

**RESOLUTION 2020-127**

**PASSED: DECEMBER 14, 2020**

**AUTHORIZING APPROVAL OF THE CITY OF DEKALB PUBLIC  
TRANSPORTATION AGENCY SAFETY PLAN AND ESTABLISHING SAFETY  
PERFORMANCE TARGETS FOR CITY OF DEKALB PUBLIC TRANSIT.**

**WHEREAS**, the City of DeKalb (the "City") is a home-rule municipal corporation with the power and authority conferred thereupon by virtue of the Illinois Constitution and Illinois Municipal Code; and

**WHEREAS**, in 2018, the Federal Transit Administration (the "FTA") published the Public Transportation Agency Safety Plan Rule (the "PTASP Rule") requiring each public transportation agency to develop a new safety plan and implement a Safety Management System ("SMS"); and

**WHEREAS**, the PTASP Rule is designed to change the safety culture of a transportation agency; and

**WHEREAS**, the City's PTASP was developed in partnership with the Illinois Department of Transportation and their designated consultant, RLS and Associates, incorporating data based upon past safety performance;

**NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF DEKALB, ILLINOIS:**

**SECTION 1:** That the City's Corporate Authorities hereby approve the PTASP, a copy of which is attached hereto and incorporated herein as Exhibit A, and authorize and direct the City Manager or his designee to execute the PTASP and take such further action as may be necessary to effectuate the PTASP.

**SECTION 2:** That the City Clerk or Executive Assistant of the City of DeKalb, Illinois be authorized and directed to attest the Mayor's Signature to this Resolution.

**PASSED BY THE CITY COUNCIL** of the City of DeKalb, Illinois at a Regular meeting thereof held on the 14<sup>th</sup> day of December 2020 and approved by me as Mayor on the same day. Passed by a 7-0-1 roll call vote. Aye: Morris, Finucane (Remote), Smith, Perkins, McAdams, Verbic, Mayor Smith. Nay: None. Absent: Faivre.

**ATTEST:**

  
RUTH A. SCOTT, Executive Assistant

  
JERRY SMITH, Mayor



# Public Transportation Agency Safety Plan



City of DeKalb

September 2020

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## Section 1. Transit Agency Information

### General Information

City of DeKalb

Accountable Executive: Marcus Cox

1216 Market St.

DeKalb, IL 60115

Phone: 815-748-2370

**Modes of Service:** Fixed-Route Bus, Demand Response, Deviated Fixed-Route

**Federal Transit Administration (FTA) Funding Sources:** FTA Section 5307

**Modes of Service Directly Provided:** None

The City of DeKalb does not directly provide transit services, but rather contracts with Transdev Services Inc. for all transit operations and maintenance throughout the DeKalb Urbanized Area including access to Sycamore and Cortland. Transdev Services Inc. is under contract for fixed-route service, complementary paratransit service, deviated fixed route service, and maintenance.

Sub-contractor safety representative:

Transdev: Melissa Ohrwall, General Manager and Safety Officer

The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.

## Section 2. Plan Development, Approval, and Updates

<b>Name of Entity That Drafted This Plan</b>	RLS & Associates, Inc. for the Illinois Department of Transportation (IDOT) in cooperation with the City of DeKalb		
<b>Signature by the Accountable Executive</b>	<b>Signature of Accountable Executive</b>	<b>Date of Signature</b>	
<b>Approval by the Board of Directors or an Equivalent Authority</b>	<b>Name of Individual/Entity That Approved This Plan</b>	<b>Date of Approval</b>	
	<b>Relevant Documentation (title and location)</b>		
<b>Certification of Compliance</b>	<b>Name of Individual/Entity That Certified This Plan</b>	<b>Date of Certification</b>	
	<b>Relevant Documentation (title and location)</b>		
<b>Version Number and Updates</b> <i>Record the complete history of successive versions of this plan.</i>			
<b>Version Number</b>	<b>Section/Pages Affected</b>	<b>Reason for Change</b>	<b>Date Issued</b>
1	All	Agency Safety Plan Version 1	
<b>Annual Review and Update of the Public Transportation Agency Safety Plan</b> <i>Describe the process and timeline for conducting an annual review of and update of the Public Transportation Agency Safety Plan.</i>			
<p>The City of DeKalb provides no direct services. All management and operations services for public transit are contracted. The City provides oversight and contract management and meets a minimum of once a month with the contractor to review their Safety Management Systems, compliance, and contractual obligations.</p> <p>The City's Public Transportation Agency Safety Plan, also referred to as Agency Safety Plan, will be jointly reviewed and updated by the City's Accountable Executive, and contracted Chief Safety Officer in July of each year. The</p>			

Accountable Executive will review and approve any changes, sign the revised Agency Safety Plan, and forward it to the DeKalb City Council for final review and approval.

