Valley Transit

CONNECTING THE FOX CITIES

Public Transportation Agency Safety Plan

LAST UPDATED December 1, 2021

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PUBLIC TRANSPORTATION AGENCY SAFETY PLAN for Valley Transit

Transit Agency Information

Transit Agency	**Name**		**Address**
	Valley Transit		801 S Whitman Avenue
Accountable Executive	**Name**		**Title**
	Ron McDonald		General Manager
Chief Safety Officer	**Name**		**Title**
	Amy Erickson		Assistant General Manager
Mode(s) of Service Covered by This Plan:		**List All FTA Funding Types (e.g., 5307, 5337, 5339):**	
Fixed Route-Directly Operated		5307	
Paratransit-Contracted		5307	
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)			
Fixed Route-Directly Operated			
Paratransit- Contracted			

Does the agency provide transit services on behalf of another transit agency or entity?	**Yes**	**No**	**Description of Arrangement(s)**
		X	

Transit Agency(ies) or Entity(ies) for Which Service Is Provided	**Name**	**Address**

Plan Development, Approval, and Updates

Signature by the Accountable Executive	**Name**	**Date of Signature**
	Ron McDonald	
	Signature	
Approval by Board of Directors (or Equivalent)	**Approving Entity**	**Date of Approval**
	Fox Cities Transit Commission	
	Signatures	
	George Dearborn-Chairperson	
	Mike Patza	
	Maggie Mahoney	
	Larry Wurdinger	
	Alderperson Brad Firkus	
	Richard Detienne	
	Carol Kasimor	

	Trish Nau	
	Greg VandeHey	
	Sam Schroeder	
	Diane Dexter	
	Alderperson Maiyoua Thao	
	Ronald Torrance	

Activity Log

Version Number and Updates *Complete history of successive versions of this plan*			
Version No.	**Section/Pages Affected**	**Reason for Change**	**Date Issued**
1	All	Document Creation	October 2020
2	Pages 3-5, 10	Annual Update	December 2021

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Background

The Moving Ahead for Progress in the 21st Century (MAP-21) Act grants the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive regulatory framework to oversee the safety of public transportation throughout the United States. As a component of this safety oversight framework, MAP-21 requires certain recipients of FTA Chapter 53 funding to develop and implement a Public Transit Agency Safety Plan (PTASP).

In addition to greater safety oversight responsibilities, MAP-21's grant of expanded regulatory authority puts FTA in a position to provide guidance to transit agencies that strengthens the use of safety data to support management decisions, improves the commitment of transit leadership to safety, and fosters a culture of safety that promotes awareness and responsiveness to safety risks. The framework to this approach is called a safety management system (SMS), which moves the transit industry towards a more holistic, performance-based approach to safety. The SMS framework has been adopted by FTA in its National Public Transportation Safety Plan ("national safety plan").

The PTASP for **Valley Transit (VT)** supports and is consistent with an SMS approach to safety risk management. SMS is an integrated collection of policies, processes, and behaviors meant to ensure a formalized, proactive, and data-driven approach to safety risk management. The aim of an SMS is to increase the safety performance of transit systems by proactively identifying, assessing, and controlling safety risks. The approach is meant to be flexible and scalable, so that transit agencies of all types and sizes can efficiently meet the basic requirements of MAP-21. The PTSAP for **Valley Transit (VT)** addresses the following elements, outlined in **Table 1** (below):

☐	**Safety Management Policy Statement:**	A policy statement establishing senior management commitment to continual safety improvement, signed by the executive accountable for the operation of the agency and the board of directors.
☐	**Document Control:**	A description of the regular annual process used to review and update the plan including a timeline for implementation of the process.
☐	**Core Safety Responsibilities:**	A description of the responsibilities, accountabilities, and authority of the accountable executive, the key safety officers, and key members of the safety management team.
☐	**Safety Training Program:**	A description of the comprehensive safety training program for agency staff that ensures that staff are trained and competent to perform their safety duties.
☐	**Safety Risk Management:**	A description of the formal processes the agency uses to identify hazards, analyze and assess safety risks, and develop, implement and evaluate risk controls.
☐	**Safety Risks:**	A description the most serious safety risks to the public, personnel and property.
☐	**Risk Control:**	A description of the risk control strategies and actions that the agency will undertake to minimize exposure of the public, personnel and property to hazards, including a schedule for implementing the risk control strategies and the primary entity responsible for each strategy.
☐	**Safety Assurance:**	A list of defined safety performance indicators for reach priority risk and associated targets the agency will use to determine if it is achieving the specified safety goals.
☐	**Desired Safety Outcomes:**	A description of desired safety outcomes for each risk using the measurable safety performance indicators established.

