VALLEY METRO

Non-Rail Agency Safety Plan (ASP)

JANUARY 2023

Revision 3

VALLEY METRO

Valley Metro
Non-Rail Agency Safety Plan

SUBMITTED BY:

Frank Sottile
Frank Sottile (Feb 2, 2023 11:10 MST)

Feb 2, 2023

Frank Sottile
Manager, Bus Transit Safety

Date

REVIEWED BY:

Adrian Ruiz
Adrian Ruiz (Feb 4, 2023 11:26 MST)

Feb 4, 2023

Adrian Ruiz
Director, Safety Security & Quality Assurance
Chief Safety Officer

Date

ACCOUNTABLE EXECUTIVE:

Feb 4, 2023

Jessica Mefford-Miller
Chief Executive Officer

Date

BOARD APPROVAL:

Sign and Print Full Name
Chair – RPTA

Date

Electronic signatures are governed by Valley Metro's electronic signature policy.

Non-Rail Agency Safety Plan (ASP)
Revision Log

Revision Number	Summary of Changes	Affected Pages	Concurrence	Effective Date
0	Initial Version	New	A. Crowe	October 2020
1	Updated Footer, incorporated feedback from agency members, updated implementation plan, updated goals, updated organizational charts	Throughout	R. Kauffman	January 2021
2	Updated cover page and document title, footer, performance targets, new employees, job titles/roles and responsibilities	Throughout	F. Sottile	April 2022
3	Added Performance targets, job titles/roles and responsibilities. (Addition of Bus Security Coordinator) elimination of light rail specific language (where applicable)	Throughout	F. Sottile	October 2022

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1.0 TRANSIT AGENCY INFORMATION

Transit Agency Name: Valley Metro RPTA

Transit Agency Address: 101 North 1st Avenue, Phoenix, Arizona

Name & Title of Accountable Executive: Jessica Mefford-Miller, Chief Executive Officer

Name of Chief Safety Officer: Adrian Ruiz, Director of Safety, Security and Quality Assurance

Mode(s) of Service covered by this plan: Bus, Vanpool, Paratransit Services

Valley Metro is the regional public transportation agency providing coordinated, multi-modal transit options to residents of greater Phoenix. With a core mission of connecting communities and enhancing lives, Valley Metro plans, builds, operates and maintains the bus, vanpool and light rail systems and alternative transportation programs for commuters, seniors and people with disabilities.

Valley Metro is governed by two boards of directors. The Regional Public Transportation Authority (RPTA) Board consists of 19 public agencies that set the policy direction for all modes of transit except light rail. The boards and the agency work to improve and regionalize the public transit system.

In 1993, Valley Metro, along with local governments, began funding a regional transit system that now covers 513 square miles. Today, member agencies include Avondale, Buckeye, Chandler, El Mirage, Fountain Hills, Gilbert, Glendale, Goodyear, Maricopa County, Mesa, Peoria, Phoenix, Queen Creek, Scottsdale, Surprise, Tempe, Tolleson, Wickenburg and Youngtown. The Valley Metro RPTA Board of Directors set policy for bus and paratransit services.

Additional information can be found on Valley Metro's website at www.valleymetro.org.

2.0 PLAN DEVELOPMENT, APPROVAL, AND UPDATES

The purpose of this document is to outline how Valley Metro is meeting the requirements outlined in the Federal Transit Administration's (FTA) National Safety Plan. The National Safety Plan serves as the FTA's key communication tool for a safety approach that sets forth a proactive approach to safety risk management that is outcome-focused and emphasizes safety performance. More information about the National Safety Plan can be found on the FTA's website.

This document outlines how Valley Metro has adopted the SMS framework in keeping in compliance with MAP 21. The Chief Safety Officer (CSO) and his/her team works alongside operations, including collaboration on the agency's Transit Asset Management (TAM) plan and state of good repair. These collaborative efforts are designed to coordinate organizational efforts from the top-town, to ensure all employees, contractors, and riding public have a safe system.

Page 2 contains dated signatures for the Accountable Executive and the Board of Directors. This page also includes the signature of the Chief Safety Officer certifying compliance with Part 673 and 674.

The review of this document is the responsibility of the Director, Safety, Security and Quality Assurance (SSQA). Each page of this document contains a footer with the document name, page number, revision number, and revision date. The initial version of the document is Revision 0. As changes are made to the document, the revision number is increased by one and the revision date is updated. A summary of changes made during each revision is contained in a table on page 3.

This document is reviewed on an annual basis to determine if revisions need to be made. Updates may be needed for a variety of reasons, including but not limited to changes in internal or contractor processes, changes in organizational structure, or changes in regulatory requirements. The narrative and table below outline the process.

During the fourth quarter of each year, the Director, SSQA emails draft copies of this document and a comment resolution form to the Leadership and Manager Teams for review. Leadership Team members are:

- Chief Operations Officer
- Director, Communications & Strategic Initiatives
- Director, Capital and Service Development
- Chief Administrative Officer
- Chief Financial Officer
- General Counsel
- Chief Executive Officer
- Senior Advisor/Chief of Staff

Manager Team members include representatives from each division, all of whom report to the Leadership Team members listed above.

The comment resolution forms are due back to the Director, SSQA by December 30th. When revisions are approved, the revision number and date will be added to the footer and the Director, SSQA will route the final document for Valley Metro's signatures.

After the final document has been signed, it is uploaded into Valley Metro's online document database and the Director, SSQA formally transmits the document to division directors for dissemination among their teams. Additionally, an email will be sent to all employees and contractors about the updated document and how/where it can be viewed.

Task	Responsibility	Target Date
Send out draft copy to division leads for review and redlines	CSO	4th quarter (CY)
Receive feedback from division leads	Leaders/Managers	December 30
Determine if ASP requires revision based on internal review comments	CSO	December 30
Incorporate feedback, if necessary	CSO	January 30
Upon document signature, transmit copies of document to division leads and post on Valley Metro's intranet (if applicable)	CSO	Upon document signature

3.0 EMERGENCY PREPAREDNESS AND RESPONSE PLAN

This section provides a brief overview of Valley's Metro's integration with Public Safety and emergency management/preparedness activities.

3.1 RESPONSIBILITIES FOR EMERGENCY PREPAREDNESS

Emergency management planning is the responsibility of Valley Metro's SSQA division. In an effort to coordinate emergency preparedness directives in the region, the Director, SSQA or designee will represent Valley Metro as an attendee in the Urban Area Security Initiative (UASI), through the Division of Emergency Management.

Valley Metro is directly responsible for training its employees on emergency response and preparedness. This also applies to all Valley Metro sub-contractors, except for Valley Metro's Transportation Services Contractors. The Transportation Services Contractors are responsible for training their employees on their roles specifically related to operations during bus emergencies.

The Regional Security Team (RST) encompasses the regular (non-project) safety/security group meetings. If representation from a Fire Department is needed, they are invited to attend the RST meeting.

3.2 EMERGENCY DRILLS

Valley Metro conducts emergency drills in conjunction with local public safety agencies. The schedule for emergency drills is determined by the Director, SSQA and Valley Metro's Operations team, with input and coordination with local public safety agencies.

Each emergency drill is monitored and formally evaluated by both Valley Metro and public safety agencies, typically using a checklist prepared for the specific activity. Reports on emergency drills that contain after action reports and implementation plans are typically prepared.

Specific Valley Metro divisions are expected to attend scheduled drills, if requested by the Director, SSQA. All divisions that participate in a drill event are required to meet immediately after the drill to debrief with their specific employees and the Director, SSQA upon completion of the drill. Records are to be kept by each division manager for review, as needed.

3.3 EMERGENCY PROCEDURES

Emergency procedures for the non-rail modes are contained in operating procedures. In addition, Valley Metro has developed a First Responder Safety Training presentation and distributed it to fire and police divisions in Phoenix, Tempe, and Mesa.

3.4 EMERGENCY TRAINING FOR FIRST RESPONDERS

Training for emergency responders is developed and continually updated by those respective agencies with the assistance as needed by Valley Metro. Training is provided via classroom and field training instruction. Emergency service agencies are responsible for training their own personnel. Valley Metro is available to help as needed and provide access to Valley Metro property, systems, and equipment.

Training of external emergency services personnel may be conducted using several methods, including general introduction to Valley Metro systems and facilities, tabletop exercises, small scale drills, and full-scale simulations. In addition, familiarization training covering facilities and vehicles is made available to public safety agencies.

Operations familiarization training is also provided to first responders. Fire and rescue units responsible for the Tempe Bus Operations & Maintenance facility (TBOM) and the Mesa Bus Operations & Maintenance Facility (MBOM) are invited and encouraged to tour the facility on an annual basis and are briefed on campus procedures and plans at that time. Building plans are provided for inclusion into their computer aided dispatch system. In addition, light rail vehicles, busses, and Valley Metro staff are available for familiarization training for the Phoenix, Tempe and Mesa Fire and Police Divisions.

4.0 SAFETY PERFORMANCE TARGETS

4.1 INTRODUCTION

The FTA has selected four safety performance measures that must be included in an agency's Safety Plan (ASP):

- **Fatalities –** total number of reportable fatalities and rate per revenue mile
- **Injuries –** total number of reportable injuries and rate per revenue mile
- **Safety events –** total number of reportable events and rate per total revenue mile
- **System reliability –** mean distance between major mechanical failures by mode

The thresholds for "reportable" fatalities, injuries, and events are defined in the National Transportation Database (NTD) Safety and Security Reporting manual. Major mechanical system failure is defined as an event that prevents a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns.

Additionally, in CY2023 Valley Metro will be measuring:

- **Passenger Falls on buses –** total number of passengers falls in revenue vehicles and rate per total number of boardings
- **Pedestrian Strikes –** Below USDOT Average
- **Rear-Ending Collisions –** Below USDOT Average

Data will be collected monthly and summarized on a calendar year basis. These performance measures and associated targets will be reviewed at the Safety and Security Committee meetings and SSQA Business Review Meetings and updates will be provided to the CEO and the Board on a regular basis. If adequate progress is not being made towards achieving a performance target, the SSQA division will coordinate a break-out session to review the specific performance measure, obstacles preventing the target from being met, and possible solutions/mitigations to move towards meeting the target.

4.2 BUS SAFETY PERFORMANCE TARGETS

Performance targets for CY2023 are listed below. As described in section 4.1, metric data will be collected monthly and reported to the applicable parties on a regular basis. The information will be presented in a variety of excel workbooks, charts, and graphs.

REPORTING PERIOD: JANUARY 2023 - DECEMBER 2023

Bus Safety Performance Targets	
Fatalities	Zero
Injuries	5% reduction in both number of events and rate per 100,000 revenue miles from CY2021
Safety Events	5% reduction in both number of events and rate per 100,000 revenue miles from CY2021
System Reliability	According to manufacturer's established performance standards
Pedestrian Strikes	Below USDOT Average
Passenger Falls on Revenue Service Vehicles	5% reduction in both number and rate per 100,000 passenger boardings from CY2021 (falls with no impairment noted)
Rear-Ending Collisions	Below USDOT Average

ASP REQUIRED METRICS

Agency Safety Plan Required Metrics							
Mode of Service	Fatalities (total)	Fatalities (per 100k miles)	Injuries (total)	Injuries (per 100k miles)	Safety Events (total)	Safety Events (per 100k miles)	System Reliability (MTBF)
Bus	X	X	X	X	X	X	X

AGENCY ELECTED METRICS:

Agency Elected Metrics			
Mode of Service	Pedestrian Strikes	Passenger Falls on Revenue Service Vehicles	Rear-Ending Collisions
Bus	X	X	X

5.0 DEVELOPMENT AND IMPLEMETATION OF SAFETY MANAGEMENT SYSTEMS

5.1 INTRODUCTION

Safety Management System (SMS) is a formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety risk mitigations and its complexity can be adjusted to meet an agency's size and function(s).

As outlined in this document, the FTA's SMS framework consists of four main components: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.

The Safety Management Policy component is the written foundation of Valley Metro's safety management system. It formally and explicitly commits the agency to the development and implementation of the organizational structure and resources necessary to sustain the safety management processes and activities of an SMS.

The Safety Risk Management component is comprised of the processes, activities, and tools that Valley Metro uses to identify and analyze hazards and to assess safety risks in operations and supporting activities. It allows Valley Metro to examine what could cause harm, to determine whether sufficient precautions have been taken to minimize the harm or if further mitigations are necessary.