Along with annual updates, the City may update the plan if:

- It determines that its approach to mitigating safety deficiencies is ineffective;
- It makes significant changes to existing service delivery;
- It introduces new processes or procedures that may impact safety;
- It changes or re-prioritizes resources available to support Safety Management Systems and the Public Transportation Agency Safety Plan;
- Changes are made to facilities, equipment, or rolling stock with a potential to impact safety;
- There is a change in contractors; and/or
- There are significant changes to the City's organizational structure

## Section 3. Safety Performance Targets

### Safety Performance Targets

*Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.*

*The following targets were developed based on the past transit safety data collected by the City of DeKalb, IL.*

Mode of Transit Service	Fatalities	Injuries	Safety Events	System Reliability
Fixed-Route Bus	0	1	1	1.65 per 100K VRM
Demand Response	0	3	1	0.25 per 100K VRM

### Safety Performance Target Coordination

*Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.*

Once targets are developed as part of the Plan update in July of each year, the City of DeKalb will share and discuss those targets and amendments with the DeKalb Sycamore Area Transportation Study (MPO) and submit to IDOT at the requested time.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Illinois Department of Transportation	
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	DeKalb Sycamore Area Transportation Study (DSATS)	



## Section 4. Safety Management Policy

### Safety Management Policy Statement

The City of DeKalb strives to provide safe, reliable, comfortable, and innovative transportation options to every member of the community. The Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all City transit system operations. By using the procedures contained in the PTASP, the City can continue to improve the safety and security of its transit contracting services.

This PTASP describes the policies, procedures, and requirements to be followed by City management, to ensure a safe environment for contracted transit employees, riders, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

The City and its contractor have a responsibility under the PTASP. The Accountable Executive will provide the continuing support necessary to achieve the PTASP objectives. A key to the success of this effort is for contracted employees to be aware that they are accountable for safely performing the requirements of their contract. The success of the program also depends on all contracted employees actively identifying potential hazards and making a commitment to the safety of others.

The City and its contractor must be aware that decisions and actions often affect the safety of those in other operations. By following the processes described in the PTASP, the City will continue to monitor performance and the safety of the system while creating a culture of safety.

The City's commitment is to:

- **Support** the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- **Integrate** the management of safety among the primary responsibilities of all contract managers and employees;
- **Clearly define** for all contractor staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of the City's safety management system;
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities--including an employee safety reporting program as a fundamental source for safety concerns and hazard identification--to eliminate or mitigate the safety risks of the consequences of hazards resulting from City contracted operations or activities to a point which is consistent with an acceptable level of safety performance;
- **Ensure** that the contractor will take no action against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure

indicates beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;

- **Comply** with, and wherever possible exceed, legislative and regulatory requirements and standards;
- **Ensure** that sufficient skilled and trained human resources are available to implement safety management processes;
- **Ensure** that contract staff provides adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;
- **Establish and measure** safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** safety performance through contract management processes that ensure that appropriate safety management action is taken and is effective; and
- **Ensure** that externally supplied systems and services that support operations are delivered, meeting established safety performance standards.

The City's Goals for Safety are established as follows:

- In collaboration with the contracted service providers, design, construct, test, and operate a transportation system that achieves the optimum level of safety performance of other transit systems of a similar size in the United States.
- Identify, evaluate, then eliminate or control hazards to contracted employees, customers, and the public.
- Ensure contractor meets or exceeds all government and industry occupational health and safety standards and practices.

The objectives of the PTASP are the means of achieving its goals. They also provide a method of evaluating the effectiveness of the City's safety efforts. The PTASP objectives for the contractor are:

- Integrate safety management and hazard control practices within the contracted service provider's operation.
- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.
- Verify compliance with the contractor's safety policies, procedures, and requirements through performance evaluations, accident and incident trends, and contract oversight.
- Investigate all accidents and incidents, including identifying and documenting the causes to aid in the implementation of preventive corrective actions.

- Increase investigation and systematic documentation of near-misses.
- Identify, analyze, and resolve safety hazards in a timely manner.
- Minimize system modifications during the operational phase by establishing and utilizing safety controls at system design and procurement phases.
- Ensure that system modifications do not create new hazards.
- Train employees and supervisors on the safety components of their job functions.

The City takes these commitments seriously as the lives of City riders, contracted employees, and the general public depend on the City's ability to oversee the contractor's culture of safety.

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Accountable Executive

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Date

### Safety Management Policy Communication

The City realizes the importance of ensuring that its employees and riders are aware of safety management policies and procedures to effectively manage the system's day-to-day operations. To do this, the City relies on several forms of effective communication by the contractor to their employees and passengers.

