

Stanislaus Regional Transit Authority Public Transportation Agency Safety Plan



March 2022

Table of Contents

- Executive Summary 2
 - Safety Policy 2
 - Safety Plan 3
 - Certification of Compliance 4
 - Coordination with Planning Processes 4
- Transit Agency Information 5
- Plan Development, Approval and Updates 6
- Safety Performance Targets 7
- Safety Management Policy 8
 - Safety Management Policy Statement 8
- Safety Risk Management 10
 - Safety Hazard Identification 10
 - Safety Risk Assessment 11
 - Safety Risk Mitigation 15
- Safety Assurances 19
 - Safety Performance Monitoring and Measurement 19
 - Management of Change 28
 - Continuous Improvement 29
- Safety Promotion 30
 - Safety Training Program 30
 - Safety Communication 33
- Terms and Abbreviations 34

- Appendix A - StanRTA Resolution
- Appendix B - Transdev Services, Inc. Safety Policies and Procedures
- Appendix C - City of Modesto Injury and Illness Prevention Program

Executive Summary

On July 1, 2021, a Joint Powers Agency agreement was instituted consolidating the two largest transit providers in Stanislaus County – Modesto Area Express (MAX) and Stanislaus Regional Transit (StaRT), forming the Stanislaus Regional Transit Authority (StanRTA).

StanRTA provides the following transit services to Stanislaus County residents:

- Fixed Route: Local and regional fixed route service in Stanislaus County
- Americans with Disability Act (ADA) Paratransit: Complement to StanRTA Fixed Route Service and is available to individuals with disabilities.
- Demand-Response Service: Special demand-response service for the general public in Oakdale, Riverbank, Patterson and Newman.
- Medi-Van: Takes passengers from Modesto to designated Bay Area Medical Centers
- Commuter Service: Express Commuter Service to the Bay Area and Stockton which connects to Sacramento.

StanRTA's fleet is comprised of eighty-four fixed route buses, 7 commuter buses, and thirty-two cutaways for demand response services.

StanRTA is committed to comprehensive safety planning. As an operator of a public transportation system that receives Federal financial assistance under Title 49 of the United States Code (USC) Chapter 53, the Transit Agency is subject to 49 CFR Part 625, 630, 670, 673, and this Safety Plan is fully compliant with that Rule as well as with the requirements of the National Public Transportation Safety Plan (NSP) as promulgated through 49 CFR 670.

Safety Policy

StanRTA and the Federal Transit Administration (FTA) have adopted the principles and methods of System Safety and of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

The StanRTA Safety Plan, hereafter referred to as the Agency Safety Plan (ASP) is an agency-wide safety plan that meets and is responsive to FTA's Public Transportation Agency Safety Program (PTASP). The ASP reflects the specific safety objectives, standards, and priorities of StanRTA. StanRTA has incorporated its System Safety

compliance into SMS principles and methods tailored to the size, complexity, and scope of its own public transportation system and the environment in which it operates.

Safety Plan

StanRTA has established an ASP that meets or exceeds the General Requirements of 49 CFR Part 625, 630, 670, 673, including the following required elements:

- The ASP, and subsequent updates, will be signed by the Accountable Executive- StanRTA's Chief Executive Officer (CEO) and approved by the StanRTA Board of Directors.
- StanRTA's Director of Operations and Planning serves as the agency's Chief Safety Officer. This position reports directly to the StanRTA CEO.
- The ASP documents the processes and activities related to SMS implementation.
- The ASP includes performance targets based on the safety performance criteria established under the NSP, and the state of good repair standards established in the regulations that implement the National Transit Asset Management (TAM) System and are included in the NSP.
- The ASP addresses all applicable requirements and standards as set forth in the NSP.
- The ASP will comply with the minimum safety performance standards authorized through the NSP.
- StanRTA will establish a process and timeline for conducting an annual review and update of the ASP.
- The ASP includes bus and demand response modes of service. StanRTA will maintain the ASP in accordance with the recordkeeping requirements in subpart D of Part 673.
- The ASP is consistent with Centers for Disease Control and Prevention and State health authority guidelines to minimize exposure to infectious diseases.
- StanRTA has composed a Safety Committee made up of representatives of frontline to assist with the development of the ASP.
- The ASP includes a risk reduction program for transit operations to improve safety by reducing the number of accidents injuries, and assaults on transit workers based on data submitted to National Transit Database (NTD).
- The ASP will set risk reduction performance targets using a three-year average of the data submitted to NTD. StanRTA's first year of operation will be July 1, 2021- June 30, 2022. StanRTA will set risk reduction performance targets as required based on years of service.
- StanRTA will allocate not less than 0.75 percent of their 5307 funds to safety related projects.

Certification of Compliance

On an annual basis StanRTA will certify through Board Resolution that it has established this ASP meeting the requirements of Part 673.

Coordination with Planning Processes

To aid in the planning process, StanRTA will make its safety performance targets available to the Department of Transportation and the Stanislaus Council of Governments (StanCOG) the region's Metropolitan Planning Organization (MPO).

Transit Agency Information

Transit Agency Name	Stanislaus Regional Transit Authority		
Transit Agency Address	912 11 th Street Ste.100 Modesto CA 95354		
Name and Title of Accountable Executive	Adam Barth, Chief Executive Officer		
Name of Chief Safety Officer or SMS Executive	Vacant, Director of Operations and Planning		
Mode(s) of Service Covered by This Plan	<ul style="list-style-type: none"> • Fixed Route • ADA Paratransit • Demand Response 	List All FTA Funding Types (e.g.,5307, 5310, 5311)	5307 5310 5311
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	<p>StanRTA operates the following transit services:</p> <ul style="list-style-type: none"> • StanRTA operates Fixed Route: Local and regional fixed route service in Stanislaus County • Americans with Disability Act (ADA) Paratransit: Complement to StanRTA Fixed Route Service and is available to individuals with disabilities. • Demand-Response Service: Special demand-response service for the general public in Oakdale, Riverbank, Patterson and Newman.. • Medi-Van: Service from Modesto to designated Bay Area Medical Centers <p>StanRTA's fleet is comprised of eighty-four fixed route buses, 7 commuter buses, and thirty-two cutaways for demand response services.</p>		
Description of Contracted Services	StanRTA provides the operation services above through its contractor Transdev North America, Inc and maintenance services through the City of Modesto.		
Name and Address of Transit Agency(ies) for Which Service is Provided	StanRTA		

Plan Development, Approval and Updates

Name of Entity That Drafted This Plan	Stanislaus Regional Transit Authority	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		3/24/22
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	Stanislaus Regional Transit Authority	3/24/22
	Relevant Documentation (Title and Location)	
	Stanislaus Regional Transit Authority Resolution – (Appendix A)	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	Stanislaus Regional Transit District	3/24/22
	Relevant Documentation (Title and Location)	
	Stanislaus Regional Transit District Resolution – (Appendix A)	

Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued

Annual Review and Update of the Public Transportation Agency Safety Plan
<i>Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.</i>
Refer to Table #5 Audit Schedule.