The Safety Assurance component ensures that mitigations are implemented, adhered to, appropriate, effective, and sufficient in addressing the potential consequences of identified hazards. Mitigations developed under the Safety Risk Management component are handed-off to Safety Assurance to review the data to determine if the mitigations were effective and to ensure no new risks have been created through implementation of the mitigations. Safety Assurance also ensures that the SMS is effective in meeting Valley Metro's goals and performance targets. The Safety Promotion component provides visibility of executive management's commitment to safety and fosters improved safety performance by increasing safety awareness through communication and training.

5.2 SMS IMPLEMENTATION PLAN

The SMS Implementation Plan consists of four phases: orientation and familiarization, planning and organizing, safety risk management, and safety assurance. A brief overview of each of these phases is provided below. A detailed SMS Implementation Plan is provided in Appendix C.

5.2.1 Orientation and Familiarization

Activities in the Orientation and Familiarization phase include obtaining Executive Commitment, conducting SMS orientation and awareness presentations, and distributing documentation to familiarize employees and contractors with SMS. These activities are discussed in further detail throughout the remainder of this document.

5.2.2 Planning and Organization

Activities in the Planning and Organization phase include developing the SMS implementation plan, developing documentation related to the safety management policy and safety performance objectives, and developing and establishing safety communication and employee reporting methods.

Safety roles and responsibilities for key personnel and key safety and security related committees are described below in Section 6.2, clearly illustrating the SSQA division is not the only group responsible for safety.

5.2.3 Safety Risk Management

Safety risk management activities are outlined in section 7.0 of this document

5.2.4 Safety Assurance

Safety assurance activities are outlined in section 8.0 of this document.

6.0 SAFETY MANAGEMENT POLICY

6.1 SAFETY MANAGEMENT POLICY STATEMENT

Valley Metro is committed to achieving compliance with statutory requirements specified in the following federal laws and rules: 49 U.S. Code § 5329 Public Transportation Safety Program / Fixing America's Surface Transportation (FAST Act); 49 CFR Part 673 Public Transportation Agency Safety Plan; 49 CFR Part 672, Public Transportation Safety Certification Training Program; 49 CFR Part 670, National Public Transportation Safety Program; 49 CFR Part 630, National Transit Database; and 49 CFR Part 625, Transit Asset Management.

The management of safety is one of our core business functions. Valley Metro is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards. Safety objectives include continuing to ensure employee and passenger safety, continually improving safety performance by setting safety performance targets, and implementing a Safety Management System (SMS) program.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Chief Executive Officer (CEO).

Valley Metro'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 managers and employees.
- Clearly define for all staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our 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 our operations or activities to a point which is consistent with our acceptable level of safety performance.
- Ensure that no action will be taken 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 all staff are provided with 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 our safety performance against realistic and data-driven safety performance indictors and safety performance targets.
- Continually improve safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and
- Ensure externally supplied systems and services to support our operations are delivered meeting our safety performance standards.

Approved by:

Feb 4, 2023

Jessica Mefford-Miller
Valley Metro
Chief Executive Officer

Date

6.2 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES

6.2.1 Overview

Valley Metro's CEO is the Accountable Executive for the Public Transportation Agency Safety Plan (ASP). Day-to-day responsibility for the ASP has been delegated to the Chief Safety Officer. The ASP is available to all Valley Metro and contractor personnel on the agency's intranet. One of the processes used by Valley Metro to communicate the agency's Safety Policy statement from the Accountable Executive is to post it in employee break rooms in the agency's facilities at the Operations & Maintenance Center, Corporate Offices in the 101 Building, the Mobility Center, the Tempe Bus Operations & Maintenance Facility, and the Mesa Bus Operations & Maintenance Facility. Additional processes used to communicate safety messages are described in section 9.1.2.

All Valley Metro employees and contractors are responsible for safety. An overview of the lines of authority for safety, accountabilities and responsibilities for various roles, and a summary of safety-related meetings is provided below.

6.2.2 Lines Of Authority For Safety

Safety responsibilities at each organizational level are:

- Chief Executive Officer – is vested with the primary responsibility for the activities of Valley Metro and overall safety performance and SMS.

- Deputy Directors/Directors/Chiefs - are responsible for promulgating Valley Metro's safety policies and for holding managers accountable for the safety performance within their respective division/divisions.
- Managers/Supervisors - are directly accountable and responsible for safety performance within their functional area in an ongoing and interactive process. This responsibility includes determining and implementing measures to counteract safety hazards and to mitigate known or potential hazards within their functional area.
- Valley Metro employees, contractors, and sub-contracted personnel - are responsible for performing their work safely and in accordance with established SMS requirements for the protection of themselves, co-workers, customers, facilities, and equipment. This responsibility is, at a minimum, per this plan and all currently published Valley Metro safety policies. As described later in this document, Valley Metro provides a direct connection to the Safety team by providing a webpage, email addresses, phone numbers, and hardcopy comment cards. Concerns about safety issues may also be addressed directly to the CEO, Director, SSQA, the Manager of Bus Transit Safety, and/or the Bus Safety Specialist.

6.2.3 Accountable Executive

The Chief Executive Officer (CEO) is the accountable executive for the safety program. The Accountable Executive's safety-related roles include:

- Reviewing and accepting this plan
- Implementing the policy statement as outlined in section 6.1
- Ensuring Valley Metro's Safety Management Systems (SMS) is effectively implemented throughout Valley Metro's transit system
- Ensuring action is taken to address substandard performance in Valley Metro's SMS
- Allocating staff time and resources to carry out the provisions of this plan, including appointing a Chief Safety Officer

6.2.4 Chief Safety Officer (Cso)

The Accountable Executive/CEO has appointed the Director of Safety, Security and Quality Assurance (SSQA) as the Chief Safety Officer for Valley Metro. The Chief Safety Officer (CSO) reports directly to the Accountable Executive/CEO. The CSO is adequately trained per 673.5 and 674.29b, has the authority and responsibility for day-to-day implementation and operation of Valley Metro's SMS, and does not serve in any operational or maintenance capacities. Within three years of hire, the CSO will obtain PTSCTP certification and will pursue obtaining safety certification with the World Safety Organization or similar safety certifying organization.

The Chief Safety Officer will be referred to as the Director, SSQA throughout the remainder of this document. This position's safety-related roles include:

- Communicating with Executive Team members and the Accountable Executive/CEO through Leadership Team meeting and providing periodic reports for the CEO
- Allocating staff time and resources to carry out the provisions of this plan
- Ensuring safety and security measures are incorporated into the design and construction of new rail systems through design reviews and the Safety and Security Certification Program

- Ensuring compliance with Federal Transit Administration (FTA), Transportation Security Administration (TSA) regulations, and TSA criteria by conducting emergency drills, investigating accidents, and providing oversight of recordkeeping related to accidents and incidents
- Reviewing reports of injury, property damage, occupational diseases, or public liability accidents and overseeing investigations, as needed, to determine root cause and prevent loss reoccurrences
- Reviewing and overseeing system safety programs and audits of facility inspections, operator and maintenance training requirements and certifications, and standard operating procedures
- The Chief Safety Officer has authority to order operations be terminated if an imminent hazard is detected

6.2.5 Deputy Director Of Transportation And Project Integration

- Responsible for directing and managing bus operations, rail operations, project integration, related facilities, functions, and staff which includes contracted Rail Operations and Fixed Route Services, route scheduling, service delivery, and the regional call-center. This position may also take on other related regional transportation management supervision responsibilities in the future.
- Responsible for the development of standards, specifications and performance of contractors and/or agency employees who will support and perform the operational and maintenance requirements of the fixed route services.
- In coordination with the Chief Operations Officer, oversees the development and administration of the annual operating and capital budgets; approves the forecast of funds needed for staffing, equipment, materials, and supplies; approves expenditures and implements budgetary adjustments as required.

6.2.6 Manager, Bus Transit Safety

The Manager, Bus Transit Safety reports to the Director, SSQA. The Manager, Bus Transit Safety's job duties include:

- Planning, developing, implementing, modifying, and administering a comprehensive System Safety Program in conjunction with a Safety Management System (SMS) to ensure compliance with applicable laws, codes, regulations, and guidelines, including acting as the agency's SMS Implementation Manager.
- Overseeing all aspects of Valley Metro's system safety program
- Conducting scheduled and unscheduled inspections of Valley Metro and contractor work sites to identify workplace hazards, proposing corrective actions, and ensuring staff and contractor compliance with applicable standards
- Investigating safety and health complaints and concerns
- Reviewing reports of injury, property damage, occupational diseases, or public liability accidents and overseeing investigations, as needed, to determine root cause and prevent loss reoccurrences

- Working with the Bus Safety Specialist to ensure time and resources are available to carry out the provisions of this plan
- Developing and implementing goals, objectives, policies, procedures, standards and guidelines for achieving safety program compliance
- Managing and responding to safety incidents and emergency response on a 24-hour basis
- Reviewing plans for new construction and modification to existing structures
- Providing leadership, vision, and guidance for Valley Metro's safety program

6.2.7 Bus Safety Specialist

The Bus Safety Specialist reports to the Manager, Bus Transit Safety. The Bus Safety Specialist's job duties include:

- Implementing and monitoring occupational health and safety program activities including facility inspections, accident investigations, and emergency planning operations
- Providing technical safety information and compliance requirements to management, employees, and contractor work to promote Safety Management Systems (SMS)
- Providing education to staff on safety related topics and responding to safety issues and concerns
- Assisting with safety oversight of non-rail contractors and construction projects, as required
- Compiling, analyzing, and interpreting statistical data to prepare written and oral reports
- Assisting with incident and accident investigations involving the public, contractors, and employees which involve Valley Metro personnel and/or property, determining cause, providing solutions, and creating regulatory agency-required reports

6.2.8 Manager, Transit Security

The Manager, Transit Security reports to the Director, SSQA. The Manager, Transit Security's job duties include:

- Planning, developing, implementing, administering, and modifying a comprehensive System Security Program which includes emergency response and recovery to ensures compliance with applicable laws, codes, regulations, and guidelines
- Conducting or providing for security and emergency preparedness training
- Overseeing the coordination of security activities for Valley Metro Operations
- Managing and responding to security incidents and emergency response on a 24 hour on-call basis
- Developing and implementing goals, objectives, policies, procedures, standards, and guidelines for achieving program compliance
- Investigating security complaints submitted by management, employees, committee members, and the public and/or regulatory agencies; conducting concurrent security investigations, supplemental reporting, and risk analysis assessment; evaluating concerns and alternatives, resolving complaints, and making recommendations to senior management for corrective action
- Interfacing with local law enforcement agencies to pursue convictions of criminal activity on Valley Metro property

- Serving as liaison with Valley Metro member agencies and with Federal, State, and Local emergency and police/fire services personnel
- Reviewing plans for new construction and modification to existing structures
- Conducting scheduled and unscheduled security inspections of Valley Metro and contractor work sites, facilities and locations to ensure staff and contractor compliance with program standards, contract requirements, and applicable laws, codes, regulations and guidelines
- Conferring with and coordinating activities with Valley Metro, contractor staffs, and public agencies to establish and implement an emergency action plan that complies with federal requirements and meets the need of state and local emergency operations
- center during a crisis situation. Acts as a liaison with State emergency management in place of the Director as needed.

6.2.9 Bus Security Coordinator

The Bus Security Coordinator reports to the Manager, Transit Security. The Security Coordinator's job duties include:

- Participating in internal, local, and regional security, and/or emergency preparedness working groups and committees
- Assisting in the maintenance of an annual comprehensive security facility risk and vulnerability assessment and inspection program
- Developing standards, protocols, and procedures to ensure a secure environment for customers, employees, and contractors
- Building and maintaining rapport with Valley Metro member cities and local law enforcement
- Analyzing threats and vulnerabilities of agency owned and leased facilities, including the transit system and its assets; notifying management and applicable stake holders of risks; providing recommendations to management for mitigating risks; and developing and implementing plans, processes and/or procedures as required.