**Contracted Employees:** The City is constantly evaluating the existing contractor's policies and procedures to verify their effectiveness. To do this, it seeks input from all stakeholders, including other City departments, to determine if change is necessary based on trends, data analysis, operational changes, or new assets. Several methods are used to communicate policy and/or procedure changes, including:

- ◆ Formal notice to contractor
- ◆ Informal communication to contractor
- ◆ Contract amendments
- ◆ The contract

The City expects its contractor to incorporate a training element for safety management policies impacting safety or service delivery to be conducted before the policy effective date (e.g. an orientation or onboarding process). New policies and procedures are to be incorporated into the orientation training for new employees as they arise.

Depending on the importance of the policy or procedure change, an acknowledgment signature is required of each employee verifying their understanding of the change.

The fixed route service contract is five years with two one-year options. The complimentary paratransit/deviated fixed route service contract is three years with two one-year options. Both contracts will expire on December 31, 2023.

**Riders:** If a rider policy is changed or added, the City and contractor notify riders through the following methods:

- ◆ Posted notices on vehicles and facilities, which include effective dates and who to contact for more information.
- ◆ Updates to digital rider guidance, including schedules and route guides, as appropriate.
- ◆ Public Meetings.
- ◆ Social Media.
- ◆ Outreach, including Title VI, as required by Federal Guidance for any services impacted by policy changes.

### Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this PTASP falls to the Accountable Executive (AE). The contract manager for Transdev, as well as employees fulfilling their commitment to safety on a day-to-day basis, support the AE.

**Accountable Executive (AE):** The AE will determine, based on feedback from the contractor, the level of Safety Management System (SMS) principals to maintain to ensure a safe work environment, rider experience, and community safety. The City's AE is committed to securing contract(s) that include the tools and training needed to provide successful and safe service for the City.

The AE, Marcus Cox, and his staff will provide contract oversight and monitoring to include accountability for all aspects of safety. The AE is responsible for developing the RFP process for contracted service and will include language relating to the responsibility of the contractor to manage and operate service using SMS principals. Though contractors are not required under 49 CFR Part 673 to develop their own PTASP, they are required to follow SMS methods of managing risk to include a compliant Employee Safety Reporting Program.

**Chief Safety Officer (CSO):** CSO's from both fixed-route and demand response contracted service are responsible for ensuring that safety elements in the following areas are properly managed with the intent of creating a culture of safety. Selected contract CSO's will participate in training relative to their role in implementing SMS per requirements in 49 CFR Part 673 and will be responsible for implementing, the following SMS tasks.

- Implementing an Employee Safety Reporting Program
- Establishing Safety Performance Targets and Measures
- Raising awareness of Safety Risk Management, including:
  - Safety Hazard Identification
  - Safety Risk Assessment
  - Safety Risk Mitigation
- Assuring Safety via a Safety Performance Monitoring and Measurement protocol
- Promoting Safety through the following methods and key staff:
  - Competencies and Training
  - Safety Communication
  - Assigning an Accountable Executive
  - Customer Service and Compliance Manager
  - Training the Contractor General Manager
  - Contractor Operations Manager
  - Contractor Facility and Vehicle Maintenance Manager
  - Contractor Safety and Training Manager
  - Contractor Paratransit Operations Manager
  - Contractor Human Resource Generalist
- Maintaining Safety Management Systems documentation
- Promoting hazard identification and safety risk assessments
- Monitoring safety risk mitigation activities
- Implementing monthly safety performance reports to the AE

- Promoting and document Safety Committee meetings
- Developing and implementing Safety Management Systems training
- Conducting safety analysis to identify trends
- Initiate root cause analysis through investigation of safety events

The following key contracted staff positions will support the City's PTASP and implement SMS principles in their respective roles within the organization.

#### Contractor Facility and Vehicle Maintenance Manager

- Monitors total maintenance (labor and parts) cost per system
- Prepares and submits a monthly report regarding road calls including major breakdowns
- Prepares and submits a monthly report regarding the cost of in-house repairs (both labor and parts) per mode of transit service
- Prepares and submits a monthly report of facility inspections and repair completed
- Participates in root cause occurrence investigations

#### Contractor Operations Manager

- Ensures that the trainers of operators and maintenance personnel conduct and document evaluations for operators and maintenance personnel
- Reviews quarterly data provide by the Chief Safety Officer and trainers and use that information to modify existing training or create new training
- Participates in root cause occurrence investigations
- Communicates with Chief Safety Officer on Safety Management System elements like Hazard Identification, Hazard Assessment, Hazard Mitigation, and Follow-up of mitigation strategies.

