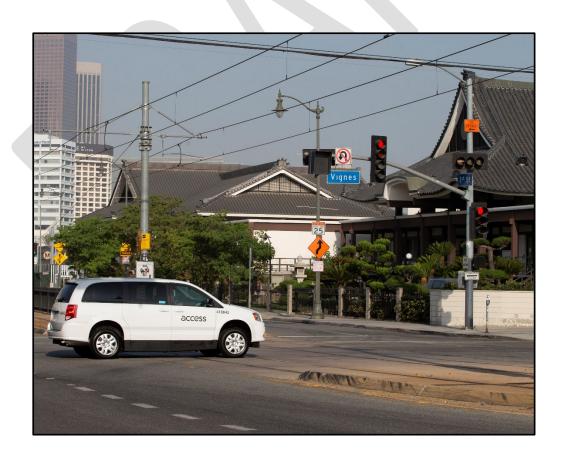# access

Public Transportation Agency Safety Plan

December 12, 2022

1. Transit Agency Information

Access Services, PO Box 5728, El Monte, CA 91734-1728

Accountable Executive: Andre Colaiace, Executive Director

- The accountable executive meets the requirements of CFR 673.5 and is ultimately responsible for carrying out the Transit Asset Management (TAM) Plan, as well as directing the human and capital resources needed to develop the Public Transportation Agency Safety Plan (PTASP) and the Transit Asset Management (TAM) plan.

Chief Safety Officer: Mike Greenwood, Chief Operations Officer

- The Chief Safety Officer meets the requirements of CFR 673.5 and is adequately trained and responsible for safety within the organization.

Mode of Service Covered by this Plan: Demand Responsive

List of all Federal Transit Administration (FTA) Funding Types:

- Federal Urban Area Formula Program (Section 5307)
- Enhanced Mobility of Seniors and Individuals with Disabilities Funds (Section 5310)
- State of Good Repair Grants (Section 5337)
- Grants for Bus and Bus Facilities (Section 5339)
- American Rescue Plan Act (ARPA)

Access' contracted service operations include:

- Eastern Region – San Gabriel Transit, Inc.
- Northern Region – MV Transportation, Inc.
- Southern Region – Global Paratransit, Inc.
- West/Central Region – California Transit, Inc.
- Antelope Valley Region – First Transit, Inc.
- Santa Clarita Region – Santa Clarita Transit
- Eligibility – Medical Transportation Management, Inc.
- Customer Service – ALTA Resources

Access Services provides transit services on behalf of:

Antelope Valley Transit Authority	Beach Cities Transit
City of Alhambra	City of Arcadia
City of Artesia	City of Baldwin Park
City of Bell	City of Bell Gardens
City of Bellflower	City of Burbank
City of Calabasas	City of Carson
City of Cerritos	City of Commerce
City of Compton	City of Cudahy
City of Downey	City of Duarte
City of El Monte	City of Glendale
City of Huntington Park	City of Inglewood
City of La Cañada Flintridge	City of Lawndale
City of Lynwood	City of Monterey Park
City of Paramount	City of Pasadena
City of Rosemead	City of Sierra Madre
City of West Covina	City of West Hollywood
City of Westlake Village	Culver CityBus
Foothill Transit	Gardena Municipal Bus Lines
Long Beach Transit	Los Angeles City Department of Transportation
Los Angeles County Department of Public Works	Los Angeles County Metropolitan Transportation Authority (Metro)
Montebello Bus Lines	Norwalk Transit
Palos Verdes Peninsula Transit Authority	Santa Clarita Transit
Santa Monica's Big Blue Bus	Torrance Transit

2. Plan Development, Approval, and Updates (§673.11)

This plan has been drafted by Access Services and addresses all applicable requirements and standards as set forth in the Federal Transit Administrations Public Transportation Safety Program and the National Public Transportation Safety Plan.

Name of Entity That Drafted This Plan	Access Services

Signature of Accountable Executive	Date of Signature

Access Services Board of Directors	
Name of Entity That Approved This Plan	Date of Approval

Mike Greenwood	
Name of Individual That Certified This Plan	Date of Certification

Version Number and Updates – Record the complete history of successive versions of this plan			
Version Number	**Issue Date**	**Revisions**	**Author(s)**
1.0	December __, 2022	Original Issue	Mike Greenwood

The Public Transportation Agency Safety Plan will be updated annually. It is Access' goal to have signed and approved plans two months before the required submission date. This will give Access adequate time to make corrections to the plan should there be a need to make changes. The plan will be reviewed annually and updated accordingly. During this review, Access staff, as well as Access' Workplace Safety Committee and Executive Safety Committee, will analyze safety performance to:

1. Determine if new Safety Performance targets should be established;
2. Determine whether increased Safety Promotion related to safety events is necessary; and
3. Ensure that the agency's Safety Assurance mechanisms are mitigating the current and most frequent safety events.