Safety Performance Targets

Safety Performance Targets are specific numerical targets set by StanRTA including, number of preventable accidents/injuries by month, year, and employee. As an FTA standard the number of accidents/injuries divided by the miles between preventable collisions not to exceed more than one (1) preventable collision per 100,000 miles is closely monitored by StanRTA. Additionally, miles traveled between mechanical failures is monitored by StanRTA on a monthly/yearly basis and an average is calculated based on the total miles between mechanical failures divided by the 12-month period to determine system reliability.

The table below is compliant with the NSP and with the National Transit Database (NTD) reporting requirements. The Safety Performance Measures are as follows:

- **FATALITIES** (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
- **INJURIES** (total number of reportable injuries and rate per total vehicle revenue miles by mode)
- **SAFETY EVENTS** (total number of reportable events and rate per total vehicle revenue miles by mode)
- **SYSTEM RELIABILITY** (mean distance between major mechanical failures by mode)

	Fatalities	Fatalities Rate <i>(per 100k VRM)</i>	Injuries	Injuries Rate <i>(per 100k VRM)</i>	System Reliability <i>(per 100k VRM)</i>	Safety Events	Safety Events Rate <i>(per 100k VRM)</i>
Fixed-Route Bus							
Non-Fixed-Route Bus							
Other							

Communication of StanRTA safety performance is disseminated via email, memos, board report, in-service training, and safety boards.

FTA requires that StanRTA coordinate with FTA Region 9 and the StanCOG, the region’s MPO. StanRTA provides StanCOG with the information in the table above as part of the Transportation Development Act process on an annual basis.

As StanRTA started operation on July 1, 2021, there is no historical background data to be reported. StanRTA will establish baseline data during the first year of operation (July 1, 2021-June 30, 2022) and then set risk performance targets as required based on years of service.

Safety Management Policy

It is StanRTA's policy to provide safe and reliable transportation service for the general public, to provide safe and healthful working conditions for our employees, and to comply with applicable occupational and environmental laws and regulations.

Operational and safety training, accident investigation, Standard Operating Procedures (SOP), and audit/inspection programs are documented and referenced in the ASP. The purpose of this plan, among others, is to recognize and correct unsafe acts and conditions, to promote safety awareness, and to assist in the prevention of injuries and illness as well as incidents that are harmful to the environment.

Every StanRTA employee and any outside contractor who serves StanRTA has the duty to adhere to the ASP; to recognize, report and correct hazards; to work in a safe manner; to promote safety awareness; and to actively assist in accident prevention.

StanRTA is committed to a comprehensive safety planning, and as an operator of a public transportation system that receives Federal financial assistance under Title 49 USC Chapter 53, also complies with 49 CFR Part 673.

StanRTA has adopted the principles and methods of SMS as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

Safety Management Policy Statement

At StanRTA safety is our credo — our core belief, our deepest conviction and our highest priority. Our responsibility and accountability for safety extends to all StanRTA employees and contractors as we care for our customers, passengers, the general public such as motorists, cyclists and pedestrians, and each other.

Operational safety shall always serve as the guiding principle and paramount priority when developing any StanRTA operational policies, practices and procedures. All decisions need to be viewed through the lens of safety.

The prevention of accidents, injuries, unsafe incidents and illness is the responsibility of every StanRTA employee. All employees, from the Chief Executive Officer to the frontline employee, are expected to lead by example and:

- Provide a safe and healthy working environment;
- Abide by all safety policies, rules and regulations;
- Expect and insist upon a total commitment to safety from fellow employees; and

- Immediately raise any safety concerns to his or her supervisor or safety representative.

StanRTA is committed to:

Executive Management Commitment to Safety: Executive Management will lead the development of an organizational culture that promotes safe operations and provided appropriate resources to supporting this core management function through fostering and ensuring safe practices, improving safety when needed, and encouraging effective employee safety reporting and communication. StanRTA will hold executives, managers, contractors, and employees accountable for safety performance.

Communication & Training: Employee engagement is crucial to a functioning SMS. Communication systems will be put in place to enable greater awareness of StanRTA safety objectives and safety performance targets as well as to provide ongoing safety communication up, down, and across the organization. All levels of management must proactively engage employees and work to keep the lines of safety communication honest and open. All employees will be made aware of the importance of StanRTA's SMS and trained in safety reporting procedures

Communication protocols include:

- Training in SMS for all employees;
- Notices to all contracted personnel,
- E-mails to all StanRTA administrative staff;
- Signed receipt from all employees and new hires;
- Inclusion in employee Safety Briefings; and
- Posting on all general bulletin boards

The ASP will always be available to all employees. It will be maintained in an accessible electronic file and in hard copy(s) by all key SMS personnel in locations accessible to employees under their supervision and management.

Responsibility & Accountability: All levels of management will be responsible for delivering safe and quality transit services that represent StanRTA's performance of its SMS. Managers will take an active role in the Safety Risk Management process and ensure that Safety Assurance functions are supported. Managers are responsible for ensuring that Safety Risk Management is being performed in their operational areas of control to assure that the safety risk associated with safety hazards is assessed and mitigated. Safety performance will be an important part of performance evaluations for StanRTA.

Responsibility of Employees & Contractors: All employees and contractors will support safety management by ensuring that hazards are identified and reported.

Employee Reporting: Executive management will establish a Safety Committee as a viable mechanism for employees to voice their safety concerns. All frontline employees will be responsible for utilizing this program as part of the SMS. No action will be taken against any employee who communicates a safety condition through the StanRTA safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct or negligence, or a deliberate or willful disregard of StanRTA rules, policies, and procedures.

Performance Monitoring & Measuring: StanRTA will establish realistic measures of safety performance and establish safety performance targets to ensure continual improvement in safety performance. Managers will verify that the safety risk mitigations put in place are appropriate and effective.

Review & Evaluation: StanRTA will measure SMS performance by analyzing key safety performance indicators, reviewing inspections, investigations, and corrective action reports, and auditing the processes that support the SMS. These activities will become the basis for revising or developing safety objectives, safety performance targets and plans with the goal of continuous safety improvement.

Safety Risk Management

The Safety Risk Management (SRM) objective is to identify hazardous conditions and/or behaviors, document them, develop and apply mitigation strategies, and assess if they can be eliminated or minimized to an acceptable risk status.

Safety Hazard Identification

StanRTA defines a hazard as any real or potential condition/behaviors that can cause injury, illness, or death; damage or loss of the facilities, equipment, rolling stock, or infrastructure of a transit system; or damage to the environment. The Chief Safety Officer is directly responsible for the implementation and ongoing management of the Safety Hazard Identification. This includes:

- Identifying hazards and consequences of hazards;
- Developing, updating, and auditing the program;
- Training all designated transit employees and contractors on the hazard management process;
- Documenting and tracking all identified hazards up to resolution, and
- Communicating hazards to the CEO through written and verbal communications.

Hazard identification encompasses a set of methodologies that first searches throughout the system for anything with the potential to do harm. Identification of hazards is the responsibility of all divisions and is the key to system safety. Identified hazards are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level. All identified hazards will be immediately reported to the Chief Safety Officer for review and assessment of consequences.