#### Contractor Safety and Training Manager

- Works with all departments to ensure local, State, and Federal regulations are being followed
- Reviews inspections and evaluations conducted by outside agencies
- Ensures data collection and reporting methods are consistent with the City's contract
- Identifies training programs needing modifications based on trends, regulation changes, or Best Practices found through communications with local, State, and Federal subject matter experts
- Ensures that employees are performing to the training standards
- Ensures that all trained employees are trained to proficiency
- Tracks, documents and maintains all safety information

- Ensure all employees are current on training certifications, refresher training programs, and new policy training
- Coordinates with Operations and Maintenance Departments on training needs
- Initiates, maintains and modifies Safety Management System principles as needed to ensure the Agency Safety Plan (ASP) is being followed by all contracted employees
- Participates in monthly safety committee meetings and convene the committee if a safety event occurs and immediate mitigation strategies are necessary

#### Contractor Paratransit Manager

- Ensures paratransit operators are meeting the City's training standards for working with persons with cognitive and physical disabilities
- Oversees service following Americans With Disabilities (ADA) Act requirements under Federal Transit Administration's 49 CFR part 27, 37 and 38
- Conducts outreach when necessary to caregivers or human service agencies to provide appropriate transportation services for individuals having difficulty using the paratransit transportation services
- Identifies areas of training needing modifications based on incident trends, new regulations, or feedback from employees

#### Contractor General Manager

- Provides oversight and management of all City of DeKalb contracted services
- Communicates with the AE regularly to update on services provided
- Works with management staff to address identified safety risks or hazards
- Oversees safety mitigation strategies
- Ensures a high level of system safety in all departments
- Conducts weekly management meetings to discuss safety and performance of contracted services
- Ensures that DeKalb Transit data is protected from cyber-crime and viruses
- Maintains software with required updates
- Communicates with technology vendors if problems occur
- Assists personnel with technology issues or questions

#### Human Resources Generalist

- Works closely with administrative personnel to identify safety and customer service issues needing immediate action
- Reviews safety data entering through Customer Service feedback opportunities like social media, direct contact, phone comments, and surveys

- Designs surveys to identify the passenger's experience
- Ensures that all aspects of the contracted services are following the clearly defined contract with the City
- Provides monthly reports to the City on customer service data

### Employee Safety Reporting Program

As part of the contracting process that began in July of 2020, the City will require the contracted service provider to include an Employee Safety Reporting Program (ESRP) as part of their responsible bid package. The ESRP will include the importance of safety and hazard reporting, elements covering retaliation assurances for reporting safety risks, and penalties for false reporting.

The City, in addition to its internal Employee Safety Reporting Program, will require the contractor to develop an Employee Safety Reporting Program that applies to staff associated with DeKalb Public Transit Service. As part of its oversight the City will require monthly reporting on the required performance and safety data.

All hazards reported through the Employee Safety Reporting Program will go straight to the Chief Safety Officer for review, assessment, investigation, mitigation, and follow-up. If the hazard directly impacts the working relationship between two or more employees, the Chief Safety Officer will ensure that no retaliation or hostile work environment results from the reporting. The City and its contractor will ensure that no action will be taken against any employee who discloses a safety concern through the respective Employee Safety Reporting Program unless that employee engaged in the following:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or
- Deliberate or willful disregard for regulations or procedures, such as reporting to work under the influence of controlled substances.

The contractor's Employee Safety Reporting Program encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- Report conditions anonymously via locked comment box in the driver area.
- Report conditions directly to any supervisor, manager, or director.

Examples of information typically reported include:

- Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles).
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection).

