Metro Transit

BUS 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 regularly updated versions of the Bus SSPP absent any requirement to do so, because it is good business practice and promotes a safety-minded corporate culture. Our bus 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 Bus ASP has been developed to comply with 49 CFR 673. Aside from reformatting there are few additional items that were required for compliance. 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
Draft Revision 0	July 2019	Initial publication of the Bus ASP
Revision 1	April 2020	Sec. 2.1.1: Updated sources of hazard information; Sec 3.1, 3.3, & 3.9: Correct references to SSPP to read ASP
Revision 2	July 2021	Sec. 1.3: Updated system description. Sec. 1.5: Updated org. charts Sec. 2.1.2: Added language regarding Hazard Reports and specifying protections to employees who report hazards. Sec. 3.1: Added language regarding specific Safety Performance Targets. Sec. 4.2: Updated reference to current revision of Bus OEMP. Sec. 4.3: Added Powered Industrial Truck Program and Mobile Elevated Work Platform Plan. Sec. 4.7: Updated alternative fuels section.
Revision 3	July 2022	Updates throughout plan from the Bipartisan bill Added ASP Development, Approvals, & Certification sheet. Sec. 1.5: Update organizations charts. Sec. 1.7: SMS documentation & records added. Sec. 2.1: Updated hazard Severity, hazard likelihood, and hazard categories charts to reflect current information. Sec. 3.1: Modal performance targets updated. Sec. 4.6: Reference to Council Policy update to reflect current policy number.
Revision 4	December 2022	JLMSC Review
Revision 5	March 2023	Sec. 1.4.3 Transit Worker Assault definition added Sec. 1.5.1 Update to Safety Department Structure Sec. 1.5.1.1 Updated language in Director of Safety Responsibilities Sec. 1.5.3 Joint Labor Management Safety Committee responsibilities Sec. 1.6 updates to revision and control section to include JLMSC Sec. 2.1.2 addition of Transit Worker Assaults of Identified Hazards Sec. 2.1.3.3 added transit worker assaults to be included as a hazard

Revision	Revision Date	Comments
		Sec. 2.1.4 updated safety devices to include operator barriers to reduce transit worker assaults Sec. 3.1 transit worker emergency response times Sec. 3.2.4 Metro Transit evaluation Cleaning Standards Sec. 3.3.1 changed facility inspections to at a minimum quarterly from monthly Sec. 3.3.1 JLMSC access to facility inspection and hazard results Sec. 4.1.5 Addition of De-Escalation Training Sec. 4.3 updated AWAIR policy reference
Revision 6	February 2024	Sec. 1.1 Updated language to include JLMSC Sec. 1.3 Updated vehicle and employee numbers Sec. 1.4.13 Added definition of Safety. Sec. 1.5.1 Changed Director of Rail and Bus Safety to Director of Safety Sec. 1.5.1.3 Removed reference to Manager of Rail System Safety. Sec. 1.5.1.4 Removed Reference to Rail Safety Officers Sec. 1.5.2.2.1 Added language to include training on blind spots. Added language that employee are to report hazard to their supervisor or TCC and that managers are responsible for ensuring employees are trained on safety reporting requirements. Sec. 1.5.3 Updated JLMSC job responsibilities. Sec. 1.7 Updated to include JLMSC and references that documents will be stored electronically. Sec. 2.1.5 Added hazard risk mitigation follow-up with JLMSC. 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 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. Sec. 3.2.3 Added language policies should include training on accident/incident reporting. Sec 3.4 Changed TXBASE to Enterprise Asset Management System and all maintenance records shall be made available to the JLMSC upon request.

Revision	Revision Date	Comments
		Sec. 3.5 Changed Bus Operator's pocket guide to Training manual; Added defensive driving and Passenger Engagement. Sec. 3.9.3 Added that documentation shall be shared with the JLMSC. Sec. 3.9.4 Added that audit records shall be made available to the JLMSC. Sec. 4.1.1 Added New Employee Orientation Sec. 4.1.2 Added that training is a minimum of 5 weeks; added De-escalation, blind spots, and other training as referenced in the current Bus Operator Training Manual. Sec. 4.1.3 Updated that training is offered virtual, simulated, and hands on as referenced in the Metro Transit Bus Maintenance Course Catalog; added blind spots to training requirements. Sec 4.1.4 Added Practical application training shall be given as deemed appropriate by the JLMSC.; Updated list of employees that are required to complete BBP training. Sec 4.1.5 Updated references to de-escalation training. Sec. 4.2 Added references to battery electric/hybrid buses. Sec. 4.3 Added reference to infectious disease guidelines awareness. Sec 4.7 Updated hybrid bus numbers.
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
Entity that Drafted this Agency Safety Plan	Metro Transit Safety	

1. SAFETY MANAGEMENT POLICY

1.1. PURPOSE AND SCOPE OF THE BUS TRANSPORTATION AGENCY SAFETY PLAN

The purpose of the Bus Transportation Agency Safety Plan (ASP) is to provide Metro Transit with a comprehensive safety outline including reference to all current safety policies, procedures and activities that have been designed and implemented to maximize safe operation and ensure compliance with applicable regulations.