Hazards can be identified in several ways such as:

- Design Review
- Daily walk-throughs of facilities
- Monthly facility self-inspections
- On board in cab cameras (e.g.: Event Vehicle Recorders)
- Accidents, Incidents, and System Reliability, and Failure Reports
- Ride Checks and Proficiency Checks
- System Inspections, Audits, and Regulatory Inspections
- Customer, Contractor, and Employee Complaints
- Safety Committee
- Employee Safety Reporting

Consequences of Safety Hazards are vetted through the Safety Risk Assessment and Safety Risk Mitigation procedures.

Safety Risk Assessment

StanRTA will use a hazard identification and analysis process before purchasing and accepting new equipment and/or modifications of existing facilities, systems or rolling stock, and infrastructure elements.

Safety Hazard Analysis Methods

Analysis of a hazard is based on both the probability of occurrence and the severity of an event. Hazards with greatest potential to cause serious injury will take highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of events by introducing protective devices and equipment, procedures and/or forms, or system modifications that reduce the amount of human and property damage resulting from an accident.

While identifying every hazard is virtually impossible, there are two methods for orderly identification of hazards: inductive and deductive analysis.

- **The inductive hazard identification process** consists of an analysis of system components to identify their respective failure modes and the effects they may have on the total system. This process assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem.
- **The deductive hazard identification process** involves defining an undesired effect (e.g., collision, fire) and then deducing the possible conditions or system component faults (or combinations of them) necessary to cause the undesired effect.

The Chief Safety Officer will continually evaluate the project using the methods described above to identify new hazards. This will be documented as described in the PTASP document. In addition, the Chief Safety Officer utilizes a variety of software and technologies (e.g.: Incident database, data visualization software) to assist in his/her analysis efforts.

Hazard Risk Assessment

Hazard Risk Assessment is a quantitative calculation based on largely subjective judgments used to determine the risk associated with each hazard and thus the urgency for implementing corrective measures to eliminate or reduce risks to a level of acceptability. Hazard Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and evaluating hazard probability. The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of safety on the system in the community where the system operates.

Hazard Severity

Hazard severity is a subjective determination. As data is accumulated over time, an objective determination applicable specifically to StanRTA can be derived. The determination reflects a credible mishap that could be anticipated to result from human error, procedural deficiencies, design inadequacies, component failure, or malfunction. Hazard Severity is based on the U.S. Department of Defense Military Standard for Systems Engineering (MIL-STD-882-E) as follows:

Table 1: Definition of Severity

SEVERITY CATEGORIES		
Description	Severity Category	Criteria
Catastrophic	1	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10 Million.
Critical	2	Could result in one or more of the following: Permanent or partial disability, injuries, or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10Million
Marginal	3	Could result in one or more of the following: Injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1 Million.
Negligible	4	Could result in one or more of the following: Injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than \$100K.

The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle not all hazards pose an equal amount of risk to personal or system safety. During the performance of hazard analyses, StanRTA will identify any Category 1 Catastrophic and Category 2 Critical hazards. These hazards will be addressed immediately.

Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event occurs to the total number of trials in which this event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per units of time, miles, trips/runs or passengers carried. Table 2 identifies the probability thresholds used by the StanRTA for hazard assessment. A hazard probability may be derived from the analysis of transit system

operating experience, evaluation of safety data or from historical safety data from other passenger bus systems and/or demand response.

Table 2: Probability Thresholds

PROBABILITY THRESHOLDS			
Description	Level	Specific Individual Item	Fleet or Inventory
Frequent	A	Likely to occur often in the life of an item	Continuously experienced
Probable	B	Will occur several times in the life of an item	Will occur frequently
Occasional	C	Likely to occur sometime in the life of an item	Will occur several times
Remote	D	Unlikely, but possible to occur in the life of an item	Unlikely, but can reasonably be
Improbable	E	So unlikely, it can be assumed occurrence may not be experienced in the life of an item	Unlikely to occur, but possible
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated	Incapable of occurrence. This level is used when potential hazards are identified and later

Table 3: Risk Assessment Value

RISK ASSESSMENT MATRIX				
SEVERITY PROBABILITY	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

Safety Risk Mitigation

Safety Risk Mitigation can be applied throughout the five phases of the system life cycle, which are:

- Planning
- Design
- Construction
- Operations
- Decommissioning

Safety risk analysis attempts to determine the set of primary events in the hazard generation process. Upon identification of these events, StanRTA will undertake measures to mitigate, control, or eliminate the generation of hazards in ways that can reduce their risk to an acceptable level. Hazard resolution is the corrective action taken in response to the hazard identification and assessment process, but time and resource restrictions may determine the level of resolution that can be accomplished.

The following are actions addressed in hazard resolution:

- Eliminate the hazard, if possible;
- Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard; and
- Provide training to educate the workforce on possible hazards

Resolution of hazards utilizes the results of the Risk Assessment Process. The objectives of the hazard resolution process are to:

- Identify areas where hazard resolution requires a change in the system design, installation of safety devices, or development of special procedures;
- Verify hazards involving interfaces between two or more systems have been resolved; and
- Verify the resolution of a hazard in one system does not create a new hazard in another system.

The following methodology to ensure system safety and security objectives to eliminate or control hazards. These controls are implemented throughout design, construction, procurement, and operations:

- Design out hazards or design to minimize hazard severity to the extent permitted by cost and practicality. Identified hazards are eliminated or controlled by the design of equipment, systems, and facilities.
- Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design which are controlled to an acceptable level using fixed, automatic, or other protective safety design features or devices. Provisions are made for periodic performance of functional checks of safety devices and employee training to meet system safety objectives.
- When design, training, and safety devices cannot reasonably nor effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons of the hazard.
- Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures and training are used to control the hazard. Cautionary notations are standardized for use by all persons involved and safety-critical issues will require certification of authorized personnel.

The Risk Matrix defines the magnitude of any specific hazard item without implementation of design, construction, procurement, or operational measures to control or mitigate the risk.

Risk Reduction Program for Transit Operations

The ASP incorporates Transdev's Safety Policies and Procedures (Appendix B) to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on dated submitted to NTD.

“Transdev will keep its employees, customers and surrounding public safe at all times. Given the risks involved with daily operations, Transdev seeks to implement a uniform, comprehensive set of safety policies and procedures to assist each employee in reducing the risk of collision, injury or other harm. These policies and procedures consist of a set of minimum standards, or operating procedures, to be implemented at every Transdev location.”