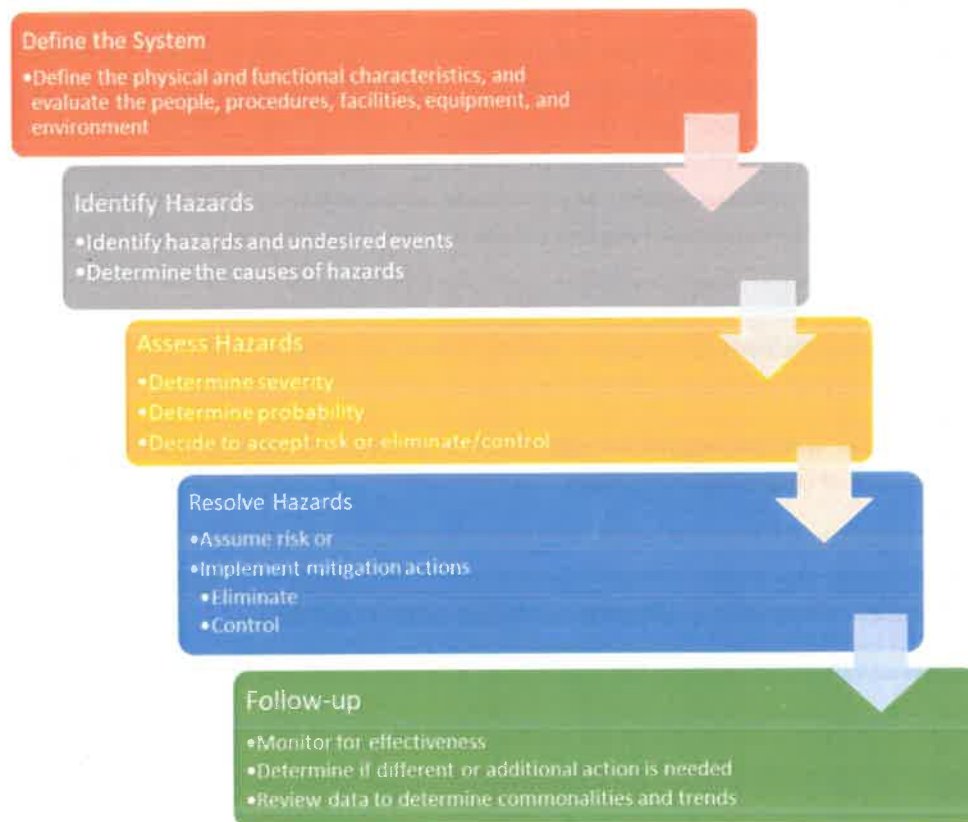


- Events that senior managers might not otherwise know about (for example, near misses). And
- Information about why a safety event occurred (for example, radio communication challenges).

#### City of DeKalb Responsibility

The City takes every hazard report seriously, and in close coordination with the contractor, investigates each one to determine if it is an isolated case or an emerging trend requiring evaluation of policies and procedures or service modifications. Contracted employees reporting hazards will not face disciplinary action unless those employees contributed to the hazard. The City wants to encourage all employees to report any hazard or threat they observe and help make the system as safe as possible for its employees, riders, and the general public. Employees may report hazards to their immediate supervisors or submit their report directly to the CSO for discussion.

The following process chart illustrates the steps taken as part of the hazard identification process through the ESRP.



#### Safety Performance Targets and Measures

The City collects monthly data from the contractor to include safety and performance data which is used annually, along with historic safety data, to develop the safety performance targets included in this plan. The City uses targets along with the monitoring of monthly data to identify trends requiring further analysis of root causes.

## Section 5: Safety Risk Management

The City's contracted transit service provider has risk management policies, procedures, and processes in place to identify, assess, and mitigate hazards. Any hazard identified is properly documented and provided to the City, if needed, as part of the monthly data collection process. Documents related to risk management and monitoring are included in periodic site reviews. The City ensures that all safety events are properly identified, assessed, investigated, and mitigated. Each contractor has a process for conducting a root cause analysis, and the results are conveyed to the City including information about each event. As part of the periodic inspections performed by the AE, safety event documentation is reviewed for the SMS process of risk management.

The following are methods and processes that the contractors will use to identify hazards, and the consequences of those hazards. Inspections are conducted and are an important source of information about hazards. Results from these inspections also help identify areas where mitigations designed and adopted to manage safety risks are not being carried out as required.

Inspections include those of personnel, vehicles, facilities, and data that identify potential safety concerns or potential safety events. Inspections focus on the following:

- Compliance with rules and regulations, which may identify:
  - Non-compliance with safety rules
  - Challenges in complying with safety rules, and
  - Emerging practices
- Operations personnel fitness-for-duty checks, which may identify:
  - Impairment
  - Fatigue
  - Attentiveness
  - Absence of corrective lenses
  - Apparent injuries, and
  - Uniform or equipment issues
- Radio or digital communication checks, which may identify defective equipment, low or no signal zones, or employee procedures not being followed
- CDL and operator citation checks, which may identify driver non-compliance with regulations and requirements
- Pre- and Post-trip inspections to identify vehicle safety defects
- Vehicle inspections, which may identify a series of defects in components and parts with the potential to impact the safety performance of the vehicle
- Facility inspections, which may identify conditions with the potential to impact the safety of employees, passengers, or the public

Inspections conducted include:

- **Facility Inspections** — Monthly facility inspections will be conducted by the Contractor's Facility and Vehicle Maintenance Manager to identify hazardous conditions of the facilities and hazardous behaviors of the employees. The inspections will be documented in writing and reported to the Chief Safety Officer.
- **Bus Stop Inspections** — Bus stops and transfer points will be inspected at least monthly to identify unsafe conditions and Americans with Disabilities Act (ADA) compliance issues. The inspections will be documented in writing and shared in a summary report with the Contractor Facility and Vehicle Maintenance Manager and Chief Safety Officer. Operators will be responsible for notifying dispatch if they notice a hazard at any stop.
- **Pre-Trip and Post-Trip Inspections** — Pre-Operation vehicle inspections are conducted before each vehicle enters revenue service. The Pre-Trip inspections require the operators to conduct systematic inspections of the interior, exterior, and mechanical operations of the vehicle. Maintenance staff is available if safety, mechanical, or cleaning defects are found. The maintenance staff will determine if repairs can be made without disrupting service or if a replacement vehicle will need to be provided. Post-trip inspections are required and are intended to document any issues experienced with the vehicle during revenue service. All Pre- and Post-Inspections will be reviewed daily by the maintenance department.
- **Routine Preventive Maintenance Vehicle Inspections** — Preventive maintenance inspections are to be conducted based on mileage and manufacturer's recommended intervals. The inspections follow manufacturer's guidelines and provide an opportunity to identify mechanical degradation, replace parts, identify safety hazards, and ensure that the vehicle is ready for revenue service. Any hazards identified are to be reported on inspection documents, and deficiencies are to either be corrected, or the vehicle is to be taken out of service until repairs can be made, using lockout/tag-out procedures.

Other hazard identification methods include:

- **Results of the annual Transit Asset Management Condition Assessments** — Facilities, rolling stock, and equipment are inspected annually as part of the update to The City's Transit Asset Management (TAM) Plan as required by the FTA's 49 CFR Part 625. The Contractor's Facility and Vehicle Maintenance Manager will conduct the assessments to ensure the contractor's fleet and leased City assets are in a State of Good Repair (SGR) per the Federal Transit Administration regulation and the City's Transit Asset Management Plan. Results from these assessments will be provided to the Accountable Executive.
- **Employee Observations** — Through the City's Employee Safety Reporting Program, Safety Committee meetings, training programs, and open-door policies, the contractor will document, assess, and mitigate safety risks identified by employees.
- **FTA Notices and Announcements** — The contractor's Safety and Training Manager will monitor updates, best practices, and training opportunities through the Federal Transit Administration's Office of Safety and Security web notification process. The notification process provides information on safety trends across the country and provides remedies to trending safety hazards.

- **Transit Industry Peer Information** — The contractor will maintain information sharing with local, State, and National transportation peers to share ideas and solutions to safety issues affecting transit systems. This includes participation in the Illinois Public Transportation Association (IPTA), interaction with the Illinois Department of Transportation (IDOT), and Illinois transit systems. On a national level, the contractor and City employees will monitor information relative to transit safety through the American Public Transit Association (APTA), Community Transportation Association of America (CTAA), National Transit Institute (NTI), Transportation Safety Institute (TSI), and the National Transportation Safety Board (NTSB).
- **Customer Feedback** — The contractor's Safety and Training Manager will share information about safety and performance complaints and will document these complaints for mitigation and analysis.
- **Near-Miss Reports** — Employees will be encouraged to report near-miss incidents utilizing the Employee Safety Reporting Program, Hazard Reporting Form, or Incident Report. These incidents will be investigated and analyzed for trends or to identify isolated occurrences. Subject matter experts (SME's) may be called upon to assist in mitigating hazards caused by near-misses.
- **Workers Compensation Claims** — The City and its contractor will monitor Workers Compensation Claims to identify trends, conduct root cause analyses, and develop mitigation strategies to create safer working environments for contracted employees.
- **Safety Event Data** — The City's contractor will document and summarize safety events monthly as part of the contract with the City, and will also analyze trending safety data which may be indicators of safety risk.

The contractor will provide a Safety Committee to review all safety events, perform root cause analyses, review mitigation strategies, and make safety recommendations to the Chief Safety Officer and Accountable Executive. Also, the contractor will schedule and conduct monthly safety meetings to communicate current safety concerns, provide feedback on existing mitigation actions taken as a result of safety events or concerns, and share safety and training information. The contractor has safety policies and procedures in place in cases of incidents or accidents, and a reporting process with designated forms to follow in the event of safety events or identified hazards.

The contractor's dispatch staff has a reporting process in place to document safety and security events, passenger complaints, fare disputes, and any other situations outside of normal operating activities. The dispatch daily reports are meant to document these events and provide the ability for internal and external follow-up. Follow-up includes outcomes, employee responses, and supervisor actions.

Using Safety Management System principles, the Dispatch Report is used to identify a risk or hazard and then sent to the Chief Safety Officer for review, assessment, investigation, and follow-up. Once an internal investigation is completed by the contractor the report is sent to the Accountable Executive for further assessment.

### Safety Hazard Assessment

As part of the accident investigation, incident investigation, or hazard identification process, an assessment will be conducted to determine the level of potential threat or hazard requiring immediate, delayed, or monitoring response. Each event assessment will include a determination of the likelihood

of the event being repeated. If there is a potential for repeated safety events or hazards, the City and its contractor will review the related areas of the system for potential opportunities to reduce risk through modifications.

In some cases, it may be as simple as modifications in training, but in other cases, it may extend to policies, procedures, processes, or personnel. The following tables indicate how the agency can assign values and measure risk to ascertain the severity and probability of operational hazards.