6.2.10 Safety and Security Program Manager

Safety responsibilities for the Safety and Security Program Manger include, but are not limited to:

- Coordinating reporting functions to the Federal Transit Administration (FTA) and Arizona Division of Transportation (ADOT) for safety certification and verification and safety compliance work; creating reports necessary for project certification, audit compliance and safety certification related to projects
- Assisting in the coordination and attending the Safety and Security Certification Review Committee (SSCRC), Fire/Life Safety and Security Committee (FLSSC), Safety and Security Readiness Review (SSRR) and Safety and Security Certification Verification Report (SSCVR) meetings associated with a project(s)
- Assisting and reviewing possible modifications to existing and new specifications related to Project Certification and ADOT/FTA compliance
- Working in collaboration with the Capital and Service Development Division to ensure that certification processes are effectively integrated and executed according to schedule

- Participating in Project Design phases to ensure that Safety and Security checklists are incorporated into the design; ensuring Design Criteria Manual (DCM) standards are not in conflict with Project Design related to Safety and Security
- Coordinating Safety and Security Management Plan (SSMP), Safety and Security Certification Plan (SSCP), conducting and/or assisting in quality assurance auditing and all other certification standards to the Project Managers, design, and construction contractors
- Prepares a variety of reports summarizing program data; analyzes related data and makes recommendations based on findings
- Assisting with development and implementation of safety certification plan and development of safety certifiable items list
- Assisting in coordinating Pre-Revenue Operations (PRO) and Revenue Service certification activities between Safety and Security and project leads
- Providing training and assisting the PM/CM, Contractor, sub-contractors, and Valley Metro staff in the certification process and deliverables
- Developing and implementing goals, objectives, policies, procedures, standards, and guidelines for achieving program compliance

6.2.11 Manager, Quality Assurance

The Manager, Quality Assurance reports directly to the CEO, with day-to-day activities being addressed by the Director, SSQA. Quality Assurance is a stand-alone program. This role works with the Manager, Transit Safety and Manager, Transit Security to ensure that the internal workings of the SSQA Division are in accordance with all ADOT and FTA published standards.

6.2.12 Quality Assurance Specialist

The Senior Project Compliance Coordinator reports to the Manager, Quality Assurance. This role is responsible for assisting with or performing quality assurance audits and reviews in accordance with FTA/ADOT requirements and Valley Metro policies, procedures, and standards.

6.2.13 Chief Operations Officer

The Chief Operations Officer (COO) is responsible for overseeing the operations and maintenance of all aspects of transit service delivery; managing, supervising, and coordinating staff/resources and activities associated with rail and fixed-route operations.

Safety responsibilities for the Chief Operations Officer or designee include, but are not limited to:

- Monitoring for safe operations and maintenance of the rail system
- Allocating staff time and resources necessary to carry out the provisions of this plan
- Reviewing and approving compliance at each stage of a System Modification and the Safety and Security Certification Program for extensions and major capital projects
- Providing operations and maintenance input for system safety activities
- Participating and/or assigning a designee to attend Safety and Security Committee meetings

- Collaborating with the safety team to develop and implement corrective action plans for safety issues and ongoing changes/modifications to the system
- Reviewing and staying current with all safety rules and procedures governing operation and maintenance of the rail and bus systems
- Ensuring maintenance of the Transportation Rule Book, Standard Operating Procedures, and Emergency Operating Procedures
- Chairing the working group responsible for the annual review and revision of the Transportation Rule Book
- Providing responsibility and oversight of all Valley Metro Rail and Bus operations such as Maintenance of Way, Maintenance of Equipment, and rail and bus transportation services contractors retained by Valley Metro (Transportation Services Contractor(s), Cleaning Contractors, etc.)

6.2.14 Manager, Contracts/Procurement

Safety responsibilities for the Manager, Contracts/Procurement include, but are not limited to:

- Ensuring that all materials and services obtained for use on the light rail system comply with accepted safety standards and practices
- Obtaining approval from SSQA for safety related materials and services prior to purchase or award of contract
- Ensuring that the Director, SSQA or designee participates in all capital procurement specification planning meetings and committees
- Tracking hazardous materials ordered by various divisions to ensure compliance with safety standards
- Conducting periodic reviews on remote procurement sites to ensure compliance with ordering procedures and record keeping as it relates to safety
- Maintaining a secured, locked work area for the maintenance of these records
- Ensuring outside contractors and consultants are advised on the Valley Metro safety and security requirements prior to job bid and that such requirements are clearly conveyed in the procurement and contract documents (Special Provisions 16 and 17)
- Periodically reviewing, in coordination with the Internal Auditor, new contractors and consultants to ensure product ordering is compliant with Valley Metro's policies and procedures

6.2.15 Bus Fleet Maintenance Specialist

The Bus Fleet Maintenance Specialist is a direct employee of Valley Metro and reports to the Manager, Bus Service Delivery. Safety responsibilities for the Bus Fleet Maintenance Specialist include, but are not limited to:

- Monitoring and leading vehicle maintenance activities, including supervising vehicle inspection processes performed by internal employees and external contractors; monitoring compliance with applicable FTA regulations; overseeing new vehicle factory acceptance and in-service inspection processes; and participating in weekly maintenance meetings.

- Monitoring and participates in the evaluation of components for vehicles and specialty equipment; determines operational needs for new vehicle specifications
- Preparing, updating, and revising a wide variety of reports

6.2.16 Facilities Maintenance Coordinator (Bus)

The Facilities Maintenance Coordinator (Bus) is a direct employee of Valley Metro and reports to the Manager, Bus Service Delivery. This individual oversees contractors and subcontractors, primarily at the MBOM location (the TBOM location is a City of Tempe facility and the City performs the building maintenance). Safety responsibilities for the Facilities Maintenance Coordinator (Bus) include, but are not limited to:

- Overseeing scheduled and assigned installation, maintenance, inspection and repair work on buildings, facilities, bus system, and equipment which includes managing and giving direction to contracted vendors on facility and grounds maintenance; monitoring and inspecting facility condition and cleanliness; and, monitoring, inspecting, and reporting on contract compliance of vendor services.
- Planning, prioritizing, monitoring, and inspecting the work of vendors involved in facility maintenance activities including, mechanical, electrical, electronic, carpentry, painting,

HVAC, life safety and security system and related functions in bus operation buildings and facilities.

- Assisting with safety training; ensuring that staff follows safety procedures, and that public safety and security procedures are followed.
- Ensuring compliance with hazardous material storage, use, handling, and disposal requirements, as well as OSHA, building, fire, and other regulatory code requirements

6.2.17 Manager, Bus Operations

The Manager, Bus Operations is a direct employee of Valley Metro and reports to the Chief Operations Officer. Safety-related duties for the Manager, Bus Operations include, but are not limited to:

- Managing and coordinating, through contractors and subordinate managerial personnel, activities of Operations Department to obtain optimum use of equipment, facilities, and personnel. Coordinating department activities with other departments and agencies as needed.
- Providing leadership and direction to the Fixed Route Transportation personnel and is responsible for the efficient and effective transportation operations. This includes responsibility for the continuity and operation of the department.
- Administering contractual service agreements; ensuring conformance with terms and conditions of contract; meeting with representatives of contract agencies to clarify terms of contract and resolve disputes; setting goals and monitoring performance objectives.
- Maintaining effective internal and external coordination and communications with Valley Metro member agencies, and consultants/contractors and other operators and providers of public transportation in the Phoenix metropolitan area.
- Managing the development of fixed route operating plans consistent with Valley Metro's commitment to provide safe, efficient and effective high-quality services.

- Coordinating and integrating bus and rail for general and special event operations.

6.2.18 Vanpool Program Coordinator

The Vanpool Program Coordinator reports to the Chief Administrative Officer. This individual works with the vanpool program management company to coordinate activities and to prepare/update/revise/receive a variety of business documents and reports.

6.2.19 Manager, Accessible Transit Services

The Manager, Accessible Transit Services reports to the Chief Administrative Officer. Safety-related duties for this role include, but are not limited to:

- Managing the operations of the Valley Metro's Mobility Services programs, Alternative Transportation Program (Ride Choice) and staff including contracted paratransit operations, Americans with Disabilities Act (ADA) certification/eligibility program, reduced fare ID program, travel training and other related services; developing procedures for program operations; ensuring compliance with applicable internal and external requirements.
- Administering contractual service agreements; ensuring conformance with terms and conditions of contract; meeting with representatives of contract agencies to clarify terms of contract and resolve disputes; setting goals and monitoring performance objectives.

Maintaining effective internal and external coordination and communications with Valley Metro member agencies, and consultants/contractors and other operators and providers of public transportation in the Phoenix metropolitan area.

6.2.20 Transportation Services Contractors

Contracts are in place with the Bus, Vanpool, and Paratransit programs that outline safety responsibilities. As discussed in sections above, the Transportation Services Contractors are managed by the following Valley Metro individuals:

- Bus Transportation Services Contractors – Valley Metro's Manager, Bus Service Delivery
- Vanpool Services Management Company – Valley Metro's Vanpool Program Coordinator
- Paratransit Services – Valley Metro's Manager, Accessible Transit Services
- Alternative Transportation (Ride Choice) – Valley Metro's Manager, Accessible Transit Services

6.2.21 Safety and Security Committee – Bus

The purpose of the Bus Safety and Security Committee (SSC) is to discuss and assess hazards identified via the Hazard Management Program including lessons learned/opportunities for improvement while conducting incident investigations, generating After Action Reports (AAR), Unusual Occurrence Reports (UOR), Incident Notifications, employee observations, passenger inquires/complaints, internal audits and inspections, safety data, etc. The committee typically convenes monthly.

This committee is chaired by the Bus Safety specialist and is comprised of Valley Metro and contractor employees. Attendees may include the following (or their designees):

- Director, SSQA
- Manager, Bus Transit Safety
- Manager, Transit Security
- Manager, Bus Operations
- Bus Fleet Maintenance Specialist
- Facilities Maintenance Coordinator
- Transportation Services Contractors

6.2.22 Regional Security Team

The purpose of the Regional Security Team (RST) is to provide a forum for the regional security stakeholders to share information, align on specific regional issues and coordinate issues on a regional level. The RST is chaired by Valley Metro's Director, SSQA, or designee. The RST is comprised of representatives from Phoenix Police Department, Tempe Police Department, Mesa Police Department, Transportation Security Administration, and Valley Metro's security contractor. The RST typically meets every other month; however, Valley Metro communicates regularly with all law enforcement as needed.

6.2.23 Special Events

Valley Metro plays an integral role in numerous special events, from local/regional, to national and international. Over the years, the agency has developed excellent working relationships with public safety personnel as well as with city leaders and other Valley Metro divisions in the proper planning and execution of mega events.

Depending on the scope of the event, Valley Metro is a member of planning committees well in advance and participates in exercises and after-action discussions. Valley Metro ensures participation in all required meetings during the pre-planning, planning, operational period and after action for all special event requests requiring transit participation. These requests are initiated by public safety personnel and planners, city leaders, division heads to the Director, SSQA.

Valley Metro logs any exercises pertaining to special event planning into the Training and Exercise Calendar which is maintained by Valley Metro's SSQA division.

Large scale events lasting more than one calendar day or events large enough to initiate using the National Incident Management System protocol, may involve Valley Metro Operations, Communications, and Security staff working in the Emergency Operations Center as a regional stakeholder.

6.2.24 Regional Transportation Advisory Group

The Regional Transportation Advisory Group (RTAG) is comprised of Valley Metro and city staff from all member cities. This group meets monthly. Valley Metro's Director, SSQA provides a safety and security report and other information on an as needed basis.

6.2.25 Executive Leadership Team

The Leadership Team is comprised of the CEO and all Division Chiefs/Directors. The group conducts a "check in" each morning to review high priority items. Any critical safety and/or security items are shared with this group and addressed immediately, if necessary.

The group also meets weekly for more detailed discussions and items of significant importance. The Director, SSQA also provides a monthly report on safety, security, and quality assurance items directly to the CEO and the Leadership Team in the form of a monthly status report.

6.3 SMS DOCUMENTATION AND RECORDS

6.3.1 Document Review, Modification, And Distribution

The review of this document is the responsibility of the Director, SSQA and is conducted at least annually.

Each page of Safety and Security documents contains a footer with the document name, organization name, page number, revision number and date. The initial version of a document is

Revision 0. When changes are made to the document, the revision number is increased by one and the month and year is changed to reflect the date of issue. A summary of changes made during each revision is at the beginning of each document. The final document is filed with Document Control. Affected parties are notified when a new revision of a policy is released.

During the fourth quarter of each calendar year, the Director, SSQA emails draft copies of this document and a comment resolution form to the Leadership Team for review. Leadership Team members are:

- Chief Operations Officer
- Director, Communications & Strategic Initiatives
- Director, Capital, and Service Development
- Chief Administrative Officer
- Chief Financial Officer
- General Counsel
- Chief Executive Officer
- Senior Advisor/Chief of Staff

Manager Team members include representatives from each division, all of whom report to the Leadership Team members listed above.