Table 1: Elements of a Public Transportation Agency Safety Plan (PTASP)

1 SAFETY POLICIES AND PROCEDURES

1.1 COMMITMENT TO SAFETY

Policy Statement

The management of safety is one of our core business functions. **Valley Transit** 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.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Accountable Executive.

Valley Transit commits 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, their accountabilities, and responsibilities for the delivery of the organization's safety performance and the performance of our Safety Management System (SMS).
- Establish and operate hazard identification and analysis, and safety risk assessment activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risk 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 indicators and safety performance targets.

- Continually improve our 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.

1.2 ANNUAL PTASP REVIEW AND UPDATE

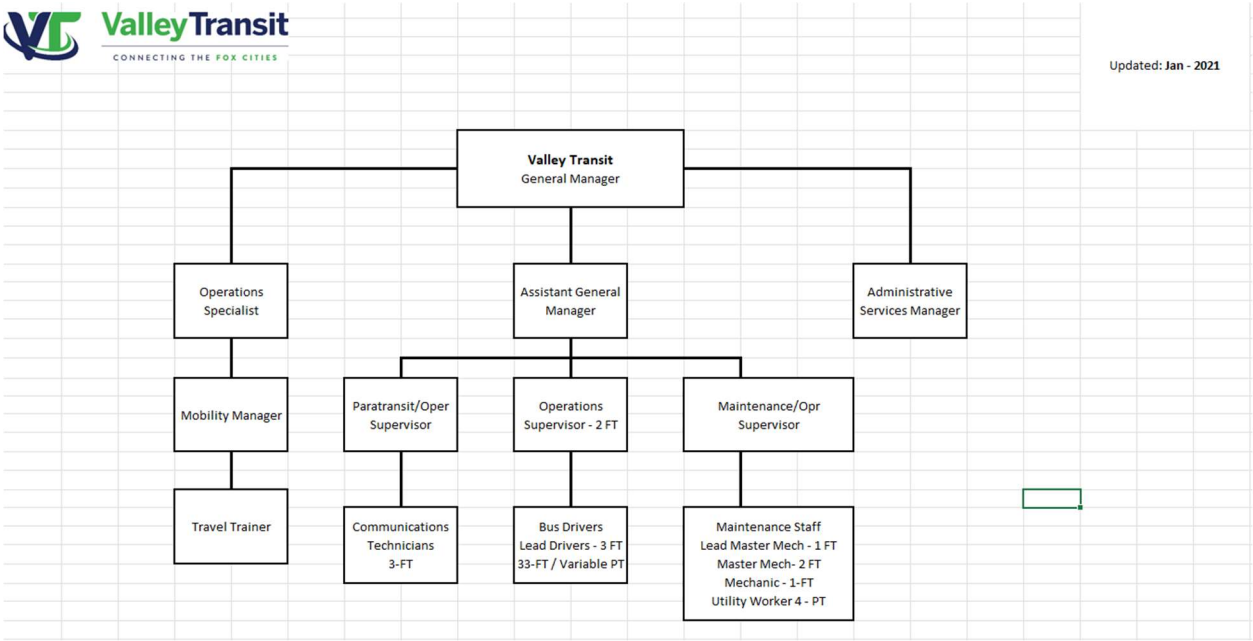
Valley Transit (VT) management will review the PTASP annually, update the document as necessary, and implement the changes within a timeframe that will allow the agency to timely submit to any annual or other periodic reviews, including its annual self-certification of compliance. At minimum, annual self-certification will consist of the Accountable Executive signing and dating this document.

Annual review of the PTASP will be conducted by **Valley Transit (VT)** by **December 1** of each calendar year. Necessary updates outside the annual update window may be handled as PTASP addenda. Reviews of the PTASP and any subsequent updates, addenda, adoption, and distribution activities will be documented in the PTASP Activity Log at the beginning of this document.

1.3 ORGANIZATION STRUCTURE AND SYSTEM SAFETY RESPONSIBILITIES

While the Accountable Executive has the ultimate responsibility for **Valley Transit's** implementation of its PTASP, **Valley Transit**'s executive management has the overall responsibility of safe and secure operations of **Valley Transit** and contract service operators. Each employee is required to carry out specific system safety responsibilities, depending on the employee's position, in compliance with the PTASP.

The information provided in the Staff Safety Roles and Responsibilities table (Appendix A) describes each position and general system safety responsibilities, and the agency's reporting structure.



