



LIGHT RAIL TRANSPORTATION
AGENCY SAFETY PLAN

REVISION 7
January 2025

Safety Governance Statement

Metro Transit has a long-standing practice of maintaining a System Safety Program Plan (SSPP) for all three of its modes: light rail, commuter rail, and bus. We have had 16 versions of the Light Rail (LRT) SSPP not only because it was a requirement of 49 CFR 659, but because it is good business practice and promotes a safety-minded corporate culture. Our LRT SSPPs – and, by extension this Agency Safety Plan – document how safety is integrated into our operation and supporting activities.

In 2018, FTA published 49 CFR 673, the Agency Safety Plan (ASP) rule. That rule requires that all modes not overseen by another regulatory agency (e.g., FRA) must be governed by an agency safety plan. We believe that mode-specific ASPs make the most sense and since the rule allows transit agencies to develop ASPs that are mode-specific, we have elected to apply that approach.

This LRT ASP has been developed to comply with 49 CFR 673. We have worked with the Office of State Safety Oversight in developing and refining this plan in accordance with its own Procedures and Standards. Future revisions of this document will reflect ongoing FTA guidance. Metro Transit continues to embrace its philosophy that safety is the cornerstone of what we do.

POLICY STATEMENT AND AGENCY SAFETY PLAN AUTHORITY

Metro Transit recognizes management of safety as a core agency function. Metro Transit is dedicated to planning, designing, constructing, operating and maintaining transportation systems that optimize the safety of passengers, employees, consultants, contractors, emergency responders, and the public. Accountability for safety begins with the Accountable Executive and permeates all levels of Metro Transit employees, including consultants and Transit Contractor employees. The following safety objectives reflect Metro Transit's overarching safety goals and demonstrate commitment to establishing, implementing, and continually improving Safety Management Systems (SMS):

- Integrate safety management into the primary responsibilities of all employees;
- Support SMS through allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication;
- Define roles and responsibilities for all employees that contribute to safety performance and SMS;
- Implement risk-based hazard management consistent with risk acceptance levels;
- Operate an employee safety reporting program that ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures;
- Comply with or exceed legislative and regulatory requirements and industry standards;
- Ensure systems and services that support operations meet or exceed agency safety standards;
- Require safety information and training to ensure all employees are competent in safety management for tasks allocated to them;
- Establish and measure safety performance against data-driven safety performance targets; and
- Continually improve safety performance and implementation of SMS.

By applying SMS as outlined above and detailed in this Agency Safety Plan (ASP), Metro Transit commits to making safety the top priority of all its operations. Metro Transit will achieve an optimum level of safety through a cooperative effort in compliance of this ASP.

Lesley Kandaras

General Manager, Metro Transit

Date Signed

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Revision	Revision Date	Comments
Revision 0	July 2019	Initial publication of the Rail ASP
Revision 1	April 2020	<p>Safety Governance Statement wording modified to reflect current status;</p> <p>Sec.1.1: Updated version of OSSO Procedures & Standards;</p> <p>Sec.1.5: clarified Met. Council role in approving ASP and updated Org. Charts as required;</p> <p>Sec.1.5.2.3: added wording to include construction support and contracted personnel;</p> <p>Sec.1.6: clarified timeline for annual review and approval process;</p> <p>Throughout document: changed SSOA to OSSO to reflect current nomenclature.</p>
Revision 2	July 2021	<p>Sec. 1.3: Updated system description.</p> <p>Sec 1.5: Updated Org Charts, Figure 4 Page 15 and Figure 5 Page 21.</p> <p>Sec. 2.1.2: Added language specifying protections to employees who report hazards.</p> <p>Sec. 3.1: Added language regarding specific Safety Performance Targets.</p> <p>Sec. 3.5: Clarified language regarding disciplinary action.</p> <p>Sec 3.9: Corrected name of LRT Internal Audit Plan.</p> <p>Sec. 4.2: Updated language regarding emergency responder inspections to reflect actual practice.</p> <p>Sec. 4.3: Added Powered Industrial Truck Program and Mobile Elevated Work Platform Plan.</p>
Revision 3	July 2022	<p>Updates throughout plan from the Bipartisan bill</p> <p>Added ASP Development, Approvals, & Certification sheet.</p> <p>Sec. 1.1: Updated to include current approval groups.</p> <p>Sec. 1.5: Update organizations charts.</p>

Revision	Revision Date	Comments
		<p>Sec. 1.7: SMS documentation & records added.</p> <p>Sec. 2.1: Updated hazard Severity, hazard likelihood, and hazard categories charts to reflect current information.</p> <p>Sec. 2.1.7: Update CAP creation and tracking process.</p> <p>3.1: Added “Safety Events” as part of the data collection process.</p> <p>Sec. 3.2.5: Added Health and Safety hazard section.</p> <p>Sec. 3.7: Updates to council policies to reflect current policy.</p>
Revision 4	December 2022	<p>JLMSC ASP Review</p> <p>3.3 Updated where training is held</p> <p>3.4 Additional reference to Rail Fleet Management Plan</p>
Revision 5	March 2023	<p>Sec. 1.4.3 Transit Worker Assault Definition</p> <p>Sec. 1.5.1 Update to Safety Department Structure</p> <p>Sec. 1.5.1.1 Updated language in Director of Safety Responsibilities</p> <p>Sec. 1.5.3 Joint Labor Management Safety Committee responsibilities</p> <p>Sec. 1.6 updates to revision and control section to include JLMSC</p> <p>Sec. 2.1.2 addition of Transit Worker Assaults of Identified Hazards</p> <p>Sec. 2.1.3.3 added transit worker assaults to be included as a hazard</p> <p>Sec. 2.1.4 updated safety devices to include operator barriers to reduce transit worker assaults</p> <p>Sec. 3.1 transit worker emergency response times</p>

Revision	Revision Date	Comments
		<p>Sec. 3.2.5 Metro Transit evaluation Cleaning Standards</p> <p>Sec. 3.3.1 changed facility inspections to at a minimum quarterly from monthly</p> <p>Sec. 3.3.1 JLMSC access to facility Inspection and hazard documentation</p> <p>Sec. 4.1.7 Addition of De-Escalation Training</p> <p>Sec. 4.3 updated AWAIR policy reference</p>
Revision 6	February 2024	<p>Sec. 1.1 Updated language to include JLMSC</p> <p>Sec. 1.2.1 Changed language from “come in contact with” to “encounter”</p> <p>Sec. 1.2.2 Changed accident cause to root cause.</p> <p>Sec. 1.3 Updated Ridership numbers and removed “peak” when referring to headways.</p> <p>Sec. 1.4.12 Added Risk Based Inspection definition.</p> <p>Sec. 1.5.1.1 Changed position to Director of Safety.</p> <p>Sec. 1.5.1.2 Changed Consolidated Hazard Matrix to Safety Risk Registry.</p> <p>Sec. 1.5.1.3 Removed reference to the Manager of Bus System Safety in the Rail Plan.</p> <p>Sec. 1.5.1.7 Removed reference to Bus Safety Specialist in the Rail plan.</p> <p>Sec. 1.5.2.2.1 Added language to include training on blind spots. Added language that employees are to report hazard to their supervisor or RCC and that managers are responsible for ensuring employees are trained on safety reporting requirements.</p> <p>Sec. 1.5.3 updated JLMSC job responsibilities.</p> <p>Sec. 1.7 Updated to include JLMSC and references that documents will be stored electronically.</p> <p>Sec 1.8 Added section on Risk Based Inspections.</p>

Revision	Revision Date	Comments
		<p>Sec 2.1.2 Added language that JLMSC shall have access to information reported to OSSO.</p> <p>Sec 2.1.5 Added hazard risk mitigation follow-up with JLMSC.</p> <p>Sec. 3.1 Added trend data will be shared with JLMSC on a quarterly basis; Added that data related to assaults when clearing train will be reviewed; Updated target goals.</p> <p>Sec 3.2 Added blind spots and visual obstructions to causal factors; added language that investigation reports will be made available to the JLMSC upon request.</p> <p>Sec 3.2.2 added that the JLMSC shall have access to accident/incident reports.</p> <p>Sec 3.2.3 Added “procedures for non-vehicle” accident to title; added language policies should include training on accident/incident reporting.</p> <p>Sec 3.4 Changed TXBASE to Enterprise Asset Management System and all maintenance records shall be made available to the JLMSC upon request.</p> <p>Sec 3.9 Added language that documentation shall be shared with the JLMSC.</p> <p>Sec 3.9.3 Added that documentation shall be shared with the JLMSC.</p> <p>Sec 4.1.3 Added de-escalation training and blind spots.</p> <p>Sec 4.1.5 Added that practical application training shall be given as deemed appropriate by the JLMSC.</p> <p>Sec. 4.1.7 Updated language to De-escalation training.</p> <p>Sec. 4.3 Updated to include infectious disease guidelines.</p>

Revision	Revision Date	Comments
Revision 7	January 2025	Sec 1.3 update of fleet numbers Sec1.4 Definitions updated with current Part 673 rule as of April 2024 Sec 1.5 updating of org charts, positions and responsibilities Sec 1.6 Clarifying language added Sec 2.1 Language updated for accuracy of actual practice Sec 2.2 Added Safety Risk Reduction Program Sec 3.1 revised language from incident/accident to Safety Event and updated SPTs Sec 3.2 Revised language from Accident/Incident to Safety Event Sec 4.1 De-escalation Training Updated from last revision and additional training section added

Agency Safety Plan Development, Approvals, & Certification

Signature of Accountable Executive/Certification of Compliance	"This certifies that Metro Transit has established a Public Transportation Agency Safety Plan meeting the requirement of 49 CFR Part 673."	
	Lesley Kandaras General Manager, Metro Transit	Date Signed
Signature of the Chief Safety Officer		
	Andrew Brody Director, Safety, Metro Transit	Date Signed
Approval by the Joint Labor-Management Safety Committee		
	Rafael Valle Labor Co-Chair Joint Labor-Management Safety Committee	Date Signed
	Ron Forrest Management Co-Chair Joint Labor-Management Safety Committee	Date Signed
Approval by the Board of Directors	This Agency Safety Plan was approved by the Metropolitan Council.	
		Date Approved
Approval by the Office of State Safety Oversight	This Agency Safety Plan was approved by the Minnesota Office of State Safety Oversight a division of Minnesota Department of Public Safety.	December 6, 2024
		Date Approved
Entity that Drafted this Agency Safety Plan	Metro Transit Safety	

1. SAFETY MANAGEMENT POLICY

1.1 PURPOSE AND SCOPE OF THE LIGHT RAIL TRANSPORTATION AGENCY SAFETY PLAN

The Light Rail Transportation Agency Safety Plan (ASP) has been developed to provide Metro Transit with a comprehensive safety outline for integration of a safety culture throughout the organization. It includes or references current safety policies, procedures and activities that have been designed and implemented to maximize safe operation and ensure that all required regulatory demands and agency safety requirements are satisfied. The ASP also identifies Metro Transit policies and procedures that will be developed and implemented to meet light rail safety requirements.

The ASP was developed under the authority and direction of the State Safety Oversight Agency, which resides in the MN Department of Public Safety. The MN Department of Public Safety established the Office of State Safety Oversight in Minnesota State Statute 299A.017. This Plan has been developed in accordance with the Office of State Safety Oversight Procedures and Standards also in accordance with 49 CFR Part 673 the Public Transportation Agency Safety Plan regulation (PTASP). This plan has been approved for implementation under Metro Transit authority by the Office of State Safety Oversight, Joint Labor Management Safety Committee (JLMSC), Accountable Executive/General Manager, Chief Safety Officer and Metropolitan Council.

The ASP documents how Metro Transit incorporates system safety into its operations. The ASP is a useful management tool which identifies both agencywide and departmental safety procedures and provides a clearly defined method for maintaining a high degree of management control for all safety responsibilities, at all levels within the agency.

The intent of the ASP is to promote a formalized systemwide safety philosophy. To ensure agency acceptance and clearly defined departmental safety responsibility, management representatives from key departments within the organization contributed to the formulation, development, and implementation of this Plan.

The implementation and distribution of this Plan throughout Metro Transit will assist in assuring that safety is included in all aspects of daily operations including, but not limited to, administration, management, bus and rail operations, maintenance of vehicles, equipment and physical plant, design, construction, procurement, abatement, and disposal activities. The Metro Transit Bus ASP and Commuter Rail System Safety Program Plan are companion documents to this Rail ASP. The Rail ASP describes how system safety is incorporated into Metro Transit's Light Rail operations.

1.2 GOAL AND OBJECTIVES FOR THE RAIL SYSTEM SAFETY MANAGEMENT PROGRAM

1.2.1 Goals

Metro Transit's system safety goal is to provide passengers, employees and those who encounter the rail transportation system, the highest degree of safety that is practical. This goal involves the development, implementation and maintenance of a light rail safety effort comprising strategy and tactics to improve the safety performance of Metro Transit. This Light Rail Agency Safety Plan is directed towards achieving this goal within Metro Transit's mission.

1.2.2. Objectives

The objectives of the Rail ASP support and achieve the system safety goal. Properly implemented, the safety management systems processes documented herein will provide for:

- Performance commensurate with the rail transit industry; directly operated NTD metrics in fatalities, injuries, safety events and reliability
- Identification and elimination or control of hazards to employees, to patrons or to the public
- A working environment which meets or exceeds all government and industry occupational health and safety standards and practices
- Investigation of all major safety events and identification and documentation of root causes, for the purpose of implementing corrective action to prevent recurrence
- Effective emergency response by Metro Transit and public safety agencies
- Integration of safety and hazard control measures into all Metro Transit department and division activities. Detailed maintenance activities can be found in the Rail Systems Maintenance Plan and the LRT System Fleet Management Plan.

Where safety events, audits, or observations indicate that the goals or objectives of this plan are not being met, the Safety Department coordinates discussion with involved departments and develops action plans for follow up and correction.

1.3 SYSTEM DESCRIPTION/ORGANIZATIONAL STRUCTURE

Metro Transit provides transportation services to customers within the Twin Cities metropolitan area using a network of bus, light rail and commuter rail routes, employing over 3,000 employees (over 350 of them assigned to LRT), and based out of 12 major administrative, operations and maintenance facilities.