The ASP is a useful management tool that identifies both corporate and departmental safety procedures and provides clearly defined safety responsibilities at all levels within the agency.

The intent of the Plan is to promote a formal, system wide safety philosophy, and – culture – to document how system safety is integrated into Metro Transit activities.

This Plan has been developed in accordance with 49 CFR Part 673 the Public Transportation Agency Safety Plan regulation (PTASP). The plan has been approved for implementation under Metro Transit authority by the Joint Labor Management Safety Committee (JLMSC), Accountable Executive/General Manager, Chief Safety Officer and Metropolitan Council.

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 operations and maintenance, maintenance of equipment and physical plant, design, construction, procurement, abatement and disposal activities. The Metro Transit Light Rail Transportation ASP and Commuter Rail System Safety Program Plan are companion documents to this Bus Transportation ASP. The Bus Transportation ASP describes how system safety is incorporated into Metro Transit's bus operations.

1.2. GOALS AND OBJECTIVES FOR THE BUS SAFETY MANAGEMENT PROGRAM

1.2.1. Goals

Metro Transit's system safety goal is to provide passengers, employees and those who interact with the bus operation with the highest degree of safety that is practical. This goal involves the design, development, operation and maintenance of a bus transportation system with strategies and tactics to improve the safety performance of Metro Transit. This Bus Agency Safety Plan is directed towards achieving this goal within Metro Transit's mission.

1.2.2. Objectives

The objectives of the Bus Transportation ASP are listed below.

- Performance commensurate with the motor bus industry; directly operated NTD metrics in fatalities, injuries, incidents and reliability
- Identification and elimination or control of hazards to employees, to customers or to the public
- Conducting Safe and effective bus operations
- Providing a working environment which meets or exceeds industry occupational health and safety standards and practices as well as regulatory requirements
- Accomplishing effective emergency response by Metro Transit and public safety agencies
- Investigation of safety events, fires, injuries, and near misses to determine probable cause(s) and contributing factors of the safety event for the purpose of implementing corrective action to prevent recurrence

- Integration of safety and hazard control measures into all Metro Transit department and division activities
- Establishment and implementation of safety policy, procedures, and requirements, which integrate safety into Metro Transit processes, decision making and operations
- Assignment of responsibilities related to safety policies, procedures, and requirements.

1.3. SYSTEM DESCRIPTION/ORGANIZATIONAL STRUCTURE

Metro Transit provides transportation services to customers within the Twin Cities metropolitan area. Prior to the pandemic, Metro Transit operated 125 bus routes, including 38 urban-local routes, 71 express routes and 9 suburban local routes serving the seven-county area. With the onset of that pandemic, service was greatly curtailed and is being incrementally restored as the region recovers and moves out of this episode. As of September 19, 2024, Metro Transit's fleet included:

Vehicle Type	Total
40-Ft Diesel	418
40-Ft Diesel BRT	16
40-Ft HYBRID	67
60-Ft Diesel	146
60-Ft Diesel BRT	50
60-Ft Electric BRT	8
COACH	59
PHANTOM	1
Grand Total	**765**

All Metro Transit buses are equipped with wheelchair lifts or ramps and racks for bicycles. Metro Transit uses Ultra-Low Sulfur Biodiesel fuel. The percentage of biodiesel varies based on season and pricing.

Metro Transit has a total of approximately 3,000 employees, which includes approximately 1,200 bus operators. Buses are stored and maintained at five service garages. Major bus maintenance and repairs occur at the Overhaul Base. Additional facilities include the Transit Control Center, Operations Support Center, Minneapolis Light Rail Operations & Maintenance Facility, St. Paul Light Rail Operations & Maintenance Facility, Light Rail Support Facility, Commuter Rail Operations & Maintenance Facility, Transfer Road and the Metro Transit Police Headquarters. There are also 64 Park & Rides, 970 bus shelters, 24 Transit Centers and 2 Service Centers. The Metro Transit Executive staff organization is depicted in Figure 1.

1.4. DEFINITIONS

1.4.1. Accident means for purposes of Metro Transit Bus Operations an accident will include but not be limited to events arising out of the operations of the bus, such as vehicle collisions when contact is made with another vehicle, equipment (forklift, sweeper, or bay-cart), person, bike, gate arm, or other object, and customer bumps, trips and falls while boarding, on board or exiting the bus.

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 of 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.

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

1.4.12. *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.

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

1.4.14. *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.

1.4.15. *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.

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

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

1.4.18. *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.

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

1.4.20. *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.

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

1.4.22. *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.

1.4.23. *Responsible Accident* means that the employee or operator had a reasonable opportunity to avoid the accident but failed to do so.

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

1.4.25. *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.

1.4.26. *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.

1.4.27. *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.

1.4.28. *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 its employees in regard to safety.

1.4.29. *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.

1.4.30. *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.

1.4.31. *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.

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

1.4.33. *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.

1.4.34. *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.

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

1.4.36. *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.

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

1.4.38. *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.

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

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

1.4.41. *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.

1.4.42. *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.

1.4.43. *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.

