissioners for review and approval on an annual basis as appropriate..

Safety Performance Targets

1. Performance targets based on metrics established under the National Public Transportation Safety Plan.

2. Metro Bus Safety Performance Targets are calculated based on the average of FY18 and FY19 as defined by the National Transit Database (NTD) by mode.

Mode of Transit Service	Total Fatalities	Fatalities per 65,000 vehicle revenue miles (VRM)	Total Injuries	Injuries per 65,000 VRM	Total Safety Events	Safety Events per 65,000 VRM	System Reliability (65,000 VRM/failure)
Fixed Route Bus	0	0	2	.2	2	.25	<3
Paratransit Bus	0	0	2	.1	3	.15	<3
Commuter Bus	0	0	0	.1	0	.1	<3

Fatalities: Death confirmed within 30 days excluding trespassing and suicide-related fatalities.
Fatalities (per XXX VRM): Total number of fatalities per total VRM by mode.
Injuries: Harm to a person requiring immediate medical attention away from the scene excluding injuries resulting from assaults and other crimes.
Injuries (per XXX VRM): Total number of injuries per total VRM by mode.
Safety Events: All events reported on the Safety & Security (S&S-40) form for NTD (major safety event, excluding major security events).
Safety Events (per XXX VRM): Total number of safety events per total VRM by mode.
System Reliability (VRM/Failures): Mean distance between major mechanical failures as defined by NTD - a failure of some mechanical element of the revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns.

3. **Safety Performance Target Coordination**
   - Metro Bus will publish and provide performance targets to the State following the April Board meeting of the next year.
   - Metro Bus coordinates, to the maximum extent practicable, with the State and Municipal Planning Organization (MPO) in the selection of State and MPO performance targets.
   - Metro Bus will publish a copy of the approved Safety Plan on our website at ridemetrobus.com. A copy of the Safety Plan is available upon request.

Safety Management Policy

Policy Statement
Metro Bus views safety as a core value. Metro Bus will develop, implement, maintain and continuously improve processes to ensure the safety of our customers, employees and the public.

Metro Bus is committed to the following safety objectives:
- Communicating the purpose and benefits of the PTASP to all employees.
- Providing a culture that encourages employees to communicate and report any unsafe work conditions, hazards or at-risk behavior without concern of retribution.
- Providing appropriate management involvement and the necessary resources to establish an effective PTASP.
- Identifying hazardous and unsafe work conditions and developing processes and procedures to mitigate safety risk to an acceptable level.

- Establishing safety performance targets that are realistic, measurable and data-driven.
- Continually improving safety processes to ensure appropriate safety management is effective.

Authorities, Accountability and Responsibilities

- o Accountable Executive
  - The Chief Executive Officer serves as the Metro Bus Accountable Executive under the following criteria:
    - Meets all the requirements in CFR 673.5 and 673.23 in that this position is ultimately responsible for carrying out the PTASP
    - Oversees human and financial resources needed to develop and maintain the PTASP
    - Designates the Chief Safety Officer

- o Chief Safety Officer
  - The Training and Safety Manager has been designated the Metro Bus Chief Safety Officer
    - The Chief Safety Officer meets the requirements in 673.5 and 673.23
  - The Chief Safety Officer has the following duties:
    - Develops and maintains Metro Bus's safety-related policies and procedures
    - Oversees day-to-day implementation of PTASP
    - Chairs the Metro Bus Safety Committee and maintains all related documentation
    - Provides safety and risk management expertise for Metro Bus
    - Delegates responsibilities as applicable
    - Designates personnel to verify and monitor compliance

- o Staff
  - All employees are responsible for the implementation of the PTASP.
  - Metro Bus employees may have the following duties:
    - Participate as members of Metro Bus's Safety Committee
    - Complete training on Metro Bus safety elements as determined by the Chief Safety Officer
    - Ensure procedures are consistent with the safety objectives in the PTASP

- o Meetings and Trainings:
  - Organizational meetings and trainings are used to support the PTASP. PTASP updates are shared, employee concerns can be brought up for discussion and feedback may be solicited. Safety items discussed in meetings are documented.
  - Examples of meetings where safety issues may be discussed:
    - Safety Committee: Reported safety hazards will be evaluated by the Safety Committee. The Safety Committee consists of Metro Bus employees representing various departments as well as at least one representative from our insurance provider. The committee meets regularly to review issues and make recommendations to improve safety.
    - Operator meetings
    - Administrative staff meetings
    - Maintenance meetings
    - Dispatcher meetings

Employee Safety Reporting

- Metro Bus encourages employees who identify safety concerns to report them in good faith without fear of retribution. There are many ways employees can report safety concerns:
  - Report anonymously via a locked Employee Comment Box in the Employee Communications Area at the Operations Center.
  - Report concerns directly to any management staff via the Incident, Safety and Accident (ISA) Report form identifying the report as a safety concern, near miss or hazardous condition. Examples of information typically reported include:
    - Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles).
    - Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspections).
    - Events that senior managers might not otherwise know about (for example, near misses).
    - Information about why a safety event occurred (for example, radio communication challenges).

