

CityBus Public Transportation Agency Safety Plan

(Version 1, Issued July 29, 2020)

1. Transit Agency Information:

Transit Agency Name	Greater Lafayette Public Transportation Corporation, CityBus
Transit Agency Address	1250 Canal Road Lafayette, IN 47902-0588
Accountable Executive	Martin Sennett, General Manager
Chief Safety Officer/SMS Executive	John Connell, Manager of Operations
Modes of Services	Fixed Route Bus ADA Paratransit
Operated or Contracted Services	None

2. Plan Development, Approval, and Updates

Entity that Drafted this Plan	Greater Lafayette Public Transportation Corporation, CityBus
Signature of Accountable Executive	
Approval of Board of Directors (Date Adopted)	July 29, 2020 Meeting Agenda Attached.
Certification of Compliance	To be determined,

Documentation of Plan Updates, Revisions:

Version Number	Section/Pages Affected	Reason for Change	Date Issued

Annual Review and Update of the Safety Plan

The Plan will be jointly reviewed and updated during the month of July of each year by the General Manger and Department Heads. All recommended changes and updates will be formalized and the General Manager (Accountable Executive), will approve the warranted changes, incorporating the changes to the new Agency Safety Plan (ASP). The updated ASP will then be forwarded to the CityBus Board of Directors for review and formal approval. Upon approval by the Board of Directors, the meeting date and resolution number shall be recorded and documented as forementioned.

3. Safety Performance Targets

The following safety performance measures have been established under the *National Public Transportation Safety Plan*.

Mode	Fatalities Total	Fatality Rate	Injuries Total	Injuries Rate	Safety Events Total	Safety Events Rate	System Reliability
Fixed Route	0	0	2	.11	3	.16	125,000
ADA Paratransit	0	0	0	0	1	.09	40,000

Safety Performance Target Coordination

CityBus' General Manager, (Accountable Executive), will share the Agency Safety Plan, (ASP), including safety performance targets, with Metropolitan Planning Organization, (MPO), each year after it's formal adoption by the CityBus Board of Directors. Copies of the ASP will also be forwarded to INDOT for review and CityBus staff will coordinate with both the MPO and INDOT in the selection of future performance targets upon request.

(Documentation of Target Transmissions)

Agency	Transmission Date	
Indiana Department of Transportation		
Area Plan Commission MPO		

4. Safety Management Policy

Safety is a core value at CityBus, and managing safety is an essential function. CityBus will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. CityBus is committed to the following safety objectives:

- Communicating the purpose and benefits of the Safety Management System (SMS) to all staff, managers, supervisors, and employees.
- Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through CityBus's Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.
- Providing appropriate management involvement and the necessary resources to establish an effective ESRP that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the ESRP. (After thoroughly analyzing provided data, the CityBus operations division will develop processes and procedures to mitigate safety risk to an acceptable level.)
- Establishing safety performance targets that are realistic, measurable, and data driven. Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

Martin B. Sennett,
General Manager and Accountable Executive

Safety Management Policy Communication

The Chief Safety Officer, who leads CityBus's SMS activities, introduced our staff to SMS principles in June 2020, at a Staff Meeting. CityBus's Safety Management Policy Statement will also be distributed to each employee in the form of a handout during this year's Fall Safety Training Meetings. CityBus also posts copies of the Safety Management Policy Statement on bulletin boards at Main Office and in the maintenance break areas of the maintenance division. CityBus has incorporated review and distribution of the Safety Management Policy Statement into new hire training and all-staff annual refresher training.

Authorities, Accountabilities, and Responsibilities

Accountable Executive:

The General Manager serves as CityBus's Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:

- Controls and directs human and capital resources needed to develop and maintain the ASP and SMS.
- Designates an adequately trained Chief Safety Officer who is a direct report.
- Ensures that CityBus' SMS is effectively implemented.
- Ensures action is taken to address substandard performance in CityBus' SMS.
- Assumes ultimate responsibility for carrying out CityBus' ASP and SMS
- Maintains responsibility for carrying out the agency's Transit Asset Management Plan.