Metro Transit provides light rail transportation services to customers within the Twin Cities metropolitan area through the LRT Blue and Green Lines. The Blue Line provides rail service originating in downtown Minneapolis, through a 1.6-mile tunnel under the Minneapolis St. Paul International Airport to the Mall of America in Bloomington (see Figure 1 for the Blue Line system map). The Blue Line was the first leg of a planned network of light rail, commuter rail and transit corridors to serve the Twin Cities region, opening in 2004. The Green Line opened in June 2014 and links downtown Minneapolis with the University of Minnesota, the Midway area, the state Capitol complex, and downtown St. Paul. It connects with the existing Blue Line near downtown Minneapolis, sharing the existing corridor to its terminus at Target Field Station (See Figure 2 for the Green Line system map.)

	BLUE LINE	GREEN LINE
MILEAGE	12	11
STATIONS – AT GRADE	15	18
STATIONS – ELEVATED	3	0
STATIONS - UNDERGROUND	1	0
SUBSTATIONS	19	14
MAINTENANCE FACILITIES	2	1
END TO END TRAVEL TIME (MINUTES)	40	46

	BLUE LINE	GREEN LINE
HEADWAYS (MINUTES)	12	12
RIDERSHIP (2023)	6,534,612	8,221,281

Fare collection on light rail is self-service/barrier-free proof of payment and Metro Transit Rider Investment Program (TRIP) Agents are responsible for fare inspection and enforcement.

The light rail vehicle fleet consists of 27 Bombardier, BOC-LF-70 (70 percent low floor light rail vehicles) and 64 Siemens S70 (70 percent low floor light rail vehicles), with an additional 27 S700 vehicles that have been delivered as part of the Green Line extension (see below). The vehicle propulsion is powered by 750 VDC from overhead power lines. The vehicles are equipped with closed circuit TV cameras on board and outward facing cab cameras for digital recording.

The LRT Rail Control Center (RCC) includes a Supervisory Control and Data Acquisition System (SCADA) to monitor train location, track status, systems, and alarms. SCADA also allows for control of substation breaker applications and monitors substation critical alarms. The Rail Control Center facility is located at the Blue Line Operation and Maintenance facility, with an Emergency Backup Center.

The radio system is the regional 800 MHz trunked network. This radio system supports normal and emergency radio communications and is compatible with all of the regional emergency services radio networks.

On the Blue Line, the signal system is an automatic block system, with Train to Wayside (TWC) communication and highway grade crossing warning equipment. Most of the Green Line is street trackage with signaled interlocking at periodic intervals.

Maintenance and operating facilities include the Blue Line Operating and Maintenance (Minneapolis O&M) building; the Rail Support Facility, and the Green Line Operating and Maintenance Facility (St. Paul OMF).

Metro Transit provides commuter rail service between Big Lake and downtown Minneapolis, terminating at Target Field Station, where it connects with buses and both Blue and Green Line LRT. The commuter railroad operates over Burlington Northern Santa Fe (BNSF) tracks, which are part of the general railroad system regulated by FRA. Rolling stock for this service includes six locomotives and 18 coaches (including 6 cab cars) for push-pull service.

Metro Transit has secured a Full Funding Grant Agreement (FFGA) status on the Southwest Corridor LRT (Green Line Extension). The Green Line Extension will connect to the existing Light Rail System at Target Field Station and extend light rail service to St. Louis Park, Hopkins, Minnetonka, and Eden Prairie. The Federal Transit Administration (FTA) has also approved the Blue Line Extension to enter the Project Development phase. The Blue Line Extension will serve downtown Minneapolis, north Minneapolis, Golden Valley, Robbinsdale, Crystal, and Brooklyn Park, although that project is currently delayed. As with the Operating LRT lines, the Green Line extension and the Blue Line extension would be governed by this ASP at the point they were commissioned for revenue service.

Figure 1 Blue Line LRT Alignment



Figure 2 Green Line LRT Alignment



1.4 DEFINITIONS

1.4.1. *Accident* means for purposes of Metro Transit Rail Operations an accident will include but not be limited to events arising out of the operations of the Light Rail Train, such as vehicle collisions when contact is made with another vehicle, equipment, person, bike, or other object, as well as customer trips and falls on LRT premises.

1.4.2. *Accountable Executive* means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a transit agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

1.4.3. An *Workplace Accident & Injury Reduction Committee (AWAIR)* a program to promote a safe and healthful work environment for all Metro Transit employees. 1.4.4. *Assault on a Transit Worker* means, as defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.

1.4.5. *CDC* means the Centers for Disease Control and Prevention of the United States Department of Health and Human Services.

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

1.4.7. *Direct Recipient* means an entity that receives Federal financial assistance directly from the Federal Transit Administration.

1.4.8. *Emergency* means, as defined under 49 U.S.C. 5324, a natural disaster affecting a wide area (such as a flood, hurricane, tidal wave, earthquake, severe storm, or landslide) or a catastrophic failure from any external cause, as a result of which the Governor of a State has declared an emergency and the Secretary has concurred; or the President has declared a major disaster under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170).

1.4.9. *Equivalent entity* means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

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

1.4.11. *Hazard* means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

1.4.12. *Injury* means any harm to persons as a result of an event that requires immediate medical attention away from the scene.

1.4.13. *Investigation* means the process of determining the causal and contributing factors of a safety event or hazard, for the purpose of preventing recurrence and mitigating safety risk.

1.4.14. *Joint labor-management process* means a formal approach to discuss topics affecting transit workers and the public transportation system.

1.4.15. *Large urbanized area provider* means a recipient or subrecipient of financial assistance under 49 U.S.C. 5307 that serves an urban area with a population of 200,000 or more as determined by the most recent decennial Census.

1.4.16. *National Public Transportation Safety Plan* means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. chapter 53.

1.4.17. *Near-miss* means a narrowly avoided safety event.

1.4.18. *Operator of a public transportation system* means a provider of public transportation.

1.4.19. *Performance measure* means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

1.4.20. *Potential Consequence* means the effect of a hazard.

1.4.21. *Public transportation* means, as defined under 49 U.S.C. 5302, regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include:

1. Intercity passenger rail transportation provided by the entity described in 49 U.S.C. chapter 243 (or a successor to such entity);

2. Intercity bus service;
3. Charter bus service;
4. School bus service;
5. Sightseeing service;
6. Courtesy shuttle service for patrons of one or more specific establishments; or
7. Intra-terminal or intra-facility shuttle services.

1.4.22. *Public Transportation Agency Safety Plan (PTASP)* means the documented comprehensive agency safety plan for a transit agency that is required by 49CFR673.

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

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

1.4.25. *Recipient* means a State or local governmental authority, or any other operator of a public transportation system, that receives financial assistance under 49 U.S.C. chapter 53.

1.4.26. *Risk Based Inspection (RBI)* describes the program and process carried out by the Office of State Safety Oversight (OSSO), that uses qualitative and quantitative data analysis to inform ongoing inspection activities. Risk-based inspection programs are designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk.

1.4.27. *Roadway* means land on which rail transit tracks and support infrastructure have been constructed to support the movement of rail transit vehicles, excluding station platforms.

1.4.28. *Safety* means the freedom from harm resulting from unintentional acts or circumstances.

1.4.29. *Safety Assurance* means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

1.4.30. *Safety Committee* means the formal joint labor-management committee on issues related to safety that is required by 49 U.S.C. 5329 and 49 CFR part 673.

1.4.31. *Safety event* means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

1.4.32. *Safety Management Policy* means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities for the management of safety.

1.4.33. *Safety Management System (SMS)* means the formal, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing hazards and safety risk.

1.4.34. *Safety Management System (SMS) Executive* means a Chief Safety Officer or an equivalent.

1.4.35. *Safety Performance target* means a quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period.

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

1.4.37. *Safety risk* means the composite of predicted severity and likelihood of a potential consequence of a hazard.

1.4.38. *Safety Risk Assessment (SRA)* means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risk.

1.4.39. *Safety Risk Management (SRM)* means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk of their potential consequences.

1.4.40. *Safety risk mitigation* means a method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.

1.4.41. *Safety set-aside* means the allocation of not less than 0.75 percent of assistance received by a large urbanized area provider under 49 U.S.C. 5307 to safety-related projects eligible under 49 U.S.C. 5307.

1.4.42. *Security* means the freedom from harm resulting from intentional acts or circumstances.

1.4.43. *State* means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

1.4.44. *State of good repair* means the condition in which a capital asset is able to operate at a full level of performance.

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

1.4.46. *Subrecipient* means an entity that receives Federal transit grant funds indirectly through a State or a direct recipient.

1.4.47. *System Safety* means the application of engineering and management principles, criteria, and techniques to achieve acceptable risk, within the constraints of operational effectiveness throughout the system and throughout the life cycle of the system.

1.4.48. *Transit agency* means an operator of a public transportation system. that is a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 or a rail transit agency.

1.4.49. *Transit Asset Management (TAM) Plan* means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

1.4.50. *Transit worker* means any employee, contractor, or volunteer working on behalf of the transit agency.

1.4.51. *Urbanized area* means, as defined under 49 U.S.C. 5302, an area encompassing a population of 50,000 or more that has been defined and designated in the most recent decennial census as an urban area by the Secretary of Commerce.

1.5 SAFETY ROLES AND RESPONSIBILITIES

The Metropolitan Council is the legislative decision-making body for Metro Transit. Metro Transit is the transportation agency of the Metropolitan Council organization. Transit responsibilities of the Metropolitan Council include:

- Policy direction and governance
- Legislative coordination on topics of interest to Metro Transit
- Policy calendar for future board actions
- Interpretation of views of the region's citizens, Metro Transit customers, and local communities into board policies.
- Annually approve the Metro Transit ASP.

The top levels of the Metro Transit organization, as shown in Figure 3, include the General Manager, Director of Capital Projects, Chief Operating Officer (COO), and Director of Safety, Police & Security Services Engineering & Facilities, Service Development, Strategic Initiatives, Marketing & Customer Service, and Transit Oriented Development.

Metro Transit has many safety roles and responsibilities provided by each Metro Transit department. To ensure that LRT operations are conducted in the safest manner possible, all transit system personnel have been assigned safety responsibilities. The following sections identify key safety roles.

All Metro Transit employees have the responsibility to serve as the eyes and ears of the transit system and report safety issues. They are expected to report safety hazards to their immediate supervisor or to the Rail Control Center.

Figure 3

Metro Transit Executive Division

Metro Transit
Executive Division Overview
Chart 4.0
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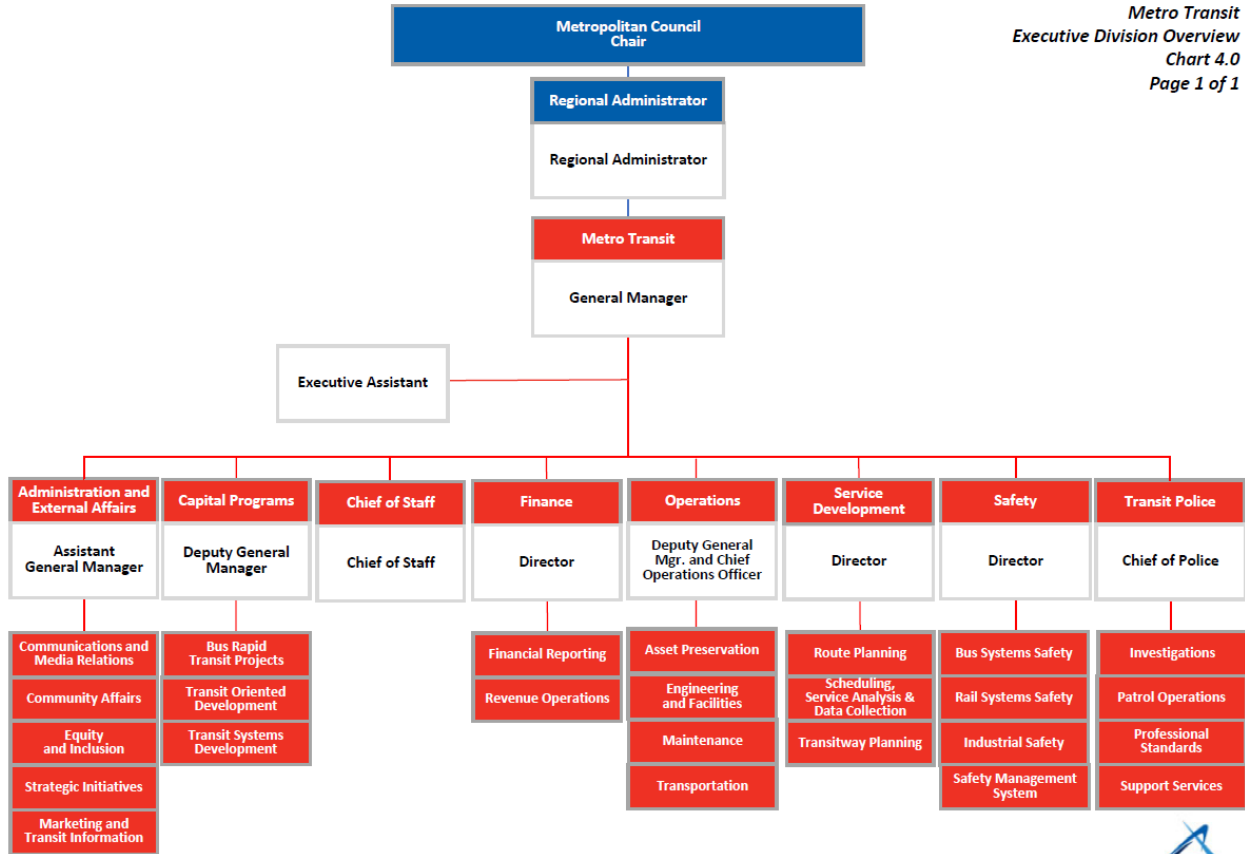
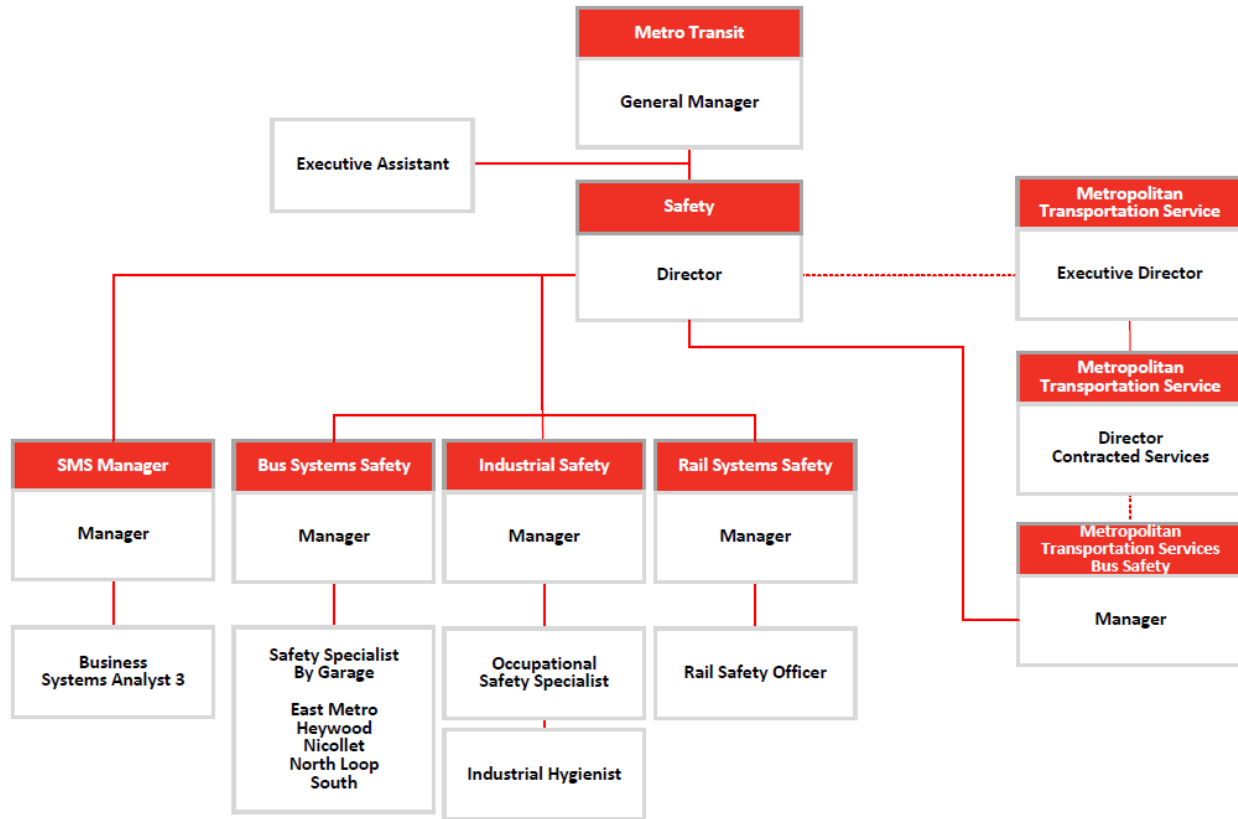