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

1.4.45. *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.

The top levels of the Metro Transit organization, as shown in Figure 1, include the General Manager, Director of Capital Projects, Chief Operating Officer (COO), and directors 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 bus 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 bus system and report safety issues. They are expected to report safety hazards to their immediate supervisor or to the Transit Control Center.

Figure 1

Metro Transit Executive Division

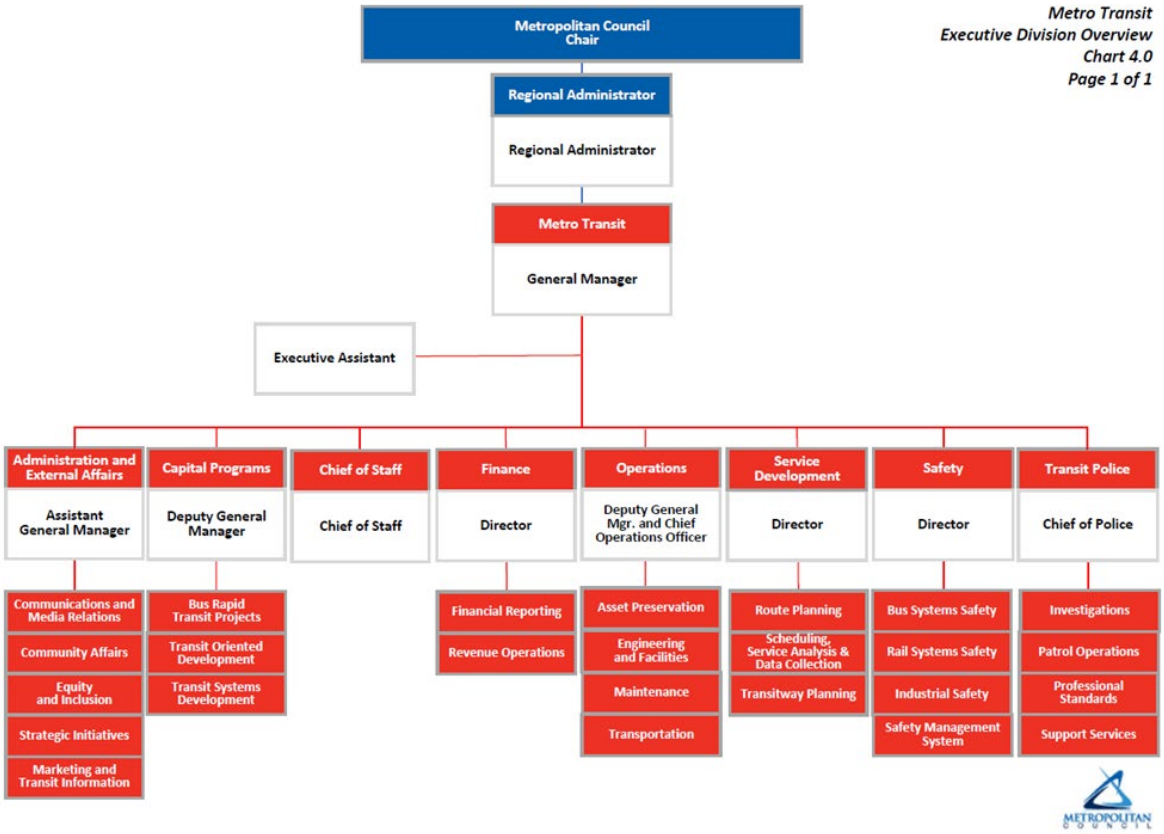
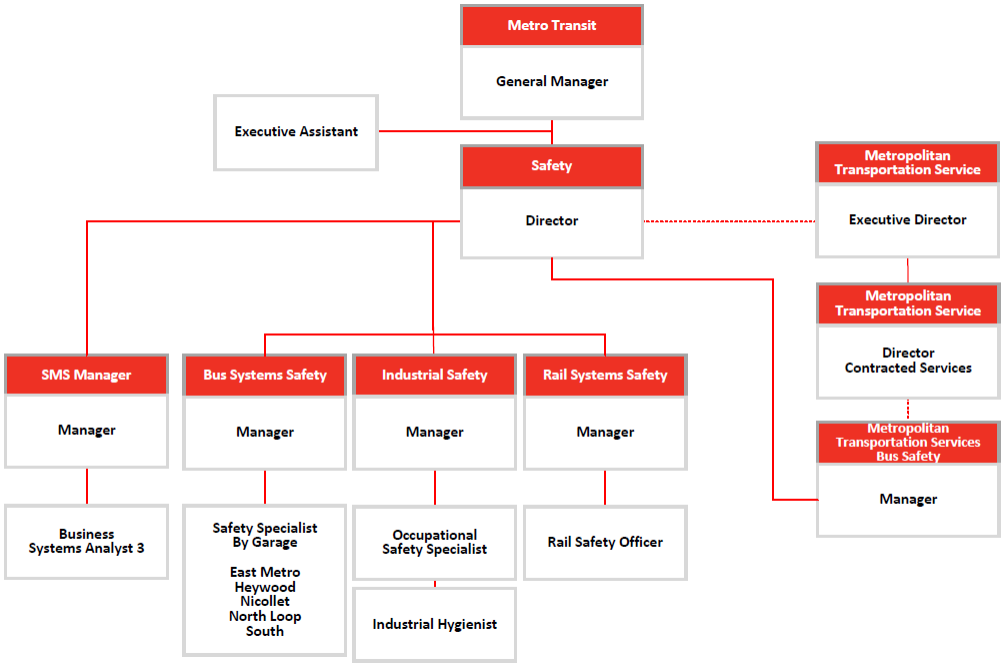


