METROPOLITAN TRANSPORTATION SERVICES

AGENCY SAFETY PLAN (ASP)

July 2021

Metropolitan Council
390 Robert Street North
St. Paul, MN 55101-1805

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REVISION HISTORY

Date	Revision	Description of Revision
July 2020	0	Initial issuance of ASP
July 2021	1	Addition of Vanpool, Minor Contract and Administrative Changes

AGENCY SAFETY PLAN DEVELOPMENT, APPROVALS, & CERTIFICATION

Signature of Accountable Executive/Certification of Compliance	"This certifies that the Metropolitan Council has established a Public Transportation Agency Safety Plan meeting the requirement of 49 CFR Part 673."	
	TBD Director, Metropolitan Transportation Services	Date Signed
Signature of the Chief Safety Officer		
	Andrew Brody Manager Bus Systems Safety, Metropolitan Transportation Services	Date Signed
Approval by the Board of Directors	This Agency Safety Plan was approved by the Metropolitan Council on (DATE).	
		Date Approved
Entity that Drafted this Agency Safety Plan	Metropolitan Council	

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TERMS, ACRONYMS, & ABBREVIATIONS

Definitions of Terms Used in ASP

Term	Definition
Accident	An Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
Accountable Executive	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Safety Management System, Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
Agency Safety Plan (ASP)	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR 673.
Chief Safety Officer (CSO)	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 49 CFR 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
Collision	A vehicle accident in which there is an impact of a transit vehicle with: • Another transit vehicle • A non-transit vehicle • A fixed object • A person(s) (suicide/attempted suicide included) • An animal • A rail vehicle
Conflict of Interest	A scenario when a person places him/herself in a position where any official act or action taken by them is, may be, or appears to be, influenced by considerations other than the general public interest. All employees and contractors subject to the requirements of the Program Standard occupy a position of public trust and confidence and should avoid not only actual breaches of public trust, but also even the appearance of conflicts of interest.
Consultants/ Contractors	An individual who is compensated by the transit agency for directly operated (DO) services, the labor expense for the individual is reported in object class 501 labor, or for purchased transportation (PT) service, the labor expense for the individual meets the same criteria as object class 501 labor.

Term	Definition
Demand Response	A transit mode comprised of passenger cars, vans or small buses operating in response to calls from passengers or their agents to the transit operator, who then dispatches a vehicle to pick up the passengers and transport them to their destinations. A demand response operation is characterized by the following: a) The vehicles do not operate over a fixed-route or on a fixed schedule except, perhaps, on a temporary basis to satisfy a special need, and b) Typically, the vehicle may be dispatched to pick up several passengers at different pick-up points before taking them to their respective destinations and may even be interrupted en route to these destinations to pick up other passengers. The following types of operations fall under the above definitions provided they are not on a scheduled fixed-route basis: • Many origins - many destinations • Many origins - one destination • One origin - many destinations • One origin - one destination
Designated Personnel	Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency.
Dial-a-Ride	See Demand Response.
Event	Any Accident, Incident, or Occurrence.
Fatality	A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes.
Fire	Uncontrolled combustion made evident by flame that requires suppression by equipment or personnel or removal of the fuel source or removal of oxygen.
Fixed-Route	Services provided on a repetitive, fixed schedule basis along a specific route with vehicles stopping to pick up and deliver passengers to specific locations; each fixed-route trip serves the same origins and destinations, such as rail and bus; unlike demand responsive and vanpool services.
FTA	Federal Transit Administration (FTA) is an operating administration within the United States Department of Transportation.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Incident	An event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
Injury	Any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene.
Investigation	The process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
National Transit Database (NTD)	A reporting system that collects public transportation financial and operating information.
Near Miss	An incident where no property was damaged and no personal injury was sustained but, where given a slight shift in time or position, damage and/or injury easily could have occurred.

Term	Definition
Occurrence	An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
OSONOC	Other Safety Occurrences Not Otherwise Classified (OSONOC) and not specifically listed as a Reportable Event, but which meet a reportable threshold. Includes (but not limited to): • Slips • Trips • Falls • Electric shock • Smoke or the odor of smoke/chemicals noticed in a transit vehicle or facility
Public Transportation Safety Certification Training Program	The certification training program established either for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1)
Reportable Events	A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a transit maintenance facility, during a transit related maintenance activity or involving a transit revenue vehicle that results in one or more of the following conditions: • A fatality confirmed within 30 days of the event • An injury requiring immediate medical attention away from the scene for one or more person(s) • Property damage equal to or exceeding $25,000 • Collisions involving transit revenue vehicles that require towing away from the scene for a transit roadway vehicle or other non-transit roadway vehicle • An evacuation for life safety reasons
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard
Safety and Security Certification	The process applied to project development to ensure that all practical steps have been taken to optimize the operational safety and security of the project during engineering, design, construction, and testing before the start of passenger operation
Safety Assurance	Processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
Safety Event	A collision, fire, hazardous material spill, act of nature (Act of God), evacuation, or OSONOC occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
Safety Management System (SMS)	The formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Term	Definition
Safety Risk Management	A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious Injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date 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
System Reliability	The safety performance measure System Reliability means the distance in miles between major mechanical failures. A reportable major mechanical failure is defined in the National Transit Database Glossary as "a failure of some mechanical element of the revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns." System Reliability is determined by dividing the number of annual vehicle revenue miles by the number of major mechanical failures, by mode.
Transit Asset Management Plan	The strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625

Acronyms and Abbreviations Used in ASP

Acronym/ Abbreviation	Definition
ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan
CEO	Chief Executive Officer
CSO	Chief Safety Officer
FTA	Federal Transit Administration
IRA	Incident Reporting Application
MPO	Metropolitan Planning Organization
MTS	Metropolitan Transportation Services
NTD	National Transit Database
OSHA	Occupational Safety and Health Administration
OSONOC	Other Safety Occurrences Not Otherwise Classified
SMS	Safety Management Systems
SOP	Standard Operating Procedures
SRM	Safety Risk Management
SSEPP	System Security and Emergency Preparedness Plan
TAM	Transit Asset Management

SAFETY MANAGEMENT POLICY STATEMENT

The Metropolitan Council (the Council)'s Metropolitan Transportation Services (MTS) recognizes management of safety as a core agency function. MTS 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 MTS employees, including consultants and Transit Contractor employees. The following safety objectives reflect MTS'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), MTS commits to making safety the top priority of all its operations. MTS will achieve an optimum level of safety through a cooperative effort in compliance of this ASP.

TBD
Director, Metropolitan Transportation Services

Date Signed

1 GENERAL

1.1 Safety Management System Overview

Safety Management Systems (SMS) is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigation. SMS includes systematic and proactive procedures, practices, and policies for managing risks and hazards. By bringing employees and contractors together from all levels of the agency to manage risk, SMS helps agencies detect and address safety problems earlier, share and analyze data more effectively, and measure safety performance more precisely.

Four main components comprise SMS:

- Safety Management Policy (Section 2) is a transit agency's documented commitment to safety. The policy defines the transit agency's safety objectives and the safety accountabilities and responsibilities of its employees.
- Safety Risk Management (Section 3) is the process for identifying hazards and analyzing, assessing, and mitigating safety risk.
- Safety Assurance (Section 4) is the processes that ensures the implementation and effectiveness of safety risk mitigation, and ensures that the agency meets or exceeds its safety objectives through the collection, analysis, and assessment of safety data.
- Safety Promotion (Section 5) is a combination of safety training and communication applied to the agency's transportation system to support SMS.