Figure 4

Metro Transit Safety Department



1.5.1 Safety Department

1.5.1.1 Director of Safety

The Director of Safety for Metro Transit reports to the General Manager, and manages the Safety Department, as shown on the organization chart in Figure 4. The Director of Safety acts with General Manager authority with all levels of management, labor unions, contractors, and employees in matters of safety and is the primary contact with state and federal safety agencies. This position is Metro Transit's Chief Safety Officer as defined in this ASP.

The Director of Safety is responsible for direction and leadership of Safety Department staff in the following activities:

- Performing safety planning activities including system safety, construction safety and safety certification
- Strategic planning around system safety for Metro Transit
- Maintaining liaison with public safety agencies and oversight agencies for emergency response planning, emergency procedures and disaster drills
- Ensuring compliance with federal, state and local laws and regulations
- Conducting appropriate investigations and developing reports

- Oversight of the development and conducting of training programs to reduce/eliminate preventable safety events and expand awareness of safety procedures
- Implementing the safety certification program
- Implementing the Rail and Bus Agency Safety Plans
- Analyzing, monitoring and updating policies, procedures and plans to promote a safe working environment
- Reviewing engineering designs prior to construction of new facilities or systems, or modifications to the existing rail system
- Reviewing and approving safety education programs
- Integrating system safety considerations into bus and rail operations, new design, and construction
- Developing and implementing rail and bus safety programs to include safety event prevention and investigation, hazard identification and resolution, and emergency preparedness
- Convening ad-hoc safety committees as appropriate.

1.5.1.2. Manager of Safety Management System (SMS)

The Manager of Safety Management System supervises the Business System Analyst III. Job responsibilities include

- Day to day of Metro Transit's Safety Management System (SMS)
- Ensure Safety Risk Registries are complete and follow up when necessary
- Provide leadership and direction to the Business Systems Analyst III
- Work with various departments to ensure mitigation strategies are implemented timely
- Work with department leaders on change management procedures
- Implementation of Bus and Rail Agency Safety Plan
- Ensuring regulatory compliance and providing training, including preparation of necessary reports
- Joint Labor Management Safety Committee (JLMSC) facilitator
- Conven, chair and attend ad-hoc and regular scheduled safety committees as appropriate
- Reviewing engineering designs prior to construction of new facilities or systems, or modifications to the existing rail system
- Assist with implementation of the safety certification program
- Oversight of Metro Transit's Safety Data and collection
- Develop and conduct training programs to reduce/eliminate preventable safety events and expand awareness of safety procedures
- Analyzing, monitoring and updating policies, procedures and plans to promote a safe working environment
- Developing, implementing and recommending safety programs to the Director of Safety to maximize safe and healthy working conditions for employees and or to maximize public and passenger safety
- Conducting Safety Audits

1.5.1.3 Business System Analyst III

The Business Systems Analyst III reports to the Manager of Safety Management Systems and supports Metro Transit's Safety Management System. Duties include:

- Manage and continue to develop the Metro Transit's Safety Departments database to support Safety Management System
- System configuration and maintenance of safety data
- Process and documentation improvement
- Leads and participates in technical working groups to study and resolve complex issues, and to advance agency and department initiatives.
- Develop dashboards for Safety Department
- Ad-hoc analyst as requested
- Assisting the Joint Labor Management Safety Committee (JLMSC) on data analytic and process needs

1.5.1.4. Manager of Rail System Safety

The Manager of Rail System Safety supervises the Rail Safety Officers. Job responsibilities include:

- Developing, implementing and recommending safety programs to the Director of Safety to maximize safe and healthy working conditions for employees and or to maximize public and passenger safety
- Remaining vigilant for novel approaches to promote safety
- Providing leadership and direction to the Rail Safety Officers
- Ensuring regulatory compliance and providing training, including preparation of necessary reports
- Reviewing engineering designs prior to construction of new facilities or systems, or modifications to the existing rail system
- Assisting with implementation of the safety certification program
- Coordinating safety department investigations of rail safety events
- Providing regular safety reports to the Director of Safety concerning safety events and occupational health and safety issues
- Maintaining the Safety Risk Registry for rail mode
- Conducting safety audits
- Researching and investigating other industry practices
- Managing and implementing rail safety awards and safety incentive programs
- Assisting in preparing communications for publications
- Coordinating implementation and updates of the Light Rail ASP and Commuter Rail SSPP and other related rail plans.

1.5.1.5. Rail Safety Officers

The Rail Safety Officers report to the Manager of Rail System Safety and supports the Rail Safety Program. Duties include:

- Identifying, prioritizing and resolving safety hazards
- Investigating safety events, as appropriate

- Preparing required regulatory reports
- Performing safety analyses as required
- Performing design review of rail systems and facilities
- Performing safety audits and inspections of facilities to ensure compliance with local, state and federal codes and regulations
- Participating in safety certification including design, construction, integrated tests, emergency drills and training
- Conducting and supporting FTA-mandated safety audits
- Chairing the An Workplace Accident & Injury Reduction Committee (AWAIR) at the Rail facilities
- Recording all rail work injuries on OSHA 300 logs
- Developing and monitoring safety goals in the rail division
- Developing and overseeing periodic safety related drills in the rail division
- Participating in Fire/Life Safety Committee meetings
- Administering the rail safety awards programs

1.5.1.6. Manager of Industrial Safety

The Manager of Industrial Safety reports to the Director of Safety and is responsible for the following:

- Developing, administering and issuing standards, policies and procedures in order to protect employees from health hazards associated with their workplace
- Assuring that Metro Transit is in compliance with OSHA Hazard Communication Standards and Minnesota Right-to-Know regulations
- Developing and conducting annual Right-to-Know training programs for employees
- Providing technical assistance and support in controlling employee exposure to hazardous chemicals and harmful physical agents
- Evaluating worksites and providing coaching in ergonomics
- Conducting safety surveys
- Monitoring effectiveness of ventilation systems
- Assisting with classifying confined space air monitoring requirements and equipment calibration.
- Anticipating and analyzing impact of proposed safety regulations on Metro Transit
- Chairing the A Workplace Accident & Injury Reduction Committee (AWAIR) at the Overhaul Base
- Recording all work injuries on OSHA 300 logs and providing technical expertise on construction site safety
- Working with and assisting Occupational Safety Specialist when required.

1.5.1.7. Occupational Safety Specialist

The Occupational Safety Specialist reports to the Manager of Industrial Safety and is responsible for the following:

- Developing, administering and issuing standards, policies and procedures protecting employees from health hazards associated with their workplace

- Assuring that Metro Transit is in compliance with federal and State OSHA General Industry and Construction Standards and regulations
- Assisting the Industrial Hygienist with the developing and conducting annual Right-to-Know training programs for employees and as otherwise required
- Providing technical assistance and support for confined space, machine guarding, lock out tag out and fall protection
- Evaluating worksites and providing coaching in ergonomics
- Conducting safety surveys
- Anticipating and analyzing impact of proposed safety regulations on Metro Transit
- Chairing the A Workplace Accident & Injury Reduction Committee (AWAIR) at their assigned location
- Recording all work injuries on OSHA 300 logs and providing technical expertise on construction site safety

1.5.2. Other Metro Transit Divisions

All levels within the Metro Transit organization have defined roles and responsibilities for safety.

1.5.2.1. General Manager

The Metro Transit General Manager is responsible for ensuring Metro Transit's commitment to safety. This position is the agency's Accountable Executive as defined in this plan. This responsibility includes:

- Promulgating the safety policy for Metro Transit
- Signs this ASP as Accountable Executive and presents same to the Metropolitan Council for annual approval
- Delegating to the Director of Safety the responsibility and authority for implementation of the Metro Transit Bus, Northstar, and LRT ASPs
- Incorporating safety awareness into all management decision-making activities
- Recommending and approving the financial resources needed to ensure the safety of Metro Transit customers
- Maintaining in Metro Transit an awareness of the need for safety of Metro Transit customers, employees and the members of the public with whom we interact
- Continuously reviewing, monitoring, and addressing safety issues
- Funding training and education for Metro Transit employees needed to ensure safety for customers and employees
- Fostering interagency and intergovernmental cooperation and agreements needed to ensure that safety issues are well coordinated
- Ensuring ongoing communication about safety related matters with customers, employees, Union leadership, elected officials, FTA, and civic groups

1.5.2.2. Chief Operating Officer, Deputy Chief Operating Officers

These executive level managers support and assist the General Manager in fulfilling their departmental responsibilities. They provide leadership in ensuring Metro Transit's commitment to safety and set an example to others. Responsibilities are outlined below by department.

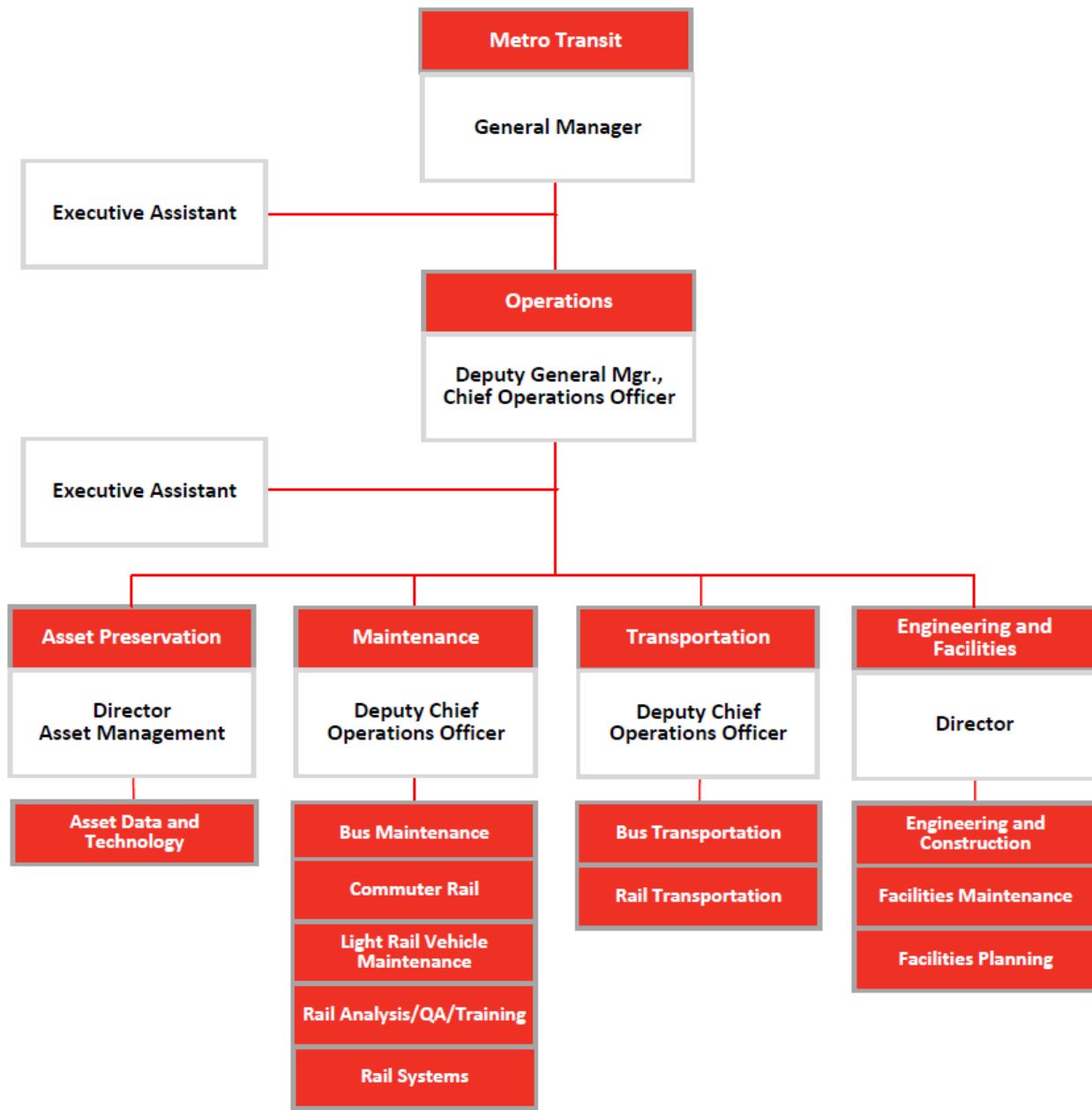
1.5.2.2.1. Rail Operations

The Rail Operations Division includes Rail Maintenance and Rail Transportation (Figure 5) up to and including the COO. Safety responsibilities include:

- Investigating safety events and collecting data to assist with identifying causes and eliminate hazards
- Training new and current rail operators in safe rail operations
- Ensuring that employees have the training and equipment to perform their jobs safely
- Enforcing safety rules
- Conducting quarterly safety meetings; disseminate safety materials and information to employees
- Issue safety equipment and ensure its proper fit and use
- Training personnel in safe operations of the trains, safe standard operating procedures including blind spots, and ensuring that operating staff attend required OSHA trainings
- Ensuring that quality control is reflected in all equipment maintenance activities
- Participating in emergency preparedness exercises
- Working with the Director of Safety, establishing safety goals and objectives for the department
- Correcting unsafe conditions and practices
- Involving safety in design and construction of new systems, trains and equipment
- Maintaining current operating rules and procedures and disseminating these to employees, as appropriate
- Incorporating rail operator safety considerations in the development of new rail specifications and rail schedules
- Establish and maintain a configuration management process
- Supporting the safety certification program
- Supporting internal audits
- All Metro Transit employees have the responsibility to serve as the eyes and ears of the transit system and report safety issues. They are expected to report safety hazards to their immediate supervisor or to the Rail Control Center
- Managers are responsible for ensuring training for all new and current employees on the safety reporting requirements

Figure 5

Metro Transit Operations



1.5.2.3. Engineering & Construction and Facilities Maintenance Departments

These departments provide engineering, construction, and maintenance for Metro Transit support and public facilities, including Rail Operations and Maintenance facilities, LRT stations, offices, park and ride lots and structures, transit centers and passenger shelters throughout the metropolitan area. Safety responsibilities include:

- Establishing and maintaining a configuration management process for facilities and facility systems
- Ensuring that facilities are designed and constructed with a strong emphasis on safety using established engineering practices and standards

- Ensuring that employees and contracted personnel have the training and equipment to perform their jobs safely
- Ensuring that facilities are maintained in safe operating condition
- Participating in the “A Workplace Accident and Injury Reduction” (AWAIR) Program
- Issuing safety equipment and ensuring its proper use
- Training personnel in safe procedures and ensuring attendance at OSHA required training
- Ensuring that quality control is reflected in all facility maintenance activities
- Participating in emergency preparedness exercises
- Establishing safety goals and objectives for the department
- Correcting unsafe conditions and practices
- Involving the Safety Department in design and construction of new systems, and facilities

1.5.2.4. Transit Systems Development Department

This department provides design, engineering and construction oversight of all new fixed guideways for LRT and BRT (New Starts Projects). Responsibilities include:

- Involving the Safety Department, Rail Operations and Bus Operations in design and construction of new systems, and facilities
- Establishing and maintaining a configuration management process via a Configuration and Change Control Management Plan that incorporates system safety items
- Developing a Safety and Security Management Plan for each New Starts project
- Developing a Safety & Security Certification Plan for each project
- Conducting a Preliminary Hazard Analysis (PHA) and Threat and Vulnerability Analysis (TVA) for New Starts Projects in conjunction with the Metro Transit Safety Department, Rail Ops, Bus Ops and public safety agencies
- Completing a Design and Construction Safety Certification Process for each project
- Providing administrative support for the Safety Review Committee for each project
- Providing administrative and technical support for generating the final Safety & Security Certification Verification Report (SSCVR) for each project
- Participating in emergency preparedness exercises
- Establishing a Construction Safety Manager reporting directly to the Deputy General Manager and working in collaboration with the Safety Department to ensure staff compliance with Metro Transit, State and Federal rules and regulations
- Administrative support for the Safety Review Committee

1.5.2.5. Administration

Administration includes service development, finance, customer services and marketing, materials management systems, and grants administration.

- Ensuring that service is planned and developed with a strong emphasis on safety using industry standards and best practices
- Incorporating rail operator safety issues in the development of rail schedules
- Disseminating safety programs to the public

1.5.2.6. Human Resources

Human Resources reports to the Deputy Regional Administrator of the Metropolitan Council. Safety responsibilities include:

- Administering the Drug and Alcohol Program
- Administering pre-employment and fit-for-duty physicals and the Medical Monitoring Program
- Recruiting and selecting employees who will have safe attitudes and the ability to perform their duties safely
- Planning and administering New Employee Orientation (NEO)

1.5.2.7. Risk Management

The Risk Management Department is the official custodian of all claims and liability data. Risk Management Staff maintain records, analyze data, make reports, and assist with identifying trends and making recommendations for loss prevention. Risk Management manages the contractor for property insurance and is the primary contact with the vendor of property insurance for loss control activities.

1.5.2.8. Strategic Initiatives

Strategic initiatives has provided analysis related to the primary causes and locations of rail safety events. They are a resource available upon request for conducting ad hoc statistical analyses and research.

1.5.2.9. Transit Police

The Metro Transit Police Department is primarily responsible for policing and system security issues and they have a system wide Rail & Bus Security and Emergency Preparedness Plan (SEPP). Security responsibilities are detailed in this plan. Security events involve intentional injury or damage. This safety plan addresses System Safety, which is involved with unplanned Safety Events. The Metro Transit Police department provides support and has procedures for responding to safety events and other emergencies. Security is overseen and audited by the Department of Homeland Security.

1.5.2.10 Transit Rider Investment Program (TRIP) agents

The 2023 MN State Transportation Omnibus Bill established the Transit Rider Investment Program (TRIP). This legislation creates a team of personnel that are tasked with:

- Inspecting fares and issuing citations for fare non-compliance
- Educating passengers on the Rules for Riders/Code of Conduct
- Assisting with wayfinding and other information
- Connecting individuals to outreach services as appropriate.

The TRIP legislation also decriminalized fare evasion, changing it from a criminal misdemeanor with a \$180 fine to an administrative (civil) citation that Metro Transit handles internally.

TRIP agents serve to fulfill this mandate.

1.5.3. Joint Labor Management Safety Committee

The Metro Transit Joint Labor Management Safety Committee (JLMSC) will be convened by an equal number of labor and management members. The JLMSC will be governed by mutually agreed upon bylaws that details the process for committee roles, voting and information sharing. Job responsibilities include:

- Review and approve the transit agency's Public Transportation Agency Safety Plan and any updates as required at § 673.11(a)(1)(i);
- Set annual safety performance targets for the safety risk reduction program as required at § 673.11(a)(7)(iii); and
 - Support operation of the transit agency's SMS by:
 - Identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program;
 - Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program; and
 - Identifying safety deficiencies for purposes of continuous improvement as required at § 673.27(d), including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

1.6 LIGHT RAIL TRANSPORTATION ASP CONTROL AND UPDATE PROCEDURES

This section establishes the frequency and method for periodic review of the Rail ASP and describes the process by which updates, corrections and modifications to the Plan are implemented.

The Safety Department will coordinate the review and revision process of the Rail ASP for Metro Transit. The Rail ASP will be reviewed and updated every year as appropriate to reflect changes in Rail system, equipment, facilities or organization. Appropriate management will evaluate proposed changes and, if warranted, submit proposed changes to the Director of Safety. No proposed changes to the Rail ASP will be made unless approved by the Director of Safety. The Director of Safety, through the Manager of Rail System Safety, has the responsibility to ensure that the review and revision process is conducted annually.

The Director of Safety, in coordination with the responsible department, may implement modifications to the plan on an ongoing basis. For urgent safety issues, the Director of Safety, in coordination with the responsible department, and the Office of State Safety Oversight (OSSO)

may immediately implement modifications to the plan to maximize the level of safety in the system and develop appropriate procedures to carry out the modifications.

Modifications that do not require immediate implementation will be subject to the review process below.

Responsible Parties	Elements of Revision Process
System Safety	Documents Recommendations for Revision
Senior Management	Reviews their Section of the Light Rail Transportation Agency Safety Plan
Responsible Department	Documents Comments to Proposed Revision
Senior Management	Documents Approval of Respective Sections of Plan
System Safety	Incorporates any Changes into Revised Plan
Joint Labor-Management Safety Committee (JLMSC)	Reviews and approves changes
System Safety	Director Submits Revised Document to OSSO
Metropolitan Council	Reviews and approves revised plan
Responsible Department	Implement ASP Revisions

The Director of Safety (often through the Manager of Rail System Safety) will notify appropriate LRT management staff of the requirement to review the Plan and offer revisions or concurrence. The draft ASP will then go to the Joint Labor Management Safety Committee (JLMSC) for review and approval. The JLMSC will be governed by mutually agreed upon bylaws that details the process for committee roles, voting and information sharing. Upon receipt of the approved sections from other departments and the JLMSC the Safety Department will incorporate any required changes. A copy of the updated Plan will be forwarded to the Minnesota Office of State Safety Oversight (OSSO) for final review and approval. Once the OSSO approves the plan, it will be submitted to the Metro Transit GM with recommendation for approval to allow for approval by the Metropolitan Council (governing board) no later than a year from the previous revision.

Once annual review of the LRT ASP is completed and approvals from the OSSO and the Metro Transit GM are obtained, the plan will be redistributed and posted on the Metropolitan Council intranet site (<https://metcmn.sharepoint.com/sites/MetroTransit/Safety/Pages/Home.aspx>). Only the current version on the plan is available to employees. During Annual Right to Know training

an overview of the ASP and agency Safety goals are presented to all employees. A revision record will be included within the plan, which includes the revision number, date, and a description of modifications. If no revisions are deemed necessary, the revision record will indicate same.

1.7 SMS DOCUMENTATION AND RECORDS

Metro Transit will maintain required documentation related to the implementation of this ASP and SMS. This includes documents that are included in whole, or by reference, that describe the programs, policies, and procedures that it uses to carry out its ASP. These documents will be made available upon request by the FTA or other federal entity, established Joint Labor Management Safety Committee (JLMSC) and the Metropolitan Council. Metro Transit and the JLMSC will maintain these documents electronically for a minimum of three years after they are created within the Metro Transit designated shared site.

1.8 OSSO RISK BASED INSPECTIONS (RBI)

The Federal Transit Administration has directed State Safety Oversight Agencies (SSOA) to develop a Risk Based Inspection Program. The directive requires that SSOA's develop policies and procedures for inspection access and data collection in consultation with each rail transit agency that the SSOA oversees. The policies and procedures must address SSOA authority and capability to enter and conduct inspections of the rail fixed guideway public transportation system, including access for inspections that occur with and without advance notice. Additionally, the policies and procedures must address how the SSOA will collect data from each rail transit agency to support its risk-based inspection monitoring and prioritization activities, including data that the rail fixed guideway public transportation agency collects when identifying and evaluating safety risk. The RBI program is contained within OSSO Program Standard, but OSSO is required to ensure the following language is included in Metro Transit's PTASP:

1. Metro Transit and the Minnesota OSSO have consulted and established policies and procedures describing the OSSO's access to Metro to conduct risk-based inspections. These policies and procedures may be found in the OSSO Program Standard and include detailed descriptions of the processes the OSSO will use to conduct inspections of Metro both with and without advance notice. The policies and procedures address:
 - Notifications to Metro Transit to conduct inspections with and without notice
 - Access procedures and escorts
 - Access for all inspection areas
 - Verification of certifications and trainings of OSSO inspectors to ensure their compliance with Metro safety protocols and requirements.

2. Metro Transit and OSSO have established clear policies and procedures that describe how OSSO's risk-based inspections will be conducted. These policies and procedures are documented in the OSSO Program Standard and referenced in this ASP. The policies and procedures address:
 - Scheduling inspections
 - Inspection reports
 - Immediate safety concerns
 - Inspections of equipment, infrastructure, and practices specific to each rail fixed guideway public transportation system

- Event verification
 - Ongoing monitoring
 - Defects and corrective or remedial action
 - Corrective Action Plan (CAP) and safety risk mitigation verification
3. A risk-based inspection program requires the collection and analysis of large sets of complex data and a mechanism for evaluating that data to inform inspection activities. Metro Transit will share safety data with OSSO as required in the Program Standard. This data includes the data required by the OSSO and the data agreed upon in the RBI policies and procedures developed in consultation with OSSO and will include the data that Metro Transit collects when identifying hazards and assessing and mitigating safety risk.
 4. Metro Transit will follow the policies and procedures developed in consultation with OSSO for submitting the data sets to be shared, the processes for sharing each data set, and the frequency that the data will be shared.

Metro Transit recognizes that this requirement is evolving as it is being developed and will rely on OSSO to provide guidance on necessary changes or additions to this plan.

2. SAFETY RISK MANAGEMENT

2.1 HAZARD IDENTIFICATION/RESOLUTION PROCESS

Hazard identification and resolution is one of the objectives of the Metro Transit Light Rail Transportation Agency Safety Plan. This process can be used by and is applicable to all levels of the organization, and is the means by which hazards are identified, analyzed for potential likelihood and severity on the transit system, and resolved in a manner acceptable to management. The process is described below

2.1.1. Defining the system

The system to be analyzed is defined by its physical and functional characteristics, including:

- People
- Procedures
- Facilities & Equipment
- Operating environment

The “system” should be appropriately defined as to lend itself to the analysis at hand.

2.1.2. Identifying the Hazards

Hazard identification defines conditions and faults, which have the potential for causing a safety event. Hazards can be identified in a variety of ways:

- Transit Worker Assaults will be tracked and analyzed using the Safety Risk Management (SRM) process defined in the Agency Safety Plan. Mitigation Strategies will be monitored for effectiveness and any ineffective measures will be reran through the SRM process.