The Risk Reduction for Operations is completed using the following processes:

- Transdev provides through, relevant and ongoing education and training for all employees to ensure that assigned duties are completed safely and effectively.
- Refresher and in-service training are provided when new duties or processes are introduced, and following accidents or the identification of potential hazards.
- Transdev observes and evaluates the safety performance of all employees and provides meaningful feedback and re-establishes expectation for improvement when performance standards are compromised.
- Unsafe behaviors are immediately corrected to prevent, accidents, injuries and near misses. Bus operators are monitored through on-board and trail check evaluations as well as regular review incidents.
- Transdev conducts prompt, accurate and thorough investigations of all accidents, injuries, illnesses and near misses, with the goal of promoting safety and preventing reoccurrences.
- Employees are subject to strict standards of accident preventability, undergo post-accident drug or alcohol testing in accordance with DOT requirements and participated in post-accident training to correct unsafe driving behaviors. Employees that do not report an accident immediately will be subject to disciplinary action up to and including termination.
- Driver assaults are mitigated through training such as Assault Awareness and Prevention for Transit Operators through Rutgers National Transit Institute (NTI) training.
- De-escalation training through a third-party will be offered for all operations and maintenance staff.

Safety Accountability and Responsibility -Safety Committee

The Transdev has established a Safety Committee as part of their Safety Policies and Procedures. The Safety Committee is comprised of a least four (4) members, and may include the Operations Manager, Operators, and Dispatch personnel. StanRTA's Chief Safety Officer coordinates the Safety Committee to ensure representation and inclusion from both the Operations and Maintenance Contractors.

- Committee members will serve for a minimum of a six (6) month term.
- Committee members will be chosen based on their safety record, attendance record, safety knowledge, leadership skill, overall safety attitude and willingness to help and contribute to the activities of the committee.
- The names of the Safety Committee members will be communicated to all employees and will be identifiable through some aspect of uniform or bulletin board posting.
- Safety Committee members will be provided with the proper training in order to be effective in promoting safety initiatives.
- Safety Committee meetings will be documented and posted promptly after each session.
- The Safety Committee will promote safety awareness and employee involvement through incentive programs, safety communications programs, and recognition of safety accomplishments.
- The Safety Committee will solicit feedback and suggestions from employees.

The Safety Committee is responsible for taking a proactive position in assisting StanRTA management to implement SMS and identify and control hazards to ensure the highest practical degree of safety for StanRTA riders and employees. The Safety Committee will identify, recommend, and analyze the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the ASP Safety Risk Assessment.

As Chairman of the Safety Committee, the Chief Safety Officer bears the primary responsibility for coordinating implementation of the ASP and monitoring compliance.

The Safety Committee will be assigned to facilitate the incorporation of the System Safety Assurance Program into all aspects of transit operations and services. The Chief Safety Officer acts as a resource for the operations, maintenance, and administrative staff, and is responsible for the administration of the System Safety Program, with assistance from contractors as required.

The Chief Safety Officer will work with the Safety Committee to approve the ASP on an annual basis.

The Chief Safety Officer has the authority and responsibility to:

- Perform accident/incident investigations;
- Ensure all major accidents/incidents, hazards, and internal safety issues are reviewed and resolved;
- Ensure internal safety reviews and inspections are conducted;
- Report unacceptable hazardous conditions to the CEO as soon as possible;

- Work with operations and maintenance staff daily to ensure all System Safety Program requirements are implemented and Program goals and objectives are achieved;
- Develop Corrective Action Plans (CAP) that result from accident/incident investigations, hazard analyses, and safety reviews and audits, as well as tracking corrective actions through completion to ensure all identified deficiencies are adequately eliminated or mitigated;
- Ensure recommendations are followed upon and corrected;
- Review, approve, or recommend changes to the reports and CAPs, submitted to the Safety Committee for safety hazards, and threat and vulnerabilities audit findings and corrective actions, prior to submittal of the final reports to the responsible parties for implementation;
- Review, approve, or recommend changes to CAPs developed in response to recommendations of the Department of Transportation (DOT);
- Review, approve, or recommend changes to the annual reports of the internal safety review process required for submission to the DOT; and
- Review, approve, or recommend changes to transit safety rules and procedures established to implement the requirements and programs defined in the ASP. protection of themselves, co-workers, customers, and the public, considering the proper use of facilities and equipment.

Safety Assurances

Safety Performance Monitoring and Measurement

Compliance with Procedures for Operations and Maintenance

All StanRTA employees and its contractors are responsible for the prevention of accidents, identification of hazards, and resolution of such hazards. Reports of all accidents, incidents, occurrences, deficiencies, near misses and defects will be maintained by the Manager of the appropriate department.

Through its contractors, StanRTA is assigned the responsibility for the safe operation of vehicles. Responsibilities include:

- Preparation and implementation of safe operating policies, plans, rules and procedures;
- Development of safety policies, plans, rules, and procedures for safe operation and maintenance;
- Compliance with DOT work rules;

- Compliance with CDC and Prevention and State health authority guidance;
- Employees are provided copies of safety and emergency rules, procedures, and policies that affect them;
- Personnel, whose safety record requires follow-up, additional training or discipline, including discharge, are identified through maintenance of records;
- Through its contractors StanRTA will develop a preventive maintenance schedule, for each system hardware element, which is designed to maintain system safety. Reported deficiencies and defects in equipment and facilities are corrected and monitored to assure satisfactory resolution. Only equipment known to be free of safety-related defects are placed into service.

StanRTA through its contractors will ensure all systems, equipment and facilities operate as required, or in the event of failure or degradation of functionality, operational safety is not compromised. This aspect of maintenance directly pertains to the safety of transit customers, emergency response agencies, the public, employees and subcontractors of transit.

Safety Inspections

Safety inspections will be conducted by the Chief Safety Officer and/or the contractors. The inspections will be unannounced and documented with checklists and photos. Safety inspections performed by the contractor will be done in accordance to their company guidelines and procedures.

Facilities Inspections

All operating, and maintenance facilities will undergo a complete inspection by the Chief Safety Officer at least once a year to ensure the safety and health of employees. Individual maintenance shops within the maintenance facilities are inspected monthly. Inspection reports are issued which list the hazards and the safety and health problems found during the inspection. Hazards identified during the inspection process are subject to the hazard management process. Follow-up inspections and reports are completed within 30 days. If the findings of the inspection can't be resolve within 24 hours, a work order will be opened and tracked until the finding is resolved.

Equipment Inspections

The contractor will ensure inspections of facility equipment are made in accordance with appropriate maintenance manuals and procedures. The contractor will ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are tracked until closure is achieved.

Vehicles – Preventive Maintenance

The contractor ensures all vehicles are maintained at a minimum in accordance with manufacturer recommendations. Most of the maintenance is time driven based

maintenance. Maintenance is tracked and coordinated through time schedules, which are maintained by the contractor. All hard copies are kept and in independent books for each vehicle for 1 year. All work completed for each vehicle is tracked through assigned repair order numbers for all repairs, or, designated maintenance inspection intervals. StanRTA's contractors are responsible for document control.

Maintenance schedules will follow a progressive preventative maintenance cycle starting with the lowest mileage (routine inspection) through mid-level and major inspections. All vehicle inspections cover the equipment progressing at higher levels of detail for each inspection. Once the highest level of inspection is reached, the cycle starts again. In conjunction with the inspection cycle, mid-level and major overhauls are scheduled. These are time-based overhauls and rebuilds of major equipment per the manufacturer requirements.