1.2 Plan Applicability & Scope

1.2.1 Applicability

The Public Transportation Agency Safety Plan (PTASP) Final Rule[1] (49 CFR Part 673) requires compliance by recipients and sub-recipients of FTA Urbanized Area Formula Grant Program funds under 49 USC § 5307. A recipient of § 5307 funding, the Metropolitan Council ("the Council") administers demand response (e.g., dial-a-ride), fixed-route bus and Vanpool contracted services through Metropolitan Transportation Services (MTS). MTS meets its requirements under 49 CFR Part 673 through participation in this MTS Agency Safety Plan (ASP). This MTS ASP applies to all MTS employees and services and Transit Contractor employees.

1.2.2 Scope

This MTS ASP meets all the requirements under 49 CFR part 673 and encompasses the equipment, facilities, plans, procedures, operations, and maintenance as they relate to

[1] FTA deferred the applicability of the PTASP requirements for small operators who only receive funds through FTA's Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities Program under 49 USC § 5310 and for Formula Grants for Rural Areas Program under 49 USC § 5311.

the MTS demand response and fixed-route bus systems and Vanpool. The MTS ASP is scaled to the size, scope, and complexity of MTS.

1.3 Plan Goals, Objectives, & Purpose

1.3.1 Goals

The overarching goal of this ASP is to enhance all aspects of safety within the agency's Transit Contractors by guiding effective and proactive management of safety risks in the system and prioritizing capital investments using performance-based planning.

1.3.2 Objectives

The overarching objective of this ASP is to establish processes and procedures to support the implementation of SMS that meets Federal Transit Administration (FTA)-mandated requirements under the PTASP Final Rule (49 CFR Part 673).

As outlined in the Safety Management Policy Statement, specific safety objectives of this ASP and its established SMS include the following:

- Integrate safety management into the primary responsibilities of all MTS employees and Transit Contractor employees;
- Support SMS through allocation of resources and promotion of a safety culture that facilitates safe practices and effective MTS employees and Transit Contractor employee safety reporting and communication;
- Define roles and responsibilities for all MTS employees and Transit Contractor employees that contribute to safety performance and SMS;
- Implement risk-based hazard management consistent with risk acceptance levels;
- Operate an MTS employee and Transit Contractor employee safety reporting program that ensures no action will be taken against any MTS employee and Transit Contractor 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 MTS employees and Transit Contractor 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.

1.3.3 Purpose

This ASP formalizes the SMS principles and strategies for demonstrating Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion through all MTS operation and maintenance activities. The ASP defines the process for identifying, evaluating, and resolving hazards associated with operations of a bus system involved in revenue service. This process helps achieve the highest practical level of operational safety for the riding public, MTS employees and Transit Contractor employees, and anyone encountering the MTS systems.

1.4 Plan Review & Update

The Chief Safety Officer (CSO) and Assistant Director of Operations will jointly review and update the ASP and the safety performance targets by June 1 of each year. The plan review will ensure that it remains current and consistent with FTA guidance and industry best practice. The MTS CSO will initiate this review and will include all relevant staff in this process. If any changes are made to the ASP, the CSO and Assistant Director of Operations will then present the updated ASP to the Accountable Executive for review and approval. The Accountable Executive will approve and then forward to the Council for approval by July 15th. Additionally, when a significant change occurs within the Council, MTS, and/or the Transit Contractors, MTS will update the ASP with applicable changes. Following any external ASP audit, for example by FTA, MTS will address any findings and recommendations and to improve the SMS program. If revised, MTS will re-issue the ASP to all ASP recipients, including the Council/MPO and the Transit Contractors. MTS is responsible for updating the ASP and coordinating with the Transit Contractors as needed.

Each year, upon completion of the annual ASP review and update process, each Transit Contractor Executive will distribute the MTS ASP, including their corresponding Transit Contractor Appendix, to all of their respective employees. Each Transit Contractor Executive will document how and when they distributed the updated ASP and will provide this documentation to the Metropolitan Council.

1.5 System Overview

The Council is the regional policy-making body, planning agency, and provider of essential services for the Twin Cities metropolitan region. The Council serves as the federally designated Metropolitan Planning Organization (MPO) for the area and delivers public transportation service to the area. Under the Council, MTS provides public transportation service using competitively procured contracts with private contractors. Table 1 describes the programs and services managed by MTS that are covered under this ASP.

Table 1. MTS Programs and Services Covered Under this ASP

Program*	No. of Contracts	2020 Op. Budget	MTS Staff	No. of Vehicles	2020 Ridership
Metro Mobility	4	$81.3M	21	632	1,414,660
Transit Link	5	$7.0M	2	83	113,804
Fixed-Route	5	$17.5M	3	110	1,058,928
Vanpool	1	$748K	1	35	57,908

Descriptions of each MTS program is provided below. Refer to the Transit Contractor Appendices for details on the current Transit Contractors providing these contracted services and therefore covered under this MTS ASP.

1.5.1 Metro Mobility

Metro Mobility provides public transportation in the Twin Cities metro area for certified riders who are unable to use regular fixed-route bus service due to a disability or health condition. Certification is based on criteria established by the federal Americans with Disabilities Act (ADA).

Metro Mobility is a door-through-door service. Operators ensure riders get from the entry door at their pickup location to inside the first entry door at their destination. Metro Mobility provides service that is complementary to public fixed-route service per ADA requirements and Specialized Transportation Services to a larger area of the region. Metro Mobility routes operate 365 days a year with similar availability to public fixed-route service.

The Metro Mobility service area is divided among three trip providers covering Metro West, Metro East, and Metro South. Riders are assigned a trip provider based on their home address. Multiple contracted service providers combine to provide Metro Mobility service. The fleet includes 583 accessible vehicles and 40 sedans.

1.5.2 Transit Link

Transit Link is shared ride demand response small bus service for the public. Service is available on weekdays throughout the seven-county metro region for trips not served by fixed-route bus and train service.

Transit Link provides curb-to-curb service, with limited assistance. Riders must reserve rides in advance, and reservations are subject to availability. Transit Link is different from Metro Mobility service in that it is available to the general public; riders are not subject to special eligibility requirements. Transit Link service is available from 6 a.m. to 7 p.m., Monday through Friday.

Transit Link service is intended to augment the fixed-route transit system in the seven-county metro area. The Transit Link fleet has 81 small buses, which can accommodate

about 8-10 riders at a time, as well as riders with wheelchairs and other mobility devices. Transit Link rides are shared rides, which means other passengers will be picked up and dropped off along the way.

1.5.3 Fixed-Route

The Council provides the majority of its fixed-route bus service through Metro Transit, which has its own ASP independent of this MTS ASP. However, MTS provides approximately 10 percent of the Council's fixed-route service. The fixed-route service contracted through MTS is for routes that generally have lower ridership. These routes use primarily 30-foot and smaller buses.

1.5.4 Vanpool

The Council's commuter vanpool program, Metro Vanpool, provides financial assistance for vanpools of five or more people, including a volunteer driver, commuting to and from work destinations throughout the region not well served by the regular-route transit network.