- Formal hazard analyses using the inductive process. They analyze system components to identify failure modes and effects on the total system or a part thereof, as well as personnel actions. Failure modes include conditions such as: fails to open; fails to close; opens or closes when not required; fails to act; acts improperly or inadequately or at the wrong time; or any combination. Examples of formal hazard analyses include Preliminary Hazard Analysis, Failure Modes and Effects Analysis and Job Hazard Analysis.
- Formal hazard analysis using the deductive process to identify sequential and concurrent states, which are causally or conditionally required to support a specific effect. An example of this type of analysis is the Fault Tree Analysis.
- Hazards that are identified as a result of a Safety Event
- Facility inspections that identify hazards or unsafe conditions (including formal AWAIR or maintenance inspections)
- Employee observations of unsafe conditions or behavior, which can be reported verbally or through completion of a Safety Report.
- Safety staff regularly reviews NTSB reports, FRA and FTA bulletins or advisories, OSSO inputs, and general industry trends to determine their applicability as inputs into the safety management and/or hazard analysis process 673.25(d)(2)(i).
- Daily Special Situations Reports (SSRs) are copied to the Safety staff and to the OSSO. These are reviewed on an ongoing basis to identify known or potential issues that can have an impact on safe operations.
- Staff reports of safety events are copied to the Safety department for analysis and further investigation as appropriate.
- Employees can self-report by filling out a Safety Report or file a report through Ethics Point, which requires a Safety Department response within 15 calendar days. These are discussed at the quarterly AWAIR (A Workplace Accident and Injury Reduction committee) meetings. The AWAIR program clearly provides protections for employees who report safety conditions to senior management as does Minnesota state statutes. These protections would be forfeited if the report involves criminal activity, substance abuse, controlled substances, alcohol, reckless behavior, intentional disregard for safety or falsification of any kind. Any actions of the forementioned can result in disciplinary action up to and including termination 673.23(b).
- Upon request the JLMSC shall have access to safety event information that has been reported to OSSO, for the purpose of review and evaluation.

Metro Transit will report certain threshold hazards to the OSSO no later than the next business day and will track them to closure per Section 2.1.6 below.

The transit agency will provide notification to the OSSO via SSR of the following occurrences:

1. Elevator or escalator safety events involving injury to one or more persons requiring immediate transport to a hospital for treatment;
2. Explosion or fire;
3. Release of hazardous materials;
4. Unauthorized persons entering the track area – accidental (known to transit agency);

5. Unauthorized persons entering the track area - intentional or trespassing (known to transit agency – may be reported and tracked by the police or security as designated by the transit agency):
6. Collisions of rail transit vehicle with a fixed object, including buildings, bumping posts, doors, signals, and support structures;
7. Collisions between rail transit vehicles and other transit agency vehicles in shared (rail-bus) corridors;
8. Train Separation (train uncoupling while operating in revenue service);
9. Non-mainline derailments
10. Non-Safe Signal System Failures (e.g. false proceed, activation failure/partial activation of a rail grade crossing system);
11. Stop signal violation;
12. Switch run-through;
13. Face-up (unauthorized opposing moves) of rail transit vehicles in a signal section, single-track section, or similar area;
14. Near misses of rail transit vehicles or rail work vehicles;
15. Incapacitation of rail transit vehicle operator in revenue service;
16. Rail work zone incursions by a rail transit vehicle or rail work vehicle (including hi-rail vehicles); or
17. Off-platform or wrong-side door activation on a rail transit vehicle.

The level of effort and analysis will naturally depend on the nature and severity of the hazard. Similar to safety event investigation, significant hazards may result in short term investigations with ongoing evaluations and investigations of hazards that may not be immediately resolved.

2.1.3 Assessing the Hazards - Qualitative Likelihood/Severity Hazard Analysis

A hazard analysis technique widely accepted in transit is qualitative likelihood and severity hazard analysis, as described in 49 CFR Part 673. The process involves defining the system, identifying the hazards, assigning severity, assigning likelihood, generating the risk index, categorizing the risk, and deciding among methods of mitigation.

2.1.3.1 Hazard Severity

Hazards are rated in terms of their effects on employees and/or the transit system. Severity categories are defined below.

SEVERITY	CHARACTERISTICS			
	People	Equipment/Services	Financial	Reputational
Catastrophic (1)	Several deaths and/or numerous severe injuries (per event)	Total loss of equipment or system interruption, requiring months to repair	Estimated loss from the incident in excess of \$500,000	Ongoing media coverage, irreparable reputational damage,

				government intervention (weeks – months)
Critical (2)	Low number of deaths and/or serious injury* (per event)	Significant loss of equipment or system interruption, requiring weeks to repair	Estimated loss from the incident in excess of \$100,000-\$499,999	Prolonged media campaign, serious reputational damage, sustained government involvement (days - weeks)
Marginal (3)	Minor injury and possible serious injury (per event)	Some loss of equipment or system interruption, requiring seven or less days to repair	Estimated loss from the incident in excess of \$10,000-\$99,999	Adverse media coverage, reputational damage, government involvement
Negligible (4)	Possible minor injury (per event)	Some loss of equipment, no system interruption, less than 24 hours to repair	Estimated loss from the incident in excess of \$1,000-\$9,999	Local media coverage and some reputational damage

*Per 49 CFR 673, serious injury: 1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; 2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); 3) Causes severe hemorrhages, nerve, muscle, or tendon damage; 4) Involves any internal organ; or 5) Involves second or third-degree burns, or any burns affecting more than 5 percent of the body surface.

2.1.3.2. Hazard Likelihood

The likelihood that a hazard will occur can be described in potential occurrences per unit of time, events, population items or activity. A qualitative hazard likelihood may be derived from research, analysis, and evaluation of safety data from the operating experience of Metro Transit or other similar transit authorities. A depiction of a hazard likelihood rating system is described below.

Likelihood Level	Specific Individual Item	Fleet or Inventory	Frequency
Frequent A	Likely to occur frequently in the life of an item	Continuously experienced	> 1 event / month
Probable B	Will occur often in the life of an item	Will occur frequently in the system	> 1 event / year
Occasional C	Likely to occur sometime in the life of an item	Will occur several times	>1 event / 10 year
Remote D	Unlikely, but possible to occur in the life of an item	Unlikely, but can be expected to occur	> 1 event / 20 years
Improbable E	So unlikely, it can be assumed occurrence may not be expected	Unlikely to occur, but possible	< 1 event for 30 years

2.1.3.3. Hazard Risk Assessment

Risk assessment determines the acceptability of accepting a risk associated with a hazard including Transit Worker Assaults. The necessity of implementing corrective measures to eliminate or reduce the hazard, or a combination of both is dependent on the risk assessment. Hazard risk assessment involves categorization of hazard severity and likelihood of occurrence. A Risk Assessment Index, or Hazard Rating Table, is shown below.

Hazard Categories

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

Hazard Risk Index	Criteria by Index *
1A, 1B, 1C, 2A, 2B, 3A	Unacceptable
1D, 2C, 2D, 3B, 3C	Undesirable
1E, 2E, 3D, 3E, 4A, 4B	Acceptable with review
4C, 4D, 4E	Acceptable without review

“Unacceptable” means the hazard cannot remain as is but must be mitigated.

“Undesirable” means that the hazard should be mitigated, if possible, within fiscal constraints. However, it may be mitigated at a later time. Further a management decision must be made as to when and how a hazard associated with an undesirable risk will be mitigated, or if management allows the hazard to exist and accepts the associated risk.

“Acceptable with review” must be reviewed by management and determine the risk associated without mitigating the hazard.

“Acceptable without review” means that the hazard can remain.

Managers can use the Hazard Rating Table to prioritize hazardous conditions and focus available resources on the most serious hazards requiring resolution while effectively managing the available resources.

2.1.4 Resolving the Hazards

A number of different means are employed to resolve identified hazards. These include design changes, the installation of controls and warning devices and the implementation of special procedures or training. The order of precedence for resolving hazards is as follows:

Design for Minimum Risk

The first priority is to eliminate hazards through engineering and design. This is applicable for facilities, rolling stock and equipment, park & rides, routes, transit stations, and product selection to provide a few examples.

Safety Devices

Hazards that cannot be eliminated or controlled through design selection shall be controlled to an acceptable level using fixed, automatic, or other protective safety design features, devices or personal protective equipment. Provisions shall be made for periodic functional checks of safety devices. For example, procedures to mitigate risk including regular maintenance of security measures such as barriers to help mitigate Transit Worker Assaults.

Warning Devices

When neither the design nor the safety devices can effectively eliminate or control an identified hazard, devices shall be used to detect the condition and to generate an adequate warning signal to correct the hazard or provide for personnel evacuation. Warning signals and their application shall be designed to minimize the likelihood of incorrect personnel reaction to the signals and shall be standardized within like types of systems.

Procedures and Instruction

Where it is impossible to eliminate or adequately control a hazard through design selection or use of safety and warning devices, procedures and training shall be used to control the hazard. Procedures may include the use of personal protective equipment. Precautionary notations on signs shall be standardized as specified by management. Safety critical tasks and activities may require certification of personnel proficiency. For example, if an operator feels ill after coming into contact with second-hand narcotic smoke the operator should proceed to the next station if able and open the train doors on the platform side and contact the Rail Control Center (RCC).

2.1.5. Follow up

Whatever the decision with respect to a particular hazard it must be monitored for effectiveness. If accepted, the situation must be monitored to ensure that the hazard has not worsened. If a corrective action plan has been developed, that corrective action must be verified and monitored to ensure that unexpected hazards have not developed. The Safety Department shall follow up with and report results of hazard risk mitigations to the Joint Labor-Management Safety

Committee (JLMSC). Long term mitigation strategies must be reviewed by the Joint Labor-Management Safety Committee (JLMSC) to ensure mitigations are sound and nothing was missed.

2.1.6. Hazard Tracking and Reporting to OSSO

The Safety Department is responsible for identifying those issues from safety event data, operating infractions, or trends discovered which are significant enough to pose an undue hazard to employees or passengers and facilitate tracking of progress toward resolving those issues. This is done by means of the Safety Risk Registry developed by the Safety Department to comply with OSSO Procedures and Standards Section 5: Corrective Action Plans, which tracks those items of interest in terms of the problems discovered, the desired resolution, the individual responsible for resolution, and the progress. This registry includes safety audit issues, post-safety event issues, and those items cited by the AWAIR safety committee. Additionally, items that involve significant change to form, fit or function to the operation are managed through the Rail Change Review Committee and tracked on the matrix. As items are corrected, those corrections are noted on the Safety Risk Registry located on the Safety shared drive and closed out as appropriate. All items on the registry will be evaluated to determine if they present a hazard and if so, a risk rating will be generated and documented. The safety department reviews these items on an ongoing basis, and when unacceptable delays are encountered in resolution, the items are escalated to appropriate senior management for assistance in resolution and closure.

Safety Risk Registry Tracking Process

1. When a hazard is identified immediate mitigating steps must be taken to remove or reduce the hazard (remove from service, secure, etc.). These may become short-term mitigations (see below).
2. Risk/hazard is added to the Safety Risk Registry and assigned a Hazard ID based of the year, mode, and number of hazards for that year, i.e. 24.LRT.023.
3. Using the Safety Risk Matrix defined earlier in this section the protentional consequence to the hazard gets assigned a Safety Risk Rating as an initial risk rating.
4. Depending on the level of risk rating is how the hazard is worked.
5. A hazard owner and a risk acceptor are identified and determined based off of the expertise and area the hazard is identified in. The hazard owner develops a team of subject matter experts known as a Safety Action Group (SAG) to develop long term mitigations strategies and a timeline to implement the mitigations.
6. Once mitigations have been identified, a final Safety Risk Rating is assigned based off the mitigation strategy using the Safety Risk Matrix.
7. These mitigations are tracked to completion. Once mitigations are completed, they are monitored for their effectiveness, and if deemed ineffective are readded to the Safety Risk Registry for more mitigation.

The Safety Department provides monthly updates of these items to the OSSO.

2.1.7 Corrective Action Plans

Corrective Action Plans are required for the following situations:

- Deficiencies identified through on-site safety and security review,
- Safety event and hazards investigations (when potential hazards are identified),
- Internal safety and security reviews,
- All Safety Reports submitted
- Any issue that could present immediate hazard(s) to persons,
- Hazards or observations that are the result of meeting, audits, or discussions.

Corrective Action Plans will meet the following OSSO guidelines outlined in Section 5 of the Procedures and Standards, and are summarized and tracked through the LRT Safety Risk Registry (with appropriate matrix headings referenced in parentheses):

- Identify the source of the noted deficiency, finding, or hazard (“Source”);
- Reference the date the CAP was opened (“Reference”);
- Line Number as a (“unique identifier”)
- Identify the noted deficiency, finding or hazard (“Issue Description”);
- Process, plan, or mechanism to address and resolve deficiency (“Corrective Action Plan”);
- Timeframe for implementation of plan of action (“Target Date”);
- Status of corrective action plan (“Status” with updated progress reflected in “Comments”);
- Department(s) and person(s) who will be responsible for implementation (“Responsible” with additional detail in “Comments”);
- A Risk Index Assessment of the hazard present (“Hazard Severity”, “Hazard Likelihood”, and “Risk Index”).

The LRT Safety Risk Registry is described in greater detail in the previous section of this ASP. Metro Transit allows NO Unacceptable Hazards to persist upon discovery without proper and immediate mitigation. As with any discovered hazards, the means of correction are documented in the LRT Safety Risk Registry, which is submitted to the OSSO monthly.

Deficiencies discovered during audits are detailed on the audit checklists and a corrective action plan (CAP), including responsible persons and timelines, is agreed upon with appropriate management. These action items are summarized on the Safety Risk Registry. As items are corrected, those corrections are noted on the matrix and closed out as appropriate. The safety department reviews these items on an ongoing basis, including monthly submission of the matrix to OSSO, and when unacceptable delays are encountered in resolution, the items are escalated to appropriate senior management for assistance in resolution.

In the event that OSSO and Metro Transit are unable to agree on the resolution of a CAP a panel will be convened, consisting of the Rail System Safety Manager (or designee), the State Safety Oversight Manager (or designee), and the Manager of the “responsible department” for the CAP in question. The panel will attempt to resolve the dispute and if that proves impossible Section 5.5 of the OSSO Program Standard dictates that:

“In the event OSSO and the transit agency cannot reach a consensus regarding a CAP at the staff level, the OSSO will contact the transit agency’s General Manager to arrange a meeting to discuss the issue. Should the OSSO and transit agency General Manager be unable to reach consensus, the Office of State Safety Oversight will arrange for the Minnesota Department of Public Safety’s

Commissioner’s Office to review each party’s position and supporting materials and issue a decision on the dispute.”

2.2 SAFETY RISK REDUCTION PROGRAM

Metro Transit’s safety risk reduction program will utilize the already established Safety Risk Mitigation process described in this Agency Safety Plan to improve safety performance by reducing the number and rates of safety events, injuries, and assaults on transit workers.