The comment resolution forms are due back to the Director, SSQA by December 30th. When revisions are approved, the revision number and date will be added to the footer and the Director, SSQA will route the final document for Valley Metro's signatures.

After the final document has been signed, it is uploaded into Valley Metro's online document database and the Director, SSQA formally transmits the document to division directors for dissemination among their teams. Additionally, an email will be sent to all employees and contractors about the updated document and how/where it can be viewed.

Task	Responsibility	Target Date
Send out draft copy to division leads for review and redlines	CSO	4th quarter (CY)
Receive feedback from division leads	Leaders/Managers	December 30
Determine if ASP requires revision based on internal review comments	CSO	December 30
Incorporate feedback, if necessary	CSO	January 30
Upon document signature, transmit copies of document to division leads and post on Valley Metro's intranet (if applicable)	CSO	Upon document signature

After the final document has been signed, it will be uploaded into Valley Metro's computerized documentation system and the Director, SSQA will formally transmit the document (or availability of the document to review, if it contains Safety Sensitive Information (SSI)) to division directors for dissemination among their teams. Additionally, an email will be sent to all employees and contractors about the updated documents and how they can be viewed.

6.3.2 Hazardous Materials

Contractual language between Valley Metro and the bus Transportation Services Contractors outlines the requirement for contractors to comply with Valley Metro's safety program to ensure the safety of their employees and Valley Metro employees.

Valley Metro's Hazardous Material Program provides employees, contractors, passengers, and the public with adequate safeguards against exposure to hazardous materials and is described in the Valley Metro Employee Safety Program Plan and Procedures. The program applies to all Valley Metro, Transportation Services Contractors, and other contractor personnel involved in the operation, maintenance, construction, modification, design and repair of the Valley Metro systems. Valley Metro, the Transportation Services Contractors, and all other contractors are required to institute policies and procedures for the safety and protection of the environment and persons who may encounter hazardous materials used in system maintenance and operations.

Valley Metro makes every reasonable effort to protect people and the environment from potentially harmful effects of hazardous materials and waste. All persons subject to this program must comply with applicable local, state, and federal laws pertaining to environmental and personal protection, and to the use, handling, storage, and transportation of hazardous materials as defined by OSHA and Valley Metro safety policies. Areas of responsibility for these procedures

include spill response, clean-up, and investigation; periodic audits of all facilities, properties, and projects; capital program review and advisement; authority policy and procedure review and implementation; and regulatory review and interpretation.

Valley Metro, the Transportation Services Contractors, and all other contractor employees whose job duties expose them to hazardous materials receive initial training and periodic refresher training in hazardous materials identification, SDS, personal protective equipment (PPE), proper handling and disposing of hazardous materials, and emergency procedures in response to hazardous material spills.

All divisions and contract employees that come into contact with hazardous materials, either by accident or through purposeful use, must report any unintended contact to their respective division manager, contract holder, or supervisor immediately. Additionally, any unintended contact with hazardous materials requires immediate contact with Valley Metro's safety team electronically, in person, or in writing, and with the knowledge of the person's immediate supervisor.

Safety Data Sheets (SDS) for chemicals are available to all personnel working at TBOM, MBOM, or in the field. SDS are kept in accordance with OSHA standards and are available for viewing any time work is taking place in that specific area. This requirement applies to all products that meet the requirements as defined in accordance with OSHA regulations in 29 CFR part 1910. Copies of all SDS shall be submitted to the Fire Departments, if required.

The use of PPE and care in following recommended guidelines is closely monitored by both Valley Metro and contracted supervisors. Violations of procedures involving hazardous materials are considered serious and in specific situations can lead to termination of employment.

Valley Metro, the Transportation Services Contractors, and all other contractors conduct periodic site assessments to monitor job and workplace hazards and environmental concerns. Assessment reports are forwarded to Valley Metro's Manager, Transit Safety to ensure issues and concerns are noted and addressed. Incidents are reviewed at the SSC meetings.

The Director, SSQA has direct oversight and responsibility for the implementation of and compliance with the various safety programs related to the handling of hazardous materials and waste. All safety procedures, whether from a Valley Metro contractor or from a Valley Metro division (Vehicle maintenance, MOW, etc.) are required to be reviewed and approved by the Director, SSQA or designee prior to implementation. Individual outside contractors may possess safety procedures for the handling of hazardous materials that exceed those of Valley Metro, as a function of their day-to-day normal activities; however, these procedures still require the approval of SSQA prior to starting work.

The Procurement division shall maintain a comprehensive list of all SDS currently in use by Valley Metro divisions, including contractor-based, so that it may be ordered through the Valley Metro Procurement division. Once purchased, these items must be stored and used in areas in compliance with all applicable codes and standards.

7.0 SAFETY RISK MANAGEMENT

A formal hazard identification, investigation, and resolution process is implemented by Valley Metro to ensure potential system hazards and risks are methodically identified, investigated, assessed, tracked, and resolved. Through this process, Valley Metro seeks to eliminate or minimize injuries to passengers, employees, and the general public while also preventing service delays and damage to property, equipment, and the environment.

If a hazard or potential hazard cannot be entirely mitigated, it is categorized by severity and probability of occurrence, analyzed for potential impact, and mitigated by design, procedures, warning devices or other methods so it falls within the prescribed level of risk acceptable to Valley Metro management.

This risk and hazard management policy applies to all employees, contractors, consultants, and any other person assigned by Valley Metro to have contact with any part of the system and obligates everyone to be constantly vigilant for potential and actual hazards. It covers all aspects of bus and light rail facilities, equipment, vehicles, right-of-way, and work environments.

7.1 SAFETY HAZARD IDENTIFICATION

Hazard identification defines conditions and faults that have the potential to cause an accident. The first step in the process is to define the physical and functional characteristics of the system to be analyzed. These characteristics are presented in terms of the major elements, which make up the system: equipment, procedures, people and environment. Knowledge of how the individual system elements interface with each other is essential to the hazard identification effort.

Valley Metro identifies potential hazards in a variety of ways, including:

- Design reviews where representatives of safety, security, design, construction, and operations participate
- Hazard analyses and special reports prepared by the FTA, other oversight authorities, consultants, Valley Metro, contractors, and suppliers
- Data from previous Valley Metro accidents/incidents or operating experience on existing similar systems
- Inspections, observations, and audits conducted by Valley Metro and external entities
- Observations and experiences of various stakeholders (public, passengers, employees, regulators) during construction, testing, and operations. Examples also include rider reports through customer service.
- Accident, incident, and near-miss reports
- Employee reporting (described in more detail in section 9.1)

7.1.1 Data Acquisition Process

Valley Metro captures safety and security data and information for operations, maintenance, design, and construction activities.

Operations safety and security data is maintained by the Transportation Services Contractors as required by contract. The Transportation Services Contractor's safety and security data that is produced and distributed includes, but is not limited to: daily activity reports, Accident/Incident

Reports, Safety Inspections, Unusual Occurrence Reports, Near Miss/Hazard Report, and employee observations in the field.

When a safety complaint is received via the Customer Assistance System (CAS), it is forwarded to the appropriate entity. The appropriate entity reviews the complaint and responds accordingly. Collection of safety data for Vehicle Maintenance and Facilities Maintenance functions are obtained through Unusual Occurrence Reports and Accident/Incident Reports generated by that specific division. The responsible division maintains a detailed record of the incident and provides a copy to the Director, SSQA or designee.

As described in section 9, several reporting methods are available for employees and contractors to report safety concerns.

7.1.2 Data Analysis

Data related to day-to-day operations is captured on a variety of spreadsheets for tracking and trending and is discussed at SSC meetings and SSQA Business Review Meetings. Periodic summaries are also provided to the CEO and the Board.

7.2 SAFETY RISK ASSESSMENT

The Risk Assessment process consists of two components – Hazard Severity and Hazard Probability.

7.2.1 Hazard Severity

The appropriate Valley Metro committee assesses each potential hazard for its effects on employees, patrons, the general public, and/or Valley Metro. Hazard severity is a subjective measure of the worst possible mishap that could result from design inadequacies, personnel error, environmental conditions, or other procedural deficiencies for systems, subsystems, or component failure or malfunction. Identified potential hazards are categorized into one of four hazard severity levels adapted from MIL-STD-882E.

Severity categories are:

DESCRIPTION	CATEGORY	POTENTIAL CONSEQUENCE
Catastrophic	1	Fatality or multiple severe injuries; severe environmental damage; total system loss; extreme financial loss to Valley Metro
Critical	2	Severe injury or occupational illness; significant environmental, system or equipment damage; major service disruptions; significant financial loss to Valley Metro
Marginal	3	Minor injury or occupational illness; minor environmental, system or equipment damage; minor service disruptions
Negligible	4	Less than minor injury, environmental occupational illness, or less than minor system or equipment damage, or insignificant service disruptions

7.2.2 Hazard Probability

The probability that a potential hazard will occur can be described in potential occurrences per unit of time, events, population items or activity. A qualitative hazard probability may be derived from research, analysis, and evaluation of safety data from the operating experience of Valley Metro or other similar transit systems.

Hazard probability categories are:

DESCRIPTION	LEVEL	SPECIFIC INDIVIDUAL ITEM	FLEET OR INVENTORY
Frequent	A	Likely to occur frequently	Continuously experienced
Reasonably Probable	B	Will occur several times in the life of an item	Will occur frequently
Occasional	C	Likely to occur sometime in the life of an item	Will occur several times
Remote	D	Unlikely, but possible to occur in the life of an item	Unlikely, but can reasonably be expected to occur
Improbable	E	So unlikely that it can be assumed occurrence may not be experienced	Unlikely to occur, but possible
Eliminated	F	Incapable of occurrence. This is used when potential hazards are eliminated.	Incapable of occurrence. This is used when potential hazards are eliminated.

7.2.3 Risk Assessment

The Risk Assessment process provides criteria to Valley Metro for determining the acceptability of assuming a risk associated with a hazard, the necessity of implementing corrective measures to eliminate or reduce the hazard, or a combination of both. Hazard risk assessment involves categorization of hazard severity and probability of occurrence. Each identified hazard is categorized by the Director, SSQA, or designee, and is assisted by the appropriate safety committee.

The risk associated with a hazard severity and probability of occurrence is based on the risk matrix below:

Severity / Probability	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

HAZARD RISK INDEX	RISK	CRITERIA BY INDEX
1A, 1B, 1C, 2A, 2B	HIGH	Unacceptable
1D, 2C, 3A, 3B	SERIOUS	Undesirable – Management decision
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B	MEDIUM	Acceptable with review
4C, 4D, 4E	LOW	Acceptable without review

Different combinations of severity and probability pose varying risks to Valley Metro. Valley Metro management uses the risk assessment process to prioritize hazards and focus available resources on the most serious hazards requiring resolution while effectively managing the available resources.

- Unacceptable - hazards which present a risk that cannot be accepted because of severity and high probability of occurrence and requires elimination of the risk or control of the risk to an acceptable level. Corrective action plans are developed and submitted to Valley Metro's Chief Executive Officer/Accountable Executive for review and approval. These corrective actions are then implemented.
- Undesirable - timely corrective action should be implemented, if at all possible, within fiscal constraints. Reduction of risk to the lowest practical level is accomplished in a variety of methods ranging from protective and warning devices to special procedures. This determination and the hazard resolution are tracked through the appropriate tracking log(s).
- Acceptable with review - Valley Metro's SSQA division and/or appropriate safety committee reviews the hazard to determine if the hazard can remain or whether a realistic mitigating measure can be implemented. This requires review by Chief Operations Officer and Director, SSQA, with input from the Chief Executive Officer/Accountable Executive.
- Acceptable without review - no additional review or action is required by Valley Metro's SSQA division and/or the appropriate safety committee.

7.2.4 Unacceptable Hazards

Unacceptable hazards are investigated by Valley Metro's SSQA division. Once Valley Metro determines the hazard has been identified as unacceptable, a corrective action plan will be developed, and the Chief Executive Officer/Accountable Executive is notified by the SSQA division. The corrective action plan will identify the hazard or deficiency, planned activities/actions to resolve the hazard/deficiency, the division(s) responsible for implementing the corrective actions, and a scheduled completion date for implementation. Unacceptable hazards are also tracked on the Hazard Tracking Log.

7.3 SAFETY RISK MITIGATION/RESOLUTION

Mitigation and resolution of hazards involves defining acceptance criteria for hazards. As described above, this acceptance criteria are based on the severity and probability of occurrence.