2 SAFETY MANAGEMENT POLICY

2.1 Safety Management Policy

The Council and the Transit Contractors covered by this ASP recognize management of safety as a core agency function and are dedicated to planning, designing, constructing, operating and maintaining transportation systems that optimize the safety of passengers, employees, consultants, contractors, emergency responders, and the public. This commitment is established in the Metropolitan Council Safety Management Policy Statement provided and signed by the Accountable Executive at the beginning of this ASP and is communicated to the Transit Contractors through each contractor's Transit Contractor Executive and SMS Manager. The safety management policy is communicated throughout MTS and from MTS to the Transit Contractors using the following channels:

- Within the signed and approved ASP provided to Transit Contractors
- During periodic performance review meetings with Transit Contractors
- Printed policy provided to Transit Contractors for display on bulletin boards and other visible areas on-site
- Briefing provided to Transit Contractors to communicate to all employees through safety meetings and other applicable verbal channels

2.2 Safety Accountability & Responsibilities

Under SMS, identified positions have specific safety responsibilities and authority. Table 2 identifies the SMS roles and responsibilities by task for MTS and the Transit Contractors. Refer to the attached appendices for additional detail on the roles and responsibilities for safety at each Transit Contractor.

2.2.1 All Employees

All MTS employees and Transit Contractor employees, including agency leadership, executive management, and key staff, are responsible for safety. Each MTS employee and Transit Contractor employee is required to work safely, correct unsafe behavior, identify and report safety hazards, and abstain from performing any task that the person feels could injure themselves or others.

Table 2. Safety Roles & Responsibilities Matrix

Roles & Responsibilities	**TBD** *MTS Director & Accountable Executive*	**Andrew Brody** *MTS Chief Safety Officer (CSO)*	**Gerri Sutton** *MTS Assistant Director Contracted Transit Services*	**Transit Contractors**
Safety Management Policy	A	P	S	S
Safety Resource Allocation	P	S	S	S
Safety Reporting & Follow-up		P	S	S
Safety Performance Targets & Measurement	A	P	S	S
ASP Review & Update	A	P	S	S
Hazard Identification & Mitigation		O		P
Safety Risk Management	A	P	S	S
Safety Assurance, Audits	A	P	S	S
Safety Assurance, Inspections		O		P
Accident Investigation		O		P
Safety Promotion, Communication		P	S	P
Safety Promotion, Training		O		P
SMS Implementation		P	S	S
Key: A = Approval. O = Oversight. P = Primary role. S = Secondary role/Support.				

2.2.2 Accountable Executive

Safety Management System Accountable Executive

TBD,
Director – MTS

The Accountable Executive is a single, identifiable person who has ultimate responsibility and accountability for implementing and maintaining the MTS's SMS and ASP. This is the same person responsible for carrying out the MTS's Transit Asset Management (TAM) Plan (TAM). The Accountable Executive has control or direction over the human and capital resources needed to develop and maintain both the ASP and TAM. The Accountable Executive is also responsible for ensuring action is taken, as necessary, to address substandard performance in the SMS. This individual is the primary decision-maker who is ultimately responsible for both safety and TAM.

2.2.3 Chief Safety Officer

The Chief Safety Officer (CSO) has the authority and responsibility for day-to-day implementation and operation of the MTS's SMS. The CSO must have adequate training to take responsibility for safety and must have a direct line of reporting to their Accountable Executive. MTS's CSO has a direct line of reporting to MTS's Accountable Executive for safety matters[2].

Safety Management System
Chief Safety Officer (CSO)

Andrew Brody
Manager Bus Systems Safety – MTS

2.2.4 Agency Leadership & Executive Management

Gerri Sutton, Assistant Director Contracted Transit Services, is responsible for oversight of all contracted transit services and will support the efforts and responsibilities of the Accountable Executive and CSO.

2.2.5 Key SMS Staff

In addition to the above MTS positions, each Transit Contractor has designated a Transit Contractor Executive as their safety-related point of contact with the MTS CSO, as well as an SMS Manager responsible for carrying out the day-to-day safety-related activities for the contracted services. Refer to the attached appendices for details on the safety roles and responsibilities at each Transit Contractor.

2.2.6 Safety Committees

By fourth quarter 2020, MTS will implement a safety committee that meets monthly to review safety data. Membership will include the MTS CSO, MTS project administrators and MTS managers. MTS's CSO will set and distribute the agenda for and facilitate these meetings. MTS will also coordinate with the Transit Contractors to review safety data on a quarterly basis, at minimum, and as needed. The purpose is to confirm that the Transit Contractors are collectively meeting safety objectives and goals, and to determine course corrections, additions or improvements to their SMS program.

MTS holds regular coordination meetings with each Transit Contractor that includes a standing safety agenda item. These coordination meetings are in addition to the quarterly (at minimum) safety data review meetings. The standing safety agenda item is used to discuss safety-related topics including but not limited to safety initiatives, hazards elevated through the safety risk management process, implementation of identified mitigations, safety audits, and employee-reported safety concerns. These meetings support SMS by informing and assuring MTS of safety issues affecting MTS and the Transit Contractor, and by addressing safety issues assigned by MTS executive management.
Additional safety coordination occurs at the Transit Contractor level. Some Transit Contractors have safety committees and others incorporate safety into their other

[2] For day-to-day, non-safety related matters, the MTS's CSO reports to the MTS Assistance Director.

committees and activities to ensure that the system is operated and maintained in a safe manner. Refer to the attached appendices for details on how each Transit Contractor incorporates safety into their committees and meetings.

2.3 Employee Safety Reporting

MTS supports the SMS through the allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication. In addition to the MTS employee safety reporting program, MTS requires each Transit Contractor to implement and maintain an employee safety reporting program that meets the following baseline components:

- Allows employees to report safety conditions to senior management
- Provides for anonymous reporting at the discretion of the employee
- Is accessible to all employees
- 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

The MTS employee safety reporting program uses a standard form and anonymous collection drop box. By fourth quarter 2020, MTS will also establish a written procedure for management and follow-up of employee safety reports and a policy for non-punitive reporting that states exceptions.

Additionally, MTS provides oversight to ensure each Transit Contractor manages an employee safety reporting program that meets these requirements. Refer to the attached appendices for details on each Transit Contractor's employee safety reporting program.

2.4 Integration with Public Safety and Emergency Management

MTS and the Transit Contractors receive support from the Metro Transit Police if a law enforcement presence is necessary. Additionally, local law enforcement provides support if needed.

MTS operates within the Council's regional framework and, therefore, MTS is part of and follows the Council's Emergency Action Plan for Robert Street Offices (December 2019). MTS also encourages the Transit Contractors to hold emergency drills for its employees to address fire and other types of emergencies. Lessons gathered from these drills are to be communicated to Transit Contractor employees and to MTS, and incorporated in training resources, as applicable.

2.5 Safety Performance Targets

MTS has established targets for its operations to be met by the Transit Contractors who operate the service. The targets represent a quantifiable, measurable safety performance or condition. MTS will regularly monitor the performance of their

contracted systems to ensure they are meeting the targets and improving safety outcomes. At least annually, when the reviewing and updating this ASP, MTS will evaluate whether changes to the safety performance targets are warranted. Safety performance targets are categorized by the following safety performance measures:

- Performance Measure: Fatalities – Total number of reportable[3] fatalities and rate per total unlinked passenger trips, by mode.
- Performance Measure: Injuries – Total number of reportable injuries and rate per total unlinked passenger trips, by mode.
- Performance Measure: Safety Events – Total number of reportable events[4] and rate per total vehicle miles, by mode.
- Performance Measure: System Reliability – Mean distance between failures, by mode.