673.11(a)(7):

- The Safety Performance Targets (SPT) below set by the Joint Labor Management Safety Committee (JLMSC) as required by 673.19(d)(2) for the safety risk reduction program performance measures established in the National Safety Plan annually. The performance to these targets will be monitored and reviewed by the JLMSC on a quarterly basis. 673.27(d)(2)
- Address the reduction and mitigation of vehicular and pedestrian safety events involving transit vehicles that includes safety risk mitigations consistent with 673.25(d)(3)
- Address the reduction and mitigation of assaults on transit workers that includes safety risk mitigations consistent with 673.25(d)(4)
- Document the safety risk mitigations identified and recommended by the Joint Labor Management Safety Committee as described in 673.25(d)(5) in the Light Rail Transportation Safety Risk Registry.
- If targets are not met Metro Transit will allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to assist the transit agency in meeting the safety performance target in the future 673.27(d)(3)(iii).
- The Accountable Executive must implement safety risk mitigations for the safety risk reduction program that are identified through the SRM process described in the Agency Safety Plan 673.23(d)(1)(i).
- The Accountable Executive receives and must consider all other safety risk mitigations recommended by the Joint Labor Management Safety Committee 673.23(d)(1)(ii).
- Any deficiencies identified through the safety performance assessment as described in this section will be reran through the Safety Risk Management process described in this Agency Safety Plan 673.27(d)(4).

Safety Risk Reduction Program Safety Performance Targets		
Target	Goal (per 100k VRM, as applicable)	Notes
Major Events	101	
Major Event Rate	2.400	
Collisions	31	
Collision Rate	0.738	
Injuries	86	
Injury Rate	2.076	
Assaults on Transit Workers		No Target set due to not having 3 years worth of data
Rate of Assaults on Transit Workers		No Target set due to not having 3 years worth of data

3. SAFETY ASSURANCE

Safety Assurance involves processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation. This involves monitoring key aspects of the operation for mitigation effectiveness and to ensure that no new hazards have been introduced into the system. This ongoing attention also provides for identification of new hazards as changes to the operation form, fit, or function are made. The rest of this section describes the safety assurance techniques used by Metro Transit.

3.1. SAFETY DATA ACQUISITION/ANALYSIS

Collection of safety data, and analysis of such data, is one way to help maintain safe working conditions at Metro Transit. Hazard identification and analysis of safety events will prevent future safety events. Metro Transit reviews safety events, looks for undesirable trends, and regularly reports safety data to the Federal Transit Administration (via National Transit Database), OSHA, NTSB, and Metro Transit departments as appropriate. These trends will be shared with the JLMSC on a quarterly basis along with any mitigations that have been implemented.

In mitigating Transit Worker Assaults Metro Transit will review procedures and call response times in emergency situations. In this process Metro Transit will look for ways to reduce response times and ensure clear communication between frontline transit workers, RCC, TCC and Metro Transit Police Department. The process will also allow JLMSC to identify mitigation strategies that are ineffective or inappropriate or were not implemented as intended and identify safety deficiencies for purposes of continuous improvement.

Risk Management manages the primary claims database in a system called Origami. Risk Management provides regular reports to Metro Transit management teams while Safety conducts further analysis and assists with distribution and communication. Data collected in Origami also contains data on employee injuries and workers compensation.

Metro Transit performs safety data collection and analysis for Rail Operations at the facility level. This Data includes the following:

- Employee on-duty safety events
- Passenger on-train safety events
- Station and Platform safety events
- Rail safety events
- Safety event monthly, annual and past years comparisons
- Lost time data
- Event severity and likelihood

Metro Transit Safety prepares reports for OSHA and the NTD. The Rail Safety Officers are responsible for generating and updating the OSHA logs for the facilities and the annual OSHA posting.

Risk Management, Safety and operations management will determine an optimal degree of safety that minimizes risk while maximizing operational effectiveness within political, financial and

technological constraints. Factors considered are the evaluation of cost, likelihood of damage, notoriety factor, frequency and severity of exposure, and the balance of benefit to loss.

Strategic Initiatives (SI) works with data collected from many sources to use higher level of analysis to identify significant risk factors and trends in safety events and injuries. This leads to informed recommendations for risk reduction programs and better use of limited resources. These targets will include measurements as established under the National Public Transportation Safety Plan (NPTSP), specifically:

- Collisions from LRT operation
- Fatalities from the LRT operation
- Injuries from the LRT operation
- Safety Events from the LRT operation
- System reliability (vehicle mean distance between failures)

The goals below are based off a 3-year rolling average as required by the National Public Transportation Safety Plan. The specific goals for these target measures set at this plan revision are:

Target	Goal (per 100k VRM, as applicable)	Notes
Number of Major Safety Events (S&S 40s)	101	
Major Event Rate per 100k VRM	2.400	
Collisions per 100k VRM	0.738	
Pedestrian Collision Rate per 100k VRM	0.187	
Vehicular Collision Rate per 100k VRM	0.543	
Number of Fatalities	2	Excludes trespassing and suicide-related fatalities for performance targeting
Fatality Rate per 100k VRM	0.049	
Transit Worker Fatality Rate per 100k VRM	0	No reported fatalities from 2021-2023
Number of Injuries	86	Includes serious injuries per NTD definition, and non-serious injuries requiring immediate transport away from the scene for medical attention
Rate of Injuries per 100k VRM	2.076	
Transit Worker Injury Rate per 100k VRM	0.065	
Number of Assaults on Transit Workers	N/A	Do not have 3 years worth of data since the definition changed in April of 2023

Assaults on Transit Worker Rate per 100k VRM	N/A	Do not have 3 years worth of data since the definition changed in April of 2023
Number of Major Mechanical Failures	162	
Miles Between Major Mechanical Failures (System reliability)	25,000	

Metro Transit establishes these Safety Performance Targets (SPTs) on an annual basis by looking at a 3-year rolling average. This process also includes the review role of Metro Transit’s Joint Labor Management Safety Committee (JLMSC) and includes the identification of deficiencies in Metro Transit’s agency’s performance against annual SPTs set by the Safety Committee under § 673.19(d)(2) for the safety risk reduction program required in § 673.11(a)(7), 673.27(d)(1)(i). Metro Transit is not required to set a target for a performance measure until three years of data has been reported to the NTD corresponding to such performance measure 673.11(a)(7)(iii)(C).

By incorporation in this plan, these goals will be adopted by the Metropolitan Council as part of the plan approval and reevaluated annually based on actual trends. The Rail Safety, Speed, and Reliability Performance Team helps collectively determine these goals and measure and, where necessary, determine steps for improvement.

When requested, Metro Transit will provide the safety performance targets to the Council, the region’s MPO, for the Council to use the safety performance targets directly and provide the targets to the State to aid in the MPO and State planning process, as applicable. Metro Transit will coordinate, to the maximum extent practicable, with the State to support the selection of State transit safety performance targets.

3.2. SAFETY EVENT REPORTING AND INVESTIGATION

Metro Transit’s policy is to document, investigate and review all safety events at an appropriate level for the severity or potential severity of that event. The purpose of safety event reporting and investigation is to ensure that all safety events are investigated objectively with the goal of determining probable cause(s) and contributing causal factors which includes blind spots and visual obstructions (fact-finding, not fault-finding). All safety events investigated by the operating department must be documented and forwarded to the Safety Department and all relevant data shall be made available to the JLMSC upon request once the investigation has been completed. All investigation findings, conclusions and recommended corrective actions to prevent recurrence will be documented, and designated management personnel are assigned responsibilities to ensure that corrective actions are implemented and monitored for effectiveness. This process is the subject of Metro Transit’s LRT Safety Event Investigation program, which is annually reviewed, updated, and approved by the OSSO on the same intervals as this document.

All occupational illnesses and injuries are investigated at the first line supervisor level. The Safety Department is available to front line supervisors to assist with their investigations when requested or may choose to be lead an investigation as appropriate. All first report of injury forms and supporting investigation reports are forwarded to Risk Management and filed. At the same time, a copy of the report, along with other facts collected, must be sent to the designated Safety Department staff for review and determination of appropriate corrective action.

Where required, the Safety Department will forward reports to all regulatory agencies, including Minnesota Occupational Safety and Health (MNOSHA), and report data as required to the National Transit Database (NTD).

3.2.1. Safety Event Policies

The purpose of safety event reporting and investigation is to ensure that all safety events are investigated with two objectives: of

- determining primary and contributing causal factors.
- These findings (and, if appropriate – recommendations) are then translated into corrective action plans that would prevent recurrence of the safety event.

All investigation findings, conclusions and recommended corrective actions to prevent recurrence are documented, and designated management personnel are assigned the responsibility to ensure that corrective actions are implemented and monitored for effectiveness.

3.2.2 Procedures for Rail Safety Event Reporting and Investigation

The Metro Transit Rail Safety Event Investigation Plan describes the process of safety event reporting and investigation. This plan is reviewed and updated as needed annually during the first calendar quarter. Metro Transit rail policy is to investigate all safety events. Safety Events, occupational illnesses and injuries are investigated at the front-line supervisor level. Safety staff and Rail Operations developed and implemented a training module for all supervisors on safety event investigation and response and all supervisors receive this training as part of their initial training (as well as providing to all staff already on board that have not attended the TSI Rail Incident Investigation course). Safety event investigation reports are compiled, reviewed and filed by the Rail Transportation Department. In addition, a copy of these reports is forwarded to the Safety Department and then forwarded to all regulatory agencies as required, including the Office of State Safety Oversight. Upon request JLMSC shall have access to safety event reports.

The Safety Department is notified of safety events. Depending on the type and severity of the event, a Safety Department representative, a Minnesota State Safety Oversight representative, a MN OSHA representative, National Transportation Safety Board representative, and or other Federal agencies with investigative authority could be involved in the investigation process, and possibly an accident investigation committee convened as well. The Safety Department may initiate its own investigation, including convening of an ad-hoc safety event investigation board, as appropriate.

Safety event notification and response is included in Metro Transit's procedures. All necessary emergency response agencies, Metro Transit management personnel, and regulatory agencies are included in the notification process. In accordance with the OSSO Procedures and Standards, the OSSO is notified of certain types of safety events on the Light Rail Transit System, specifically:

Events to be tracked by the transit agency and reported to the OSSO within *two hours*:

1. Fatality (occurring at the scene or within 30 days following the safety event);

2. One or more persons suffering serious injury (serious injury in accordance with the definition in the Definitions & Acronyms section of this document; the notification is based on information available to the transit agency at the time);
3. A collision involving a rail transit vehicle with any other vehicle, person, or object;
4. A runaway train;
5. An evacuation for life safety reasons; or
6. Any derailment of a rail transit vehicle (yard and mainline).

Events to be tracked by the transit agency within 30 days:

1. A personal injury that is not a serious injury;
2. One or more injuries requiring medical transportation away from the event;
3. Non-collision-related damage to equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency;
4. A maintenance-related evacuation of a train into the right-of-way or onto adjacent track; or customer self-evacuation;
5. Certain low-speed collisions involving a rail transit vehicle that result in a non-serious injury or property damage; or
6. Damage to catenary or third-rail equipment that disrupts transit operations.

Events to be tracked by the transit agency and made available to the OSSO or FTA for review, *as requested*:

1. Non-collision-related damage to equipment, rolling stock, or infrastructure that does not disrupt the operations of a transit agency;
2. Close calls / near misses (of which the transit agency is made aware);
3. Safety rule violations;
4. Violations of safety policies;
5. Damage to catenary equipment that do not disrupt operations; or
6. Vandalism / theft.

As provided in 49 CFR 674 and the OSSO Procedures and Standards, the Safety Department is authorized to conduct investigations on behalf of the MN OSSO. When the Safety Department conducts an investigation on behalf of the OSSO, the final report shall be submitted to the OSSO for review, approval, and adoption of the report(s) and any corrective actions proposed.

In addition to the event investigation function, the Safety Department conducts a periodic review of rail safety events to determine common trends and works with the responsible department to develop appropriate preventive programs.

3.2.3. Procedures for Non-vehicle Safety Event Personnel Policies

Metro Transit currently has safety event policies for employee, non-employee/customer, and LRT safety events.

Policies should include training for what safety events must be reported under the policy to include clearly defined examples.

3.2.3.1 An employee involved in a safety event must do the following:

- Request medical attention, if necessary
- Report and describe the event according to policy, rule, and/or union contract
- For loss of time from work, report to the medical facility as soon as possible within twenty-four hours of the occurrence or on the next day the medical facility is open.

The employee's immediate supervisor will prepare and distribute the appropriate forms as soon as possible, but no more than twenty-four hours after notification of the safety event.

3.2.3.2 The employee's supervisor will take the following actions:

- Make appropriate arrangements for medical attention, if requested.
- Call TCC whenever 911 is contacted for emergency medical purposes
- Review the safety event and, depending on the nature and severity, convey the impact to the appropriate department for response to the scene
- Conduct an initial investigation of the safety event
- Ensure that conditions which could cause a similar safety event are reported for remedial and/or corrective action
- Ensure that proper documentation is prepared and filed for use in developing a corrective action plan
- If loss of time from work is possible or occurs at any time afterwards due to the safety event, direct the employee to report to the medical facility as soon as possible; preferably within twenty-four hours or on the next day the medical facility is open.

For non-employee safety events, employees are responsible for collecting the appropriate information and preparing an accident report. A copy of the accident report is forwarded to the Safety Department and Risk Management Department for filing and follow-up investigation and reporting.

3.2.4. Procedures for Non-vehicle Safety Events or Injuries

3.2.4.1 An employee involved in a safety event must do the following:

- Request medical attention, if necessary
- Report and describe the event according to policy and/or union contract
- Complete and sign a first report of injury form (If incapacitated the supervisor must complete this form).
- If the employee seeks medical attention for an injury, the employee must submit workability notes from the doctor's office visit and any follow up visits to their supervisor as soon as possible.
- For loss of time from work or restricted duty, the employee must report to the medical facility as soon as possible within twenty-four hours of the occurrence or on the next day the medical facility is open.

3.2.4.2 The employee's supervisor will take the following actions:

- Make appropriate arrangements for medical attention, if requested.
- Call RCC whenever 911 is contacted for emergency medical purposes

- Conduct an initial investigation of the safety event and report findings to management and the Safety Department.
- Complete Supervisors portion of Employees First Report of Injury form and assure the employee section is complete.
- Ensure that conditions, which could cause a similar safety event, are reported and that remedial and/or corrective action is taken
- Ensure that proper documentation is prepared/kept and recommendations are made
- If loss of time from work or restricted duty is possible after the safety event, direct the employee to report to the medical facility as soon as possible within twenty-four hours or on the next day the medical facility is open.
- Forward all doctor workability notes to Risk Management and your facility Rail Safety Officer along with the first report of injury.
Ensure the first report of injury form is completely filled out. Submit the 1st report of injury form and any doctor workability notes to Risk Management and the facility Rail Safety Officer.