Transit agency performance targets were last transmitted to the Southern California Association of Governments (SCAG) on July 19, 2022.

<u>Management's Commitment</u>

The individuals signing this PTASP attest all items and conditions contained in this plan are understood, accepted, recommended, and supported; they are committed to implementing the PTASP and achieving its safety goals and objectives.

Andre Colaiace, Executive Director	Date

Hector Rodriguez, Deputy Executive Director	Date

Mike Greenwood, Chief Operations Officer/Chief Safety Officer	Date

F Scott Jewell, Director of Administration	Date

Matthew Avancena, Director of Planning & Coordination	Date

Bill Tsuei, Director of Information Technology	Date

Randy Johnson, Director of Government Affairs and Outreach	Date

3. Safety Performance Targets (§673.11(a)(3))

Preventable Collisions per 100,000 miles	≤0.75
Preventable Incidents per 100,000 miles	≤0.25
Fatalities per 100,000 miles	0.00
Reportable Injuries per 100,000 miles	≤0.10
Safety Events per 100,000 miles	≤0.20
Operator Assaults per 100,000 miles	≤0.02
Mean Miles between Major Mechanical Failures	≥50,000

4.   Conformance with FTA Guidelines (§673.11(a)(4)))

This PTASP addresses all requirements as set form in the FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan. The PTASP will be revised when FTA establishes standards through the public notice and comment process.

All requirements in Access' PTASP will flow down to its operating contractors via its contracts, contract amendments, and scopes of work. Access' contractors shall be fully compliant with 49 CFR Part 673 and implement the requirements outlined in the February 17, 2022, "Dear Colleague" letter issued by the Federal Transit Administration.

5.   **Review and Update of the PTASP (§673.11(a)(5))**

This PTASP will be reviewed annually to make necessary updates, corrections, and modifications. Access will seek feedback from affected departments and operating contractors to determine if any changes are needed. Any significant changes to the plan will be made and presented to the Access Executive Director for adoption by the Board of Directors.

6. **Safety Management Policy (§673.23)**

Safety is Access' number one priority. Access educates, encourages, and endorses a strong culture of safety at all levels of the organization, valuing the responsibility entrusted in us by the passengers who use the service. Access is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all of our services are safe, reliable, and cost effective.

All levels of the organization, extending to all of Access' contractors, are accountable for the delivery of the highest level of safety performance, starting with the Executive Director.

Access' commitment is to:

- Implement a safety management system (SMS), which is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards;
- 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 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, contractors, 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 employees 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 indicators and safety performance targets;
- Continually improve our safety performance through management processes that ensure that appropriate, effective safety management action is taken; and
- Ensure that externally supplied systems and services to support our operation meet our safety performance standards.

Safety Management Policy Communication

Access staff are informed of their responsibilities related to safety and SMS during onboarding, within their job descriptions, and receive an annual performance evaluation that includes safety related evaluation criteria. Additionally, each employee is required to acknowledge through a signature that they have received a written copy of Access' Safety Management Policy Statement. Signed copies are filed within individual employee files. Access provides additional safety information via the Intranet, emails, meetings, and safety committees.

The importance of safety and incorporation of SMS is extended to its operating contractors via the RFP scope-of-work and/or contract amendment(s) for each operating contract. Access also collaborates with its contractors to ensure that Access' targets, goals, and expectations are achieved in the performance of the service.

Authorities, Accountabilities, and Responsibilities

The Accountable Executive has the ultimate responsibility for carrying out the Agency Safety Plan. The Accountable Executive is also responsible for the development and implementation of the agency's Safety Management System (SMS). This makes the accountable executive responsible for ensuring that the agency's SMS is effectively implemented, and actions are taken, as necessary, to address substandard performance.

The Chief Safety Officer is responsible for the day-to-day implementation of the Safety Management System. The CSO is responsible for reporting any substandard performance of the SMS directly to the accountable executive.

Agency Leadership contributes to the implementation of the SMS by enforcing and reporting substandard performance that occurs in each operating facility. Each contractor's operations and maintenance facility have its own safety manager that is responsible for implementing and monitoring the progress of SMS responsibilities. Functional areas across the administrative team share in safety responsibilities.