The objectives of hazard mitigation/resolution are to:

- Identify areas where hazard mitigation/resolution requires a change in the system design or development of special procedures
- Verify hazards involving interfaces between two or more systems have been resolved
- Verify the mitigation/resolution of a hazard in one system does not create a new hazard in another system

7.3.1 Mitigation/Resolution Review Process

Each hazard reviewed is categorized by the Director, SSQA or designee in conjunction with maintenance, operations, engineering, design, or construction and assisted by the appropriate safety committee based on the nature of the hazard. The applicable committee determines to do one or more of the following to initiate mitigation/resolution of the hazard:

- Develop mitigating measures or a specific correction action plan for mitigation or elimination of the hazard and assessing responsibility for implementation
- Recommend a course of action to division or executive management for mitigation or elimination of the hazard
- Assign a subcommittee to research mitigation/resolution scenarios or alternatives and work with division management to implement
- Communicate the hazard or unsafe condition to the appropriate supervisor/manager for internal follow-up and resolution, including assuring the mitigations/resolutions effectively resolved the hazard and did not introduce any new, unintended hazards.

7.3.2 Hazard Resolution – Order Of Precedence

Several methods are used by Valley Metro to resolve identified hazards, including design changes, modification to construction or construction techniques, installation of controls and warning devices, training, and/or the implementation of special procedures. The hierarchy of hazard mitigation/elimination, from most effective to least effective is:

- Design to eliminate or to minimize hazard severity and/or probability. To the extent permitted by cost and practicality, identified hazards are eliminated or controlled by the design of equipment and facilities.
- Hazards that cannot reasonably be eliminated or controlled through design are controlled to the extent practicable and to an acceptable level of risk using fixed, automatic, or other protective safety design features or devices. Provisions are made for periodic functional checks of these safety devices.
- When design, construction, and safety devices cannot effectively eliminate or control an identified hazard, warning devices are used to the extent practicable. These devices detect the hazard and generate a warning signal to operating personnel and/or the public. Warning signals and their application are designed to minimize the probability of incorrect reaction to the signals.
- Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety devices and warning devices, procedures and training are used to control the hazard. Cautionary language is standardized, and certain safety- critical tasks require personnel certification.

8.0 SAFETY ASSURANCE

8.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT

8.1.1 Overview

Valley Metro's SSQA division captures system wide performance measures through Safety and Security reporting, Accident/Incident Review Boards, and Safety and Security committee meetings. Reportable incidents are logged by the SSQA Division in the Hazard Tracking Log and/or the Accident/Incident Log. The Safety and Security Committee meets regularly to review incidents and to recommend Corrective Action Plans. Valley Metro also works through the Safety Security Committee to review trending in accidents, incidents, and near misses in an effort to develop preventative action planning and/or to review the effectiveness of previous mitigations (if mitigations were implemented and a trend continues, this indicates the mitigations were not fully effective in resolving the trend).

Additionally, Valley Metro assembles quarterly information for submission to its Board of Directors. This information contains Safety and Security metrics for the current fiscal year quarter, the previous quarter, and the previous fiscal year quarter.

8.1.2 Reports

A reporting process showing the rate for incidents and lost time for each month is developed and available for review by Valley Metro. Non-revenue service reporting is through the specific division manager and onto the Director, SSQA or designee. Revenue service-based incidents are reported through the transportation contractors to Operations and the Director, SSQA or designee.

Periodic reports are distributed to senior Valley Metro leaders by SSQA, the Vanpool Program Coordinator, the Manager, Accessible Transit Services, and the Transportation Services Contractors. Additional information, such as investigation reports and unusual occurrence reports are typically not included in the monthly summary report but are available for inclusion if needed.

Safety data is compiled by Valley Metro for a comprehensive report on the state of overall safety and for submission to, and in compliance with, the National Transit Database.

8.1.3 Accident / Incident Reporting and Investigations

8.1.3.1 Overview

Prompt and thorough investigation and reporting of accidents is necessary to:

- Identify all the factors contributing to the cause of an accident while minimizing disruptions to revenue service

- Determine the appropriate corrective action to prevent the accident from reoccurring
- Satisfy requirements for investigation, notification, and corrective actions
- Comply with Valley Metro procedures

8.1.3.2 Accident/Incident Investigation Procedures

Conducting investigations of accidents and incidents is part of the Hazard Management process. Follow-up and corrective action, as applicable, from these investigations are entered into the Accident/Incident tracking log and follow the Hazard Management process. The results of the Transportation Services Contractors' investigations are discussed during SSC meetings. Additionally, the Vanpool Program Coordinator receives copies of accident/incident investigations from the contracted management company for the vanpool program.

As part of the accident investigation, the training and safety records of the involved employee are reviewed by the specific division manager (for non-revenue related accidents) or the Transportation Services Contractor (for revenue related accidents). The specific division manager will have direct involvement in reviewing potential areas of improvement or omission. Regardless of the division involved, the Director, SSQA or designee is also responsible for reviewing accident investigations.

8.1.3.3 Internal Notification Procedure (Revenue Service)

The Transportation Services Contractors notify a multi-disciplinary group of accident/incidents as outlined in contractual language.

8.1.3.4 Corrective Action Resulting from Accident Investigation

When accident investigations identify causal factors that require corrective actions, a Corrective Action Plan is developed and tracked on the Accident/Incident Log. This log identifies the division/contractor responsible for the action identified and a recommended time frame for implementation. Valley Metro Safety monitors the log to ensure all items are carried through to completion.

8.1.4 System and Facilities Inspections

Examples of Valley Metro facilities and equipment that are subject to inspection include, but are not limited to: vehicles, park-n-ride lots, and operation and maintenance facilities.

Specifics for inspection checklists and inspection frequencies are based on manufacturer supplied manuals and industry standards and include the respective manufacturer maintenance manual(s). Should manufacturer information not be available, Valley Metro or the Transportation Services Contractor will provide the standard based on best industry practices. The experiences of employees, Valley Metro as an agency, and the Transportation Services Contractors may also contribute to the content of inspection checklists and the frequencies of inspections.

Buildings and related equipment to the buildings, such as eye wash stations, first aid kits, general housekeeping issues, etc., are subject to an ongoing inspection to ensure the overall cleanliness and safety of the areas being inspected. This approach also includes rigging and equipment that

may be used in the day-to-day activities of workers who reside at any of the buildings located within the TBOM and MBOM campuses.

Bus inspections are made in accordance with manufacturer's recommendations and industry-accepted practices including:

- Periodic inspections specified by component supplier manuals
- Walk-around inspection checklist
- Visual inspection by the operator

The industrial safety plans for all Valley Metro facilities, including those located at the TBOM and MBOM campuses include, but are not limited to:

- The process used for facilities and equipment safety inspections
- Identification of facilities and equipment subject to regular safety related inspection and testing
- Techniques used to conduct inspections and testing
- Inspection schedules and procedures

Valley Metro's Facilities and Maintenance Supervisors and the Safety Division are responsible for the industrial safety plans for their respective facilities. The City of Tempe is responsible for the facility maintenance at the TBOM campus. Each member city is responsible for maintaining its bus stops.

Safety inspections of Valley Metro facilities are conducted by supervisory personnel and various Valley Metro divisions to detect and eliminate potential hazards, to ensure the safety of passengers using Valley Metro facilities, to ensure employee safety, and to ensure compliance with regulations. Checklists are used to ensure uniformity of inspections. Completed checklists are maintained by the division that conducted the inspection as a record of compliance with the safety criteria. These records are subject to audits to verify compliance. Open items found during the inspections are assigned to specific personnel to close the item. Pictures and other supporting documentation often accompany the item, which is tracked, by number, until closed. Persons responsible for correcting (closing) a specific item are assigned a timeline based on the severity of the infraction. An inspection report is issued to the responsible division listing safety and health hazards found during the inspection. All identified hazards not easily correctable are entered into the hazard resolution process and tracked for review and disposition via the SSC.

8.1.5 Maintenance/Inspections

Although similar in nature and approach to the section above, the specific requirements of this section relate to maintenance inspections of physical equipment located along the wayside and at the TBOM and MBOM campuses. The requirements ensure the equipment performs as originally designed and is safe to operate on a day-to-day basis.

Examples of these inspections relate to manufacturer requirements for inspection of a specific item (busses, radio performance testing, etc.) or scheduled preventative maintenance (PM) activities as called out by the manufacturer. Examples of areas subject to PM or other inspection

include, but are not limited to busses, vanpool vehicles, park-n-ride lots, security kiosks, operator break rooms at the end of line stations, and all facilities in the TBOM and MBOM campuses.

Inspections and PM procedures are conducted to comply with all manuals and instructions provided by manufacturers or providers of the equipment being maintained or inspected. In the event more stringent PM or other maintenance is required (based on existing systems operation,

PM, repair and safety outcome. Such practices shall be documented in accordance with Valley Metro procedures.

Detailed PM procedures and checklists are included in the applicable system and manufacturer maintenance manual. Inspections and PM activities are typically conducted by the Valley Metro technician responsible for such activities or operational system and are then forwarded to the supervisory personnel familiar with the equipment or work processes being inspected or undergoing PM.

In the event a safety issue is discovered during the performance of the PM or related inspection, the specific issue is addressed and repaired within the PM. If the repair cannot be performed, the item is transferred to the inspection log designed for such use.

Timelines associated with the repair or mitigation of safety issues are tracked through to completion. Safety issues that have a significant impact on either passenger or employee safety that cannot be addressed during the designated PM time frame are immediately relayed to Director, SSQA in written form.

Safety audits of PMs and other related inspections include but are not limited to: identification of affected facilities and equipment, maintenance cycles, documentation review, and integration of identified issues into the hazard management process. The division manager shall make available to the auditor the actual PM or inspection procedure, if requested. The division manager shall keep previous revisions of the inspection or PM procedure as an active record and to show evolution (if any) of the process for that specific system. All PM/Maintenance procedures shall be recorded and stored in the workorder system.

8.1.7 Transit Asset Management Plan (TAMP)

Transit asset management (TAM) is a strategic business practice intended to support transit agencies with maintaining their assets in a state of good repair. In an effort to reduce the future costs of repairs and replacement of transit capital assets, the Federal Transit Administration has made asset management a high priority as part of an effort from the Moving Ahead for Progress in the 21st Century Act (MAP-21). The FTA TAM final rule defines an asset inventory as a register of capital assets. The inventory must include the quantity and type of all capital assets that a transit provider owns, except for non-vehicle equipment values at less than $50,000. In addition, the inventory includes any rolling stock, guideway infrastructure, and maintenance, passenger, or administrative facilities that are owned by third-party contractors and used by transit agencies.

Valley Metro has developed a Transit Asset Management Plan to meet the Federal TAM requirements of a Tier I transit provider. The TAMP includes an inventory of capital assets, an assessment of asset condition, and the processes and tools that support investment prioritization. Additionally, the TAMP states Valley Metro's TAM and State of Good Repair policy, outlines the implementation strategy, assigns key activities, summarizes resources, and includes an evaluation plan for continual improvement. If an asset is rated a 2 or lower by a condition assessment, the TAMP Manager will notify the Safety team. Safety will meet with the appropriate division(s) to identify and resolve potential hazards associated with substandard or failed conditions. This document is signed by the Accountable Executive.

There are two groups of subject matter experts that support the Asset Management Program Manager. The Asset Management Technical Team includes representative from each operating division who engage in lifecycle asset management planning. The second group of subject matter experts is the Asset Management Working Group. This working group is comprised of representatives from diverse areas throughout the Agency, including marketing, bus and rail transportation, finance, and accounting, and SSQA. One of the main purposes of the Working Group is to assist in implementing new or updated strategies, objectives, plans, schedules, processes, procedures, etc.

Valley Metro uses several tools to support investment prioritization. From budgeting to programming project needs, to changing and/or expanding services, to managing assets, there are several processes used for decision-making; these processes do not necessarily require the use of specialized software. Section 4 of the TAMP provides additional information on these various decision support tools.

In accordance with the TAM final rule, Valley Metro will periodically review and revise the TAMP to ensure that is continues to align with the Agency's strategic goals, complies with FTA requirements and, most importantly, improves the safety and reliability of Valley Metro's assets. Valley Metro will set performance targets for the following fiscal year each July and will update the TAMP each year that inventory changes. Additionally, Valley Metro will update the entire TAMP at least once every four years in accordance with the FTA mandate.

8.2 MANAGEMENT OF CHANGE

8.2.1 Non-Rail ASP Document Control

Sections 2.0 and 6.3.1 outline how revisions of this document are controlled.