Table 3 provides MTS's annual safety performance targets by mode.

When requested, MTS 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. MTS will coordinate, to the maximum extent practicable, with the State to support the selection of State transit safety performance targets.

Table 3. Safety Performance Targets by Mode (2021)

Performance Target for 2021	Mode		
	Fixed-Route	Demand Response	Vanpool
Est. Annual Vehicle Revenue Miles (VRM)	3,400,000	26,000,000	895,000
No. of Fatalities	0	0	0
Rate of Fatalities per 100K VRM	0	0	0
Number of Injuries	3	50	0
Rate of Injuries per 100K VRM	0.097	0.19	0
Number of Safety Events	50	45	0
Rate of Safety Events per 100K VRM	1.47	0.17	0
Total Major Mechanical Failures	130	450	0
Miles Between Major Mechanical Failures (System Reliability)	31,538	66,667	0

2.6 SMS Documentation & Records

MTS will maintain and require documentation related to the implementation of this ASP and its SMS. MTS also requires the Transit Contractors to provide and maintain SMS documentation and records. 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

[3] The thresholds for "reportable" fatalities, injuries, and events are defined in the National Transit Database Safety and Security Reporting Manual, available at https://www.transit.dot.gov/ntd/2019-ntd-safety-and-security-policy-manual.
[4] Event as defined in CFR Part 673.5. Refer to Table 1. Definitions of Terms Used in ASP.

federal entity. MTS will maintain these documents for a minimum of three years after they are created.

3 SAFETY RISK MANAGEMENT

This chapter provides detail on Safety Risk Management (SRM). SRM includes the activities that a public transportation agency undertakes to control the likelihood or severity of the potential consequence of hazards. MTS will utilize SRM for system wide hazards that are identified, contractors will utilize their own SRM process documented in the appendix or in a separate manual referenced in the appendix. Major SRM sub-components include Hazard Identification safety risk assessment and safety risk mitigation. Figure 1 below summarizes the six basic steps of SRM.

Figure 1. Safety Risk Management Process

1. Define the System or Asset
   - Define the physical and functional characteristics and understand and evaluate the people, procedures, facilities, equipment and environment
2. Identify Hazards
   - Identify hazards and incidents or undesired events
   - Determine the causes of hazards
3. Assess Hazards
   - Determine probability
   - Determine the severity without controls
   - Decide to accept risk or eliminate/control
4. Resolve or Mitigate the Hazards
   - Assume risk or
   - Implement corrective action
     - Eliminate
     - Control
5. Reassess Hazard
   - Assess mitigation or control for effectiveness
   - Apply additional mitigation or controls if risk is not within acceptable levels
6. Follow-up
   - Monitor for effectiveness
   - Monitor for unexpected hazards

3.1 Safety Hazard Identification

The first step in hazard identification is defining the systems and sub-systems subject to hazards, followed by identifying specific physical and procedural hazards related to the identified systems and subsystems. MTS identifies hazards as part of existing operations and maintenance activities, changes to the existing system or environment, capital projects, including vehicle procurement. A safety hazard is:

— Any real or potential condition that can cause personal injury or death or damage to or loss of equipment or property,

- A condition that may be a prerequisite to an accident, or
- Is a situation that has the potential to do harm.

Hazards are identified through a variety of sources, including those listed below. In addition, SMS enables every employee to identify hazards through Safety Promotion efforts and non-punitive hazard reporting, described further in Section 5.

- FTA's Hazard Analysis Guideline for Transit Projects (January 2000)
- FTA and other oversight agencies
- Changes to the system identified through management of change
- Accident/incident data and experience
- Accident/incident data from other bus systems with similar characteristics
- Hazard scenarios
- Applicable industry standards
- Field assessments and surveys
- Project-specific design data and drawings, reviews, testing, and start-up activities
- Incident Reporting Application
- Employee Safety Reporting System (ESRS)

The following tools and techniques may be used for hazard identification and analysis:

- Preliminary Hazard Analysis
- Operational Hazard Assessment
- Accident/Incident Analysis
- Job Hazard Analysis

3.1.1 Safety Risk Assessment

After identifying system-specific hazards, SRM assesses safety risk by first identifying the potential to do harm in the system and then analyzing options to mitigate the likelihood and severity of the consequence(s) to an acceptable level. The process seeks to identify and define as many hazardous conditions as possible, take existing mitigations into account during safety risk assessment activities and initiate the safety risk mitigation process before those conditions or associated activities cause an accident.

The methodology for analyzing safety risk has two elements: evaluating potential consequence(s) severity and evaluating potential consequence likelihood.

3.1.2 Hazard Consequence Severity

Hazard Consequences are rated in terms of their effect on transit customers, employees, the public, and the operating system. Hazard consequence severity is a subjective measure of the worst credible case consequence that results from design inadequacies, component failure or malfunction, human error, environmental conditions, or operating or maintenance practice, and procedure deficiencies. The

ratings are illustrated in Figure 2. The categorization of hazards is consistent with risk-based criteria for severity and reflects the principle that not all hazards pose an equal amount of risk.

Figure 2. Hazard Consequence Severity Definition

SEVERITY	CHARACTERISTICS			
	People	**Equipment/Services**	**Financial**	**Reputational**
Catastrophic	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	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)
Moderate	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
Minor	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
Insignificant	No injury	Minor damage to equipment no system interruption, no immediate repair necessary	Estimated loss from the incident is likely less than $1,000	No adverse media coverage or 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.*

3.1.3 Hazard Consequence Likelihood

The likelihood that a hazard will occur during the planned life expectancy of the system element, sub-system or component is described qualitatively, in potential occurrences per unit of time, events, population, items, or activity. A qualitative hazard consequence likelihood is derived from research, analysis, evaluation of safety data from the operating experience of the agency or historical safety data from similar bus systems, and from expert opinion. Figure 3 summarizes the hazard consequence likelihood categories.

Figure 3. Hazard Consequence Likelihood Categories

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 during 30 years

3.2 Safety Risk Assessment

Together, the consequence of the hazard's likelihood and severity measure a hazard's magnitude and priority for applying the control measures. Hazards are then examined, qualified, addressed, and resolved based on the severity of a potential outcome and the likelihood that such an outcome will occur. The value derived by considering a hazard's consequence likelihood and severity is the Safety Risk Rating. The resulting risk rating is a measure of the acceptability or undesirability of the potential consequences of a hazard and is applied to the Risk Assessment Index.

Assignment of a Safety Risk Matrix enables MTS and Transit Contractor management to properly understand the amount of risk involved by accepting the hazard relative to what it would cost (schedule, dollars, operations, etc.) to reduce the hazard consequences to an acceptable level.

Figure 4 identifies the Safety Risk Matrix, based upon hazard consequence severity and likelihood, and outlines the criteria for further action and decision authority based on each matrix category. The Safety Risk Matrix is used to assist the decision-making process in determining whether a safety risk should be eliminated, controlled, or accepted. This helps prioritize hazardous conditions and focus available resources on the most serious hazards requiring resolution while effectively managing available resources.

For example, if the potential for an accident/incident reveals a Category 1 (catastrophic) occurrence with a Level A (frequent) likelihood, the assessed level of risk is Unacceptable and the system safety effort is directed toward eliminating the hazard or

at the very least implementing redundant control measures. A Category 1 (catastrophic) or Category 2 (critical) safety risk may be tolerable if it can be demonstrated that its occurrence is highly improbable. This approach provides a basis for logical management decision-making that considers the hazard's severity and likelihood.