- The Chief Safety Officer reviews any documents identifying safety concerns in the Safety Risk Register. Every concern will be acknowledged. Any confirmed deficiency and/or safety rule or procedure violation will be managed through Metro Bus's Safety Assurance process. Metro Bus's Chief Safety Officer will provide safety updates during staff meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee will follow up directly with the employee once the concern has been addressed.

  - Metro Bus encourages employees to report safety concerns in good faith.
  - Disciplinary action may be taken if the safety concern and/or incident includes, but is not limited to, any of the following:
    - Willful participation in illegal activity, such as assault or theft;
    - Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk;
    - Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances;
    - Unsafe behavior or incident reflects actions that have been previously addressed or that the employee has been coached on for correction.

Safety Assurance

Through the Safety Assurance process, safety procedures are evaluated to determine whether they are sufficient to control safety risk. Safety risk mitigations are assessed to ensure mitigations are appropriate and implemented as intended. Investigations of safety events are used to identify causal factors.

- **Safety Performance Monitoring and Measurement**
  - Compliance monitoring activities
    - Metro Bus staff monitors its system for compliance with Operations and Maintenance procedures, utilizing the following methods:
      - Safety audits
      - Informal inspections
      - Regular review of onboard camera footage
      - Onboard visits
      - Employee safety surveys

- Investigation of safety occurrences
- Safety review prior to the launch or modification of any facet of service
- Gathering and monitoring data related to the delivery of service

- Regular vehicle inspections and preventative maintenance.
  - Results from these activities are compared against recent performance trends to determine where action needs to be taken. The Chief Safety Officer identifies non-compliant or ineffective activities, including mitigations, and brings the information forward as an assessment for the Safety Committee.

- **Safety Risk Mitigation Activities**
  - The Chief Safety Officer will ensure mitigation procedures are implemented, effective, appropriate and working as intended. This information is maintained in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

    - Monitoring mechanisms may include:
      - Tracking a specific metric on daily, weekly or monthly logs or reports
      - Conducting job performance observations
      - Metro Bus's Safety Committee reviews the performance of individual and large scale safety risk mitigations during meetings, based on the reporting schedule determined for each mitigation
        - The Committee will determine if a specific safety risk mitigation is not implemented or performing as intended.
        - If this occurs, the Safety Committee will propose a course of action to modify the mitigation or manage the safety risk.
        - The Chief Safety Officer will oversee any changes.
      - Monitoring activities may include, but are not limited to:
        - Reviewing results from accident, incident and occurrence investigations.
        - Monitoring employee safety reporting.
        - Reviewing results of internal safety audits and inspections.
        - Analyzing operational and safety data to identify emerging safety concerns.
        - Results of monitored activities will be documented.

    ### Investigations
      - Documented procedures for conducting safety investigations can be found in the accident packet. These procedures follow all traffic safety reporting and investigation requirements established by Minnesota's Department of Motor Vehicles. Investigations of events (accidents, incidents and occurrences, as defined by FTA) will be performed to find causal and contributing factors and review the existing mitigations in place at the time of the event.
      - The Chief Safety Officer maintains all documentation of Metro Bus's investigation policies, processes, forms, checklists, activities and results.
      - An investigation report is prepared and sent to the Accident/Incident Review Committee to aid in their analysis of the event.
      - Metro Bus's Accident/Incident Review Committee consists of members that represent Management, Operations and Safety departments.
      - The Chief Safety Officer chairs the board.
      - Metro Bus's Accident/Incident Review Board determines whether:
        - The accident was preventable or non-preventable

- o Casual factor(s) contributed to or were present during the event
- o The accident appears to involve underlying organizational causal factors

- **Information Monitoring Activities**
  - o The Safety Committee reviews safety data captured in employee safety reports, safety meeting minutes, customer complaints and other safety communication channels.
  - o The Safety Committee reviews audits and assessments, with findings concerning Metro Bus's safety performance, compliance with procedures or the effectiveness of safety risk mitigations.