3.2.5 Health Safety Hazards

Metro Transit will use its Safety Risk Management (SRM) process described in this plan to document and mitigate any health hazards that would arise such as a pandemic. Furthermore, Metro Transit will follow guidelines consistent of the Centers for Disease Control and Prevention and the Minnesota Department of Health whichever is the most restrictive.

Metro Transit will continue to investigate and implement ways in establishing standards that currently do not exist to maintain proper cleanliness of vehicles to protect our employees and our customers. The cleaning standards would include a job task analysis to ensure proper training and Personal Protective Equipment (PPE) for employees when completing these disinfecting tasks.

3.3. FACILITIES INSPECTIONS

Metro Transit facilities are inspected on a regular basis to identify items needing corrective action. The facilities associated with the Light Rail system, such as the yard and shops, stations, and substations will also be inspected on a regular basis. Systems components follow inspection guidelines found in the Rail Systems Maintenance Plan. Facilities such as buildings and stations have periodic inspection criteria built into the designated database and include periodic inspection of safety components (such as elevators, fire alarm and suppression systems, which may be performed by contractors) as well as boilers, cranes/hoists, and other facility components.

The majority of the light rail functions are housed in the Blue Line Operations and Maintenance Facility building (O&M) including the Rail Control Center; vehicle maintenance; and transportation. The Green line Operations and Maintenance Facility (OMF) in St. Paul provides facilities for storage and servicing of Green Line rolling stock. Training for Rail Employees is housed at the Light Rail Training Center located on the O&M Campus. Other related facilities include the Metro Transit headquarters building at the Heywood Office Building (administration), and the adjacent Rail Support Facility (for systems employees).

Facilities safety inspections are closely related to the Hazard Management Process (Section 2) because those personnel who conduct facility inspections will often discover hazardous conditions.

As conditions are noted by the maintenance department, safety staff, field supervision, or train operators at station facilities, they are reported to the RCC who makes notification to facilities maintenance. It is the responsibility of facilities maintenance to resolve the hazards passed along by RCC.

3.3.1. Facility Inspection Checklists

Facility inspections are conducted using checklists to guide the inspection. All inspections are documented. Inspection reports include the following:

- Date of Inspection
- Name of Facility
- Listing of Items Observed
- Description of Observed Deficiencies
- Recommendations to Improve Safety
- Name of Inspector.

Facilities and Engineering, Rail Maintenance, and Safety conduct, at a minimum, quarterly safety inspections in their locations as part of the “A Workplace Accident and Injury Reduction” (AWAIR) program. The inspection team may use a variety of checklists that focus on different aspects of industrial safety each month but is always on the lookout for general facility defects. When a defect is noted, it is recorded in the meeting minutes and shared with Engineering and Facility Maintenance to correct. If the problem cannot be resolved with simple maintenance, then steps are taken to include the needed improvement in the facility capital improvement plans. In the meantime, steps are taken to mitigate the hazard and tracked on the Safety Risk Registry.

Other types of inspections conducted through Engineering and Facility Maintenance include:

- Exterior conditions
- Building facilities – HVAC, electrical, boilers, hoists, overhead cranes
- General housekeeping
- Fire extinguishers in the facilities and the vehicles
- Fuel and hazardous materials storage tanks
- Fire suppression systems including sprinklers
- Fire alarm systems.

Certain facility inspections are contracted out, such as the sprinkler inspections and overhead crane inspections. All fire systems are monitored by outside contractors, who check for alarms and coordinate with appropriate Metro Transit staff.

Temporary measures will be mandated immediately by the inspector, garage manager, or Safety to protect life and property should corrective action for an unacceptable or undesirable hazard be delayed for any reason.

All audit reports, inspection checklists, inspection findings, hazards, identification reports, and action items produced as part of the regular of the AWAIR committee inspections will be made available to the JLMSC at least one week before being placed on the agenda of the JLMSC. For example, the JLMSC will have access to information produced through the hazard management

process, including the results of the hazard risk analysis or risk mitigation performed on hazards identified through inspections.

3.4. RAIL MAINTENANCE AUDITS/INSPECTIONS

The Metro Transit maintenance audits/inspections provide top management with a mechanism for documenting the fact that key elements of the organization are effectively performing specified functions.

An audit attempts to answer the following questions:

- Does a plan or procedure or schedule exist?
- Is it adequate?
- Is it communicated effectively?
- Is it implemented?
- Are results documented and followed up on, as appropriate?
- Who is responsible for it?
- Is it monitored?
- When it was last audited?
- Is there a report on the results of the audit?
- What corrective actions were required?

These organizational elements include all Metro Transit maintenance plans and procedures including preventive maintenance activities, scheduled maintenance, and unscheduled maintenance procedures. Maintenance Inspection and Repair activities occur for Systems, Vehicles and Facilities.

Systems maintenance includes track, traction power substations, train control, and communications. The governing maintenance document for all systems is the Rail Systems Maintenance Plan. Track maintenance typically includes measurements of track gauge, profile, alignment, cross level, twist and wear, flaws. Power inspections typically include replacement of breakers, substation battery tests, and substation maintenance. Signals maintenance typically includes testing of signal equipment such as switches, relays, track circuits and wiring.

Vehicle maintenance typically includes the inspection, maintenance and repair of rolling stock by performing scheduled maintenance inspections and running repairs. These are governed by the Rail Fleet Management Plan. This plan was developed using industry experience and manufacturer recommended maintenance.

Frequencies of preventive maintenance by equipment type are tracked via Enterprise Asset Management System (EAMS), the adopted central maintenance management system for Metro Transit. Metro Transit may change to alternative tracking software at its discretion. Upon request JLMSC shall have access to all maintenance records.

3.5. RULES AND PROCEDURES REVIEW

The Metro Transit Rail Operations Department is responsible for ensuring that operating Rules and Procedures are carefully developed, maintained and followed. The Rail Operations Manager develops and updates rules and procedures and conducts a periodic review of rules and

procedures and test operations. These are all document in the Metro Transit Light Rail Transportation (LRT) Rule Book.

Rail operations are conducted in accordance with Rules and Procedures. Each rail employee is issued a controlled copy of the Metro Transit Rail Operations LRT Rule Book and is tested annually on its contents. This applies to both transportation employees (including supervisors) and those maintenance employees whose functions require them to interface with mainline or yard train operations including Right of Way (ROW) worker protection required for given tasks performed in the ROW. Additionally, management employees are provided access to the Light Rail Standard Operating Procedures for reference. Rulebook revisions require review and approval by the Rail Change Review Committee (RCRC).

Rail car and systems maintenance also have procedures (such as Rail Fleet Management Plan for rail car maintenance or the Rail Systems Maintenance Plan for systems maintenance) which standardize how they maintain equipment and managers of these respective departments are responsible for ensuring compliance with those procedures through sign off on work performed or QA assessments.

Proficiency tests are conducted periodically by the Rail Operations or Maintenance Departments and/or the Safety Department to ensure compliance with rules and procedures. These are performed in accordance with the Light Rail Compliance Testing Reference Guide, which prescribe a frequency of testing and highlighted rules, and tests are conducted on operating employees (including supervisors) as well as maintenance employees whose jobs entail compliance with operating rules. Serious infractions are addressed immediately, and other deficiencies are reported to the appropriate authority for remedial or disciplinary action.

Transportation management has developed a tracking and summary system where violations can be summarized by employee or by specific violation and trends can be noted. Operations uses a violation rating system classifying violations according to severity and discipline follows those levels. The responsibility for establishing, tracking, and dealing with these matters' rests with operations and maintenance management, not the Safety Department.

3.6. SYSTEM MODIFICATION DESIGN REVIEW AND APPROVAL PROCESS

Safety certification programs will govern rail system commissioning, start-up and any modifications to existing facilities. The Metro Transit Safety and Security Certification Program is tailored for each New Start capital project. The Safety and Security Review Committee will evaluate evidence in terms of whether the new start system is considered safe for passenger operations. The Safety and Security Review Committee (SRC) is a standalone committee for the given capital project or equivalent a multi-disciplinary group to oversee the conduct of safety and security efforts for the project, directly accountable to the transit agency's executive leadership. The SRC is typically chaired by a full-time System Safety and/or Security Manager or the Certification Manager. The SRC can be comprised of senior management personnel, or their designees, who represent the major project areas and activities. The SRC oversees the SSC program and directs resolution of identified hazards. The SRC discusses ongoing safety and security concerns; reviews and approves certification activities; and resolves issues among the project team and with the agency's executive leadership.

The objectives of the Safety Certification Program are to:

- Assure, to the maximum extent practical, that necessary safety and security requirements are designed and incorporated into the rail transportation system, equipment and facilities
- Conduct a systematic review or testing to evaluate system elements for conformance to the intended design
- Document those safety tests or reviews in a format that clearly displays the successful completion of the project.

Safety certification must address requirements under four integrated functions:

- System Safety- elimination, minimization, or control of potential hazards and the protection of property from damage against injury and/or property damage.
- Fire and Life Safety - elimination, minimization, or control of potential hazards to customers, employees, emergency response personnel and the general public caused by fire, smoke, explosion or resulting panic, and the protection of property from fire, explosion or chemical exposures.
- Occupational Safety - elimination, minimization or control or potential hazards to employees and emergency response personnel.
- Public Safety - elimination, minimization or control of potential hazards to the general public and customers that result from operation of the system.

Critical participation on safety committees by MTPD ensures an all-hazards approach to the safety certification process that incorporates threat and vulnerability considerations.

The Safety & Security Review Committee will review aspects of the proposed rail system development including the following:

- Operational safety impacts
- Customer safety impacts
- System safety requirements
- Employee safety training requirements
- System hazard elimination/control.

System modification is the result of any changes to the transportation system, rolling stock, equipment, and facilities. This process is applicable to new procurement, as-built drawings or schematics, training on maintenance and/or operations associated with this endeavor, certification of any operational rules, agreements and maintenance and repair/training manuals that it may encompass. The Metro Transit Rail Change Review Committee evaluates evidence presented in terms of whether the system modification is considered safe for public occupancy and passenger operations.

The Rail Change Review Committee (RCRC) meets periodically to evaluate proposed changes to the system. This forum ensures configuration control as well as system safety considerations in modifications that may be less comprehensive in scope, e.g. items not requiring full scale safety certification, but which nevertheless change form, fit or function of a safety critical item. Typically, for projects not requiring an FFGA, this process is implemented in lieu of full safety certification.

3.7. CONFIGURATION MANAGEMENT

The Metro Transit Configuration Management process will include design modifications, specification and procurement of vehicles and components, and contract change orders.

Metro Transit Work Instruction Policy E-11, titled Project Execution Plan (PEP), applies to all construction projects. This procedure requires project documents including drawings and specifications to be delivered to many different departments within Metro Transit and include an archives file.

Each design group will typically make changes as required to drawings that are then sent to the field forces. The field forces will perform the work per the design drawings and indicate any variations from the design. These variations are incorporated on the drawings that will include the latest revision date. These drawings are called As-Built or In-Service drawings. As Built or In-Service drawings are filed at the respective design office with copies sent to field locations or headquarters, as necessary.

The Safety Department is made aware of projects of significance when Engineering issues Project Execution Plans. These include a short description of the project and identify stakeholders, etc. The Director of Safety reviews these and determines the level of participation from Safety Department staff to ensure that safety has been included in changes to equipment, systems, vehicles and facilities.

Accordingly, LRT Operations has established a configuration management process to track the status of the rail system configurations. The configuration management process includes the Rail Change Review Committee (RCRC). Significant system changes must be approved by the RCRC.

After the proposed change is approved by the RCRC, each design group typically makes changes as required to drawings that are then sent to the field forces. The field forces perform the work per the design drawings and indicate any variations from the design. These variations are incorporated on the drawings and the revision date noted. These drawings are called As-Built or In-Service drawings. As Built or In-Service drawings are held at the rail transportation library and respective design office with copies sent to field locations or headquarters as necessary.

3.8. PROCUREMENT

The Purchasing Department is responsible for the procurement of materials, services (contracts) and public works. Generally, specifications are in the form of written description, performance requirements, drawings, prints, commercial industry standards and other descriptive literature references. All items to be procured shall be evaluated for health, safety, and environmental compliance with current applicable regulatory specifications.

Requestors of goods or services from procurement are responsible for identifying material or services that have potential safety impact and for ensuring that such material or services meet safety requirements of Federal and State compliance regulations, OSHA standards, or identifying the requirement for Safety Department review.

Common supplies will require user department review. Special supplies or services may require review by the Safety Department. All chemicals require Safety Data Sheets (SDS) review by the user department and the Safety Department before utilization.

Metro Transit Purchasing will consult with the Safety Department during pre-procurement planning for specialty items requiring safety review. In particular, when procuring toxic substances, Metro Transit vendors must supply SDSs before shipping toxic substances, as defined by the Minnesota State Right-to-Know Law, or when defined as a hazardous chemical by the Occupational Health and Safety Administration Hazardous Communication Standard.

3.9. INTERNAL SAFETY AUDITS

The Metro Transit Safety Department is responsible for the preparation and implementation of a System Safety Audit Policy and Program that provides a proactive approach toward auditing safety compliance. The audit plan is documented in the LRT Agency Safety Plan - Internal Audit Program Plan. Audits are conducted within all departments and cover agency safety policies and procedures, as well as regulatory requirements. Internal rail safety audits are conducted of all items in this LRT Agency Safety Plan within a three-year period, as required by the Office of State Safety Oversight. Documentation shall be shared with the JLMSC to identify mitigation strategies that may be ineffective, inappropriate, or not implemented as intended and identify Safety deficiencies for the purposes of continuous improvement.

3.9.1. Audit Responsibility

The Director of Safety is responsible for implementing the audit process, performing safety audits of the Metro Transit organization with and through safety department staff. Members of the Metro Transit staff, who are not directly involved in the area being audited, assist the director.

3.9.2. Internal Safety Audit Objectives

The objectives of the internal safety audits are to provide a mechanism for determining the effectiveness of the Light Rail Transportation ASP and to assess the implementation level of the Plan. Specifically, Metro Transit's internal safety audit objectives are to:

- Verify that safety programs have been developed/implemented in accordance with Rail ASP requirements
- Assess the effectiveness of programs
- Identify program deficiencies
- Identify potential hazards in the operational system
- Verify that prior corrective actions are being tracked for closure
- Provide management with an assessment of the status and adequacy of system safety
- Assure continuing evaluation of safety-related programs, issues, awareness and reporting.