Figure 2

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 a Safety Department of 12 people, as shown on the organization chart in Figure 2. 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 regulatory 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 the Safety Department 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 related reports
- Oversight of the development, promulgating, reviewing, approving, training programs to reduce/eliminate preventable safety events and expand awareness of safety procedures to employees and the public
- Inspecting facilities, equipment and property for existing or potentially hazardous conditions and recommending corrective actions
- Analyzing, monitoring and updating policies, procedures and plans to promote a safe working environment
- Implementing the ASPs associated with each mode
- Integrating system safety considerations into bus and rail operations, new design, and construction
- Developing, monitoring and evaluating bus, commuter rail and light rail safety programs to include safety events/fire prevention and investigation, identification of occupational safety hazards and emergency preparedness
- Convening ad-hoc safety committees as appropriate
- Providing leadership to the safety staff.

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 envets 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 Systems 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 analytics and process needs

1.5.1.4. Manager of Bus System Safety

The Manager of Bus System Safety supervises the six Safety Specialists. Job responsibilities include:

- Developing, implementing and recommending safety programs to the Director of Safety to maximize public and passenger safety
- Remaining vigilant for novel approaches to promote safety
- Providing support of the industrial hygienist, the occupational safety specialist and safety specialists
- 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 existing system elements
- Coordinating safety department investigations of bus safety events
- Maintaining the Safety Risk Registry for bus mode
- Assisting with implementation of the safety certification program
- Providing regular safety reports to the Director of Safety concerning safety events, and occupational health and safety issues

- Managing and conducting safety audits, including garage QA assessments
- Researching and investigating other industry practices
- Managing and implementing safety awards and safety incentive programs
- Assisting in preparing communications for publications
- Coordinating implementation and updates of the Bus ASP.

1.5.1.5. 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 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.

1.5.1.6. 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 An Workplace Accident & Injury Reduction Committee (AWAIR) at the Transfer Road Facility
- Recording all work injuries on OSHA 300 logs and providing technical expertise on construction site safety

1.5.1.7. Bus Safety Specialist

Bus Safety Specialists are assigned to each Metro Transit operating garage and one is designated as the System Safety Specialist. The Safety Specialists report to the Manager of Bus Safety. Duties include:

- Identifying, prioritizing and following up on the resolution of safety hazards
- Observing drivers and mechanics and ensuring that they are following safety policies and procedures
- Evaluating new bus operators' performance and transferring bus operators' performance as appropriate
- Investigating bus and other company vehicle safety events objectively to determine causal and contributing factors, including responsibility
- Assisting managers and supervisors in investigating industrial safety events
- Conducting operator safety conferences
- Monitoring corrective action implementation and their effectiveness
- Requesting Ride and Trail Checks for operators to identify unsafe driving practices and procedures
- Reviewing bus operators' safety records with Transportation Managers
- Developing and conducting safety-training sessions for employees and the public
- Performing safety audits and inspections of facilities to ensure compliance with local, state and federal codes and regulations
- Recording all work injuries on OSHA 300 logs and assist supervisors with employee injury investigations
- Administering the bus safety awards programs
- Chairing the AWAIR Committee at their respective garages.

1.5.2. Other Metro Transit Divisions

All levels within the Metro Transit organization have defined roles and responsibilities for bus 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 (when required) 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.