The maintenance criteria described above is strictly followed. If a bus is at the mileage or time requirement and the scheduled maintenance is not complete, the bus must be removed from service until the required maintenance is complete. No vehicles can carry passengers in service with any DOT Out of Service violations/criteria.

Safety Risk Mitigations

Work Orders

Each facility inspection report is sent to create the appropriate work orders, if applicable. It identifies specific areas and targets specific recommendations for corrective action. Unacceptable hazards identified are reported to the Chief Safety Officer.

The Contractor will generate Work Orders for defects identified during Fleet Maintenance, Facilities Management and Systems Maintenance inspections.

Hazardous Material & Local, State & Federal Regulations

The Occupational Safety and Health Act (OSHA) program is directed towards achieving a safe working environment for employees and minimizing the likelihood of accidents. The program emphasizes the recognition, evaluation, and control of hazards arising in and from the occupational environment.

Hazardous Materials Control

StanRTA and its contractors are fully aware of the importance of employee chemical safety programs and the duty to comply with legally mandated hazardous materials rules and regulations. StanRTA's Hazard Communication Programs complies with Title 29 Code of Federal Regulations Part 1910.1200, Hazard Communication Program. The Hazard Communication Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections. When necessary, consultants may be hired for special projects such as indoor air quality, chemical vapor, and particulate sampling.

The Chief Safety Officer reserves the right to reject a product if it is deemed either too hazardous for employee use or is unable to provide adequate safeguards or protection.

The SDS review/request procedure, which requires SDS review and approval by the Chief Safety Officer or designee or contractor is included in the Hazard Communication Program. These programs are the responsibility of the affected division and the Chief Safety Officer. Program effectiveness is reviewed via the Internal Safety Audit Process. SDS for all hazardous materials considered for purchase and use are reviewed by the contractor for approval. The user furnishes the manufacturer's SDS for hazardous products and information on the planned use and application methods. Follow-up is conducted on the field use of approved products to ensure safe/proper handling methods are utilized. The contractor is responsible for keeping current files of all SDS at the Bus Maintenance Facility.

Personal Protective Equipment

All personal protective equipment used by StanRTA personnel and contractors is reviewed and approved by the Chief Safety Officer or contractor staff in accordance with respiratory, hearing conservation, electrical gloves, and other applicable safety standards.

Safety/Industrial Hygiene Training and Education

StanRTA provides training to employees and directs contractors to provide training in basic, safe work practices and hazard identification. Employees/contractors exposed to chemicals and/or potentially overexposed to physical agents receive training in industrial hygiene principles, use and care of personal protective equipment and hazards and safe handling methods of chemicals.

Drug & Alcohol Program

StanRTA and its contractors are certified as a drug-free workplace and complies with all provisions of the U.S. Department of Transportation, Federal Transit Administration, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs.

Covered employees receive a minimum of 60 minutes of training on the effects and consequences of prohibited drug use and additional training on the effects of alcohol on personal health, safety, the work environment, and on the signs and symptoms that may indicate prohibited drug use. Supervisors will, in addition to the covered employee training, receive an additional 60 minutes of training on the physical, behavioral, speech and performance indicators of probable drug use.

StanRTA, and its contractors, are responsible for administering the FTA Drug and Alcohol-Free Workplace regulations. StanRTA contractors are responsible for administering the Substance Abuse Policy.

Employee Safety Reporting

Safety reporting is an essential part of SMS. StanRTA management fosters an atmosphere of trust that encourages and rewards employees for providing safety-essential information, even if it is self-incriminating, without fear of reprisal. An effective SMS empowers employees with the confidence to raise concerns that may lead to serious safety/quality error and assures them someone will listen to them and investigate their issues or concerns in a professional manner — all without fear they will face unduly harsh penalties for admitting to genuine mistakes.

Table #4 presents a guideline on mitigation and management of safety events

Human Error	At-Risk Behavior	Reckless
An inadvertent action – slip, lapse, mistake	A choice – risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: <ul style="list-style-type: none"> > Processes & procedures > Checklists > Training > Design 	Manage through: <ul style="list-style-type: none"> > Increase situational awareness > Remove incentives for at risk behavior > Create incentives for safe behavior 	Manage through: <ul style="list-style-type: none"> > Remedial action > Punitive action

What is important to emphasize is any cultural change in the organization will take time to be fully implemented and see the results of these changes.

Investigation of Safety Events

All employees and contractors are expected to comply with StanRTA’s accident and incident reporting procedures and use the forms prescribed. Roles, responsibilities, and accident reporting thresholds are outlined in the procedure, including accident notification, reporting, and investigation throughout the organization. The level of investigation required is dependent on the seriousness of the event.

Notification of Accidents and Incidents to External Agencies

Recordable accidents tracked by StanRTA and made available to DOT, MPO, and FTA:

- Fatality (occurring at the scene or within 30-days following the accident).

- One or more persons requiring immediate medical treatment away from the scene of the accident.
- One of more vehicles incurring disabling damage and needing to be towed from the scene of the accident as result of the accident.

Job related employee fatalities shall be reported to Occupational Safety and Health Administration within 8 hours of occurrence. In-patient hospitalization, amputation, or eye loss shall be reported within 24 hours.

Pursuant to the NTD Safety and Security Reporting Manual, **substantial damage** is defined as damage to any involved vehicles, facilities, equipment, rolling stock, or infrastructure that:

- Disrupts the operations of the transit agency
- Adversely affects the structural strength, performance, or operating characteristics of the vehicle, facility, equipment, rolling stock, or infrastructure, requires towing, rescue, on-site maintenance, or immediate removal prior to safe operation.

Substantial damage excludes damage limited to:

- Cracked windows
- Dents, bends, or small puncture holes in the body

Accident/Incident Reporting and Documentation

Each bus investigation conducted on behalf of DOT must be documented in a final report that includes a description of investigation activities, findings, identified causal factors, and a CAP, if applicable. All accident reports must follow the requirements established in the contractor's accident investigation plan. At its discretion, and as specified in its accident investigation plan, StanRTA or its contractors may separate its investigation report into two parts:

- Description of investigation activities, investigation findings, and determination of the most probable cause and additional contributing causes; and
- Recommendations to prevent recurrence, including a CAP which implements the recommendations.

StanRTA or its contractors prepares written accident and unacceptable hazardous condition reports on standard forms. Such written reports are maintained. Reports contain the most probable cause, other contributing causes, CAPs, and a schedule for implementing corrective actions.

The status investigation reports at a minimum shall include:

- Minutes of any meeting held by a local safety ad hoc reportable event investigation committee or contractor
- Disclosure of any immediate corrective actions of planned or completed principal issues or items currently being evaluated
- Overall progress and status of the investigation.

Written reports are filed for all occurrences that fall into the category of an accident, incident, or injury. The Chief Safety Officer files a monthly statement of all accidents, incidents, unacceptable hazardous conditions, and tracks open corrective action items through completion.

In addition, StanRTA maintains a file of the annual safety performance report in a format available for review by DOT at any time during an investigation. The report shall be prepared and a full briefing on the known circumstances of the event, status of StanRTA's investigation and investigation activities.