Figure 4. Safety Risk Matrix

Safety Risk Matrix					
Likelihood	**Severity**				
	1 Catastrophic	**2 Critical**	**3 Moderate**	**4 Minor**	**5 Insignificant**
(A) Frequent	**1A**	**2A**	**3A**	**4A**	**5A**
(B) Probable	**1B**	**2B**	**3B**	**4B**	**5B**
(C) Occasional	**1C**	**2C**	**3C**	**4C**	**5C**
(D) Remote	**1D**	**2D**	**3D**	**4D**	**5D**
(E) Improbable	**1E**	**2E**	**3E**	**4E**	**5E**

LEGEND

Unacceptable - Cannot be accepted as is, **must** be mitigated

Undesirable - Acceptable with Executive-level signoff

Acceptable w/ Review - Acceptable Operational-level signoff

Acceptable - Can be accepted as is

3.3 Safety Risk Mitigation

As safety risks are identified, whether through a formal risk assessment or informally such as through employee reporting mechanisms, hazards can be resolved by deciding to either assume the risk associated with the hazard or to eliminate or control the risk. Once a hazard is identified and the safety risk assessment indicates that a mitigation is required, the agency solicits input from stakeholders throughout the organization. When a mitigation strategy is finalized by the stakeholders it is presented to the Safety Committee at the next Safety Committee meeting to ensure transparency. Mitigation to bring a hazard to an acceptable level of risk is applied in the following order of precedence, listed from most effective at the top of the list to least effective mitigations at the bottom:

- Avoidance
- Elimination
- Substitution
- Engineering Controls
- Warnings

- Administrative Controls such as Operations and Maintenance Procedures
- Personal Protective Equipment and Guards

MTS will review the Transit Contractors' hazard identification and mitigation program. Once mitigations are agreed by MTS and the Transit Contractors for identified hazards, mitigations are tracked through the safety risk management program to ensure all concerns raised have been addressed, mitigated, and implemented. Hazard tracking may be done through reports, logs, worksheets and/or similar methods that allow for updating if changes occur that impact the findings of the safety analysis.

MTS audits and provides oversight to the Transit Contractors to confirm the Transit Contractors manage safety risk at an acceptable level to MTS. Refer to the attached appendices for details on how hazards are captured and tracked by the Transit Contractors.

4 SAFETY ASSURANCE

Safety assurance includes safety reviews, evaluations, audits, and inspections, as well as data tracking and analysis and investigations. Safety Assurance provides for the implementation and effectiveness of safety risk management and confirms that MTS meets or exceeds its safety objectives through the collection, analysis, and assessment of information. MTS will conduct an annual review of the effectiveness of its safety risk mitigations through its safety assurance efforts and safety verification efforts and report the results of the review to the Accountable Executive.

4.1 Safety Performance Monitoring & Measurement

SMS generates data and information that senior management need to evaluate whether implemented safety risk mitigations are appropriate and effective, and how well an agency's safety performance fits with their established safety objectives and safety performance targets. Safety performance monitoring will occur through routine monitoring of operations and maintenance activities in compliance with contractual requirements. It also includes risk monitoring to track implementation and success of mitigations and controls put in place to manage risk.

Prior to updating the ASP each year, MTS will implement an audit that evaluates compliance with this ASP, MTS Contracts and SMS. The program will:

- Monitor compliance and sufficiency of procedures for operations and maintenance
- Monitor operations to identify ineffective, inappropriate, or unimplemented safety risk mitigations
- Conduct investigations of safety events to identify causal factors
- Monitor information from safety reporting systems
- Document audit outcomes
- Collect and track safety data

Any findings from this audit will be reviewed by the MTS safety committee, and the committee will update this ASP document, as warranted, during the ASP annual update.

4.2 Management of Change

MTS will evaluate significant changes that occur within the agency or Transit Contractors for safety impacts by following these steps:

1. *Identifing proposed changes*: shall be completed within the MTS management team meetings
2. *Assessing proposed changes*: stakeholders assess the proposed changes to determine whether a proposed change may have an unintended impact.
3. *Evaluating a proposed change*: stakeholders will determine if the change may introduce a new hazard or have an impact on safety performance.

4 *Documenting porposed changes*: If the change has a safety impact, risk associated with the change will be evaluated, treated, and documented following the processes outlined in the ASP. If the change does not have a safety impact, no further steps will be taken.

These changes will be discussed as part of MTS's safety committee activities and may include, but are not limited to:

- New contractor providing service or substantive amendment to contract provisions
- New buses, equipment, and/or facilities
- New or changed routes
- Other changes that might have a safety impact

4.3 Continuous Improvement

MTS will evaluate their SMS program annually to identify areas of improvement. Evaluation of the SMS programs is necessary to ensure that they effectively and efficiently allow MTS to meet safety objectives and performance targets. When there is a safety deficiency identified during a safety performance assessment, changes to data collection to help better understand the problem will be made and carried out by the Accountable Executive. MTS will use the data and information gathered while conducting safety performance monitoring to address any identified weaknesses in organizational structures, processes, and resources in a timely manner.

4.4 Investigations

MTS contractors will investigate at a minimum all accident, incidents and occurrences as defined in this manual. MTS will provide oversight to all contractors to ensure investigations are being completed and identifying causal factors of each safety event. Causal factors shall include the following:

- Organizational factors (the elements of the management, policies, and procedures of the transit agency operating the transit vehicles that contributed to the safety event)
- Equipment and infrastructure factors (the failures in functioning of vehicles or other technological components of the transit system that contributed to a safety event) Environmental factors (the characteristics of the environment in which the people and vehicles were operating that contributed to the safety event)
- Outside factors (the larger context in which the transit agency is operating, where factors outside the control of the agency contributed to the safety event)
- Human factors (the errors, rule violations, and characteristics of the people involved that contributed to the safety event)

Investigation information shall be stored within the initial notification of the incident within the Incident Reporting Application.

4.5 Internal Safety Reporting

MTS has an employee safety reporting hot line and e-mail that is monitor by the MTS Safety Staff. Each report is documented within a tracking spreadsheet and investigated. After investigation the Manager of Safety report to stakeholders what has been reported and assess the risk to determine if the hazard within the report need to be ran through the SRM process. MTS Safety Department staff will contact the individual reporting if the reporter so desires however the reporter has the option to remain anonymous.

5 SAFETY PROMOTION

MTS uses Safety Promotion to communicate and disseminate safety information to strengthen the safety culture. Safety Promotion includes safety lessons learned, reporting systems, recommendations based on safety metrics, and safety training. The goal is to foster a positive safety culture where employees receive ongoing training and updates of safety progress; feel comfortable reporting safety issues or concerns; and understand why safety is important and how they impact safety.

5.1 Safety Communication & Culture

MTS provides safety messaging content for customers to the Transit Contractors. Transit Contractors are responsible for providing the safety messaging content to their customers through placards, message boards, reader boards, social media communication, etc.

MTS communicates performance goals, objectives and targets to the Transit Contractors. The Transit Contractors will communicate this information to their employees.

Transit Contractors are responsible for communicating operational or maintenance safety hazards and their mitigations to their employees. Additionally, the response to any hazard reported through the employee safety reporting program will be communicated to employees. The MTS CSO will communicate responses to hazards reported by MTS employees back to those employees. The Transit Contractor SMS Manager will communicate responses to hazards reported by Transit Contractor employees back to those employees.