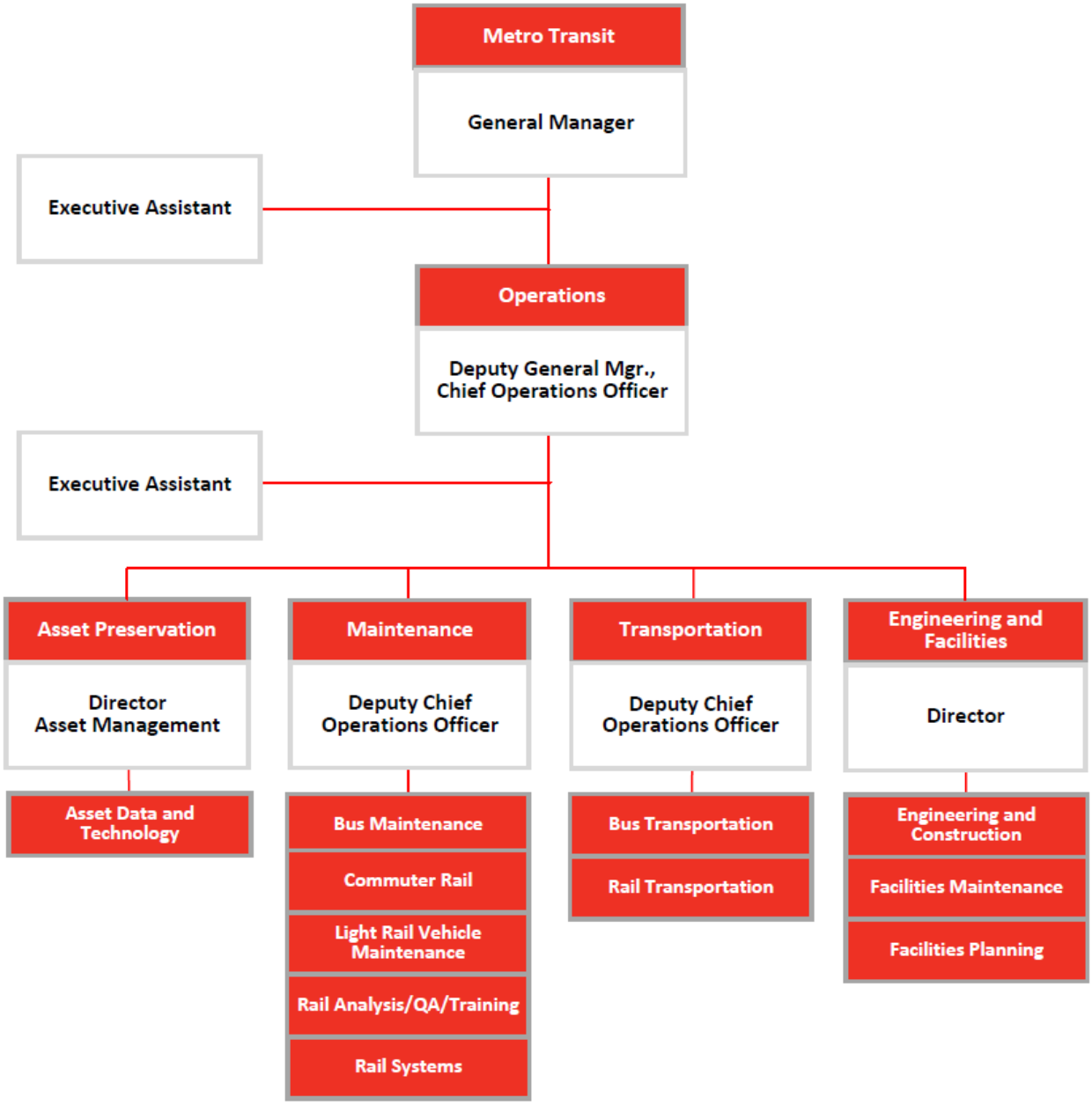
1.5.2.2.1. Bus Operations

The Bus Operations Division includes Bus Maintenance and Bus Transportation (Figure 3) 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 bus operators in safe bus operations
- Ensuring that employees have the training and equipment to perform their jobs safely
- Enforcing safety rules
- Conducting monthly 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 bus, safe standard operating procedures including blind spots, and ensuring that operating staff attend required OSHA training
- 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, buses and equipment
- Maintaining current operating rules and procedures and disseminating these to employees, as appropriate
- Incorporating bus operator safety considerations in the development of new bus specifications and bus schedules
- Establish and maintain a configuration management process.
- Investigating safety events and preparing and forwarding a report to the Safety Department.
- 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 Transit Control Center.
- Managers are responsible for ensuring training for all new and current employees on the safety reporting requirements.

Figure 3

Metropolitan Council Metro Transit Operations



1.5.2.3. Engineering & Construction and Facilities Maintenance Departments

These departments provide engineering and maintenance for Metro Transit support and public facilities, including bus garages, 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 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 bus operator safety issues in the development of bus schedules and routes
- 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 have provided analysis related to the causes of responsible bus 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 and security events. The Metro Transit Police department provides support and has procedures for responding to safety and security events and other emergencies.

1.5.2.10. Transit Rider Investment Program (TRIP)

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. BUS TRANSPORTATION ASP CONTROL AND UPDATE PROCEDURES

This section establishes the frequency and method for periodic review of the Bus 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 Bus ASP for Metro Transit. The Bus ASP will be reviewed and updated every year as appropriate to reflect changes in bus system, equipment, facilities or organization. Department heads will evaluate proposed changes and, if warranted, submit proposed changes to the Director of Safety. No proposed changes to the Bus ASP will be made unless approved by the Director of Safety. The Director of Safety, through the Manager of Bus 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, 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 Bus 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)	Review and approves changes

Metropolitan Council	Reviews and approves revised plan
Responsible Department	Implement ASP Revisions

The Director of Safety (often through the Manager of Bus System Safety) will notify appropriate Bus 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. The plan will then 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 Bus ASP is completed and approvals from 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.

2. SAFETY RISK MANAGEMENT

2.1. HAZARD IDENTIFICATION/RESOLUTION PROCESS

Hazard identification and resolution is one of the objectives of the Metro Transit Bus System 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 hazard report form.
- 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 Hazard Report Form 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.