Reports and records of accident investigations submitted to DOT by StanRTA as well as related reports and records produced by both DOT and StanRTA, will be treated as confidential information, and will not be released without concurrence by both DOT and StanRTA.

Internal Safety Reporting

StanRTA and its contractors has the responsibility to monitor the safety performance of operations. The Chief Safety Officer is responsible for compiling and analyzing all safety data to determine if safety performance meets established safety goals. This data includes injuries to passengers, contractor personnel, public; potentially hazardous equipment failures; unacceptable hazardous conditions, and rules as well as procedure violations. A closed-loop reporting system for identifying and monitoring safety-related items has been established. To close out each incident, safety verification activities and results are reviewed and audited by the contractor and reviewed by the Chief Safety Officer. The Chief Safety Officer is responsible for providing safety data to the contractor for review. The Chief Safety Officer monitors Safety Key Performance Indicators utilizing several tools and provides monthly progress updates to the CEO.

Tracking of hazard related data is used to identify trends. These trends are further analyzed and/or investigated to determine causal factors. Tools available to the Chief Safety Officer include Risk-Based Analysis, Monthly Performance reviews, EVR data, and data analysis and trends.

The Chief Safety Officer and its contractors are responsible for information regarding accidents, incidents, hazardous conditions, and operations which are obtained from different reporting mechanisms. These include but are not limited to: Accident/Injury Reports and Investigations, Incident Reports, Daily Operations Summaries, Operator,

and Supervisor Reports; Employee/Occupational Injury reports, mining of maintenance data, analysis of vehicle records, and procurement contracts.

Internal Audits

The purpose of internal system safety audits is to perform an official evaluation of accomplishments, problems, and trends related to safety and to evaluate the effectiveness of the implementation of the ASP. The Chief Safety Officer is responsible for the direction of the safety reviews and audits of its contractors to determine performance related to the Safety goals and objectives.

Organizational functions subject to the safety audit process include:

- Facility inspections
- Maintenance audits/inspections
- Review of rules, standard operating procedures, special bulletins, and orders
- Review of training/re-certification programs
- Emergency response planning, coordination, training
- Configuration Management
- Systems modifications (review and approval)
- Safety data analysis
- Employee safety programs
- Hazardous materials program
- Interdepartmental safety goals and objectives
- Occupational safety and health programs
- Contractor safety
- Procurement and specification engineering
- Drug and Alcohol Testing Program
- Any aspect or responsibility as outlined in this document

StanRTA and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity including documentation, practices, and compliance with the ASP and other requirements. The Chief Safety Officer reviews training, practices, and procedures to correct deficiencies identified during the performance of audits or other safety activities, including inspections and emergency drills.

Safety Audit Process

The Chief Safety Officer is responsible for the management of the Internal Safety Audit Program. All StanRTA employees and contractors are required to cooperate fully with Safety and Security personnel. Contractors and senior managers ensure their areas participate fully in the safety audit process.

Integrity of the Process

To maintain the integrity of the review process, an external audit team is used to conduct safety audits. The Chief Safety Officer does not perform audits/reviews of those functions and elements for which it is directly responsible to implement. No team member shall audit a function or activity for which they are responsible.

Auditing Cycle

The Internal Safety Audit Process is intended to be an ongoing, continuous safety review process.

Over a three-year period, all elements of the ASP must be audited at least once. The Internal Safety Audit Process is intended to be an ongoing, continuous safety review process. It is intended that at least 2 components of the ASP will be audited per year. The schedule is revised as necessary to accommodate schedules for auditors and the audited divisions.

The Audit Schedule is presented in Table #5 below.

Safety Audit Schedule	
Year 1	Full SSPP (expected to be the last SSPP Audit)
Year 2	<ol style="list-style-type: none">1. Safety Promotion:<ul style="list-style-type: none">• Training Program• Safety Communication2. General Requirements3. Safety Policy<ul style="list-style-type: none">• Safety Management Policy• Employee Safety Reporting• Key Management & Responsibilities
Year 3	<p>Risk Management</p> <ul style="list-style-type: none">• Risk Management• Safety Hazard Identification• Safety Risk Assessment• Safety Mitigation• Safety Assurance:<ul style="list-style-type: none">• Performance Monitoring and Measurement• Management of Change• Continuous Improvement

An annual audit schedule must be developed, reviewed, maintained, and updated to ensure all elements are reviewed during the three (3) year audit cycle.

The Chief Safety Officer notifies the division/organization a minimum of 30 days in advance of a scheduled safety audit.

Checklists and Performance of Safety Audits

Checklists are prepared during the review of the ASP section, documents referenced in the ASP section, previous audits, and corrective actions.

Pre-audit and post-audit conferences are held by the audit team with the entity being audited. The safety audits are comprised of record reviews, interviews, field observations, and inspections and measurements to verify the accuracy of documentation and spot inspections of facilities and equipment to verify compliance with the ASP, procedures, codes, and regulations.

Management of Change

Configuration Management requirements will be included in all contracts to ensure changes to the design of equipment and facilities, after design reviews, are adequately documented and approved. The configuration management process uses baseline management to ensure the technical baseline is defined and controlled throughout the maintenance and operation phase, and the end products satisfy the technical and operational requirements derived from the system needs.

Selected documentation, such as as-built drawings, manuals, procedures, and other documents, are formally designated and approved as part of the technical baseline and are under StanRTA control for future capital projects, all documents related to the segment/phase that are under the control of a contractor will be turned over for control and maintenance following completion of said phase.

For future capital or maintenance improvement projects, the designated contractor shall be responsible for quality control testing and inspections if required in accordance with an approved Quality Control Plan.

Additions or modifications to bus operations, and to the existing configuration of presently operating system fixed facilities, rolling stock, and equipment directly related to operation of rolling stock, are approved by the Chief Safety Officer. These reviews are established to ensure system and operational changes are approved prior to implementation, and drawings, manuals, and other related documents, including training programs, are updated to reflect these changes, which are also reflected in the Maintenance Management Plan.

Upon the approval of any system or operations change StanRTA will create Special Instructions or create and/or revise current SOPs to advise affected employees. Supervisors will distribute, individually to each employee, the new control document, ensuring each employee understands the operational change as it applies to their job. Each employee is required to sign for their copy and place the updated material into their SOP book.

Continuous Improvement

Continuous improvement is measured through monitoring safety performance indicators. Progress is related to the maturity and effectiveness of the SMS. Safety assurance processes support improvements to the SMS through continual verification and follow-up actions.

These objectives are achieved through the application of internal evaluations and independent audits of the SMS. Compliance of this requirement is indicated when:

- The Safety Committee has the necessary authority to make decisions related to the improvement and effectiveness of the SMS; or
- The SMS is periodically reviewed for improvements in safety performance.

This element is satisfied when the organization routinely monitors the SMS performance to identify potential areas of improvement and the outcomes of this process lead to improvements to the SMS, which includes inclusion of best practices as they come forth.