- Operations
    - Provide contractor oversight particularly in areas of operations and safety.
    - Provide on-street service monitoring and investigation of safety events, collisions and incidents.
    - Manage emergency preparedness and emergency response.

- Customer Service
  - Monitor customer feedback related to safety, communicate safety complaints to appropriate parties, and ensure that safety complaints are investigated in a timely fashion.
- Fleet Maintenance
  - Manage and ensure the state of good repair of all revenue vehicles.
  - Provide vehicle mechanical quality oversight.
  - Regularly update new revenue vehicle specifications to ensure that the fleet meets, or exceeds, safety requirements.
  - Conduct monthly maintenance and appearance inspections of revenue vehicles.
- Facilities
  - Manage and ensure the state of good repair of all buildings and equipment.
  - Conduct periodic audits of all Operations and Maintenance yards.
- Finance
  - Ensure agency safety functions are appropriately budgeted.
- Human Resources
  - Ensure agency new hire onboarding includes appropriate orientation in Access' SMS and PTASP.
- Information Technology
  - Provide security for all network and electronic communication assets.
  - Support timely and accurate collection and reporting of safety data.
- Marketing and Communications
  - Manage effective internal and external safety communication.
- Planning
  - Provide oversight of compliance with 49 CFR 40 (Procedures for Transportation Workplace Drug and Alcohol Testing Programs) and 49 CFR 655 (Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations).
  - Provide training opportunities for Access and contractor staff in support of the PTASP.
- Procurement
  - Ensure scopes of work and technical specifications include appropriate safety considerations.
- Risk Management
  - Gather information, investigate, and make determinations related to all collisions and incidents from transit operations.
  - Manage insurance claims in support of transit operations.
- Safety
  - Oversee the successful operation of Access' vehicle-based onboard video camera system.
  - Support all aspects of Access' SMS and PTASP.

- Operating, Eligibility, and Customer Service Contractors
  - Abide by contractual requirements included in scopes of work.

Safety Objectives

To achieve the safety mission, Access has established the following objectives for itself and its operations and maintenance contractors:

- Perform annual audits of operations and maintenance contractors to ensure compliance with SMS;
- Identify and resolve hazards through an established employee reporting system;
- Conduct emergency drills at the administrative office and contractor facilities;
- Establish and monitor preventable collision and incident benchmarks;
- Establish and monitor injury benchmarks;
- Establish and monitor fatality benchmarks;
- Establish and monitor safety event benchmarks;
- Establish and monitor system reliability benchmarks;
- Establish a proactive, positive and visible safety culture including two-way feedback regarding reported hazards;
- Meet and exceed safety requirements in design specifications, engineering, facility construction, equipment, and systems installation testing, and in operations and maintenance; and
- Evaluate the safety implications of all proposed service modifications prior to implementation.

Employee Safety Reporting Program

Reporting of workplace hazards is covered in Access' Illness and Injury Prevention Plan (IIPP) and reported hazards are reviewed by the Workplace Safety Committee to ensure the risk is assessed and mitigated. Hazards are reported in multiple ways including submission of a Report of Unsafe Condition or Hazard.

Per California regulation, all of Access' operating contractors are also required to maintain an IIPP and have a similar process for reporting workplace hazards.

Safety Committees

1. The Executive Safety Committee meets monthly to conduct a formal review of safety performance and review of safety concerns that cannot be satisfactorily resolved by individual departments because of cost or authority reasons. The Executive Safety Committee consists of the following key staff members:
   - Executive Director
   - Deputy Executive Director
   - Chief Operations Officer (Chief Safety Officer)

- Director of Planning and Coordination
- Director of Governmental Affairs and Outreach
- Director of Information Technology
- Director of Administration

2. The Safety Steering Committee meets monthly and includes key staff from both Access and its operating contractors.

3. The Workplace Safety Committee (WSC) meets bimonthly and includes key front-line staff from Access, as well as a management sponsor. One role of the WSC is to review employee reports of workplace hazards and ensure that the hazard is assessed that consequences of the hazard are considered, and that the hazard is mitigated.

4. Contractor Safety Committees meet regularly at each operating contractor location and include an equal number of management and front-line employees.

5. The Change Control Committee (CCC) meets as-needed, but at a minimum of quarterly, to support the identification and assessment of changes that may introduce new hazards or impact the agency's safety performance. The CCC includes representatives from the Operations, Safety, Fleet, and Risk Management Departments.