MTS and the Transit Contractors will review lessons learned from incidents, accidents and reported hazards and provide feedback to their employees regarding findings. This communication is an important step in letting employees know that they are important to the organization.

5.2 Competencies & Training

MTS establishes and implements a safety training program for all MTS employees directly responsible for safety. The CSO will achieve the CSO training requirements set by FTA. The CSO will also establish and implement training at all levels of the organization to support SMS implementation. This training will be consistent with FTA requirements, and the CSO will monitor and document training competencies for all MTS employees. The annual safety refresher training course will be required of all MTS employees and course content will depend on the employee's level of responsibility. The CSO will coordinate with the Transit Contractor SMS Manager to provide oversight to Transit Contractor training competencies.

MTS provides training requirements to the Transit Contractors. Each Transit Contractor establishes, maintains and documents a training program to meet MTS's requirements and monitors and documents training competencies for all employees. Refer to the attached appendices for Transit Contractor training program information.

MTS requires the following minimum safety training program elements be met by all Transit Contractors. At least one mechanic at each Transit Contractor must have ASE certification for work on drivetrain items. All operators receive all the following required training prior to being placed in revenue service, in addition to the contractor-specific training requirements listed in the attached appendices:

- Training in all aspects of the MTS Contracted Operator Handbook
- Hazard identification and reporting, and position-specific SMS roles and responsibilities
- Training in Customer Service, Disability Awareness, and Conflict Resolution
- Training on all relevant contracted transit system policies and procedures
- Defensive driving techniques
- Use of Computer Aided Dispatch/Automatic Vehicle Location (CAD/AVL) system
- Use of the mobile data computers
- Appropriate use of voice communication system, whether provided by Council or contractor.
- Use of MTS-provided fare collection devices

5.3 Contractor Safety Program

MTS's Procurement Department will evaluate all contracts for safety impacts and include safety-related procurement language and specification requirements, as applicable. Any contractors to MTS will demonstrate job-appropriate training and competencies that meet or exceed the requirements of MTS. The MTS CSO, or designee, will audit contractor compliance with the training requirements on an annual basis. Existing contracts will be modified to address the requirements of this MTS ASP.

TRANSIT CONTRACTOR APPENDICES

A FIRST TRANSIT

Contracted Service Description

Under its contracts with MTS, First Transit provides fixed-route bus service and both Transit Link and Metro Mobility demand response bus service. As shown in the table below, two garages operate demand response exclusively (Roseville and Burnsville), two garages operate fixed-route exclusively (Minneapolis), and one garage operates both demand response and fixed-route (Blaine). MTS provides the vehicles, but First Transit maintains and holds the liability insurance on the vehicles.

Service Mode	Garage Location(s)
Metro Mobility (Demand Response)	St. Paul (1 Ridder Circle)
	Burnsville (3400 Highway 13 W)
Fixed-Route	Minneapolis (3400 Spring St NE)
	Minneapolis (3204 Como Ave SE)
	Blaine* (2180 108th Lane NE)

First Transit's fixed-routes run buses seven days each week. The number of buses that run each route vary by day. Fixed-route service uses a combination of 30-foot Gillig, 40-foot New Flyer and Gillig, and cutaway transit buses.

First Transit's demand response routes operate at the times designated for Metro Mobility and Transit Link. First Transit's Metro Mobility routes operate 365 days a year with similar availability to public fixed-route service. Transit Link operates from 6 a.m. to 7 p.m., Monday through Friday. The Metro Mobility service uses cutaway lift-equipped buses on Ford E450 Super Duty chassis and Ford Flex sport utility vehicles. Transit Link service uses cutaway lift-equipped buses on Ford E450 Super Duty chassis.

Safety Roles & Responsibilities

The positions below are responsible for safety at First Transit:

- Transit Contractor Executive: Paul Buharin, Region Vice President
- Transit Contractor SMS Manager: Tracy Hogan, Safety Manager

In addition, First Transit has a Safety Solutions Team at its local level that meets once per month to discuss safety priorities, safety issues, and hazard management, and to communicate safety-related information across all departments. Each location's Safety Manager participates in the Safety Solutions Team. First Transit Region Safety Managers also conduct regular internal reviews of local operations using a risk-based Location Safety Review.

First Transit also hosts routine Executive Safety Meetings in the following formats and posts minutes from each meeting at each location:

- First Group Executive Safety Committee
- First Group Safety Council
- First Group America Safety Council
- Performance Review Management
- Safety Advisory Committee

Employee Safety Reporting Program

First Transit provides employees an anonymous safety reporting channel through their *Transit Connect* application. Managers can see how many people at each location are using the application, but do not see personally-identifying information of the users. No identifying information is required to submit a report. Additionally, each location's Safety Manager maintains a secured mailbox for employee comments, which are reviewed daily, and operates and "open door policy" to encourage open communication between employees and management. First Transit also encourages employees to report through its Ethics Hotline via email, phone, or webpage submission.

First Transit employs a company-wide safety concept, "BeSafe" to further reduce collisions and injuries by increasing the communication between employees and managers about safety-related issues. BeSafe encourages employees of all levels to initiate reports of any near miss, route and security hazards, and any unsafe condition. When a BeSafe report is filed, First Transit investigates it and follows up with the reporting employee regarding the resolution of the report.

First Transit's corporate safety management policy establishes that First Transit will not retaliate against nor impose any other form of retribution on any employee because of his or her good faith reporting of a safety issues/concern, another person's suspected violation of company policies or guidelines, and any alleged violations of federal, state, or local laws. If the circumstances and the offense charged, in First Transit's judgement, present a potential risk to the safety and/or security of its customers, employees, premises and/or property, such events may result in disciplinary or other appropriate action to the extent permitted by applicable law.

Each First Transit employee is also issued a "Near Miss and Hazard Reporting" pad for documenting and reporting safety, route, and security concerns. Employees are encouraged to report any near miss incident and hazard. Employees are asked to be involved in reporting the event and determining lessons learned.

When an employee reports a hazard, it is given to the location's Safety Manger for review and follow up. The location's Safety Manager undertakes an investigation of the hazard in coordination with the applicable stakeholders for the reported hazard, such as the Operations Manager for operations issues or the Maintenance Manager for vehicle

maintenance issues. Once the investigation is completed, the location's Safety Manager works with the appropriate management person until which time the hazard is resolved.

When a near miss or safety/security hazard is reported that needs immediate attention, dispatch is notified immediately. If immediate attention is not required, the employee is encouraged to submit the information to management by the end of their workday. First Transit managers then initiate conversations with employees about their observations of both safety and unsafe behaviors.

An employee's contribution to the cause of an injury or collision is considered in disciplinary action, up to and including termination. If, after analysis, First Transit determines that the incident resulted from an overt decision, disciplinary action is indicated. If not, then appropriate counseling and/or retraining is indicated.

Results from the employee hazard reporting process are communicated back to employees via a variety of channels depending on the type of hazard and who is impacted: the *Transit Connect* application, printed flyers posted on the driver notice board, and/or direct communication with the people on the impacted route via the Ranger on-board computer and pick up drop off instructions.