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 Likelihood	CATEGORY (1) Catastrophic	CATEGORY (2) Critical	CATEGORY (3) Marginal	CATEGORY (4) 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 pull their bus over and open doors and windows and contact the Transportation Control Center (TCC).

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

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 Part 673 PTASP regulatory requirements, 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. 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.

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 be 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 Bus 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 process 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 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	91	
Major Event Rate	0.484	
Collisions		Working on this
Collision Rate	0.303	
Injuries	120	
Injury Rate	0.643	
Assaults on Transit Workers		Need 3 years worth of data
Rate of Assaults on Transit Workers		Need 3 years worth of data

3. SAFETY ASSURANCE

Safety Assurance involves processes within a transit agency's Safety Management System that function 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, 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 bus operations at the garage or facility level. The iDash System is used to track the individual safety performance of bus operators. Data collection in iDash includes the following:

- Employee on-duty vehicle safety events coded by type
- Employee on-duty citations
- Passenger safety events coded by type
- Employee responsible accidents
- Date of Safety Conferences
- Safety Keys Training
- Other corrective actions
- Discipline.

Metro Transit Safety prepares reports for OSHA and the NTD. The safety specialist at each garage is responsible for generating and updating the OSHA logs for that facility and the annual OSHA posting. At the Heywood Office, TCC, and Operations Support Center the Safety Manager is responsible for the OSHA data. The Industrial Hygienist is responsible for the OSHA reporting at the OHB, and the Occupational Safety Specialist is responsible for reporting at Transfer Road.

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. This leads to informed recommendations for safety event 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 per 100,000 vehicle miles
- Fatalities from the bus operation
- Injuries from the bus operation
- Safety Events from the Bus System operation
- System reliability (vehicle mean distance between failures)

The sole exception to that methodology was determining the target goal for fatalities by mode. While experience has unfortunately often been otherwise, we believe that stating any goal greater than zero deaths somehow sends an unacceptable message. 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)	91	
Major Event Rate per 100k VRM	0.484	
Collision per 100k VRM	0.303	
Pedestrian Collision Rate per 100k VRM	0.02	
Vehicular Collision Rate per 100k VRM	0.283	
Number of Fatalities	1	
Fatality Rate per 100k VRM	0.007	
Assault on Transit Worker Fatality Rate per 100k VRM	0	
Number of Injuries	120	
Injury Rate per 100k VRM	0.643	
Transit Worker Injury Rate per 100k VRM	0.048	
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	198	
Miles Between Major Mechanical Failures (System Reliability)	69,000	

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 role of Metro Transit's Joint Labor Management Safety Committee 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.

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 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 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 Metro Transit Vehicle Collision or Customer Fall Reporting and Investigation

Metro Transit equipment safety event reporting and investigation procedures are described in the following:

- Metro Transit Bus Operator's Rule Book and Guide
- Transit Control Center (TCC) policies and procedures
- District Supervisors operating policies and procedures
- Safety Department procedures for processing safety evnets
- A Workplace Accident and Injury Reduction (AWAIR) Program
- Metro Transit Police Policies and Procedures
- Maintenance Manager Online Tool and Bus Maintenance SOPs
- Risk Management Policies and Procedures.

For all departments, whenever a bus, Metro Transit non-revenue vehicle, equipment, or personal vehicle being used for work purposes (not transportation to and from work) is involved in an safety event the TCC must be notified as soon as possible. This is required whether the safety event took place on public or Metro Transit property. The exception is Metro Transit buses being operated by a mechanic in Metro Transit garage bays, maintenance facilities and yards.

Safety Event notification and response is included in Metro Transit's procedures in the TCC. All necessary emergency response agencies, Metro Transit management personnel and regulatory agencies are included in the notification process. A bus, vehicle, or equipment accident/incident report is prepared by the operator, reviewed by Safety, and forwarded to Risk Management, in accordance with established procedures.

In addition, the Safety Department, with data and support from Risk Management, conducts periodic reviews of bus safety events to determine common trends and 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 vehicle 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 safety 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.

3.2.3.2 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 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 and filed for use in developing a corrective action plan
- 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 Safety Specialist 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 Safety Specialist

3.2.4 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 of 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. Facilities are listed in Section 1.3 (System Description/Organization Structure) of this Bus ASP.

When appropriate, facilities inspections should include Hazard Identification and Resolution as described in section 2.

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, Bus 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 uses 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, a work order is made for Engineering and Facility Maintenance to correct. The work order is identified as an AWAIR need so that progress can be easily tracked. 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 buses
- 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. BUS MAINTENANCE AUDITS/INSPECTIONS

Metro Transit bus maintenance plans and procedures include preventive maintenance activities, as well as scheduled and unscheduled maintenance procedures. Bus maintenance inspection and repair activities occur at bus garages and the overhaul base.

This is accomplished by performing preventative maintenance inspections and running repairs based on those inspections. Bus preventive maintenance schedules are detailed in the Metro Transit Bus Maintenance Plan and include both mileage-based and time-based inspections.

Bus Maintenance records of all maintenance activities are documented in the automated Enterprise Asset Management System (EAMS). Upon request JLMSC shall have access to all maintenance records.