6. All safety committees will be documented through meeting agendas and meeting minutes.

7.   Safety Risk Management (§673.25)

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

<u>Safety Hazard Identification</u>

Hazards are an inevitable part of transit operations. Only after identifying those hazards can, they be addressed. Sources of hazard information include:

- Safety reporting
- Formal and informal observations of the operation
- Scheduled and unannounced inspections
- Internal safety investigations
- Collision and incident reports
- Committee reviews
- Industry data
- Governmental sources
- Customer and public feedback or complaints

Employees at the administration building and operations and maintenance facilities are trained on how to report hazards or risks they identify or incidents and close calls they experience. This reporting is highly encouraged across the organization. All personnel, whether directly employed or employed by a contractor, are provided with various options of reporting hazards and close calls. Reporting is encouraged using any method an individual is most comfortable using. This includes verbally to a supervisor or management staff, written by way of an incident report, or electronically using email.

Within the operations, vehicle-based hazards (defects) are reported by the driver on the daily vehicle inspection report (DVIR) and then reviewed by a technician, maintenance supervisor, or maintenance manager.

Non-vehicle-based hazards are reported using a designated form (or alternative method) and submitted for investigation, analyzed, and communicated to the safety committee for review. Each contractor facility identifies and manages their safety risks using their safety committee. The safety hazard reporting process includes feedback from the investigating party to the reporting party, whenever possible, to close the feedback loop on what was done to mitigate or eliminate the hazard.

Location specific safety concerns are addressed by Road Safety Inspectors through the location evaluation process.

Safety Risk Assessment

Employees are encouraged to immediately address hazards that may be easily resolved, such as a trip hazard that may be easily moved. Hazards that require more extensive measures for resolution should be elevated to managers or safety committees for corrective action. Managers and safety committees are encouraged to conduct appropriate investigations to determine the potential risk as evaluated by examining the severity and probability of the hazard.

Hazard severity is the measure of the consequence the hazard presents. The greater the potential hazard consequence, the more severe the hazard. Below is a chart describing Access' hazard severity categories:

HAZARD SEVERITY CATEGORIES		
Category	Severity	Characteristics
4	Catastrophic	Death, system loss, or severe environmental damage
3	Critical	Severe injury, severe occupational illness, or major system or environmental damage
2	Marginal	Minor injury, minor occupational illness, or minor system or environmental damage
1	Negligible	Less than minor injury, occupational illness, or system or environmental damage

Access uses a rating system to identify the frequency level of a hazard occurring:

HAZARD FREQUENCY INDEX		
Description	Level	Specific Individual Event
Frequent	A	Likely to occur frequently
Probable	B	Will occur regularly
Occasional	C	Will occur rarely
Remote	D	Unlikely but possible
Improbable	E	So unlikely it can be assumed that it will not occur

Viewed in relation to one another, the hazard severity and hazard probability properties measure a hazard's magnitude and allows for the prioritization of applying control measures. Hazards are then analyzed, evaluated, and treated based on the likelihood that an event will occur and the potential severity of the consequence of that occurrence. The value derived by considering a hazard's severity and probability is the Hazard Risk Index. The Hazard Risk Index measures the acceptability or unacceptability of the hazard.

The Hazard Risk Index enables Access' management to accurately assess the amount of risk involved by viewing the hazard relative to what it would cost Access (in terms of person-hours, funding, operations, schedule, etc.) to reduce the hazard to an acceptable level. The following

matrix identified the Hazard Risk Index based on hazard category and probability, as well as the criteria for defining further action based on that index.

HAZARD PROBABILITY TABLE				
Severity				
Frequency of Occurrence	**Negligible**	**Marginal**	**Critical**	**Catastrophic**
Frequent	4A	3A	2A	1A
Probable	4B	3B	2B	1B
Occasional	4C	3C	2C	1C
Remote	4D	3D	2D	1D
Improbable	4E	3E	2E	1E

After considering the risk frequency and severity, staff will determine if the risk level is acceptable, undesirable, or unacceptable.

HAZARD RESOLUTION TABLE		
	Unacceptable	1A, 1B, 1C, 2A, 2B, 3A
	Undesirable – Executive Level Review Required	1D, 2C, 3B
	Acceptable – Management Level Review Required	1E, 2D, 3C, 4A, 4B
	Acceptable – Acceptable without Further Review	2E, 3D, 3E, 4C, 4D, 4E

Safety Risk Mitigation

Risk mitigation is primarily accomplished through Access' safety committee structure, which includes the bi-weekly collision review meeting (internal staff), the Workplace Safety Committee (internal staff), and the monthly Safety Steering Committee (internal and operating contractor staff).