Safety Risk Management

- **Process**
  - o Metro Bus uses the Safety Risk Management process as a primary method to ensure the safety of our operations, passengers, employees, vehicles and facilities. Hazards and their consequences are identified and assessed for potential safety risk. Assessments allow Metro Bus to examine what could cause harm and determine whether sufficient precautions have been taken to minimize any resulting harm, or if further mitigations are necessary. The Chief Safety Officer leads the Safety Risk Management process. The results of the Safety Risk Management process are documented in the Safety Risk Register. This process is applied to all components and departments of Metro Bus.

  - o In carrying out the Safety Risk Management process, Metro Bus uses the following terms:

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

- **Safety Hazard Identification**
  - o Safety Hazards and potential consequences can be identified through a variety of sources, including, but not limited to:
    - Review of vehicle camera footage
    - Review of monthly performance data and safety performance targets
    - Observations from supervisors
    - Maintenance reports
    - Comments from customers, passengers and third parties
    - Organizational meetings
    - Results of audits and inspections of vehicles and facilities
    - Results of training assessments
    - Investigations into safety events, incidents and occurrences
    - The FTA and other oversight authorities (mandatory information source)
    - Submission of Incident/Safety/Accident Reports from employees

- **Safety Risk Assessment**

- Metro Bus uses a Safety Risk Assessment to determine the likelihood and severity of the consequences relating to hazards, including existing mitigations, and prioritizing hazards based on safety risk.
- The Safety Committee will assess hazards using Metro Bus's Safety Risk Matrix (Appendix A). This matrix expresses assessed risk as a combination of one severity category and one likelihood level; also referred to as a hazard rating. For example, a risk may be assessed as "1A" or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level.
    - This matrix categorizes combined risks into levels based on the likelihood of occurrence and severity of the outcome. Risk levels:
        - High - hazard ratings are considered unacceptable and require action to mitigate the safety risk.
        - Medium - hazard ratings are considered undesirable. The Safety Committee will make a decision of acceptability.
        - 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.

The Chief Safety Officer will schedule safety risk assessments with the Safety Committee. When an assessment is scheduled, the following information will be included for review:
- (i) Any available information relating to the severity and likelihood of the risk
- (ii) Relevant sections of the Assessment Matrix

Once sufficient information has been obtained to make an informed decision on the risk and any mitigation, the Safety Committee will document their determination. The Chief Safety Officer is responsible for completing the Safety Risk Register with all applicable details. And for retention of all related documentation for three years from the date of generation.

To ensure sufficient analysis is complete relating to hazards, consequences and mitigation, Metro Bus staff may:

- Reach out to the reporting party to gather all known information about the reported hazard
- Conduct a walkthrough of the applicable area
- Generate visual documentation (photographs and/or video)
- Take any measurements deemed necessary
- Conduct interviews with employees to gather relevant information on the reported hazard
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.)
- Contact other sources that may have association with or technical knowledge relevant to the reported hazard
- Review any previously reported hazards of a similar nature
- Evaluate tasks and/or processes associated with the reported hazard

If a hazard is identified and the reporter believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of any Minnesota protection standard, the Accountable Executive and/or

the Chief Safety Officer has full authority to bypass the assessment process and mitigate the immediate threat.

- **Safety Risk Mitigation**
  - o Metro Bus's Accountable Executive and Chief Safety Officer will establish and review procedures to mitigate or eliminate safety risk(s) associated with specific hazards based on recommendations from the Safety Committee.
  - o Prioritization of safety risk mitigations is based on assessment results.

- **Safety Risk Register**
  - o The Chief Safety Officer maintains the Safety Risk Register.
  - o The Safety Risk Register will include all assessments and related, applicable documentation completed by the Safety Committee.
  - o The Safety Risk Register will be available for review upon request.

Safety Promotion

- **Competencies and Training**
  - o Metro Bus's comprehensive safety program applies to all Metro Bus employees.
  - o Metro Bus dedicates resources to the PTASP. The scope of safety training is appropriate to each employee's individual safety-related job responsibilities and their role in the organization.
  - o Basic training requirements for Metro Bus employees, including frequencies and refresher training, are documented in Metro Bus's Training Matrix.

    - Operations safety-related skill training includes the following:
      - New-hire bus vehicle Operator classroom and hands-on skill training
      - Bus vehicle Operator refresher training (annual)
      - Bus vehicle Operator retraining (remedial or return to work)
      - Classroom and on-the-job training for Dispatchers
      - Classroom and on-the-job training for Operations Supervisors and Managers
      - Accident investigation training for Operations Supervisors and Managers

    - Vehicle maintenance safety-related skill training includes the following:
      - On-going vehicle maintenance technical skill training
      - Accident investigation training for Maintenance Supervisors and Manager
      - Ongoing hazardous material training for Maintenance department staff
      - Training provided by vendors

    - Metro Bus Management staff are required to complete FTA's Safety Management System (SMS) Awareness online training.