2 SAFETY RISK MANAGEMENT (SRM)

2.1 HAZARD IDENTIFICATION

Establishing an effective hazard identification program is fundamental to safety management at **Valley Transit**. Hazard identification can be reactive or proactive in nature: safety event reporting, incident investigation, and trend monitoring are essentially reactive; other hazard identification methods proactively seek feedback through data collection, observation, and day-to-day operations analysis. Common hazard identification activities may include:

- Safety assessments
- Trend monitoring
- Hazard and safety event reporting
- Safety surveys
- Safety audits
- Evaluating customer suggestions and complaints

The number of near misses, known as accident precursor data, is significantly greater than the number of accidents for comparable types of events. The practice of reporting and learning from accident precursor data is a valuable complement to other hazard identification practices. To be successful, hazard identification must take place within a non-punitive and just safety culture. **Valley Transit** employs systematic safety improvements by discovering and learning of potential weaknesses in the system's safety.

2.1.1 Non-Punitive Reporting Policy

Valley Transit is committed to the safest transit operating standards practicable. To achieve this, it is imperative that **Valley Transit** have uninhibited reporting of all safety events that may compromise safe operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. Such communication must be completely free of any form of reprisal.

Valley Transit will not take disciplinary action against any employee who discloses a safety event. This policy shall not apply to information received by **Valley Transit** from a source other than the employee, or that involves an illegal act, or a deliberate or willful disregard of rules, regulations, or agency policies or procedures.

Valley Transit's method of collection, recording, and disseminating information obtained from transit safety reports has been developed to protect, to the extent permissible by law, the identity of any employee who provides transit safety information.

2.2 RISK ASSESSMENT

Once a hazard has been identified, **Valley Transit** will conduct an assessment to determine the potential consequences. Factors to be considered are the likelihood of occurrence, the severity of the consequences (should there be an occurrence), and the level of exposure to the hazard. **Valley Transit** will assess risks subjectively by experienced personnel using a risk assessment matrix. Results of the risk assessment process will help determine whether the risk is being appropriately managed or controlled. If the risks are acceptable, the hazard will continue to be monitored. If the risks are unacceptable, steps will be taken by **Valley Transit** to lower the risk to an acceptable or tolerable level, or to remove, avoid, or otherwise eliminate the hazard.

2.3 RISK MITIGATION

The assessment process may indicate that certain hazards have an acceptable level of risk, while others require mitigation to an acceptable or tolerable level. **Valley Transit** will further manage risk by completing a **Hazard Assessment Log (Appendix E)** that can help prioritize safety risks. The level of risk can be lowered by reducing the severity of the potential consequences, likelihood of occurrence, exposure to that risk, or by some combination.

In general, **Valley Transit** will take the following safety actions to mitigate risk – these actions can be categorized into three broad categories, including:

1. **Physical Defenses:**
   These include objects and technologies that are engineered to discourage, or warn against, or prevent inappropriate action or mitigate the consequences of events (e.g. traffic control devices, fences, safety restraining systems, transit controls/signals, transit monitoring systems, etc.)
2. **Administrative Defenses:**
   These include procedures and practices that mitigate the likelihood of accident/incident (e.g. safety regulations, standard operating procedures, personnel proficiency, supervision inspection, training, etc.)
3. **Behavioral Defenses:**

These include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior of motorists, passengers and pedestrians; factors outside the control of the agency (e.g. the *Zero in Wisconsin* campaign)

2.4 PRIORITIZE SAFETY RISKS

Once a hazard has been identified and the risk level assessed, **Valley Transit** will prioritize safety risks.

3 SAFETY ASSURANCE

Safety assurance provides the necessary feedback to ensure that the SMS is functioning effectively and that **Valley Transit** is meeting or exceeding its safety objectives. Safety assurance requires a clear understanding of how safety performance will be evaluated, or in other words, what metrics will be used to assess system safety and determine whether the SMS is working properly. Having decided on the metrics by which success will be measured, safety management requires embedding these metrics in the organizational culture and encouraging their use for ongoing performance improvement.

3.1 DEFINING SAFETY GOALS AND OBJECTIVES/OUTCOMES

Setting safety goals and objectives is part of strategic planning and establishing safety policy for **Valley Transit**. Clearly defining safety goals is the first part in creating a safety performance measurement system.

Safety goals are general descriptions of desirable long-term impacts. For example, a general safety goal might be:

> *"Foster agency-wide support for transit safety by establishing a culture where management is held accountable for safety and everyone in the organization takes an active role in securing transit safety."*

Safety objectives or outcomes are more specific statements that define measurable results. For example, a specific safety objective for the goal stated above might be:

> *"Establish regular transit safety meetings comprised of staff at varying levels, including executives, officers, managers, operators and maintenance personnel."*

The safety objective/outcome will then be measured by defining specific performance metrics, including a baseline and target, that **Valley Transit** will determine is reasonable.