8.   Safety Assurance (§673.27)

Safety Performance Measurement

Access tracks safety performance through multiple key performance indicators (KPIs):

A. Preventable Collision per 100,000 miles – This performance measure compares the number of preventable collisions that occur in a given time period (e.g., a month) to the total number of miles operated during the same time period. Preventable collisions are also weighted by severity.

A collision is defined as contact made between a vehicle (vehicle 1 [V1]) while performing Access business and another object (vehicle 2 [V2], bicycle, pedestrian, tree, fence, wall, sign, curb, etc.) even if there is no measurable amount of damage to V1 and/or the other object.

A preventable collision is determined as such after a thorough investigation and consideration of whether all reasonable precautions were taken by the V1 driver to prevent the collision. A thorough investigation includes review of required reports, video, photographs, witness statements, etc. Access uses the definition of the National Safety Council: *"a preventable collision is a collision in which the driver failed to do everything reasonable to avoid it."*   A determination of "preventable" is made with three assumptions:

1. V1 driver completed professional driver training and demonstrates a higher proficiency than an average non-professional driver;
2. V1 driver understands and practices defensive driving principles stressed during training; and
3. V1 driver was provided job-specific training including but not limited to understanding operational procedures and policies.

Calculation: Preventable Collisions per 100,000 Miles = (Number of Weighted Preventable Vehicle Collisions)/(Total Miles Operated)

FY 2022-23 Target: ≤0.75 Preventable Collisions per 100,000 Miles

B. Preventable Incidents per 100,000 Miles – This performance measure compares the number of preventable incidents that occur in a given time period (e.g., a month) to the total number of miles operated during the same time period. Preventable incidents are also weighted by severity.

A preventable incident is defined as any non-collision event that must be reported by the driver due to conditions that result in, or could result in, injury or property damage.

A preventable incident is determined as such after a thorough investigation and consideration of whether all reasonable actions were taken by the V1 driver to avoid the

incident. A thorough investigation includes review of required reports, video, photographs, witness statements, etc. The determination is made with two assumptions:

1. V1 driver had completed professional driver training and demonstrates a higher proficiency than an average non-professional driver; and
2. V1 driver was provided job-specific training including but not limited to understanding operational procedures and policies.

Calculation: Preventable Incidents per 100,000 Miles = (Number of Weighted Preventable Vehicle Incidents)/(Total Miles Operated)

FY 2022-23 Target: ≤0.25 Preventable Incidents per 100,000 Miles

C. <u>Reportable Injuries per 100,000 Miles</u> – This performance measure compares the number of injuries that occur in a given time period to the total number of miles operated during the same time period. The FTA definition of an injury is one that requires immediate medical attention away from the scene for one or more persons, if the injured person declines medical attention and/or leaves the scene of the injury, it is not counted in this measurement.

Calculation: Reportable Injuries per 100,000 Miles = 100,000 x [(Number of Passenger Injuries)/(Total Miles Operated)]

FY 2022-23 Target: ≤0.10 Reportable Injuries per 100,000 Miles

D. <u>Fatalities per 100,000 Miles</u> – This performance measure compares the number of fatalities that occur in a given time period to the total number of miles operated during the same time period. The FTA definition of a fatality is a fatality that occurs within 30 days of a Reportable Safety Event.

Calculation: Fatalities per 100,000 Miles = 100,000 x [(Number of Fatalities)/(Total Miles Operated)]

FY 2022-23 Target: 0 Fatalities per 100,000 Miles

E. <u>Safety Events per 100,000 Miles</u> – This performance measure compares the number of Reportable Safety Events that occur in a given time period to the total number of miles operated during the same period. The FTA definition of a Safety Event is an event occurring on transit right-of-way or infrastructure, in a transit maintenance facility, during a transit related maintenance activity, or involving a transit revenue vehicle and meeting established National Transit Database (NTD) thresholds. 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 events, OSHA-reportable events in administrative buildings, death that are the result of illness or other natural causes, other events (assault, robbery, non-transit vehicle collisions, etc.) occurring at pickup or drop-off locations, collisions that occur while traveling to or from

a transit maintenance facility, collisions involving a supervisor vehicle, or other transit service vehicle operating on public roads.