ASP Annual Review Process

StanRTA has the authority for the development, implementation, and management of the ASP. It also has the primary responsibility of implementing the ASP with oversight and review by the Chief Safety Officer. Annual review of the ASP is mandatory and StanRTA specific responsibilities within the ASP framework include, but are not limited to:

- By November of each year notify the Chief Safety Officer of any recommended changes to the ASP for review and approval by the CEO;
- Revisiting the ASP annually to reflect changes in organizational structure and new systems that require significant changes in operation;
- Review progress on goals and objectives;
- Refine and improve on the current goals and objectives of the SMS program;
- Identify new tasks or objectives to respond to system growth or any new regulations that effect safety and security;
- Identify any additional or emerging safety or fire/life safety-related tasks and responsibilities;

At every point of the review process the Chief Safety Officer will work with the Safety Committee for comments, suggestions, and revisions to the ASP. On-going review and revision of the ASP ensures the document remains current.

Safety Promotion

Safety Training Program

Safety training is conducted on facilities, equipment, and vehicles. Operating rules and SOPs will be prepared by StanRTA and provided to all personnel. The Chief Safety Officer and its contractors oversee the formulation of training programs and records.

StanRTA periodically completes reviews and oversight activities associated with the training program. Activities or functions judged to be safety-critical may require special training and/or certification. This ongoing training is included in regular safety meetings and all documentation is also kept at the facility.

Refresher training is accomplished at least annually for operations and maintenance contractor employees and when situations related to employee performance warrant it. Emergency responders are also trained during the pre-revenue period and during drills that occur at least annually. These are also documented, and records retained at the facility.

Operations Personnel Training

All bus operators will be required to successfully have completed the contractors bus operation training program (Operator Development Program). This course covers SOPs and Operator Rules that govern the operation. New Operators are also provided Behind the Wheel training by a certified Instructor.

New bus operators are also evaluated by established their contractor using an Observation Report Form. New Operators must meet all criteria satisfactorily or they receive additional training. The contractor, on a separate occasion prior to certification, will determine whether each Operator demonstrates safe control of the revenue vehicle or needs additional training. Each Operator is certified with both written and practical testing to validate operational readiness.

Annually, the contractor will ensure each operator is given a refresher course on the rules and procedures and will recertify with written and practical testing. The re-certification may consist of one or more of the following: a quiz, a checklist, a test, and a demonstration of troubleshooting techniques. Any person who fails the annual examination is given special retraining.

Updated training materials will be developed under coordination by the contractor in conjunction with the Chief Safety Officer prior to the opening of any new bus extension or major modification to the existing routes or introduction of new vehicles. Operations personnel will be certified by either written or practical testing.

Operators through its contractor are subject to periodic in-service evaluation or Operators by Route Supervisors who monitor their compliance to rules and procedures outlined in the Rule Book and SOPs. Route Supervisors shall complete a Driver Evaluation Form after completion of the in-service evaluation and will review the information in the report with the Operator. Positive reinforcement is given as warranted. Operators observed violating rules or procedures may be subject to progressive discipline.

The contractor will maintain a Rule Violation Log that chronicle safety violations each month and administers all disciplinary actions, retraining, re-instructions, and determines the consequence of any rule violations. Which will be made available to the Chief Safety Officer upon request.

Maintenance Personnel Training

The contractor's maintenance requirements, methods, and procedures for the facility equipment and systems will be described in manuals, handbooks, and other documentation developed for the training and certification of maintenance personnel. Use of personal protective equipment, emergency equipment, and safety instructions are included within the training program. (The City of Modesto Injury and Illness Prevention Program follows in Appendix C.)

The contracted maintenance personnel are required to operate buses, heavy equipment, or other specialized vehicles/equipment/apparatus and will be certified by both written and practical testing to document the employee's knowledge of safety and operating procedures and skill in the proper and safe operation and procedures. Annually, each employee will re-certify in the proper and safe use of the equipment/vehicles with written and practical testing. Any person who fails the annual examination will be given special retraining.

Safety Training

The contractor's safety information on approved methods and procedures are used in manuals, handbooks, and other documentation developed for the training and certification of operators and maintenance personnel. Identification of protective devices and emergency equipment are included in the training documentation and instruction. In addition, safety posters and notices are used, as appropriate, to enhance awareness during all phases of system operations. Proficiency demonstrations and certifications are required of all operators and maintenance personnel. Safety concerns are incorporated in briefings given to personnel prior to their working with hardware or facilities. The Chief Safety Officer will

make reviews of the safety training program every six months to ensure training materials and programs remain consistent with employee needs.

Emergency Response Personnel Training

Training to familiarize fire, police, and emergency service personnel with facility requirements is coordinated through and conducted by StanRTA and its contractors. Emergency preparedness and response drills are developed by StanRTA and its contractors. Training classes, drills, and after-action reviews are then conducted with emergency service personnel and StanRTA personnel to:

- Ensure the adequacy of emergency plans and procedures;
- Ensure readiness of the StanRTA's and contractor personnel to perform under emergency conditions; and
- Ensure effective coordination between the StanRTA, its contractors, and emergency response personnel and outside agencies.

Contractor Safety

Contractors, not part of operations activities associated with the facility must seek approval, in writing, from StanRTA to perform work on property and infrastructure. StanRTA must ensure the requesting party abides by StanRTA's safety requirements. Requirements include but are not limited to: reflective safety vests, safety signaling to operators, and an understanding of all unsafe conditions. StanRTA may require contractors to attend safety classes prior to approval and issuance of an Access Permit; this requirement depends on the work request. StanRTA will determine which contractors shall attend such classes and receive certification prior to the approval and issuance of an Access Permit when necessary.

Record Keeping

Personnel records of all training activity by employees are maintained by StanRTA contractors.

Compliance with Training Requirements

The internal audit process includes the means of determining that all necessary training is conducted and documented including the proper qualification of operating and maintenance personnel. Training materials, testing, and grading processes are reviewed and evaluated for completeness and accuracy.

The audit process is guided by the following criteria related to training compliance:

- Identify training requirements for all personnel related to safety. This encompasses initial and refresher training of procedures, equipment uses, and manufacturers' training, retraining requirements identified due to accident or incident investigations.
- Review all training programs identified for safety adequacy.

- Assess the effectiveness of the training programs and on-the-job experience by the conducting emergency scenarios, drills, audits, and evaluations. These job evaluations are based on job performance, statistical trends, and public feedback.
- Review employee performance, including employee records and conduct in-person interviews to confirm technical knowledge and issues.
- Evaluate training provided to operations personnel and emergency response personnel when substantive operational changes are made, or with the introduction of new equipment, facilities, or specialty vehicles

Safety Communication

StanRTA and its contractors have a robust Safety Communications program consisting of:

- Monthly Safety Meetings Initiative
- Topic-specific videos, posters, bulletins addressing risk-prioritized defensive driving and injury prevention topics
- Safety Campaigns
- Local management communications
- Intranet Communications
- Safety Posters and Bulletins

Terms and Abbreviations

The following definitions used in this document are consistent with 49 CFR Parts 625, 630, 670, 673, and 674 as of September 2016.