Chief Safety Officer / SMS Executive:

The Accountable Executive designates the Manager of Operations as CityBus' Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:

- Develops CityBus' ASP and SMS policies and procedures
- Ensures and oversees day-to-day implementation and operation of CityBus' SMS.
- Manages CityBus' ESRP.
- Chairs the CityBus Safety Committee and Coordinates the activities of the committee; Establishes and maintains CityBus Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents; and Maintains and distributes minutes of safety committee meetings.
- Advises the Accountable Executive on SMS progress and status.
- Identifies substandard performance in CityBus SMS and develops action plans for approval by the Accountable Executive.

- Ensures CityBus policies are consistent with CityBus safety objectives.
- Provides Safety Risk Management (SRM) expertise and support for other City Bus personnel who conduct and oversee Safety Assurance activities.

Agency Leadership and Executive Management:

Agency Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of City Bus' SMS under this plan. City Bus Agency Leadership and Executive Management include:

- Manager of Operations,
- Dispatchers,
- Fleet Manager and Manager of Vehicle Maintenance,
- Training personnel,
- Operations Street Supervisors.

CityBus Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:

- Participate as members of CityBus' Safety Committee (Dispatchers and Street Supervisors will be rotated through the Safety Committee on a one year term, other positions are permanent members).
- Complete training on SMS and City Bus' ASP elements.
- Oversee day-to-day operations of the SMS in their departments.
- Modify policies in their departments consistent with implementation of the SMS, as necessary.
- Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executive or the Chief Safety Officer, including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness.

Key Staff:

CityBus uses the Safety Committee, as well as quarterly Drivers' Meeting and quarterly All-Staff Meetings, to support its SMS and safety programs:

- Safety Committee: Any safety hazards reported will be jointly evaluated by the Safety Committee and the Chief Safety Officer during the quarterly meeting. The Safety Committee members include the Manager of Operations (Chief Safety Officer), Dispatcher/Scheduler of Operations, two representative from fixed route, a representative from paratransit, and a representative from maintenance who meet quarterly to review issues and make recommendations to improve safety.
- Quarterly Staff Meetings: Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and

hazard self-reporting are encouraged. Information discussed in these meetings will be documented.

Employee Safety Reporting Program:

CityBus encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log-Safety Risk Register.
- Report conditions anonymously via a locked comment box in the driver area
- Report conditions using their name or anonymously to Safety@gocitybus.com
- Report conditions directly to any supervisor, manager, or director.

Examples of information typically reported include:

- Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles);
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection);
- Events that senior managers might not otherwise know about (for example, near misses);
- Information about why a safety event occurred.

On a daily basis, the Chief Safety Officer reviews the dispatch daily Operations Log, checks the comment box and dedicated email address, and documents identified safety conditions in the Safety Risk Register. CityBus' Chief Safety Officer, supported by the Safety Committee, as necessary, will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through CityBus' SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through CityBus' Safety Assurance process.

The Chief Safety Officer discusses actions taken to address reported safety conditions during the quarterly Safety-Staff Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee follows up directly with the employee when CityBus determines whether or not to take action and after any mitigations are implemented.

CityBus encourages participation in the ESRP by protecting employees that report safety conditions in good faith. However, CityBus may take disciplinary action if the report involves any of the following

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

5. Safety Risk Management Process

CityBus uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to CityBus' leadership.

CityBus' SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary. The Chief Safety Officer leads CityBus' SRM process, working with the Safety Committee to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of CityBus' SRM process are documented in our Safety Risk Register and referenced materials.

SRM process applies to all elements of our system including our operations, and maintenance departments; facilities and vehicles, personnel recruitment, training, and supervision. In carrying out the SRM process, CityBus uses the following terms:

- Event – Any accident, incident, or occurrence.
- Hazard – Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure belonging to CityBus; or damage to the environment.
- Risk – Composite of predicted severity and likelihood of the potential effect of a hazard.
- Risk Mitigation – Method(s) to eliminate or reduce the effects of hazards.
- Consequence – An effect of a hazard involving injury, illness, death, or damage to CityBus property or the environment.