Calculation: Safety Events per 100,000 Miles = 100,000 x [(Number of Safety Events)/(Total Miles Operated)]

FY 2022-23 Target: ≤0.20 Safety Events per 100,000 Miles

F. Mean Miles Between Major Mechanical Failures – This performance measure compares the number of major mechanical failures that occur in a given time period to the total number of miles during the same period. The FTA definition of a Major Mechanical Failure is when a vehicle is prevented from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns. In most cases, Major Mechanical Failures require the vehicle to be towed back to the yard.

Calculation: Mean Miles between Major Mechanical Failures = [(Total Miles Operated)/(Number of Major Mechanical Failures)]

FY 2022-23 Target: ≥50,000 Miles between Major Mechanical Failures

G. Operator Assaults – This performance compares the number of operator assaults in a given time period to the total number of miles during the same period. Access uses the California Penal Code (section 240) definition of an assault: An assault is an unlawful attempt, coupled with a present ability, to commit a violent injury on the person of another." An assault is a misdemeanor under this section, and acts of assault can be a punch, slap, or kick upon an operator, as well as the operator being struck by a thrown object, or being spat upon.

Calculation: Operator Assaults per 100,000 miles = 100,000 x [(Number of Assaults)/(Total Miles Operated)]

FY 2022-23 Target: ≤0.02 Operator Assaults per 100,000 Miles

Contract Facility Safety

Operations, Maintenance, and Contractor administration services are conducted at the operating yards. To create a safe workplace and protect employees and visitors from risk and injury, Access requires its contractors to comply with local, state, and federal requirements, including, but not limited to, Job Hazard Analysis, Personal Protective Equipment, Hazard Communication, Emergency Action Plans, Bloodborne Pathogens, Lockout/Tagout, and Record Keeping. To ensure requirements are met, Access conducts semiannual audits to assess the safety of each facility.

Collision and Incident Investigation and Communication

Access' operating contractors are required to conduct investigations on all collisions, incidents, injuries, illnesses, and near misses. Contractor staff who conduct accident investigations are required to be provided adequate investigation training. Contractors are also required to determine the preventability of all collisions and incidents, as well as what level of retraining, coaching, counseling, and/or discipline is appropriate for each collision or incident.

On top of investigation processes and procedures employed by its contractors, Access employs a multi-level accident investigation process that starts with the collection of all pertinent evidence (driver report, road supervisor reports, video, photographs, witness statements, etc.). All documentation is stored electronically in Access' Rider360 customer data management system. An initial determination of preventability, as well as severity, is made by Access' Risk Management Department. Meeting every two weeks, Access' Collision/Incident Review Committee (which includes staff from Risk Management, Operations, and Safety) reviews all serious and unusual collisions and incidents to confirm preventability, severity and identify elevated risk incidents and trends. Access uses a third-party administrator to assist in managing insurance claims and lawsuits resulting from collisions and incidents. In some cases, collisions or incidents are referred for a Root Cause Review, convened by an Access Road Safety Inspector, who will interview the driver and/or re-enact the collision or incident.

Upon determination of preventability, Access shares decisions with its operating contractors and is available to discuss disagreements on preventability or severity. This process creates another level of review. In some cases, Access may require that the driver be removed from providing revenue service for excessive preventable collisions or incidents, or for a particularly serious single collision or incident.

General Reporting/Investigation Practices

All persons operating a revenue vehicle are required to report any injury or accident, regardless of severity, immediately after its occurrence. Enforcement and discipline are determined by the contractor, and post-accident training is also conducted by the contractor.

Safety Performance Monitoring

Vehicle Maintenance is monitored per the following:

- Bimonthly vehicle fleet health audits
- New vehicle certification
- Preventative Maintenance Inspection (PMI) file audits
- Annual visual inspections of the fleet in support of Access' Transit Asset Management (TAM) plan
- Turnover inspections
- Subcontractor vehicle file audits

Vehicle Operations are monitored per the following:

- Road Safety Inspector observations
- Road Safety Inspector rollout inspections
- Road Safety Inspector collision/incident response
- Driver training audits
- Monitoring of SmartDrive video events
- Comments/complaints by passengers

Management of Change

Change may introduce new hazards and safety risks into Access' operation. Therefore, Access has established criteria that defines when a change must be evaluated through the safety risk management process. If a proposed or identified change meets or triggers those criteria, Access will use Safety Risk Management to review existing mitigations to determine if they are sufficient or if new mitigations are necessary. These changes include, but are not limited to:

- New vehicles;
- New vehicle technology;
- Safety recalls issued by a vehicle manufacturer or the National Highway Traffic Safety Administration (NHTSA);
- Changes to vehicle equipment;
- Changes to vehicle technology; and
- Changes in operational procedures.