8.2.2 Changes Related to Organizational Structure

Valley Metro's organizational structure and proposed changes to the organizational structure are reviewed by the Leadership Team.

As described throughout this document, the effects of changes in organizational structure, training, and other people-related changes are monitored as part of ongoing safety assurances,

accident / incident / near miss investigations, employee safety concerns reporting, and routine safety-related meetings.

8.3 CONTINUOUS IMPROVEMENT

Valley Metro assesses its safety performance in a variety of ways. As outlined above, data is collected from several sources, reviewed by the safety team and other applicable personnel, and is discussed at various meetings. Additionally, Valley Metro has established its performance targets for CY2023 and will be tracking performance monthly. Performance measures and targets will be reviewed and updated as part of the annual review of this document.

Random ride checks are performed to evaluate adherence to contractual requirements, such as badging, uniforms, fare collection, following routes, head signs, and ADA compliance.

9.0 SAFTEY PROMOTION

9.1 SAFETY COMMUNICATION

9.1.1 Employee Safety Reporting System

In addition to reaching out directly to managers, supervisors, and Valley Metro's Safety team, the agency provides several other processes for employees and contractors to report safety concerns.

- Emailing VMSafetyConcerns@ValleyMetro.org. The distribution list for this email address is Valley Metro's Safety team.
- Calling (833) 232-SAFE (7233), which allows for the caller to remain anonymous, if desired. This phone number is staffed by a non-SSQA Valley Metro team member 24 x 7. The content of these calls is then provided to Valley Metro's Safety team via email. The Safety team is immediately contacted by phone if the concern needs immediate resolution.
- Completing a web-based form on Valley Metro's intranet at http://safe.valleymetro.org, which allows for the individual to remain anonymous, if desired. The completed forms are emailed to Valley Metro's Safety team for follow-up. The website clearly indicates critical safety concerns should be called into the phone number above for immediate attention.
- Filling out a comment card. These cards are available in break rooms throughout the agency. Cards with safety-related comments are forwarded to the Safety team.

A member of Valley Metro's Safety team responds to each concern and tracks them on a spreadsheet to ensure follow through. If the individual reporting the safety concern provides a phone number and/or email address, a member of Valley Metro's Safety team will contact the individual to provide feedback on the concern (for example, actions that were immediately taken, a timeframe for resolution, and/or asking the individual if the actions taken fully addressed his/her concern). If the individual reports anonymously, Valley Metro Safety indicates "anonymous" on the tracking spreadsheet. A summary is provided during the Safety and Security Committee meetings.

The employee safety reporting system has been shared with employees and contractors in a variety of ways. Communication tactics included mass emails, posters in employee common areas, magnets in high visibility areas throughout the agency (refrigerators, ice machines, door frames, near timeclocks), and messages on monitors across the agency. The Safety team will continue to work with Marketing on new communication strategies related to employee safety reporting (for example, new posters/magnets or business cards).

In accordance with Valley Metro's Anti-Discrimination, Harassment & Retaliation Policy & Complaint Procedure, Valley Metro does not tolerate retaliation against anyone asking questions or who is raising or reporting concerns in good faith. Our employees should always feel comfortable coming forward or immediately reporting concerns through one of the reporting

channels. Deliberate or egregious safety violations will not be tolerated and will be subject to progressive disciplinary action.

9.1.2 Communication of Safety-Related Messages To The Agency

Valley Metro uses a variety of processes to share safety-related messages throughout the organization. As previously described, document revisions are transmitted to division directors to share with their teams. The SSQA Director also emails a variety of information throughout the agency, including safety and security tips/messages (related to specific times of the year, holidays, etc.). SSQA has a division-specific page on the intranet with information that is updated on a periodic basis.

Information about the employee reporting system was rolled out using a variety of methods, including emails, posters, and magnets. New communications materials will be rolled out on a periodic basis to ensure the message is continuously shared.

9.2 COMPETENCIES AND TRAINING

It is Valley Metro's policy that all employees working on the Valley Metro system are properly trained and qualified to perform the duties to which they are assigned prior to performing those duties. Verifications of such qualification are conducted through internal audits of training programs, documentation, and interview of trained personnel.

Specific "construction based" safety and security training is not addressed in this section. Construction safety and security training related to capital projects is responsibility of the Valley Metro Capital and Service Development Division; however, all construction personnel retained by Valley Metro shall attend and remain current in the training as detailed below. It is the responsibility of the Capital and Service Development Project Manager to ensure training on his/her project(s) remains current. Construction based safety and security work for current and future capital projects are evaluated on a project specific basis and such procedures and documentation shall be in accordance with Valley Metro Safety and Security approval, prior to work start.

9.2.1 Rules Compliance / Procedure Review

9.2.1.1 Overview

Bus system operations are governed by operating procedures and Transportation Services Contractor(s) Rulebooks. Operating rules and procedures provide specific directives for conducting transit operations and maintenance procedures to identify the maintenance requirements for the complete system.

9.2.1.2 Review of Rules and Procedures

The Transportation Services Contractors are responsible for periodic reviews of the operating procedures and Transportation Rulebook. Immediate need for rule and/or procedural changes are handled by special orders and/or bulletins. These serve as temporary rules and procedures until the rule or procedure is revised.

9.2.1.3 Process for Ensuring Rules Compliance

Achieving successful compliance with rules and procedures is facilitated through:

- Training of all personnel with regards to rules and procedures
- Managers and supervisors setting positive examples for employees
- Requiring that all staff under a specific managers direction know and follow applicable rules and procedures
- Immediate and consistent disciplinary action to ensure that employees follow established rules and procedures. Likewise, immediate, and consistent praise to ensure employees are recognized for demonstrating adherence to the rules and procedures
- Identifying the resources necessary to follow applicable rules and procedures, and ensuring that such resources are available to all employees and contractors
- Establishing methods of recognition that provide further incentives for demonstrating compliance with rules and procedures.

9.2.1.4 Compliance Techniques

Valley Metro rules compliance is conducted to determine the knowledge and application of operating rules and procedures. Operations is responsible for assuring implementation, development, managing changes as well as providing direct oversite compliance with day-to-day activities to determine effectiveness. Compliance is monitored, verified, and enforced through direct supervision and observation of skills, as well as competency testing, both on the job and through structured classroom setting.

Day-to-day compliance with established rules and procedures is the responsibility of all managers and supervisors and they are held accountable for the safety performance of their staff through periodic reviews. Periodic audits of supervisory personnel for compliance with rules and procedures are conducted by the Director, SSQA or designee, the Transportation Services Contractors, and Valley Metro's operations and maintenance managers/directors. All audit results, regardless of auditing mechanism, are reviewed by the Valley Metro Director, SSQA.

9.2.1.5 Documentation

Records of rules compliance checks are maintained by the Transportation Services Contractors and are reviewed periodically, but not less than annually, by the Director, SSQA or designee. Any potential hazards identified are tracked through resolution and violations are monitored for improvement through follow-up checks.

9.2.2 Employee Safety Program (Direct and Contractor)

Valley Metro's Employee Safety Program is described in the Employee Safety Program Plan and Procedures. The Transportation Services Contractors and all other contractors working with Valley Metro have established safety rules and programs to maintain a safe work environment for their employees. These contractor rules and programs are at least as stringent as the requirements outlined in Valley Metro's Employee Safety Program Plan and Procedures and apply to all employees working directly for Valley Metro, the Transportation Services Contractors, or any other contractor, regardless of purpose, who may come to be employed by Valley Metro.

Contractors' employee safety standards are auditable by Valley Metro as part of contract compliance reviews. Elements of the employee safety programs include but are not limited to Right-to-Know programs, the hazard identification and resolution process, worker protection and

the revenue or maintenance alignment are also subject to these provisions and each contractor, through Valley Metro's Director, Capital and Service Development, shall ensure compliance to this auditable element.

All Valley Metro contractors, including the Transportation Services Contractors, and all direct Valley Metro employees must provide and receive initial personal safety training as well as job-specific, technical training. These training procedures must be approved by the Director, SSQA (if related to safety and/or security) and the applicable division manager prior to implementation by the specific contractor or direct employee division manager.

All managers, regardless of affiliation with bus operations, must provide supplemental and refresher training for repetitive, new, or revised tasks, technologies, territory, or equipment while under the direct supervision of any Valley Metro division tied to any aspect of revenue or maintenance service. The need for training recertification depends on the safety critical nature of the job and any re-certifiable applicable skills as may be required by Valley Metro and/or the equipment/system manufacturer. Additional safety meetings and safety procedures may be implemented by contractors directly involved in capital construction projects not yet tied to the revenue alignment. These "toolbox talks" and other safety meetings fall outside the intent of this section and are specific to ongoing capital projects work.

All safety information and materials are provided and made available to operations, maintenance, facilities maintenance personnel, and other contractors as needed. Postings at remote job locations, offices, and other work areas shall clearly show the requirements discussed in this section.

In addition to its own safety standards, Valley Metro requires the coordination and cooperation with a variety of Federal, State, and local agencies to ensure the safety of the system. Examples of these agencies include, but are not limited to:

- Arizona Department of Transportation (ADOT)
- Federal Transit Administration
- Occupational Safety & Health Administration / Arizona Division of Occupational Safety & Health
- Local fire / rescue divisions
- Local police divisions
- Transportation Security Administration, Surface Transportation Inspectors
- Local emergency management agencies
- Utility companies
- Medical facilities

The Director, SSQA is the governing authority to ensure and establish compliance with the standards in this section.

9.2.3 Transportation Services Contractors

Operator training (initial and refresher), supplemental training, Supervisor training, Maintenance Manager and Technician training, Front Line Supervision training, and security training programs.

Vanpool drivers must go through an approval process by the management company. Once approved to operate a vehicle, the driver must complete safety training prior to operating the vehicle.

9.2.4 Outside Contractor Training

All safety-related elements of initial training involving new equipment and facilities are documented. Contractors support training by providing necessary systems and equipment documents that relate to training, such as operations, safety and maintenance manuals.

The manuals and procedures provided by the contractor or sub-tier contractor are reviewed by the applicable Valley Metro division manager and SSQA prior to authorization to proceed with the work as detailed in the contract. Copies of the procedures shall remain with the applicable Valley Division manager and SSQA. Additional copies of these procedures may reside with the Valley Metro procurement division, should such activities be tied to pay-for-performance goals, or liquidated damages (LD) provisions as may be held within the contract documents. The decision to generate such documentation to the procurement division shall fall to the Valley Metro division manager authorizing the contractor to perform the work.

9.2.5 Training Requirements

Valley Metro employees and contracted staff attend a new employee orientation. The SSQA division leads a Safety and Security presentation as part of the orientation program. Topics discussed include PTASP/SMS, employee reporting system for safety concerns, and emergency preparedness. Additional training is provided to affected staff members as outlined in the Employee Safety Program Plan.

Bus employees are trained and qualified on operating rules, timetable and special instructions, safety rules, and standard operating procedures.

Additionally, some staff members are required to complete additional training in order to ensure compliance with Part 672. Below is a list of various safety-related training courses along with job titles of those who will be required to complete this additional training:

- **PTSCTP – Bus:**
    - Director, SSQA
    - Manager, Bus Transit Safety
    - Transit Bus Safety Specialist
    - Manager, Transit Security
    - Manager, Quality Assurance
    - Chief Operations Officer
    - Manager, Bus Operations

- Transportation Services Contractor(s) Safety Manager(s)
- Others responsible for accident investigations

- **TSSP – Bus:**
  - Director, SSQA
  - Manager, Bus Transit Safety
  - Transit Bus Safety Specialist
  - Manager, Transit Security
  - Quality Assurance Manager
  - Chief Operations Officer
  - Manager, Bus Operations

- **TSI SMS Awareness:**
  - Valley Metro Executive Leadership, Directors, and Managers

- **NIMS 100 and 200:**
  - Director, SSQA
  - Manager, Bus Transit Safety
  - Manager, Transit Security

And any other operations personnel as designated by SSQA or Division Director/Chief of that Division. Preferred to have Deputy Director level and/or Manager level for Bus Operations when practical for this higher level of NIMS.