Table 1 – Risk Assessment Matrix

Risk Assessment Matrix				
Likelihood/ Severity	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	HIGH	HIGH	HIGH	MEDIUM
Probable (B)	HIGH	HIGH	MEDIUM	MEDIUM
Occasional (C)	HIGH	MEDIUM	MEDIUM	LOW
Remote (D)	MEDIUM	MEDIUM	LOW	LOW
Improbable (E)	LOW	LOW	LOW	LOW

Table 2 – Safety Risk Index

Safety Risk Index	Criteria by Index
<b>HIGH</b>	<u>Unacceptable – Action Required:</u> Safety risk must be mitigated or eliminated.
<b>MEDIUM</b>	<u>Undesirable – Management Decision:</u> Executive management must decide whether to accept safety risk with monitoring or require additional action.
<b>LOW</b>	<u>Acceptable with Review:</u> Safety risk is acceptable pending management review.

### Safety Risk Mitigation

The City currently mitigates risks as they happen in coordination with its contractor. Actions taken might include route changes due to construction or ensuring that there is a spare bus in case of a breakdown

or safety event. These actions are taken as a result of identifying potential risks to employees or passengers and preparing for the likelihood of an accident or incident resulting in service disruption.

The contractor, in coordination with the AE, is responsible for conducting route analyses and reviews for determining safety and performance. All route or service reviews must be documented properly to include safety elements. Information collected from route and demand response manifest reviews is provided to the Safety Committee for evaluation during monthly safety meetings. Contract managers also review the documents for safety and performance information.

Safety Management System principles dictate that transit employees must document when mitigation actions are taken. Documentation is essential to understanding whether actions taken were appropriate to the level of risk or if additional actions are necessary. By documenting hazards, hazard assessments/investigations, and mitigation actions, the City is collecting information to analyze trends and effective responses. It is also required as part of the safety performance target development mentioned in Section 3.

## Section 6: Safety Assurance

### Monitoring Compliance Activities

The City has monitoring practices in place for Federal and State compliance, including 49 CFR Part 673. A process for determining the effectiveness of the Agency Safety Plan includes the collection of data for analysis to determine trends. Various software programs are used to monitor safety in the areas of Maintenance, Operations, Customer Service, Training, and Human Resources. Those programs include: LISTEN Complaint Software, ETA Transit Automatic Vehicle Locator, RTA Fleet Management Software, AngelTrax, DriveCam, Webrisk, Microsoft Power BI, and Transdev Operations Management (TOM).

The Chief Safety Officer for the contractor is responsible for reviewing all safety events, mitigation strategies, reviewing events, and recommending any necessary disciplinary action. They work closely with all departments and communicate well. The Chief Safety Officer is not only responsible for internal reporting to the contractor's headquarters, but also for external reporting to the City's Accountable Executive.

The contractor's Operations Department is responsible for monitoring and modifying routes, primarily for performance reviews. Safety elements added to the existing service performance reviews allow safety data to be collected with route proposals or modifications.

Various administrative personnel monitor incoming customer feedback and if safety issues are presented, the team member forwards the documented customer feedback to the appropriate department for further investigation.

### Monitoring Service

The City collects performance and safety data from its contractor as required by the contract. The data includes safety performance targets as required by the FTA's National Transit Database and Illinois Department of Transportation. The Accountable Executive evaluates this information to identify trends in performance and safety. If anomalies are noted in the data, contact with the contractor will be made by AE to identify the cause.



The monthly data collected include:

- ◆ Passenger Counts by Route by Day
- ◆ Total Revenue Hours
- ◆ Accident Logs (Preventable/Non-Preventable) (AFR)
- ◆ Employee Injuries (IFR)
- ◆ Complaints (Valid/Invalid)
- ◆ Road Calls (Vehicle Breakdowns that Require Maintenance to Scene and/or Towing)
- ◆ Monthly National Transit Database (NTD) Reports including the following:
  - Fatalities
  - Injuries
  - Safety Events
  - System Reliability
- ◆ Vehicle Inspection Reports (Maintenance and Daily Vehicle Inspection Reports)
- ◆ Facility/Equipment Inspections

The City uses an Excel program to track these data points and conduct analyses to identify trends.

Additionally, the City's AE or designated staff will visit the contractor facility and vehicles periodically to conduct reviews of assets, records, and processes to ensure adherence to contractual obligations and Federal compliance issues.

#### Investigation of Activities

The AE and associated staff will establish and carry out a schedule of regular safety inspection tours of the contractor facility. The main purpose of this safety inspection will be to highlight any unsafe conditions or acts that might exist and effectuate corrective actions before an accident can occur. A regular dialogue will take place between the AE and management of both contracted organizations. The AE or its designee will make a written report of their findings.