No operations should take place in the changed environment until:

- The change is evaluated to determine if it will impact safety
- If it might impact safety, a safety risk evaluation must be completed.

Modification to in-service vehicle design is managed by Access' Fleet Design & Maintenance Department and documented through Technical Service Bulletins.

Continuous Improvement

Evaluation of SMS is necessary to ensure it effectively and efficiently allows Access to meet its safety objectives and performance targets. Access uses the data and information collected from the subcomponents in this Safety Assurance section while conducting safety performance monitoring to address any identified deficits in SMS organizational structures, processes, and resources in a timely manner. Access strives for continuous improvement and recognizes this is a dynamic process and significant efforts within Safety Assurance and Safety Promotion are required to improve systems and practices to comply with SMS standards.

Safety-related data is collected, compiled, organized, stored, and maintained by individual departments, the data is then reported to and analyzed by the Chief Safety Officer and team. Further, the information gathered during this process is reported to the Safety Steering

Committee and Executive Safety Committee by the Chief Safety Officer and used by Access to identify hazards through trend analysis. If a trend is identified through the analysis, the trend is further investigated to determine the causes and tracked through resolution by the responsible department and Chief Safety Officer. Moreover, tracking of hazard-related data is used to identify trends; trends are further analyzed and/or investigated to determine causal factors. Identified hazards are categorized with corrective action recommendations. Corrective actions are tracked within the responsible department to closure using a hazard tracking log and reported to the Chief Safety Officer.

Transit Asset Management (TAM) is a business model used to guide the prioritization of funding based on the condition of assets. TAM defines the State of Good Repair as a condition of an asset to operate at full performance level: able to perform its designated function, does not pose an unacceptable safety risk, and its lifecycle investments have not been met or recovered. Access has adopted TAM as the official, institutional approach in managing infrastructure assets, making capital investment and operational expenditure decisions, and considers the results of its condition assessments while performing safety risk management and safety assurance activities. TAM data is provided to the Chief Safety Officer for inclusion in the monthly SMS/PTASP Committee Meeting Agenda.

9.   Safety Promotion (§673.29)

Competencies and Training

To implement an effective two-way feedback loop, front-line staff and management are provided regular training. SMS training is provided to drivers specifically for safety reporting competencies. They are provided training during their onboarding on what to report and how to report it. Management staff are provided training on how to analyze the safety data, turning it into safety intelligence for senior management decision-making for the allocation of safety management resources.

Access' Safety Management System is designed to be a living document, which will continually identify, evaluate, and mitigate safety risks consistent with Access' safety objectives and performance targets. From the Accountable Executive to the front-line employees, five questions will be asked continually to ensure continuous assessment of the SMS:

1. What are our most serious safety concerns?
2. How do we know this?
3. What are we doing about it?
4. Is what we are doing working?
5. How do we know what we are doing is working?

Driver Training

Training and education of drivers is the responsibility of contractor staff and must include minimum curriculum topics and training hours. Besides meeting minimum requirements, contractors are required to train to proficiency. Training includes classroom training, behind the wheel training, and a satisfactory evaluation. A minimum of 90 hours of total new driver training is required by Access. Within that total, a minimum of 25 hours of behind the wheel training and 15 hours of classroom-based defensive driving training is required. Access' contractors often exceed minimum training requirements.

Access contractors require drivers to attend monthly safety meetings, as well as a minimum of 8 hours of annual continuous training, and training after having a preventable collision/incident.

Instructor Qualifications

Training instructors must complete the Instructor's Course for Transit Trainers (FT00562) offered by the United States Department of Transportation's Transportation Safety Institute (TSI). Training instructors must also meet all federal, state, and local requirements and be approved by Access as a key position. Additional requirements are included in operating contracts.

Safety Communication

As outlined in the Hazard Identification and Analysis section, front-line staff are encouraged to communicate safety issues and are provided with various methods to communicate to management. Safety communication is designed to be a two-way feedback loop to establish a positive safety culture.

Safety Communication occurs through many methods including:

- Safety Monitors – TV monitors placed at each operating location and displaying timely and topical safety materials and themes;
- Safety Steering Committee – joint monthly meetings between Access and operating contractor staff;
- Workplace Safety Committee – quarterly meetings among Access staff to focus on the safety of the administrative headquarters;
- Contractor Safety Committees – monthly meetings amongst contractor staff that includes an equal number of front-line employees and management employees;
- Safety Meetings – monthly contractor meetings including contractor safety-sensitive employees;
- Safety Training – portion of new driver training, and annual driver training, which includes safety topics;
- SmartDrive Coaching – vehicle-based onboard video system events meeting certain criteria result in coaching, counseling, training, and/or discipline to bring about corrective action (and in some cases, positive reinforcement) for event categories including collisions, near collisions, fundamental driving errors, distracted driving, and unsafe driving;
- Signage;
- Bulletin boards; and
- Radio communication with drivers.