Safety Hazard Identification:

The safety hazard identification process offers CityBus the ability to identify hazards and potential consequences in the operation and maintenance of our system. Hazards can be identified through a variety of sources, including:

- ESRP;
- Review of vehicle camera footage;

- Review of monthly performance data and safety performance targets
- Observations from supervisors
- Maintenance reports
- Comments from customers, passengers, and third parties, including CityBus' vendors
- Safety Committee, Drivers and Staff Member concerns
- Results of audits and inspections of vehicles and facilities
- Results of training assessments
- Investigations into safety events, incidents, and occurrences; and
- Federal Transit Administration (FTA) and other oversight authorities (mandatory information source).

When a safety concern is observed by CityBus' management or supervisory personnel, whatever the source, it is reported to the Chief Safety Officer. Procedures for reporting hazards to the Chief Safety Officer are reviewed during Staff Meetings and in the Safety Committee.

The Chief Safety Officer also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations Log. The Chief Safety Officer reviews these sources for hazards and documents them in Citybus' Safety Risk Register. The Chief Safety Officer also may enter hazards into the Safety Risk Register based on review of operations and maintenance activities, from the results of audits and observations, and from information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

The Chief Safety Officer may conduct further analyses of hazards and events entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, the Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard;
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary;
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard;
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.);
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard;
- Review any past reported hazards of a similar nature; and

- Evaluate tasks and/or processes associated with the reported hazard.

The Chief Safety Officer will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee during quarterly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities. Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM process (with or without the full Safety Committee) for safety risk assessment and mitigation. This means that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or State environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further SRM activity.

Safety Risk Assessment:

CityBus assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk. The Chief Safety Officer and Safety Committee assess prioritized hazards using CityBus' Safety Risk Matrix. This matrix expresses assessed risk as a combination of one severity category and likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as "1A" or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level. This matrix also categorizes combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- "High" hazard ratings will be considered unacceptable and require action from CityBus to mitigate the safety risk,
- "Medium" hazard ratings will be considered undesirable and require CityBus' Safety Committee to make a decision regarding their acceptability,
- "Low" hazard ratings may be accepted by the Chief Safety Officer without additional review.

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk. The Chief Safety Officer schedules

safety risk assessment activities on the Safety Committee agenda and prepares a Safety Risk Assessment Package. This package is distributed at least one week in advance of the Safety Committee meeting. During the meeting, the Chief Safety Officer reviews the hazard and its consequence(s) and reviews available information distributed in the Safety Risk Assessment Package on severity and likelihood. The Chief Safety Officer may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment. Once sufficient information has been obtained, the Chief Safety Officer will facilitate completion of relevant sections of the Safety Risk Register, using the CityBus Safety Risk Assessment Matrix, with the Safety Committee.

The Chief Safety Officer will document the Safety Committee's safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Safety Risk Register. The Chief Safety Officer will maintain on file Safety Committee agendas, Safety Risk Assessment Packages, additional information collection, and completed Safety Risk Register sections for a period of three years from the date of generation.

Safety Risk Mitigation:

CityBus' Accountable Executive and Chief Safety Officer review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the Safety Committee. CityBus can reduce safety risk by reducing the likelihood and/or severity of potential consequences of hazards.

Prioritization of safety risk mitigations is based on the results of safety risk assessments. The Chief Safety Officer tracks and updates safety risk mitigation information in the Safety Risk Register and makes the Register available to the Safety Committee during bimonthly meetings and to CityBus staff upon request. In the Safety Risk Register, the Chief Safety Officer will also document any specific measures or activities, such as reviews, observations, or audits, that will be conducted to monitor the effectiveness of mitigations once implemented.

6. Safety Assurance

CityBus has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits,
- Informal inspections,
- Regular review of onboard camera footage to assess drivers and specific incidents,
- ESRP,
- Investigation of safety occurrences,
- Safety review prior to the launch or modification of any facet of service,
- Daily data gathering and monitoring of data related to the delivery of service, and,
- Regular vehicle inspections and preventative maintenance.

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation by the Safety Committee.