Accident: Any event involving a transit vehicle or taking place on transit-controlled property where one or more of the following occurs:

A loss of life;

A report of a serious injury to a person;

A collision of a transit vehicles;

A runaway of transit vehicle;

An evacuation for life safety reasons; or

Any transit vehicle, at any location, at any time, whatever the cause

An accident must be reported in accordance with the thresholds for notification and reporting set forth in Part 674.

Administrator: The Federal Transit Administrator or the Administrator's designee.

Advisory: a notice from FTA to recipients regarding an existing or potential hazard or risk in public transportation that recommends recipients take a particular action to mitigate the hazard or risk.

Agency Safety Plan (ASP): a document adopted by a Transit Agency detailing its safety policies, objectives, responsibilities, and procedures.

Audit: an examination of records and related materials, including, but not limited to, those related to financial accounts.

BTW: Behind-The-Wheel, a type of required Operator training

CEL: Certifiable Elements List

CEO: Chief Executive Officer of the Transit Agency.

Chief Safety Officer (CSO): an adequately trained individual who has responsibility for safety and reports directly to a CEO, Chief Executive Officer, president, or equivalent officer. The CSO does not serve in other operational or maintenance capacities, [unless Transit Agency is a small public transportation provider as defined in Part 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system].

CM: Construction Manager.

Consequence: the potential outcome(s) of a hazard.

Continuous Improvement: a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies.

Contractor: An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or a Transit Agency, through contract or other agreement.

Corrective Action Plan (CAP): A plan developed by a Transit Agency that describes the actions the Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Transit Agency to develop and carry out a CAP.

Direct Recipient: an entity that receives funds directly from the Federal Transit Administration.

Event: An Accident, Incident, or Occurrence

Facility: a building or structure that is used in the provision of public transportation.

FMLA: Family Medical Leave Act

FRA: The Federal Railroad Administration is an agency within the United States Department of Transportation

FTA: The Federal Transit Administration is an agency within the United States Department of Transportation.

Grade Crossing (as defined in the National Transit Database glossary): an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail or pedestrian traffic; either in mixed traffic or semi-exclusive situations.

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 of a rail's fixed guideway public transportation system; or damage to the environment

Hazard Analysis: The method by which hazards are identified and analyzed as to their possible effects upon the safe operation of the entire system (i.e.: Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)

Hazard Identification: formal activities to analyze potential consequences of hazards during operations related to provisions of service.

Hazardous Condition: An immediate condition that could cause an accident involving personal injuries or death.

Incident: An unforeseen event or occurrence that does not necessarily result in death, injury, contact, or property damage. As defined by the FTA, and Incident is:

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.

Individual: Any person at the property of a transportation system.

Injury: Any physical damage or harm to persons because of an incident that requires immediate medical attention away from the scene.

Investigation: The process of determining the causal and contributing factors of an accident, incident, or hazard, for preventing recurrence and mitigating risks

Lagging Indicators: provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved.

Leading Indicators: provide evidence, through monitoring, that key safety management actions are undertaken as planned.

Management of Change: a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process.

National Public Transportation Safety Plan: The plan to improve the safety of all public transportation systems that receives Federal Financial Assistance under 49 U.S.C. Chapter 53.

Near Miss: a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations.

NTSB: National Transportation Safety Board, an independent federal agency.

Occurrence: An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure and does not disrupt the operations of the transit agency.

Person: A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a public transportation system.

Performance criteria: categories of measures indicating the level of safe performance within a Transit Agency.

Performance Measure: a parameter used to assess performance outcomes.

Performance Target: a specific level of performance for a given performance measure over a specified timeframe.

PHA: Preliminary Hazard Analysis.

PPE: Personal Protective Equipment

Practical Drift: the slow and inconspicuous, yet steady uncoupling between written procedures and actual practices during the provision of services.

Program Standard: is a written document developed and adopted by a State that describes the policies, objectives, responsibilities, and procedures used to provide safety and security oversight of a transit agency.

Public Transportation Agency Safety Plan (PTASP): The comprehensive ASP for a transit agency that is required by 49 U.S.C. 5329(d) and based on a Safety Management System. Until one year after the effective date of FTA's PTASP Final Rule, a System Safety Program Plan (SSPP) developed pursuant to comply with 49 CFR part 659 will serve as the transit agency's safety plan.

Public Transportation Safety Certification Training Program: Either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1).

Risk: The composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation: A method or methods to eliminate or reduce the effects of hazards.

Sabotage: The deliberate destruction of transit property or the slowing down of public transit operations by employees with the intention of damaging business or the economic condition of the transit agency.

Safety: the state in which potential of harm to persons or property damage during operations related to provision of reduced to and maintained at acceptable level through continuous hazard identification and safety risk management activities.

Safety Certification: The process used to verify the system meets criteria, codes, regulations, and contract requirements as they relate to safety, fire/life safety, and security.

Safety Performance: an organization's safety effectiveness and efficiency, as defined by safety performance indicators and safety performance targets, measured against the organization's safety objectives.

Safety Performance Indicator: a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

Safety Performance Measurement: the assessment of non-consequential safety-related events and activities that provide ongoing assurance that safety risk mitigations work as intended.

Safety Performance Monitoring: the activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

Safety Performance Monitoring and Measurement: activities a transit agency must Monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance; monitor its operations to identify hazards not identified through the Safety Risk Management process; monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended; investigate safety events to identify causal factors.

Safety Assurances Reporting Program: a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.

Safety Review: a formal, comprehensive, on-site review by DOT or FTA of the transit agency's safety practices to determine whether the agency complies with the policies and procedures required under the Safety Plan.

Safety Risk Management: A process within an ASP for identifying hazards and analyzing, assessing, and mitigating safety risks.

Security and Emergency Preparedness Plan (SEPP): is defined as a document developed and adopted by the transit agency describing the application of operating,

technical, and management techniques and principles to the security aspects of the system throughout its life to reduce threats and vulnerabilities and describing the emergency preparedness policies and procedures for mobilizing the system and other public safety resources to assure rapid, controlled, and predictable responses to various types of transportation and community emergencies.

Serious Injury: 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 nose); 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.

SMS Executive: A Safety Officer or an equivalent.

SSOC: Safety & Security Operations Committee

State: A State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands

State Safety Oversight Agency (SSO): 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 this part.

Subsystem: An element of a system that may constitute a system

System Safety Program Plan (SSPP): It is a document developed and adopted by the transit agency, describing its safety policies, objectives, responsibilities, and procedures. Until one year after the effective date of FTA's PTASP Final Rule, an SSPP developed pursuant to comply with 49 CFR part 659 will serve as the rail transit agency's safety plan.

System Security Plan (SSP): A document developed and adopted by the transit agency describing its security policies, objectives, responsibilities, and procedures.

Vehicle: Any rolling stock used on a public transportation system, including, but not limited to, passenger and maintenance vehicles

Appendix A - StanRTA Resolution

Appendix B - Transdev Services, Inc. Safety Policies and Procedures

Appendix C - City of Modesto Injury and Illness Prevention Program