



April 20, 2022

To: Human Resources Committee  
City of Appleton Common Council

From: Ron McDonald, General Manager

Subject: Authorization to add a Safety and Compliance Specialist position to the Table of Organization

Valley Transit continues to struggle with driver recruitment efforts. Valley Transit has 9 of 36 full-time driver positions vacant. On February 7, 2022, the Federal Motor Carrier Safety Administration (FMCSA) enacted the Entry Level Driver Training Requirements (ELDT) for commercial driver license. The ELDT requirements are intended to create standardized training.

ELDT requirements require FMCSA approved curriculum with a significant amount of reporting. Without adequate staff to take on the additional training and reporting, Valley Transit intended to partner with Fox Valley Technical College. FVTC is now reserving training sessions 6-months out, in September. We have bus driver candidates that we intend to hire and a six-month waiting period for a bus driver recruit is unacceptable. As detailed in FMCSA Title 49 Part 380 Appendix A, the ELDT requirements detail 245 practices that need to be taught.

Additionally, in 2021 the Federal Transit Administration mandated each Transit agency develop and maintain a Public Transportation Agency Safety Plan (PTASP). This is a very labor intensive and extensive initiative. The goal is to have in place a safety plan so that the practices and processes are such that Valley Transit operates as safe as practically possible. There are four components to the required Safety Management System: Safety Management Policy-Leadership, Commitment & Accountability includes Employee Safety Reporting Program; Safety Risk Management-Identify, Assess & Mitigate; Safety Assurance-Measure, Monitor & Evaluate; and Safety Promotion-Communicate & Training.

Most recently, the new Bipartisan Infrastructure Law 49 U.S.C. § 5329 / IIJA § 30012 mandates Transit Agencies must spend 0.75 of their section 5307 funds related to safety initiatives.

With the mandates identified above in addition to other safety related initiatives, Valley Transit is requesting authorization to add a Safety and Compliance Specialist to its Table of Organization.

**Cost Analysis:**

For analysis purposes, a Grade L salary control point plus full fringe benefits is projected at \$106,700. This position can be funded with unspent salary dollars in 2022. In 2023 and beyond, this position will be budgeted with 60% paid for by combined WisDOT and FTA grants. The remaining 40% is paid for through multiple local funding sources. I anticipate the annual impact to the City of Appleton portion of Valley Transit's budget is \$7,200.

**Recommendation:**

Authorization to modify Valley Transit's Table of Organization by adding a Safety and Compliance Specialist position.

Respectfully submitted by,

  
Ron McDonald