Metro Transit bus maintenance has an internal Quality Assurance program that audits the effectiveness of the inspection and maintenance plan. At each garage, the garage supervisors perform regular Quality Assurance on bus inspections, bus repairs, general cleaning and lift inspections.

3.5. RULES AND PROCEDURES REVIEW

Metro Transit is responsible for ensuring that operating Rules and Procedures are carefully developed, maintained and followed. Rules and Procedures are updated periodically as appropriate. Bus Operator Rules and Procedures use bulletins posted in each garage to notify them of all changes to practice, operating rules and regulations. To reinforce rules and operating procedures compliance, especially when an area of non-compliance is identified, bulletins may be re-issued.

Bus operations follow written Rules and Procedures. The Bus operator's Training Manual includes the following information:

- Definitions
- Equipment
- Normal Operations
- Special Operations
- Defensive Driving
- Passenger Engagement
- Emergencies
- Radio Codes.

3.6. SYSTEM MODIFICATION DESIGN REVIEW AND APPROVAL PROCESS

System modification refers to new bus specifications, new construction, remodeling of existing facilities, or changes in facility equipment or machinery. System modification is the result of any

change to the transportation system, 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 the modification may encompass.

The objectives of the System Modification Program are to:

- Assure, to the maximum extent practical, that necessary safety requirements are designed and incorporated into the transportation system, buses, equipment and facilities
- Conduct a systematic review or testing of each new element of the system, buses, equipment or facilities to assure conformance to the intended design or specification
- Document those safety tests or reviews in a format that clearly displays the successful completion of the project
- Identify when engineering or design has not eliminated a hazard so that the appropriate mitigation can be developed.

The System Modification Program is supported by the following elements:

- Identification of safety requirements utilizing safety criteria derived from industry experience, codes, standards and mandated regulations
- Verification of compliance with safety requirements throughout the life cycle of the project (concept, design, construction, operation, maintenance and disposal)
- Review of safety critical elements or components affected by additions, deletions, substitutions, rebuilding, deferring maintenance or extension of service life.

System modification is accomplished by the following types of hazard management:

- System Safety- elimination, minimization, or control of hazards that could result in damage or injury
- Fire/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 patrons and the general public 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.

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.

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.

3.9. INTERNAL SAFETY AUDITS

The Metro Transit Safety Department is responsible for the development and implementation of the Bus System Safety Audit Process that provides a proactive approach to ensure safe operations of the bus system. The Internal Bus Safety Audit Program Plan documents process by which the Metro Transit Bus Transportation ASP is audited. The audit plan will be revised to correspond with this Bus Transportation ASP.

3.9.1. Audit Responsibility

The Director of Safety is responsible for establishing and promoting the safety audit process within Metro Transit. The Manager of Bus Safety is responsible for carrying out the audits and generating audit reports. The schedule for items to be audited is published in the Internal Bus Safety Audit Program Plan.

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 Bus 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 Bus 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 will document all internal safety audits in writing. Reports will identify areas that need correction or improvement. Typically, the report will be addressed to the appropriate department manager, preferably the manager(s) involved in the audit and who would be responsible for implementing corrective action. The manager of safety will maintain a corrective action matrix. This matrix will serve as a tracking mechanism for open items until their completion. (This does not include items identified by an AWAIR committee inspection unless the issue is a system issue.)

Audit records will be kept by the manager of safety for review and for preparation of summary reports which shall be made available per request by JLMSC, executive management, and Metropolitan Council.

4. 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.

4.1.1. 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. New Employee Orientation sessions covers Employee Benefits, and Drug and Alcohol Awareness policy. Additional department-specific training follows as detailed in the following sections.

4.1.2. Bus Transportation Training

All new Metro Transit bus operators receive a minimum of seven weeks to include the following:

- Right-to-Know information on safety & hazardous materials (Safety Department)
- Bloodborne Pathogens Awareness Training (Safety Department)
- Drug & Alcohol Awareness - drug & alcohol policy, random testing, etc. for FTA safety sensitive & non-safety sensitive MT employees
- Various other training as referenced in the current Bus Operator Training Manual and Bus Operator Apprenticeship Program.
- De-escalation Training (all bus transportation front line workers)
- Blind Spots

Bus Transportation has developed a Professional Operator Development (POD) program that is presented annually to each bus operator. It includes information on new transit ways and other safe operating and organizational development needs. It also includes information on how to stay healthy and thrive as a Metro Transit Bus Operator.

4.1.3. Bus Maintenance Training

All new Bus Maintenance employees receive New Employee Maintenance Orientation, (NEMO) depending on the requirements of their position.

The Maintenance Training Department provides virtual, simulated, and hands on training as referenced in the Metro Transit Bus Maintenance (MTBM) Course Catalog.

Maintenance training records are organized by subject, including right-to-know, respirators, forklift, lock-out/tag-out, confined space, hearing protection, hazardous waste, personal protective equipment, blind spots and blood borne pathogens.

4.1.4. 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 every year.

Employees transferring into the Bus Maintenance Department and Facility Engineering receive additional RTK training. They also receive other training as needed for their new position.