Director SSQA and SSQA Personnel will function as the primary lead in Emergency Operations Centers and work with Operations on response and recovery capabilities

- **Overview of Valley Metro's ASP/General Safety/Security/Emergency Preparedness Orientation**
  - All Valley Metro employees and contracted staff

10.0 CORRECTIVE ACTION PLANS

10.1 SOURCES OF CORRECTIVE ACTION PLANS

When issues arise that require corrective action, a corrective action plan is created. There are multiple ways an issue may be brought to the attention of the SSQA team, including, but are not limited to the following:

- Hazards identified/reported by the Safety and Security Committee, employees, contractors, external agencies, member cities public safety, board members or the public
- Audits/Inspections
- Issues/opportunities for improvement or hazards identified as a result of an accident/incident investigation
- Issues/opportunities for improvement or hazards identified as a result of performing trend analysis
- Issues/opportunities for improvement or hazards identified as a result of an After- Action Review
- Any other means that a hazard is brought to the attention of the Valley Metro Safety Division requiring further mitigation or possibly policy/procedure change, training, equipment or system modification.

10.2 CORRECTIVE ACTION PLANS

When an issue requiring corrective action is identified, a Corrective Action Plan is created.

Below is Valley Metro's template used for corrective action planning.

CAP DETAILS	Description
CAP: Source	Where the CAP was generated from. For example, Internal Safety & Security Audit, employee report, accident report, etc.
CAP: ID Number	Unique ID number generated by SSQA
CAP: Identified Action	Issue that is being addressed in the corrective action plan
CAP: Proposed Implementation Date	Anticipated date to implement the CAP actions
CAP: Actual Implementation Date *(closed only)*	When CAP actions were actually implemented
CAP: Individual Responsible for Implementation	Who (by name) is responsible for ensuring the CAP is implemented
CAP: Department Responsible for Implementation	Which department/division is responsible for implementing the CAP
CAP: Status	Status – Open, Closed, Pending
CAP: Implementation Verified? *(Closed only)*	Date the implementation of CAP actions was verified

CAP DETAILS	Description
CAP: Issues Preventing Resolution *(Open only)*	What, if any, issues are preventing resolution of the CAP
CAP: Status Updates	Narrative of updates of work to implement CAP
CAP: Alternative	If needed

Corrective actions plan, developed as the result of an accident, are included on the Accident / Incident tracking log. Valley Metro Safety monitors these corrective action plans that are created by the Transportation Services Contractor and follows-up to ensure the activities are completed according to the details outlined in the corrective action plan.

10.3 CORRECTIVE ACTION PLAN MONITORING LOG

Each of the Corrective Actions Plans is then tracked by the SSQA division on a monitoring log. Information collected in the CAP Monitoring Log includes:

- Source – how the issue was reported (audit, incident investigation, employee report, design review, FTA finding, etc.)
- Date Opened – when the hazard was identified
- CAP Internal Tracking ID Number – the CAP Monitoring Log is numbered sequentially each year
- Identified Action – a narrative of the actions that should occur
- Proposed Implementation Date
- Actual Implementation Date
- Individual Responsible for Implementation – must include name(s) of those responsible for implemented the actions
- Department Responsible for Implementation
- CAP Status – Open or Closed
- Implementation Verified
- Issues Preventing Resolution

10.4 COMMUNICATION RELATED TO CORRECTIVE ACTION PLANNING

The CAP log should be updated at least monthly by the responsible parties. If the need to change or modify a CAP occurs, the responsible person must update each applicable column of the CAP Monitoring Log, provide a detailed explanation for the change, outline the subsequent steps towards mitigation, and demonstrate an acceptable level of risk for the Safety and Security Committee's (or other committee, as appropriate) approval. If there are obstacles/barriers preventing close out of a CAP, the Director, SSQA reaches out to the CEO/Accountable Executive for assistance.

11.0 BIPARTISAN INFRASTRUCTURE LAW

11.1 OVERVIEW

Congress establishes the funding for FTA programs through authorizing legislation that amends Chapter 53 of Title 49 of the U.S. Code. On November 5, Congress sent President Biden the Bipartisan Infrastructure Law for signature. The legislation reauthorizes surface transportation programs for FY 2022-2026 and provides advance appropriations for certain programs. The Bipartisan Infrastructure Law authorizes up to $108 billion to support federal public transportation programs, including $91 billion in guaranteed funding.

By July 31, 2022, a transit agency that receives Section 5307 funding and serves a large, urbanized area (an urbanized area with a population of 200,000 or more) must establish a Safety Committee compliant with 49 U.S.C. § 5329(d)(5). Once established, the Safety Committee should begin work to meet its responsibilities as soon as practicable. If a transit agency is not yet compliant with the new PTASP requirements, FTA expects that by December 31, 2022, the Safety Committee will comply with the statutory requirement that it must approve an update to the agency's Agency Safety Plan (ASP), incorporating applicable PTASP requirements in 49 U.S.C. § 5329(d).

12.0 DOCUMENTATION, DEFINITIONS, AND ACRONYMS

12.1 DOCUMENTATION

Documentation is maintained in accordance with Valley Metro's Records Retention policy. ASP and SMS documentation is retained for a minimum of three years. Upon the request of the FTA or any other Federal entity, Valley Metro will make documentation available in accordance with its policy and procedures for releasing information and protecting Safety Sensitive Information (SSI).

12.1.1 Training Documentation

Each division is responsible for maintaining their corresponding training records for their employees, consultants, contractors, and sub-tier contractors. Valley Metro divisions maintain their corresponding training records for their employees. Records are kept in a secure location and are available to Valley Metro's SSQA team for periodic audit.

Division managers involved with consultants, contractors and sub-tier contractors ensure that outside safety documents and procedures shall not conflict with Valley Metro safety and security requirements. Divisions will not allow consultant, contractor, or sub-tier contractor documents to supersede Valley Metro safety training during the duration of the contract term.

12.2 DEFINITIONS

Accountable Executive means a single, identifiable person who has ultimate responsibility for carryout 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.

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 service 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.

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 Safety Plan.

Event means any Accident, Incident, or Occurrence.

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

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 a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

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 transportation as defined under 49 U.S.C. 5302(14).

Performance measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress towards 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 Federal Transit Administration (FTA).

Public Transportation Agency Safety Plan means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part (673.5).

Public Transportation Safety Certification Training Program means either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with 49 U.S.C. 5329(c) (2), or the program authorized by 49 U.S.C. 5339 (c)(1).

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

Rail transit agency means any entity that provides services on a rail fixed guideway public transportation system.

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

Safety 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 (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systemic procedures, practices, and policies for managing risks and hazards.

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

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 Public Transportation 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 the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhage, 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.

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a railed fixed guideway public transportation system.

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.

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

State Safety Oversight Agency means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329 and the regulations set forth in 49 CFR Part 674.

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.

12.3 ACRONYMS

Acronym	Definition
AIP	Accident / Incident Investigation Plan
BASE	Baseline Assessment and Security Enhancement Program
CAP	Corrective Action Plan
CAS	Customer Assistance System
CEO	Chief Executive Officer
COO	Chief Operations Officer
CPTED	Crime Prevention Through Environmental Design
CSO	Chief Safety Officer
DCM	Design Criteria Manual
FTA	Federal Transit Administration
MBOM	Mesa Bus Operations & Maintenance Facility
MOE	Maintenance of Equipment
MOW	Maintenance of Way
NTD	National Transportation Database
NTSB	National Transportation Safety Board
OCC	Operations Control Center
OMC	Operations and Maintenance Center
PPE	Personal Protective Equipment
PM	Preventative Maintenance
PRO	Pre-Revenue Operations
ASP	Agency Safety Plan
PTSCTP	Public Transportation Safety Certification Training Program

Acronym	Definition
RMC	Regional Management Committee
RPTA	Regional Public Transportation Authority
RST	Regional Security Team
SDS	Safety Data Sheet
SMS	Safety Management Systems
SOP	Standard Operating Procedure
SSQA	Safety, Security and Quality Assurance
TBOM	Tempe Bus Operations & Maintenance Facility
TSA	Transportation Security Administration
TSSP	Transit Safety and Security Program
UASI	Urban Area Security Initiative
UOR	Unusual Occurrence Report
VMR	Valley Metro Rail

APPENDIX A: 2021 NTD SAFETY & SECURITY QUICK REFERENCE GUIDE – NON-RAIL MODE REPORTING

Copied from: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/subdoc/301/2020-ntd-quick- reference-guide-non-rail.pdf

Reportable Event: *A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a maintenance facility (or rail yard), during a transit related maintenance activity, or involving a transit revenue vehicle. Excluded from this event reporting requirement are: events that occur off transit property where affected persons, vehicles, or objects come to rest on transit property after the event, OSHA events in administrative buildings, deaths that are a result of illness or other natural causes, other events (assault, robbery, non-transit vehicle collisions, etc.) occurring at bus stops or shelters that are not on transit-controlled property, collisions that occur while travelling to or from a transit-related maintenance activity, collisions involving a supervisor car, or other transit service vehicle operating on public roads.)*	
S&S-40 Major Event Report	**S&S-50 Non-Major Monthly Summary**
MAJOR THRESHOLDS	**NON-MAJOR THRESHOLDS**
An event meeting the reportable event definition AND meeting <u>one or more</u> of the following reporting thresholds: • A fatality confirmed within 30 days (including suicide) • An injury requiring transport away from the scene for medical attention for one or more persons (partial exception in the case of Other Safety Events) • Estimated property damage equal to or exceeding $25,000 • An evacuation for life safety reasons • Collisions involving transit roadway revenue vehicles that require towing away of a transit roadway vehicle or other non-transit roadway vehicle **Reports are due within 30 days of the date of the event**	Less severe Other Safety Occurrence Not Otherwise Classified (OSONOC) injuries meeting the reportable event definition that is that is **NOT** a result of a collision, evacuation, security event, hazmat spill, or Act of God, and non-major fires. Other Safety Occurrence Not Otherwise Classified (OSONOC): • Single injury event requiring transport away from the scene for medical attention (do not report “minor” collisions on S&S-50) Fires: • Requiring suppression that **does not** meet a major incident reporting threshold injury, fatality, evacuation, or property damage of $25,000 or more). **Reports due by the end of the following month (e.g., January data due by end of February)**

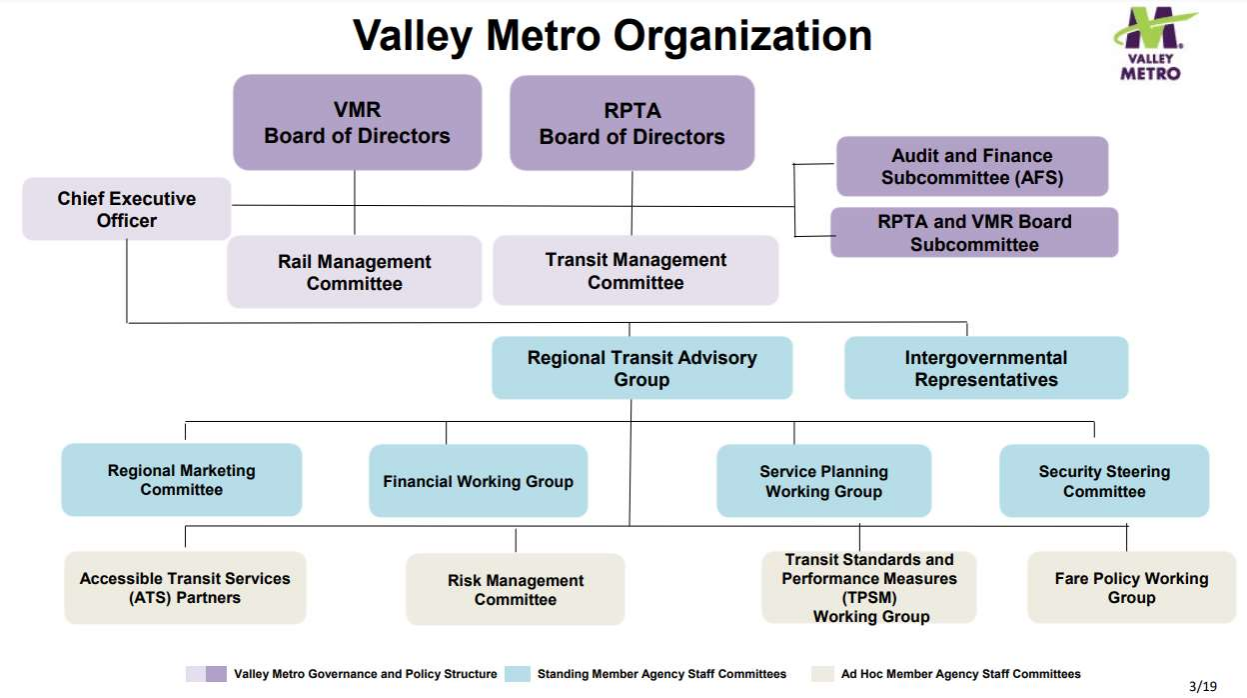
EVENT TYPES	EVENT TYPES

• Collision (including suicide/attempted suicide)
• Fire
• Hazardous material spill (requires *specialized* clean-up)
• Acts of God (nature)
• System security:
  • Arson
  • Bomb threat/bombing
  • Burglary / Vandalism
  • Chemical/biological/radiological/nuclear release
  • Cyber security event
  • Hijacking
  • Sabotage
  • Suspicious package
  • Other security event (shots fired, projectiles, etc.)
• Personal Security:
  • Assault
  • Homicide
  • Suicide or Attempted Suicide (no transit vehicle involved)
  • Robbery
  • Larceny/theft
  • Motor vehicle theft
  • Rape
  • Other personal security events (perpetrator tazing)
• Other Safety Occurrences not Otherwise Classified (OSONOC) (two injuries and/or another threshold)
Miscellaneous events that meet a threshold
	Other Safety Occurrence not Otherwise Classified (OSONOC):
	