3.2 DEFINING SAFETY PERFORMANCE MEASURES

Performance measurement is the regular systematic collection, analysis, and reporting of data that track resources used, work produced, and whether specific outcomes were achieved. In other words, it is a tool to quantify and improve performance, and engage and communicate with **Valley Transit** staff and external stakeholders.

The two core functions of performance measurement include monitoring and evaluating progress. Performance can be measured in terms of inputs, outputs, outcomes, and efficiency, among many other criteria.

Valley Transit will utilize these basic principles of performance measurement, including:

- Stakeholder involvement and acceptance
- Focus on agency goals and activities
- Clarity and precision
- Creditability and robustness
- Variety of measures
- Number of measures
- Hierarchy of measures
- Forward-looking measures
- Integration into agency decision-making
- Timely reporting
- Understand agency specifics, including context and scale of operations
- Realism of goals and targets

3.2.1 Metrics

System safety data is collected through a variety of sources and includes:

- Near miss information
- Accident investigation reports
- Internal safety audits (or reviews)
- Safety committee meetings
- Injury reports (including occupational injury)
- Event reports (including accidents, incidents, and occurrences)
- System monitoring (including testing and inspection records)
- Hazard management program

This safety data will be analyzed and used for development of key safety performance indicators and targets.

Valley Transit will initially focus on areas based on data delivered to the National Transit Database (NTD), as the following:

- **Fatalities**
    - Total number of reportable fatalities, and rate per total vehicle revenue miles

- **Injuries**
    - Total number of reportable injuries, and rate per total vehicle revenue miles
- **Safety Events**
    - Total number of reportable events, and rate per total vehicle revenue miles
- **System Reliability**
    - Mean distance between major mechanical failures

These safety performance measures are used to select improvement targets for these four measures and for each mode of transit, in order to encourage improvements and monitor the safety performance of delivering transit services. In addition, **Valley Transit** will select additional performance measures and targets, both leading and lagging, to insure continual improvement of our SMS.

Valley Transit will make its safety performance measures improvement targets available to applicable state agencies and metropolitan planning organizations (MPOs), and, to the maximum extent practicable, will coordinate with both in the selection of safety performance targets.

The safety data collected from the above sources will be analyzed for potential safety impacts. Identified areas of concern are reported to appropriate personnel in the form of specific project reports, memos, and recommendations from the safety committee.

Records of system safety data are maintained for a minimum of three years. Certain information, such as safety certification backup documentation is maintained by **Valley Transit**'s document control process. In addition to safety data, **Valley Transit** maintains other data and documentation of activities required by the PTASP. Distribution of safety-related reports and data is accomplished through the **Valley Transit** Forward Focus committee.

3.3 MONITORING PERFORMANCE AND EVALUATING RESULTS

Once safety goals, objectives/outcomes, and measures have been defined, they can be organized into a **Safety Performance Matrix (Appendix G)** or **Safety Performance Outline (Appendix F)**. Organizing information, particularly in a matrix, will allow **Valley Transit** to continuously monitor safety performance and evaluate results. **Valley Transit** will evaluate safety performance and update documentation at least semi-annually.

3.4 INTEGRATING RESULTS INTO AGENCY DECISION-MAKING PROCESSES

Valley Transit is committed to using the data collected and information learned to inform decision making and instill positive change. The main objective is the continuous improvement of transit system safety. When performance goals are not met, **Valley Transit** will work to identify why such goals were not met and what actions can be taken to minimize the gap in achieving defined goals. However, when goals are easily achieved, action will be taken to exceed expectations and re-establish a reasonable baseline.

Uses of Performance Results include:

- Focus attention on performance gaps and trigger in-depth investigations of what performance problems exist

- Help make informed resource allocation decisions
- Identify needs for staff training or technical assistance
- Help motivate employees to continue making program improvements
- Support strategic planning efforts by providing baseline information for tracking progress
- Identify best practices through benchmarking
- Respond to elected officials and the public's demand for accountability

3.5 SUSTAINING A SAFETY MANAGEMENT SYSTEM

In order to sustain the SMS, **Valley Transit** will ensure that particular processes are employed to instill an organizational foundation. Examples of actions taken to sustain the SMS include:

- **Create measurement-friendly culture:**
  All staff, including senior managers, should be actively engaged in creating measurement-friendly culture by promoting performance measurement as a means of continuous improvement. Senior managers will also lead by example and utilize performance metrics in decision making processes.
- **Build organization capacity:**
  Investment in developing skilled human resources capacity is essential to sustaining an SMS. Both technical and managerial skills will be needed for data collection and analysis and setting goals. Managing staff and the governing board will commit the financial resources required for organizational capacity and maintaining an SMS on a continuous basis.
- **Reliability and transparency of performance results:**
  The SMS will be able to produce and report its results, both good and bad. Performance information should be transparent and made available to all stakeholders. Messengers should be protected to preserve the integrity of the measurement system. The focus should be on opportunities for improvement rather than allocating blame.
- **Demonstrate continuous commitment to measurement:**
  Visible commitment to using metrics is a long-term initiative. **Valley Transit** will demonstrate a commitment to performance measurement by establishing a formal process of reporting performance results, such as including transit safety and performance measurement as a standing agenda item at city council and county board meetings.

4 SAFETY PROMOTION

4.1 SAFETY PROMOTION, CULTURE AND TRAINING

Valley Transit believes safety promotion is critical to the success of an SMS by ensuring that the entire organization fully understands and trusts its safety policies, procedures, and structure. Further, safety promotion involves establishing an organizational and workplace culture that recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

4.1.1 Safety Culture

Positive safety culture must be generated from the top. The actions, attitudes, and decisions at the policy-making level must demonstrate a genuine commitment to safety. Safety must be recognized as the responsibility of each employee, with the ultimate responsibility for safety resting with the Accountable Executive. Employees must trust that they will have management support for decisions made in the interest of safety, while also recognizing that intentional breaches of safety will not be tolerated.

The primary goal of safety promotion at **Valley Transit** is to develop a positive safety culture that allows the SMS to succeed. A positive safety culture is defined as one which is:

A. An Informed Culture

- Employees understand the hazards and risks involved in their areas of operation
- Employees are provided with the necessary knowledge, training and resources
- Employees work continuously to identify and overcome threats to safety

B. A Just Culture

- Employees know and agree on what is acceptable and unacceptable behavior
- Human errors must be understood, but negligence and willful violations cannot be tolerated

C. A Reporting Culture

- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action
- When safety concerns are reported, they are analyzed, and appropriate action is taken

D. A Learning Culture

- Learning is valued as a lifetime process beyond basic-skills training
- Employees are encouraged to develop and apply their own skills and knowledge to enhance safety
- Employees are updated on safety issues by management, and safety reports are fed back to staff so that everyone learns the pertinent lessons

4.1.2 Training

During the initial implementation of an SMS, specific training will be required for all employees and contract staff, to explain the agency's safety culture and describe how **Valley Transit**'s SMS works. The Chief Safety Officer is the resource person for providing a corporate perspective on **Valley Transit**'s approach to safety management.

Safety Management training topics may include:

A. Initial Safety Training for All Staff

1. Basic principles of safety management including the integrated nature of SMS, risk management, safety culture, etc.
2. Corporate safety philosophy, safety goals and objectives, safety policy, and safety standards
3. Importance of complying with the safety policy and SMS procedures, and the approach to disciplinary actions for different safety issues

4. Organizational structure, roles and responsibilities of staff in relation to safety
5. Transit agency's safety record, including areas of systemic weakness
6. Requirement for ongoing internal assessment of organization safety performance (e.g. employee surveys, safety audits, and assessments)
7. Reporting accidents, incidents, and perceived hazards
8. Lines of communication for safety managers
9. Feedback and communication methods for the dissemination of safety information
10. Safety promotion and information dissemination

B. Safety Training for Operations Personnel

1. Unique hazards facing operational personnel
2. Seasonal safety hazards and procedures (e.g. winter operations)
3. Procedures for hazard reporting
4. Procedures for reporting safety events (accidents and incidents)
5. Emergency procedures

C. Safety Training for Management

1. Principles of the SMS
2. Management responsibilities and accountabilities for safety
3. Legal issues (e.g. liability)

D. Training for the Safety Officer

1. Familiarization with different transit modes, types of operation, routes, etc.
2. Understanding the role of human performance in safety event causation and prevention
3. Operation of the SMS
4. Investigating safety events
5. Crisis management and emergency response planning
6. Safety promotion
7. Communication skills
8. Performing safety audits and assessments
9. Monitoring safety performance
10. National Transit Database (NTD) safety event reporting requirements

APPENDICES

Appendix A – Staff Safety Roles and Responsibilities

Appendix B – Safety Assessment and System Review

Appendix C – Facility Safety and Security Assessment

Appendix D – Risk Assessment Matrix

Appendix E – Hazard Identification and Risk Assessment Log

Appendix F – Prioritized Safety Risk Log

Appendix G – Safety Performance Matrix

Appendix H – Safety Performance Outline