CityBus monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The Chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation. The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate department head, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities.

The Chief Safety Officer will endeavor to make use of existing CityBus processes and activities before assigning new information collection activities. The Chief Safety Officer and Safety Committee review the performance of individual safety risk mitigations during quarterly Safety Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the Safety Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution. CityBus' Chief Safety Officer and Safety Committee also monitor CityBus's operations

on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- Reviewing results from accident, incident, and occurrence investigations;
- Monitoring employee safety reporting;
- Reviewing results of internal safety audits and inspections; and
- Analyzing operational and safety data to identify emerging safety concerns.

The Chief Safety Officer works with the Safety Committee and Accountable Executive to carry out and document all monitoring activities.

CityBus maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event (see CityBus Safety Event Investigation Procedures Manual for specific procedures for conducting safety investigations).

These procedures also reflect all traffic safety reporting and investigation requirements established by Indiana Department of Motor Vehicles. The Chief Safety Officer maintains all documentation of CityBus investigation policies, processes, forms, checklists, activities, and results. As detailed in CityBus' procedures, an investigation report is prepared and sent to the Accident/Incident Review Committee for integration into their analysis of the event. CityBus Accident/Incident Review Committee consists of operations supervisors, a safety committee member and a maintenance representative.

The Chief Safety Officer chairs the board. CityBus' Accident/Incident Review Board determines whether

- The accident was preventable or non-preventable;
- Personnel require discipline or retraining;
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.

The Chief Safety Officer and Safety Committee routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer and Safety Committee ensure that the concerns are investigated or analyzed through CityBus' SRM process. The Chief Safety Officer and Safety Committee also conduct internal and external reviews, including audits and assessments, with findings concerning CityBus' safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

7. Safety Promotion

CityBus' comprehensive safety training program applies to all CityBus employees directly responsible for safety, including

- Bus vehicle operators,
- Dispatchers,
- Maintenance technicians,
- Managers and supervisors,
- Agency Leadership and Executive Management,
- Chief Safety Officer, and
- Accountable Executive

CityBus dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS. Basic training requirements for CityBus employees, including frequencies and refresher training, are documented in CityBus' Safety Training Matrix and the CityBus Employee Handbook

Operations safety-related skill training includes the following:

- New-hire bus vehicle operator classroom and hands-on skill training,
- Bus vehicle operator refresher training,
- Bus vehicle operator retraining (recertification or return to work),
- Classroom and on-the-job training for dispatchers,
- Classroom and on-the-job training for operations supervisors and managers, and
- Accident investigation training for operations supervisors and managers.

Vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance technician skill training,
- Ongoing skill training for vehicle maintenance supervisors,
- Accident investigation training for vehicle maintenance supervisors,
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
- Training provided by vendors.

CityBus' Accountable Executive and Agency Department Heads must complete FTA's SMS Awareness online training.

Safety Communication:

CityBus' Chief Safety Officer and Manager of Operations coordinate CityBus' safety communication activities for the SMS. CityBus' activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- Communicating safety and safety performance information throughout the agency: CityBus communicates information on safety and safety performance in its quarterly newsletter and during quarterly Staff Meetings.
- Communicating by establishing a permanent agenda item in all weekly Staff Meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact CityBus' service or safety performance, and updates regarding SMS implementation.
- Communicating by soliciting information from drivers during training meetings.
- Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency: As part of new-hire training, CityBus distributes safety policies and procedures, included in the CityBus Employee Handbook, to all employees
- CityBus provides training on these policies and procedures and discusses them during safety talks between supervisors and bus operators and vehicle technicians. For newly emerging issues or safety events at the agency, CityBus Chief Safety Officer issues bulletins or messages to employees that are reinforced by supervisors in one-on-one or group discussions with employees.
- Informing employees of safety actions taken in response to reports submitted through the ESRP: City Bus provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

Additional Information:

CityBus will maintain documentation related to the implementation of its SMS; the programs, policies, and procedures used to carry out this ASP; and the results from its SMS processes and activities for three years after creation. They will be available to the FTA or other Federal or oversight entity upon request.