	Injury due to:
	• Slip/Trip
	• Fall
	  • Including person making contact with a non-moving transit vehicle
	• Injury to maintenance workers
	• Boarding/alighting
	• Electric shock/burns
	• Abrupt or evasive transit vehicle maneuvers
	• Mobility device (e.g. wheelchair) securement issues
	• Injury sustained on a mobility device lift
	• Stairs/elevator/escalator injury
	
	Fire:
	• Requires suppression but no major threshold is met
	  • Small fire on in transit station
	• Small engine fire on transit vehicle

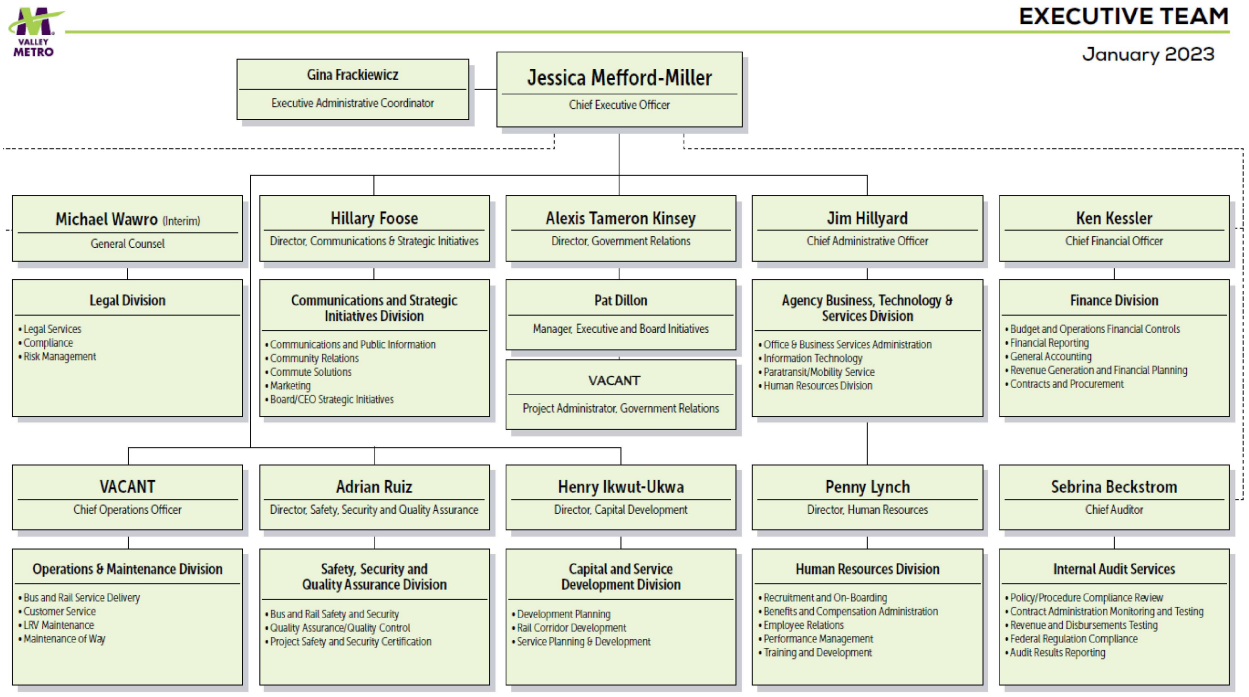
APPENDIX B: ORGANIZATIONAL CHARTS

Below are high-level Valley Metro organizational charts. For the purpose of efficiency, the organizational charts in this document will be updated as part of the annual document review. In between revisions of this document, the most current organizational chart can be obtained by contacting the Director, SSQA.

Valley Metro Organization



Executive Division



APPENDIX C – SMS IMPLEMENTATION PLAN (REVISION 1, JANUARY 2021)

This SMS Implementation Plan template was provided to Valley Metro by Arizona Department of Transportation in April 2020 and has been updated to reflect changes to timeline and personnel responsibility (Technical Assistance Document 20-01).

PURPOSE

The SMS Implementation Plan serves as a companion document to the Agency Safety Plan (ASP). This plan describes the details of who, what, where, when, and how the agency will build its SMS by formalizing the processes and procedures necessary to develop, operationalize, and verify implementation. This plan ensures that key roles and responsibilities have been established, critical activities have been identified, significant timelines and milestones scheduled, and necessary resources and staffing allocated for each phase of SMS development.

KEY STAKEHOLDERS

Accountable Executive: **Jessica Mefford-Miller –** Chief Executive Officer, Valley Metro

Chief Safety Officer: **Adrian Ruiz –** Director, Safety, Security, and Quality Assurance, Valley Metro

SMS Implementation Manager: **Frank Sottile –** Bus Safety Manager, Valley Metro

Key Staff: **Vacant –** Chief Operations Officer, Valley Metro (formerly Ray Abraham)
Henry Ikwut-Ukwa – Director, Capital Development, Valley Metro
Penny Lynch – Director, Human Resources, Valley Metro
Julie Landsburg – Training Administrator, Valley Metro
Transportation Services Contractors

IMPLEMENTATION ACTIVITY BY PHASE

#	Activity	Responsibility	Sample Deliverables	Proposed Implementation Date
Phase 0: Orientation and Familiarization				
0.1	Obtain Executive Commitment	Scott Smith	Signed Safety Management Policy Statement	Complete

#	Activity	Responsibility	Sample Deliverables	Proposed Implementation Date
0.2	Identify SMS Implementation Manager	Adrian Ruiz	Manager, Transit Safety designated as SMS Implementation Manager	Complete
0.3	Conduct SMS orientation and awareness presentations	Adrian Ruiz	Training agendas and sign-in sheets	Q1 2021
0.4	Distribute SMS familiarization documents	Adrian Ruiz	Acknowledgement of receipt forms	Q1 2021
Phase I: Planning, Organization, and Policy Development				
1.1	Develop SMS Implementation Plan	Andrea Crowe	SMS Implementation Plan, Rev. 0	Complete
1.2	Complete SMS implementation gap analysis	Kenneth DeBow	SMS Gap Analysis Report	Complete
1.3	Develop Public Transportation Agency Safety Plan: • Establish Safety Management Policy • Develop blueprint of essential activities of Safety Risk Management • Develop blueprint of essential activities of Safety Assurance • Develop blueprint of essential activities of Safety Promotion	Andrea Crowe	PTASP, Rev 0 (Document titled ASP Rev 2)	Complete
1.4	Complete SMS Workload Assessment • Staffing resources needed based on SMS implementation tasks and level of effort • Timeline for increasing staffing resources	Adrian Ruiz	SMS Workload Assessment Report	Complete
1.5	Complete training needs assessment • Identification of SMS competencies and required training, by position • Program to deliver training in timely and effective manner	Kenneth DeBow Julie Landsburg	Training Needs Assessment Report	Complete
1.6	Complete recordkeeping gap analysis	Kenneth DeBow Julie Landsburg	Recordkeeping Assessment Report	Ongoing
1.7	Develop infrastructure for safety management communication throughout the system	Adrian Ruiz	• Intranet • Posters • Emails • Phone Hotlines • Cards	Ongoing Marketing activities

#	Activity	Responsibility	Sample Deliverables	Proposed Implementation Date
			• Periodic ASP Refresher training	
1.8	Identify sources of data necessary for safety assurance activities	Adrian Ruiz Ray Abraham Henry Ikwut-Ukwa	List / Database of Safety Data Sources	Ongoing
Phase II: Safety Risk Management				
2.1	Initiate resource allocation activities to address staffing needs by department *(Follows Task 1.4)*	Adrian Ruiz	Staffing Plan, Budgetary Process	January 1, 2022 – Ongoing
2.2	Initiate training program to address SMS needs by department *(Follows Task 1.5)*	Kenneth DeBow Julie Landsburg	Training Program Plan	Complete
2.3	Develop procedures and forms to document SMS activities by department *(Follows Task 1.6)*	Kenneth DeBow Julie Landsburg	• SOPs • SMPs • SMS Policies	Complete
2.4	Initiate Safety Management Communication throughout agency *(Follows Task 1.7)*	Adrian Ruiz	• Intranet • Posters • Emails • Phone Hotlines • Cards • Periodic ASP Refresher Training	Ongoing Marketing Activities
2.5	Initiate Employee Safety Reporting Program *(Follows Task 1.7)*	Andrea Crowe	• ESRP Handbook • Anti-Retaliation Policy	Complete
2.6	Initiate safety risk management activities, including identification, assessment, and resolution, for each department *(Follows Tasks 2.2 and 2.3)*	Adrian Ruiz Ray Abraham Penny Lynch Henry Ikwut-Ukwa ACI	• Hazard Management Plan • Accident Investigation Plan • Hazard and event final reports and tracking logs	Complete
2.7	Develop infrastructure for safety performance monitoring and measurement, including process to receive and analyze data from all sources and establishing performance indicators and targets *(Follows Task 1.8)*	Adrian Ruiz Ray Abraham	Safety Data Acquisition and Analysis Group	Complete
2.8	Develop infrastructure for management of change, including defining thresholds for engaging in change management activities and ensuring that all departments know and adhere to those requirements	Adrian Ruiz Ray Abraham Henry Ikwut-Ukwa	• Change Management Program • Agency Policies • SSCP • SSMP • Configuration Management Plan	Complete

#	Activity	Responsibility	Sample Deliverables	Proposed Implementation Date
2.9	Develop infrastructure for continuous improvement, including developing improvement criteria, establishing internal SMS assessments, and process to participate and develop corrective actions from external assessments	Adrian Ruiz Ray Abraham Henry Ikwut-Ukwa	• Internal Safety and Security Audit Program • Corrective Action Plan Program • Business Review Meetings	Complete
2.10	Revise SMS Implementation Plan based on the outcomes of the above activities	Adrian Ruiz	SMS Implementation Plan, Rev. 2	Complete
Phase III: Safety Assurance				
3.1	Initiate safety performance monitoring and measurement activities for each department *(Follows Task 2.7)*	Adrian Ruiz Ray Abraham Henry Ikwut-Ukwa	Trend Analysis Reports CAP Monitoring Logs / IAPP	Ongoing
3.2	Initiate management of change activities for each department *(Follows Task 2.8)*	Adrian Ruiz Ray Abraham Henry Ikwut-Ukwa	• Change Committee Meeting Agendas and Minutes • Change Request Reviews • SSCVRs	Ongoing
3.3	Initiate continuous improvement activities for each department *(Follows Task 2.9)*	Adrian Ruiz Ray Abraham Henry Ikwut-Ukwa	• Internal Audit Reports • Implementation of CAPs from external audits	Ongoing
3.4	Continue to monitor workload for SMS to ensure proper allocation of resources *(Follows Task 2.3)*	Adrian Ruiz	Staffing Plan, Rev. 1	Ongoing
3.5	Revise SMS Implementation Plan based on the outcomes of the above activities	Adrian Ruiz	SMS Implementation Plan, Rev. 3	As necessary

REFERENCES

- 49 CFR Part 673, Public Transportation Agency Safety Plan
- 49 CFR Part 672, Public Transportation Safety Certification Training Program
- 49 CFR Part 670, Public Transportation Safety Program
- 49 CFR Part 625, Transit Asset Management
- 49 CFR Part 630, National Transit Database
- FTA, Safety Management Systems Framework
- FTA, Path Towards Safety Management Systems Implementation
- FTA, PTASP and SMS – The Role of the Transit Agency's CSO/SMS Executive and Key Staff

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Final Audit Report 2023-02-05

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