3.9.3. Safety Audit Process

Safety audits rely on the concept of spot-checking samples in areas for compliance with internal safety procedures and requirements. The departments to be audited will be notified when safety audits will be conducted, what types of documents will be reviewed, and the audit criteria. Ongoing inspections can be conducted on a surprise basis, but internal safety audits must be coordinated with all concerned parties. The intent of the audit process is to satisfy and ensure Metro Transit is in regulatory compliance and suggest industry best practices. Perhaps the most important means of satisfying an audit query is to produce documentation in the form of measurement, procedure, test, or visual. Documentation shall be shared with the JLMSC to

identify mitigation strategies that may be ineffective, inappropriate, or not implemented as intended and identify Safety deficiencies for the purposes of continuous improvement.

3.9.4. Audit Reporting

The Safety Department documents all internal safety audits. The audits are conducted according to the LRT Internal Audit Plan using checklists, which contain references to corresponding LRT Agency Safety Plan sections. The results are documented in the Metro Transit Internal Rail Safety Audit report issued upon completion of the audits, with corrective actions summarized on the Safety Risk Registry. The LRT Safety Audit report will be transmitted to the OSSO with a certification letter from the General Manager, indicating whether the agency is in compliance with its ASP or identifying the activities the agency will take to achieve compliance. For the purposes of the certification letter, open items do not, in and of themselves, indicate noncompliance. Rather, items that have a corresponding corrective action plan would indicate compliance with the audit program and, by extension, the LRT ASP.

3. SAFETY PROMOTION

4.1. TRAINING AND CERTIFICATION

Training and certification programs occur during initial hiring, during ongoing operations and maintenance, and as a result of safety infractions.

4.1.2. New Employee Orientation

All new Metro Transit employees receive new employee orientation that is developed by the Human Resources Department. The new employee orientation varies from 1 to 4 days depending on the work the employee will be doing. The morning of the first day covers an orientation to the Metropolitan Council. The afternoon session covers Employee Benefits, Safety Overview and Right-To-Know training, and Drug and Alcohol awareness and policy. Additional department-specific training follows as detailed in the following sections.

4.1.3. Rail Transportation Training

Rail training and certification programs for employees include the following:

- Operators: De-escalation, rules and procedures, vehicle certification, Blind spots, and line familiarization
- Supervisors: De-escalation, rules and procedures, vehicle certification, line familiarization, specialized training
- Vehicle maintainers: De-escalation, rules and procedures (including Blue Flag protection and Lock Out – Tag Out), line familiarization; in-depth vehicle certification; on-the-job training
- Systems maintainers: De-escalation, rules and procedures, vehicle certification; specialized training.

All rail employees are recertified annually on rules / procedures and OTE operation, as applicable. Vehicle maintainers and systems employees are recertified every three years on critical maintenance tasks as determined by the appropriate departments. Training records are tracked by the individual operating, systems maintenance, or vehicle maintenance department via the manual or electronic recordkeeping system of their choosing. Such records must be readily available on site for inspection and verification by any interested party.

4.1.4. Contractor Safety Training

Any contractor requesting a permit to work on the Right of Way (specifically, working within 12' of track centers or OCS) must complete the Metro Transit Light Rail Safety Training developed and delivered by the Rail Training Department. An electronic roster is maintained by the Rail Training Department of all contractors completing this training. After completing the training, the contractors are issued a certification card that must be on their person anytime they access the ROW. The roster is also accessible by Rail Transit Supervisors who may check compliance with procedures on the Right of Way. (In emergencies or unforeseen situations, limited exceptions may be made to allow

inspections or emergency maintenance by non-trained personnel when escorted by a qualified person.)

4.1.5. OSHA Required Safety Training

All new Metro Transit employees receive Right-to-Know (RTK) training in new employee orientation. The health hazards of diesel exhaust emissions and controls used by Metro Transit are included in this training as an overview of Safety Data Sheets (SDS) and the new Global Harmonized System for Labels and hazard communication.

All transportation and maintenance employees at Metro Transit receive a refresher in Right-To-Know (RTK) every year. Employees transferring into the Rail Maintenance Department and Facility Engineering receive additional RTK training. They also receive other training as needed for their new position. Practical application training shall be given as deemed appropriate by the JLMSC.

Right-To-Know will be assessed every year for its effectiveness. During the pandemic Right-To-Know was done online, starting at the end of 2022 Right-To-Know has shifted back to in person due to the feedback that was presented to the Safety Department. Identified changes that have occurred over the year will be communicated through Right-To-Know

All new Rail Maintenance employees receive instructions on voluntary use of dust mask style respiratory protection. Employees that transfer to the Rail Body/Paint Shop receive instructions on the mandatory use of respirators including half-mask style and supplied air systems. Body Shop employees receive supplemental and updated information about mandatory respiratory issues as part of their Right to Know training. Employees wearing respirators for comfort reasons receive refresher training as deemed appropriate due to observations of work practices in the work environment.

All new cleaners in rail maintenance and all new janitors in facility maintenance receive training in bloodborne pathogens by the Safety Department. Rail Supervisors also receive bloodborne pathogens training. Annual bloodborne pathogen training is provided by the Safety Department.

Additional training arranged for or provided by Metro Transit includes:

- Forklifts
- Lock-Out/Tag-Out
- Confined Space
- Hearing Protection
- Personal Protective Equipment (PPE)
- Personal Fall Arrest Systems
- Other topics as requested.

4.1.6. Rail System Safety Staff Training

The Director, Manager of Rail System Safety, and Rail Safety Officers shall be certified as required by 49 CFR 672. At a minimum, this would include completing required TSI classes to obtain a Transit Safety and Security Program certification (TSSP), and Public Transit Safety Certification Training Program (PTSCTP) and required recertification training.

4.1.7. De-escalation Training

Metro Transit plans to expand de-escalation training to all frontline personnel beginning in Q1 2025. It is currently offered to all bus operators.

4.1.8. Additional Training

Aerosol use training is offered to employees on a voluntary basis.

Training delivered by Red Kite Project, is offered to front-line workers as an optional 3-day workshop. The training focuses on case studies and role plays based on commonly occurring incidents. Modules include:

1. Psychological Trauma Education
2. Anti-bias Training
3. Conflict Management
4. Crisis De-escalation

4.2 EMERGENCY RESPONSE PLANNING, COORDINATION, TRAINING

The Safety Department, in conjunction with the Rail Operations Department and Fire and Life Safety Committee, has developed and implemented a Light Rail Operations Emergency Management Plan.

This Light Rail Operations Emergency Management Plan incorporates the key elements of emergency management. Key emergency response topics addressed in this plan include:

- Ensuring that proper notification of emergencies is implemented throughout the agency.
- A formal safety event investigation program, further described in the Metro Transit Light Rail Safety Event Investigation Plan
- Emergency drills, including tabletop exercises and actual field exercises involving Metro Transit personnel and external agencies. The types and locations of emergency drills are discussed in the Fire and Life Safety Committee.
- Training programs for employees and emergency response agencies

The Rail and Safety Departments provide training materials to public safety agencies that respond to calls on or about Metro Transit property. These agencies include local fire departments, police departments, medical facilities, and EMS agencies.

Emergency drills are held each year. The Office of State Safety Oversight and other rail agencies are invited to these drills as observers. The Fire and Life Safety Committee meets on a regular basis to discuss the types and locations of these emergency drills. All drills are evaluated and critiqued for the benefit of Metro Transit and the emergency response agencies. Emergency planning is currently performed by coordination between Metro Transit departments and emergency responders.

Each existing Metro Transit facility has an Employee Emergency Action Plan. The Safety Department develops Emergency Action Plans for facilities related to the rail system. These plans specify the recommended sequence of actions to be taken by Metro Transit personnel in the event of an emergency (fire, medical, security, etc.). Components of the plan include recognition of the emergency, establishing proper notification procedures, and proper response action to the emergency. The safety department is responsible for periodic review and update of these plans, with the assistance of facility management and the operating departments occupying these facilities.

4.3 EMPLOYEE OCCUPATIONAL SAFETY PROGRAMS

The Safety Department is responsible for developing and implementing Employee Safety policies and programs for Metro Transit.

Employee Safety Programs include the following elements:

- Right-to Know Programs
- Hazard Identification and Resolution Process
- Worker Protection and Safety
- Industrial Hygiene Programs
- Hazardous Materials Control
- Personal Protective Equipment
- Workplace Safety Training
- Infectious disease guidelines awareness as necessary and in accordance with Federal, State, and Agency requirements.

Metro Transit Employee Safety Programs include the following (current versions as found on “MetNet” intranet site):

Program Title	Location
<p>A Workplace Accident and Injury Reduction (AWAIR) Program</p> <ul style="list-style-type: none"> • Safety Committees • Safety Reports • Inspections • Hazard Analysis 	<p>Available on Metnet: Metro Transit Safety Policy/Safety Department</p>
<p>Metropolitan Council Accident/Injury Prevention Program</p>	<p>Available on Metnet Metropolitan Council Administration Policies and Procedures HR 9-1a</p>
<p>Metropolitan Council Safety Committee Procedures</p>	<p>Available on Metnet Metropolitan Council Administration Policies and Procedures HR 9-1a</p>
<p>Hazard Communication/Right-To-Know Program</p>	<p>Available on Metnet: Metro Transit Safety Policy/Safety Department</p>
<p>Metropolitan Council Right-To-Know Policy</p> <ul style="list-style-type: none"> • SDS management contract 	<p>Available on Metnet: Metropolitan Council Administration Policies and Procedures HR 9-1a</p>
<p>Respirator Protection Program</p> <ul style="list-style-type: none"> • Medical Evaluations • Fit-Testing • Training 	<p>Available on Metnet: Safety Department and Maintenance Managers; Metro Transit Safety Policy/Safety Department</p>

Program Title	Location
Bloodborne Pathogens Exposure Control Plan	Available on Metnet: Metro Transit Safety Policy/Safety Department
Hearing Conservation and Medical Monitoring <ul style="list-style-type: none"> • Baseline Hearing Tests • Annual Hearing Tests 	Industrial Hygienist
Confined Space Entry Program	Available on Metnet: Metro Transit Safety Policy/Safety Department
Fall Arrest and Fall Equipment Plan	Available on Metnet: Metro Transit Safety Policy/Safety Department
Silica Exposure Control Plan	Available on Metnet: Metro Transit Safety Policy/Safety Department
Powered Industrial Truck Program	Available on Metnet: Metro Transit Safety Policy/Safety Department
Mobile Elevated Work Platform Plan	Available on Metnet: Metro Transit Safety Policy/Safety Department

Program Title	Location
Employee Emergency Action Plans <ul style="list-style-type: none"> • Nicollet • Heywood • Heywood Office • North Loop Garage • MJ Ruter • East Metro • South • Overhaul Base • Transit Control Center • Transfer Road • Operations Support Facility (OSC) • LRT O&M (Minneapolis) • LRT OMF (St. Paul) • Rail Support Facility (RSF) • LRT Training Center (MOW) • Northstar VMF • Northstar BNSF Crew Rest Facility 	Safety Department

4.4 HAZARDOUS MATERIALS PROGRAMS

The proper handling, use, and disposal of hazardous materials are important functions at Metro Transit. Each department is responsible for obtaining and distributing current information on hazardous materials in their areas of jurisdiction. This information includes technical specifications, Safety Data Sheets (SDS), instructions and procedures. The Safety Department will be consulted prior to any chemical procurement changes or process changes that may introduce new hazards into the work environment. Employee access to SDS information is available through online access or telephone hazard hotline.

Training on hazardous chemicals will be provided whenever new hazards are introduced into the work environment or whenever hazardous chemicals will affect specialized procedures such as Confined Space Entry. Chemical training will provide information on specific hazards and measures that can be taken to control or minimize the hazards. Control measures can include such strategies as engineering controls, substitution, or personal protective equipment.

All new procurements for a chemical, substance, or compound are sent to the Safety Department and to the Environmental Manager (consultant) for review before being brought onto Metro Transit property. In 2012, new procedures, including a new form, were implemented.

Metro Transit Materials Management Department ensures that materials, which come onto Metro Transit property, are properly labeled and packaged.

The Safety Department is responsible for the following occupational safety and health activities related to hazardous materials:

- Overseeing and administering industrial hygiene inspections and monitoring
- Maintaining the Safety Data Sheet (SDS) data base
- Providing technical advice and expertise
- Responding to exposure concerns and incidents
- Performing reviews and audits of agency practice
- Recommending Personal Protective Equipment
- Reviewing new procurements of hazardous materials
- Overseeing and auditing performance on various hazardous materials programs.

The Engineering & Facility Management Department is responsible for the following hazardous materials activities:

- Compliance with 2012 MPCA License for VOCs
- Spill response, clean up, and investigation
- Annual environmental audits of all facilities, properties and projects
- Capital program review and advisement
- Liaison with government agencies
- Authority policy and procedure review and implementation
- Regulatory review and implementation
- Administrative functions for hazardous waste and environmental lab contract preparation
Hazardous waste storage, management and disposal.

4.5. DRUG AND ALCOHOL POLICY

Metro Transit is committed to maintaining an alcohol and drug free workplace, to provide a safe and productive work environment and to retain public trust and confidence in our transportation services. The purpose of the Drug and Alcohol Policy is to prevent safety events and losses resulting from alcohol and drug use. This policy also defines alcohol and drug-testing requirements, outlines applicable Employee Assistance Program services, and complies with the Federal Transit Administration's drug and alcohol regulations.

The Metro Transit Drug and Alcohol Policy also includes provisions for detection and deterrence sanctions for violations, Employee Assistance Program, and definitions of special requirements for safety sensitive positions. This program is administered by the Human Resources Department.

4.6 CONTRACTOR SAFETY COORDINATION

Contractor personnel work on Metro Transit property under the authority of various capital projects. The execution of these projects involves contractor personnel who do not come under the direct jurisdiction of Metro Transit, who work on Metro Transit property, and often under operating conditions. Certain safety requirements must be applied to all members of the contractor work force to ensure the safety of passengers, Metro Transit employees, contractor employees, as well as the protection of Metro Transit property.

Construction Job Site Safety Requirements are detailed in Metro Transit procedure C-07 titled Construction Job Site Safety.

Contractors are required to comply with Federal and Minnesota Occupational Safety and Health Administration (OSHA) safety requirements. This stipulation is incorporated into Metro Transit

contracts. Contractors are expected to have their own written safety programs to meet OSHA's requirements. The Safety Department may ask to review the contractor's safety program(s).

Contractors are required by contract to use either their own, or Metro Transit's Hot Works program for any welding, cutting, or other hot works operations.

Specific LRT training contractor training requirements are specified above in Section 4.1.4 of this plan.