Hazard Identification & Tracking

First Transit identifies hazards through multiple channels, including but not limited to:

- Near miss and hazard reporting
- Accident and incident investigations
- *Transit Connect* application submissions
- Direct reports to managers
- MTS audits
- Daily Safety & Health Walkthrough and Checklist
- Positive Check-in Procedures & Reasonable Suspicion
- Vehicle Maintenance Risk Assessment
- Pre-survey Job Hazard Analysis
- Facility Parking Risk Management Assessment
- On-board Video Technology

First Transit logs and tracks hazards using its Safety Toolbox, an online tool used by management to record the occurrence of safety-related events, review safety critical data, and track corrective actions as necessary. Each location Safety Manager captures, tracks, and stores identified hazards at their location as established by their location's specific protocols (e.g., in spreadsheets, file folders, etc.). As applicable, the Safety Toolbox online tool is updated to reflect outcomes of the hazard resolution process.

Safety Training Program

First Transit provides training that meets its contractual requirements with MTS. First Transit requires training in the following safety-related areas:

- Behind-the-wheel and classroom training for new operators
- Training on new technologies (e.g. new farebox system)
- How to conduct effective safety inspections
- Safety Awareness
- *Safe Work Methods* program, including proper use of PPE and injury avoidance
- Safe operation of ADA assistive devices for boarding
- Drug and Alcohol awareness; Distracted driving; Fatigue and Sleep Apnea awareness
- OSHA training for all maintenance personnel, including MSDS and PPE training
- Safety education related to observed accident/incident trends at mandatory monthly meetings

Safety-Related Agency Documents

First Transit maintains the following safety-related documents:

- First Transit Agency Safety Plan, September 2019
- First Transit Employee Handbook, February 2019
- First Transit Shop Safety Handbook, September 2018
- FTA Drug and Alcohol Policy, June 2019
- First Transit Safety Management System Standard Operating Procedures (SOP)
- FirstGroup Security Manual

B TRANSIT TEAM

Contracted Service Description

Under its contracts with MTS, Transit Team provides demand response bus service for Metro Mobility's Metro West and Metro South zones, along with providing Metro Mobility Agency service. As shown in the table below, Transit Team operates its Metro Mobility services out of three garages (Minneapolis, Maple Grove and Burnsville).

Service Mode	Garage Location(s)
Metro Mobility (Demand Response)	Minneapolis (1154 N Fifth Street)
	Maple Grove (10751 89th Ave N)
	Burnsville (14420 County Rd 5)
Transit Link (Demand Response)	Maple Grove (10751 89th Ave N)

Transit Team's Metro Mobility routes operate 365 days a year with similar availability to public fixed-route service. The service uses cutaway lift-equipped buses. Under the MTS contract, Transit Team has 467 operators, 9 administrative staff, 23 customer service representatives (reservation staff), 14 dispatchers, 20 mechanics, and 33 others operating out of the two garage facilities. Transit Team currently operates a total of 367 cutaway vehicles of various makes and models on behalf of MTS, which will increase to 445 vehicles in August 2020 to cover the Metro South contract that was awarded in February 2020.

Safety Roles & Responsibilities

The positions below are responsible for safety at Transit Team:

- Transit Contractor Executive: Michael Richter
- Transit Contractor SMS Manager: Dulce Palomares & John Kowalski

Employee Safety Reporting Program

Transit Team has a non-punitive reporting policy in which it will not take disciplinary action against any employee who discloses an incident or occurrence involving transit safety. The policy does not apply to information received by Transit Team from a source other than the employee, or which involves an illegal act or deliberate or willful disregard of regulations or procedures.

Transit Team currently accepts safety reports from employees, which can be filed anonymously, through the mailboxes of the Transit Contractor Executive and SMS Manager. Transit Team has implemented a standard employee safety reporting form and anonymous collection drop box separate from the existing mailbox drops.

The instructions for employees for this Transit Team Safety Reporting drop box are as follows:

> *Please use this box for the reporting of any safety concerns. The reporter can remain anonymous. However, please know that the reporting of any safety issues that are a direct violation of company policy, or any state or federal law, will not preclude the reporter from potential disciplinary action, up to and including termination of employment.*

When a report is made by an employee, a member of Transit Team's management team investigates the report. All incidents are tracked in a safety reporting spreadsheet that compiles information regarding the hazard and policy implementation to mitigate the hazard. New operational procedures are communicated to employees during monthly safety meetings and through memo distribution.

Hazard Identification & Tracking

Transit Team identifies hazards through multiple channels, including but not limited to:

- Near miss and hazard reporting
- Accident and incident investigations
- Direct reports to managers
- Transit Team audits
- MTS audits
- Feedback from observation and analysis of day-to-day operations
- Customer complaints
- Safety Assessment and System Reviews

Transit Team logs and tracks hazards using is Prioritized Safety Risk Log, which is used to organize identified safety risks. The log is updated frequently to demonstrate continual progress towards risk reduction through mitigation strategies. The log incudes a timeline for each logged risk to project and track completion dates. The log also identifies the priority level for safety risks, describes the risk, outlines planned mitigation strategies to address the risk, captures the outcome of the planned mitigations strategies, assigns the responsible staff, and logs the outcome of the prioritized safety risk.

Safety Training Program

Transit Team provides training that meets its contractual requirements with MTS. Transit Team operator training includes 24 hours of classroom training and nearly 200 hours of field training before operators perform revenue service. The training includes:

- All training requirements found in Minnesota Rules 8840.5640
- Behind-the-wheel and classroom training for new operators
- Defensive driving
- Special driving conditions and bad weather operations

- Passenger assistance and first aid
- Maltreatment awareness and abuse prevention
- Safety Management principles including risk management and safety culture
- How to conduct effective safety inspections, including pre- and post-trip
- Safe operation of ADA assistive devices
- Emergency response procedures
- OSHA training, including proper use of PPE and MSDS
- "Right-to-know" training
- Monthly safety education briefings
- Refresher training, as needed
- Map book training

In addition to operator training, Transit Team requires safety training for all staff, for management, and for the safety officer.

Safety-Related Agency Documents

Transit Team maintains the following safety-related documents:

- Employee Handbook, January 2018
- Transit Team, Inc. PTASP, December 2019
- Transit Team, Inc. New Hire Manual, January 2018
- Transit Team, Inc. Safety Manual, July 2014
- Transit Team, Inc. Public Transit Agency Safety Plan, December 2019
- Transit Team, Inc. FTA Drug and Alcohol Testing Policy, January 2020
- Transit Team, Inc. COVID-19 Pandemic Response Plan, February 2020
- Transit Team, Inc. Continuity of Operations Plan, January 2019
- Transit Team, Inc. operations and maintenance plans, manuals, and checklists

C Midwest Paratransit Services

Contracted Service Description

Under its contract with MTS, Midwest Paratransit Services (MPS) provides demand response bus service for Transit Link. As shown in the table below, MPS operates its Transit Link services out of three garages (Maple Grove, Inner Grove Heights, and Shakopee).

Service Mode	Garage Location(s)
Transit Link (Demand Response)	Maple Grove (11785 Justen Cir)
	Inner Grove Heights
	Shakopee (1615 Weston Court)

MPS's Transit Link service operates from 6 a.m. to 7 p.m., Monday through Friday. Under the MTS contract, MPS operates 46 cutaway vehicles that are mostly Ford 450 cutaways with some smaller vehicles out of Maple Grove garage.

Safety Roles and Responsibilities

The positions below are responsible for safety at MPS:

- Transit Contractor Executive: Matt Liveringhouse, CEO
- Transit Contractor SMS Manager: Jason Knoll, Training Manager

In addition, MPS holds monthly safety meetings with all available employees. Supervisors or the Training Manager reviews takeaways from the safety meetings with employees who could not attend the meetings (e.g., they were on shift driving) and confirm the employee's understanding.