    - The PTASP is available to all employees and the public. Staff will be advised of any modification.

- **Safety Communication**

  - o All employees receive a copy of the PTASP.

- o Safety updates and reminders are posted on bulletin boards at the Operations Center in the Operations Communications Area and emailed to all exchange users.
- o Safety Communication activities focus on three categories (established in 49 CFR Part 673):

    - Communicating safety and safety performance
        - Metro Bus communicates information about safety and safety performance in its monthly newsletter, on information screens with bi-monthly updates, on bulletin boards and during staff meetings. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact Metro Bus's service or safety performance, and revised procedures.

    - Communicating hazards and safety risks
        - As part of new-hire training, all employees receive safety policies and procedures.
        - For newly emerging issues or safety events at the agency, memorandums are posted in the Operations Communications Area at the Operations Center, emails are sent to all exchange users, and meetings may be held as applicable.

    - Informing employees of safety actions taken
        - Metro Bus provides targeted communications to inform employees of safety actions taken. Examples include handouts, flyers, safety talks, updates to bulletin boards and one-on-one discussions between employees and supervisors.

Additional Information

- **Documentation** The PTASP documentation will be retained for three years. This information will be available upon request. Form examples are included in the appendix.

- **Term Definitions**
    - Safety Management System - a formal, comprehensive, collaborative approach to managing safety bringing management and labor together to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more precisely.
    - Safety Risk Management – the process that comprises activities aimed at identification of hazards in the operational environment and initial control of their consequences.
    - Safety Risk Assurance – verifying that safety mitigation activities are being implemented, appropriate and effective.
    - Safety Risk Mitigation – Formal activities to control the probability or severity of the potential consequence(s) of hazards during operations related to providing services.

- **Common Acronyms**
    - FTA – Federal Transit Administration
    - FMCSA – Federal Motor Carriers Safety Administration
    - ASP – Agency Safety Plan
    - PTASP – Public Transportation Agency Safety Plan
    - MPO – Municipal Planning Organization
    - APO – Area Planning Organization
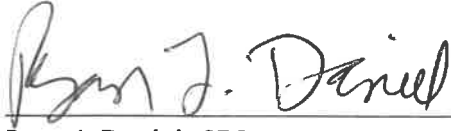   - CSO – Chief Safety Officer

- SMS – Safety Management System

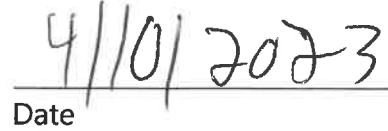- **<u>Appendices</u>**
    - Appendix A - Safety Risk Matrix
    - Appendix B - Safety Risk Register
    - Appendix C - Employee Safety Reporting Document (Incident/Safety/Accident Report)
    - Appendix D - Safety Inspection / Audit Checklist
    - Appendix E - OTP-SI-Log FYXXXX

Signatures

The St. Cloud Metro Bus Agency Safety Plan addresses all applicable requirements and standards as set forth in the FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.
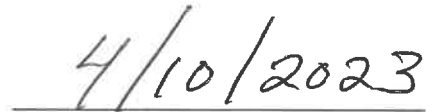
_____   4/10/2023
Ryan I. Daniel, CEO   Date
Accountable Executive
St. Cloud Metropolitan Transit Commission

_____   4/10/2023
Dave Kleis, Board Chair   Date
St Cloud Metropolitan Transit Commission

Appendix A – Safety Risk Assessment Matrix

Safety Risk Assessment Matrix

MIL-STD-882E	Safety Risk Assessment Matrix			
Severity / Probability	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
A - Frequent	1A	2A	3A	4A
B - Probable	1B	2B	3B	4B
C - Occasional	1C	2C	3C	4C
D - Remote	1D	2D	3D	4D
E - Improbable	1E	2E	3E	4E
F - Eliminated				

1A, 1B, 1C, 2A, 2B   High   **Unacceptable**

1D, 2C, 3A, 3B   Serious   **Undesirable** with management decision required

1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B   Medium   **Acceptable** with review by management

4C, 4D, 4E   Low   **Acceptable** without review

Safety Risk Register

	Occurrence Date	Claim#	Cat	Safety Concern Description	Risk Matrix	Mitigation Solution	Entered By	Bus#	Staff	Yrs of Service	P/UNP	Imp Date	Comm Date
1													
2													
3													
4													
5													
6													
7													
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