Right-To-Know will be assessed every year for its effectiveness. Identified changes that have occurred over the year will be communicated through Right-To-Know. Practical application training shall be given as deemed appropriate by the JLMSC.

All new Bus Maintenance employees receive instructions on voluntary use of dust mask style respiratory protection. Employees that transfer to the Overhaul Base Body 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 voluntarily receive refresher training as deemed appropriate due to observations of work practices in the work environment.

- Individuals who handle bloodborne pathogens receive initial training and recurrent training annually. The list below are examples of employees who receive this training: Cleaners in Bus Maintenance
- Janitors
- Transportation Street Supervisors
- Transit Control Center Supervisors

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.

4.1.5. 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.

4.1.6. Additional Training

Aerosol use training is offered to employees on an 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 events. Modules include:

1. Psychological Trauma Education

2. Anti-bias Training

3. Conflict Management

4. Crisis De-escalation

4.2. EMERGENCY RESPONSE PLANNING, COORDINATION, TRAINING

Emergency response is documented in the Bus Emergency Operations Management Plan (Bus OEMP).

This plan establishes the response process and responsibilities for various Metro Transit departments, employees, and outside agencies in the event of a bus transit emergency or a community emergency to which Metro Transit will be requested to respond and for which public safety agency assistance is required. Key elements of the Metro Transit Bus Emergency Operations Management Plan are as follows:

- Ensuring that proper notification of emergencies is implemented throughout the agency
- Providing training programs for employees and emergency response agencies
- Commitment to the use of the National Incident Management System (NIMS) and training of appropriate staff
- Conducting emergency preparedness exercises. These exercises will include discussion- based (tabletop) and operations-based (field) exercises involving Metro Transit personnel and external agencies. A drill planning committee may be used.
- Participation in community and state emergency preparedness exercises as appropriate.
- Ensuring that necessary cooperative agreements are established.

Metro Transit may conduct an emergency preparedness exercise as a stand-alone modal exercise, in conjunction with other modes, or as part of a large multi-agency exercise. All drills are evaluated and critiqued for the benefit of Metro Transit and the emergency response agencies.

Each Metro Transit facility has an Employee Emergency Action Plan. 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. Each year, at each facility, an emergency drill such as a fire drill will be conducted. 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.

Emergency planning is coordinated between the Transit Control Center and outside emergency responders. Joint inspections between Metro Transit staff and emergency responders are

conducted on existing and new facilities to address concerns of the emergency responder. Metro Transit also provides battery electric/hybrid bus emergency response information to emergency responders in the Metro Area. This information is currently in the form of a power point presentation developed in cooperation with the EMS Education Department of North Memorial Medical Center, which provides emergency statewide emergency responder training and the Minnesota State Highway Patrol. The power point is also made available to any emergency responder in the Metropolitan area upon request. The Safety Department, along with the TCC and Engineering and Facility Maintenance assists in planning the coordination of emergencies through interaction with city Emergency Management services, and other related state and federal governmental agencies.

4.3. EMPLOYEE OCCUPATIONAL SAFETY PROGRAMS

The Safety Department is responsible for developing and implementing Employee Occupational 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
- A Workplace Accident and Injury Reduction Program with Committees.
    - 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
A Workplace Accident and Injury Reduction (AWAIR) Program • Safety Committees • Safety Hazard Reports • Inspections • Hazard Analysis	Available on Metnet: Metro Transit Safety Policy/Safety Department
Metropolitan Council Accident/Injury Prevention Program	Available on Metnet Metropolitan Council Administration Policies and Procedures HR 9-1a
Metropolitan Council Safety Committee Procedures	Available on Metnet Metropolitan Council Administration Policies and Procedures HR 9-1a

Program Title	Location
Hazard Communication/Right-To-Know Program	Available on Metnet: Metro Transit Safety Policy/Safety Department
Metropolitan Council Right-To-Know Policy • SDS management contract	Available on Metnet: Metropolitan Council Administration Policies and Procedures HR 9-1a
Respirator Protection Program • Medical Evaluations • Fit-Testing • Training	Available on Metnet: Safety Department and Maintenance Managers; Metro Transit Safety Policy/Safety Department
Bloodborne Pathogens Exposure Control Plan	Available on Metnet: Metro Transit Safety Policy/Safety Department
Hearing Conservation and Medical Monitoring • 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 • 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) • MOW (LRT Training) • Rail Support Facility • 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 events
- 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.

4.7. ALTERNATIVE FUELS AND SAFETY

Metro Transit currently has 67 hybrid diesel-electric buses in the fleet at the Nicollet, Heywood, and East Metro Garages, with 8 battery-electric buses in the fleet at Heywood Garage.

The following precautions for diesel-electric and all-electric buses include:

- All hybrid or ~~all~~ battery-electric buses are identified as such on the exterior of the bus so that those responding will know of the hazard
- Emergency Response information is provided by the manufacturer inside the rear engine compartment and behind the bus operator seat
- Emergency Response information is provided to all emergency responders in the areas with hybrid buses and ~~all~~ battery-electric buses.