The contractor will conduct daily, monthly and annual reviews of employees, assets, policies, procedures, training, and processes to ensure that they are meeting the intent of Safety Management System principles and City required safety policies and performance. These safety reviews include but are not limited to the following.

- Vehicle Pre/Post-trip inspections;
- Facility reviews including shelters, transfer points, bus stop signs, maintenance facilities; administrative facilities, storage, and parking areas;
- Preventive maintenance program;
- Employee evaluations – video reviews, ride-along assessments, follow-along assessments;
- Policy and procedure reviews;
- Fire Marshall and/or OSHA reviews;
- Assessments of technology;
- Review and monitoring social media compliments and complaints;

- Threat and vulnerability assessments;
- Route evaluations for safety and performance — new and existing; and
- Training program effectiveness.

The City has established safety performance goals within its contractor and will maintain accurate records of performance and accidents. These goals and records will be reviewed regularly and appropriate action will be taken as a measure of managerial and supervisory proficiency. The AE will be responsible for reviewing all accident and investigation reports as they occur, within 24 hours of the incident. All accidents will be investigated thoroughly regardless of severity through root cause analysis conducted by the contractor and the AE. Information derived from investigation and analysis may lead to changes in policy, procedures, or processes to mitigate or reduce future occurrences.

## Section 7: Safety Promotion

### Safety Training

Training programs for the contractor relate to safety, policies, procedures, Federal, State, and local regulatory compliance and performance monitoring related to efficiency, productivity, and safety. The contractor also provides thorough new hire training and remedial/refreshers training. Additionally, contract employees receive training from outside organizations like local first responders as well as Federal, State, and local training programs.

As part of the annual training curriculum, and as required by contract, the City will require the contractor to be flexible to include additional or replacement training based on current safety trends requiring new or revised training as part of the safety mitigation strategy. As mentioned in Section 6, trends in safety data through safety performance measurement will allow the City and its contractor to identify if there is an upward trend in a particular safety category and respond with appropriate training to prevent incidents from occurring.

Training files are included in periodic site reviews by the AE or his designee to ensure training programs are kept current and are relative to current events or trends in safety. All contracted employees must meet the contractual training requirements and achieve proficiency before operating in revenue service without supervision.

Additional evaluations above and beyond normal frequency will be conducted on new employees or employees required to take remedial training to ensure they are performing to the training standard. If not, additional training or counseling may be conducted, or termination may result if all methods have been exhausted per the contractor's policies and procedures.

### Safety Communication

The City's contractor displays information relating to safety warnings in various locations for easy employee visibility, including breakrooms, dispatch areas, and in garages. Any changes made to policies,



procedures, or processes are distributed to all employees impacted by the change. In turn, training programs, employee handbooks, and all relevant documents, including policies or procedures, are updated to reflect the change. If the change is considerable, the City may require training of contracted employees prior to the release of the change to ensure employees understand the change.

The City's contractor will notify their employees of policy, procedure, or process changes through various methods including but not limited to the following:

- Memorandums;
- Bulletin board postings;
- Training; and
- Electronic notification processes, such as emails.

Weekly or monthly contractor meetings and Safety Committee meetings are also used to convey hazards or safety issues that have been identified with mitigation actions being taken. Minutes of the meeting are taken and contractor management staff attend. The meetings are meant to discuss safety event response, mitigation analysis, trend analysis, training, and safety performance measures.

## Section 8: Additional Information

This PTASP was developed from information in the contractor documents, policies and procedures, and manuals listed below:

- Transit Service Provider Agreement
- Vehicle Maintenance Plans
- Facility Maintenance Plans
- Transdev Employee Handbook
- Transdev Safety Security and Emergency Preparedness Plan (SSEPP)

## Section 9: Definitions of Terms Used in the Safety Plan

SMTD incorporates all of FTA's definitions from 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

- **Accident** means an Event that involves any of the following: Loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
- **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and

capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

- **Equivalent Authority** 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.
- **Event** means any Accident, Incident, or Occurrence.
- **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.
- **Incident** means an event that involves any of the following: a personal injury that is not serious; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
- **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
- **National 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.
- **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
- **Performance measure** is 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.
- **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
- **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency as required by 49 U.S.C. 5329 and Part 673.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- **Safety Assurance** means a process within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

- **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation efforts. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- **Safety performance target** means a performance target related to safety management activities.
- **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.
- **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Management** means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Serious injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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.
- **Transit agency** means an operator of a public transportation system.
- **Transit Asset Management 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.

## Section 10: Commonly Used Acronyms

Acronym	Word or Phrase
ADA	American's with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
IDOT	Illinois Department of Transportation
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
U.S.C.	United States Code
VRM	Vehicle Revenue Miles