Employee Safety Reporting Program

MPS employees can report safety concerns through a variety of channels including direct communication, incident reports, a pre-trip inspection program, a risk and hazard reporting form, and an anonymous collection drop box. The MPS "open door" policy encourages direct safety reporting to supervisors and dispatchers from which the supervisor goes through the appropriate channels to resolve (e.g., maintenance). The MPS incident report is a paper form that operators fill out and submit to their supervisor for documentation and resolution. Operators use a digital program (Fleetio) to log pre-trip inspections of vehicles that automatically notifies maintenance of a driver fails inspection.

The MPS risk and hazard reporting form is a digital form available to all employees through headquarter computers. The form provides fields for employees to log the date, reporter name, location, hazard severity rating, incident report (if applicable), and pictures (if applicable). Once submitted by the reporting employee, the risk and hazard reporting form information is automatically populated into a tracking sheet accessible to

the Transit Contractor Executive and SMS Manager for managing the reported hazards. The SMS Manager reviews submitted forms for completeness and fills in gaps (e.g., uploading incident reports).

MPS will also implement a standard employee safety reporting form and anonymous collection drop box no later than July 20, 2020. MPS will also establish a written procedure for management and follow-up of employee safety reports and a policy for non-punitive reporting that states exceptions not later than July 20, 2020.

MPS communicates reported hazards and associated resolutions back to its employees using direct communication between supervisors and employees, by posting notices on operator bulletin boards, by posting messages on the homepage of the MPS time clock program, and during monthly safety meetings.

Additional Integration with Public Safety and Emergency Management

Through their SSEPP, MPS coordinates with county and local law enforcement to manage incident response for incidents affecting transit operations. Additionally, MPS coordinates with local public safety agencies, local community emergency planning agencies, and local human services agencies to address security and emergency preparedness, including participation in formal meetings and committees.

Hazard Identification and Tracking

MPS identifies hazards through multiple channels, including but not limited to:

- Near miss and hazard reporting
- Accident and incident investigations
- Direct reports to managers
- Pre-trip inspections (submitted through Fleetio)
- MTS audits

MPS logs and tracks hazards through a management form and tracking sheet accessible to the Transit Contractor Executive and SMS Manager. The management form reviews employee-submitted risk and hazard reporting forms, and then facilitates assessing the risk of reported hazards and assigning recommendations and mitigations. The SMS Manager will involve supervisors in the implementation of identified mitigations, as applicable (e.g., Maintenance Manager for maintenance issues). The management form is also used to track implementation of identified mitigations and verify that mitigations are performing as intended.

Safety Training Program

MPS provides training that meetings its contractual requirements with MTS. MPS requires training in the following safety-related areas:

- Behind-the-wheel and classroom/computer training for new operators

- Passenger assistance and first aid
- How to conduct effective safety inspections, including pre- and post-trip
- Special driving conditions and bad weather operations
- Safe operation of ADA assistive devices
- Security and emergency preparedness
- Emergency response including passenger evacuation
- Drug and Alcohol awareness
- OSHA training, including Material Safety Data Sheets training

Safety-Related Agency Documents

MPS maintains the following safety-related documents:

- MPS System Safety Program Plan, January 2018
- MPS System Security and Emergency Preparedness Plan, January 2018
- MPS Employee Handbook, [undated]
- MPS Maintenance Program Plan, January 2018
- MPS Substance Abuse Policy, January 2018

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Contracted Service Description

Under its contract with MTS, Schmitty & Sons provided fixed-route bus service operated out of one garage (Lakeville) as shown in the table below.

Service Mode	Garage Location(s)
Fixed-Route	Burnsville (3100 Hwy 13 West)

Schmitty & Sons operates 20 30-foot Gillig buses over 5 fixed routes of service throughout the region from 3:30am until 1:30am Monday through Friday, and from 4:30am until 2:00am on Saturday and Sunday. Schmitty & Sons has 66 operators, two mechanics, and four dispatchers working under its MTS contract.

Safety Roles and Responsibilities

The positions below are responsible for safety at Schmitty & Sons:

- Transit Contractor Executive: Kathryn Forbord, Director of Sales, Marketing and Business Operations
- Terminal Contractor SMS Manager: Mike Sheady, Safety Manager
- Project Manager: Mike Huddleston

In addition, Schmitty & Sons holds monthly Safety Summit meetings attended by MTS that include analysis of accidents and incidents to identify trends. Schmitty & Sons also holds monthly employee safety meetings for operators and dispatch.

Employee Safety Reporting Program

Schmitty & Sons will implement a standard employee safety reporting form and anonymous collection drop box no later than July 20, 2020. Schmitty & Sons will also establish a written policy for non-punitive reporting that states exceptions not later than July 20,2020.

When an employee reports a hazard, management will verify the hazard and assign responsibility for the hazard to the Maintenance Supervisor, Safety Officer, or the Project Manager depending on the type of hazard reported. The identified person responsible for the hazard will put all information pertaining to the hazard, including the risk assessment and identified mitigations, into a spreadsheet/log and ensure it is assigned a completion date or follow up date. The identified person responsible for the hazard will also continually update the hazard log and track data for safety performance measurements.

Information on reported hazards and their resolutions, including applicable protocol for establishing resulting conduct policy or implementation, is communicated to everyone who has a stake in the reported hazard and its resolution, as applicable, such as

dispatch, maintenance, and/or human resources. This communication will be completed via in-house memo as well as through verbal instructions to inform operators as necessary. New hazards are reviewed at the monthly safety meetings with operators and dispatch and at the monthly Safety Summit meeting with managers and attended by MTS.

Hazard Identification and Tracking

Schmitty & Sons identifies hazards through multiple channels, including but not limited to:

- Near miss and hazard reporting
- Accident and incident investigations
- Direct reports to managers
- MTS audits

Schmitty & Sons has a Preventable Accident Analysis Program, which records and analyzes incidents and files an incident report, case notes, photos and videos, accident analysis, and police or state patrol reports where required. The program evaluates each accident involving a company vehicle to determine whether an accident was "preventable" or "unpreventable." Accidents are analyzed using the Accident Analysis form, which includes determination of preventability, fault, and final recommendations.

This analysis is reviewed at a monthly Safety Summit meeting. The accident is also evaluated for degree of negligence, based on a points system that is explained in the Employee Handbook. Points are assigned based on operator actions, casualties, property damage, and rate of recurrence.

Schmitty & Sons maintains a safety hazard tracking log summarizing all accidents and works with MTS to resolve hazards and open issues. The Schmitty & Sons Annual Report summarizes the safety data.

Safety Training Program

Schmitty & Sons provides training that meets its contractual requirements with MTS. Schmitty & Sons requires training in the following safety-related areas:

- Future pre-employment "work simulation" to test operator fitness and abilities
- Behind-the-wheel and classroom training for new operators
- ADA training
- "Employee Right-to-Know" standard, which requires Schmitty & Sons to provide training/information in safe use of hazardous chemicals (for employees exposed to such chemicals)
- CPR training
- Bus evacuation
- Safety education related to observed accident/incident trends

— Driver retraining, as needed

At the completion of operator training, a third-party tester signs off with approval.

Safety-Related Agency Documents

Schmitty & Sons maintains the following safety-related documents:

— Employee Handbook, July 2019
— FTA Drug and Alcohol Policy, October 2019