Driver Safety Incentive Program

Access recognizes its drivers' contributions through the Driver Safety Incentive Program for all Access certified drivers that operate Access-owned or dedicated vehicles. Under this program, drivers that reach 25,000, 50,000, 75,000, and 100,000 plus miles are rewarded through this incentive program. To be awarded, drivers need to go without a preventable collision, incident or safety violation in the period-of-time being audited. Drivers receiving incentives for reaching 25,000 have a choice of an Access backpack or Access 47 Brand ball cap and those with over 50,000 safe miles receive an Access jacket. Drivers that reach 75,000 or 100,000 miles without a preventable collision, incident or safety violation earn American Express gift cards valued at $250 and $500, a small token of Access' appreciation for keeping safety at the forefront of the operations. After auditing the safe miles, these incentives are distributed quarterly to Access' contractors for distribution to drivers. Access benefits from this program as it rewards the

drivers for their demanding work and incentivizes them to keep driving safe and stay committed to driving for Access. In FY22, expenses for the program were $277,608.70 and 663 different drivers received at least one incentive item.

10.   Safety Plan Documentation (§673.31)

Access will maintain documents that are included in whole, or by reference, which describe the programs, policies, and procedures used to carry out this PTASP as required by regulations.

PTASP documents will be made available upon request to the Federal Transit Administration or other federal entity, or a State Safety Oversight Agency having jurisdiction. The Chief Safety Officer will be the primary point of contact when providing PTASP related information to external agencies.

Appendix A – Definition of Terms Used in Safety Plan (§673.5)

Accident means an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of rail transit vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

Accountable Executive, (typically the highest executive in the agency) means a single, identifiable person who has ultimate responsibility for carrying out the Safety Management System of a public transportation agency, 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.

Employee means an employee of Access, an employee of Access' contractor, or an independent contractor providing services on behalf of Access or Access' contractors.

Event means an accident, incident, or occurrence.

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Incident means an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Injury means any damage or harm to persons that require immediate medical attention away from the scene because of a reportable event. Agencies must report each person transported away from the scene for medical attention as an injury, whether or not the person appears to be injured.

Major Mechanical Failures prevent a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns.

Passenger means a person other than an operator who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.

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

Safety Management Policy means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

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

Safety objective means a general goal or desired outcome related to safety.

Safety performance means an organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.

Safety performance indicator refers to a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

Safety performance measure is an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

Safety performance monitoring means activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

Safety performance target means a quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe 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 means the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.

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 Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risks.

Safety risk mitigation means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.

Safety risk probability means the likelihood that a consequence might occur, taking as reference the worst foreseeable–but credible–condition.

Safety risk severity means the anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable–but credible–condition.

Serious Injury means any injury which: (1) requires hospitalization for more than 48 hours, commencing within seven days from the date of the injury was received; (2) results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) causes severe hemorrhages, nerve, muscle, or tendon damage; (4) involves any internal organ; or (5) involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

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

Appendix B – Acronyms

ASP	Agency Safety Plan
CCC	Change Control Committee
CFR	Code of Federal Regulations
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
FTA	Federal Transit Administration
IIPP	Illness & Injury Prevention Program
IRP	Incident Response Plan
IRT	Incident Response Team
NPTSP	National Public Transportation Safety Plan
OSHA	Occupational Health & Safety Administration
PMI	Preventative Maintenance Inspections
PTASP	Public Transportation Agency Safety Plan
SCAG	Southern California Association of Governments
SMS	Safety Management System
TAM	Transit Asset Management
TSI	Transportation Safety Institute
WSC	Workplace Safety Committee

Appendix C – Reference and Related Documents

- Fleet Maintenance Plan
- Emergency Operations Plan (EOP)
- Illness and Injury Prevention Program
- Transit Asset Management Plan
- EOP Infectious Disease Annex
- Operations Policies and Procedures
- National Public Transportation Safety Plan
- 49 CFR 673
- Management of Change Procedures
- "Dear Colleague" letter issued by the Federal Transit Administration on February 17, 2022