PTASP/Safety Management System (SMS) Plan

VALPO TRANSIT

Approved by Valparaiso Board of works and safety

July 12,2024

1. Safety Management Policy

Safety Management System (SMS) Policy Statement

Valpo Transit, Inc. is committed to providing the highest level of safety for the public, our employees, and contractors. Satisfying our customers' special needs with 100% regulatory compliance and the lowest possible risk is our first operational priority. We will never increase our risk of accident or injury to solve operational problems in the course of providing the *Best Customer Experience*.

To meet that commitment, Valpo Transit has adopted the Safety Management System (SMS) and developed safety policies and activities in support of an effective SMS. This plan is based on the four components of SMS: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.

Every employee and contractor are directed and empowered to administer the SMS and its specific activities for the prevention, control, and resolution of unsafe conditions and actions. The primary objectives of this SMS plan are to proactively identify and mitigate safety hazards and risks, promote a positive safety culture, and maintain regulatory compliance.

Our safety objectives are to:

- Ensure that effective safety management systems and processes are integrated into all of our activities.

- Designate an individual responsible for the safety function who reports directly to the Chief Executive Officer of the company and authorize that individual to develop and implement programs to promote safety.

- Ensure all employees and contractors are aware that safety is their primary responsibility, and they are held accountable for delivering the highest level of safety in their daily work activities.

- Clearly define the safety accountabilities and responsibilities to all employees and contractors, including the responsibility of managers and supervisors to develop, implement, and enforce safety rules and procedures in their respective work areas.

- Provide all employees and contractors with appropriate safety information and skills training; ensure employee and contractor competence in all safety matters related to their position with the company.

- Develop and embrace a positive safety culture in all of our activities that recognizes the importance and value of effective safety management and acknowledges that safety is the number one operating value in everything we do.

- Ensure a culture of open reporting of all safety hazards, ensuring that no action will be taken against any employee who discloses a safety concern through the proper chain of command, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

- Promote and maintain a positive safety culture with positive recognition and reinforcement of safe behaviors.

- Ensure that all equipment, systems, and services meet our safety performance standards through periodic audits and inspections.

- Establish performance metrics and measures of our safety performance against our safety performance indicators and safety performance targets.

- Continually develop and improve our safety processes through actively monitoring, measuring, and reviewing our performance against our objectives and targets.

- Conduct safety and management reviews to improve our safety performance and ensure that relevant and corrective actions are taken.

- Comply with all state and federal regulatory requirements and standards.
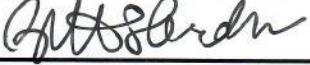
Signed: _____   Date: **7/12/2024**

Beth Shrader/ Chief Executive Officer

1.1 Commitment to Safety Statement

Providing the highest level of safety for all Valpo Transit employees, passengers, and the communities we serve is our core operating value. Safety is at the forefront of delivering the *Best Customer Experience* and is the first of our key components of successful performance.

Doing work safely must be the foundation of all operational activities. Safety standards will never be compromised, subordinated, or diminished by any other goal. Safety is the process that drives all functions and activities and is at the center of everything we do at Valpo Transit.

Valpo Transit is committed to being the safest organization possible and is committed to an incident and injury free workplace and security excellence. We will review and continually improve our practices to continuously drive improvements in safety, health, environmental, and security performance.

Accountability is fundamental to our mission. Every individual at VALPO TRANSIT is responsible for working and acting safely and embracing safety as a lifestyle. Compliance with this Commitment, applicable laws, and other requirements is the responsibility of every employee and contractor acting on our behalf.

Safety leadership is a core responsibility of management and is the company's most important management value. Managers at all levels will set the standard in our industry, from the Chief Executive Officer to the first-level supervisor.

Every employee is responsible to:

- Promote and maintain a safe work environment for all personnel and our passengers.
- Act consistently to influence safe behaviors and eliminate unsafe behaviors, actions and decisions.
- Go above and beyond the minimum safety standards of his / her job.
- Directly participate in all aspects of our safety program.
- Abide by all applicable safety rules and regulations.
- Work with management to decrease our exposure to risk.
- Immediately report all incidents/accidents and hazards.
- Complete all assigned safety training programs to continuously enhance safety skillset.
- Intervene in an activity if it is observed that its being conducted with an unacceptable level of risk.
- Encourage and reinforce the safe behaviors of others.
- Resolve circumstances responsibly that require corrective action.
- Insist upon an unwavering commitment to safety.

VALPO TRANSIT leadership is committed to supporting this statement with the resources and accountability necessary to achieve safety excellence.

This ASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program 49 C.F.R. Part 673 and the National Public Transportation Safety Plan Program and the National Public Transportation Safety Plan. The full text of Part 673 is available at http://www.transit.dot.gov/PTASP.

Contractor Management

It is the responsibility of Valpo Transit to ensure that contractor work practices meet established safety standards of the agency and any and all federal, state, and local regulations and requirements.

Valpo Transit will monitor contractor compliance through scheduled and unscheduled safety audits of equipment, work sites and practices, regulatory compliance, and required records. Significant violations, especially in areas of safety, will be addressed by the appropriate management person, and may include termination of the contract or other legal action.

1.2   Safety Management System Development

This Safety Management System (SMS) plan was developed to outline our systematic procedures, practices, and policies for managing risks and hazards. Additional plan elements are available as references to support the information outlined in this document.

Key definitions of our process throughout our Safety Risk Management includes the following:

- A **hazard** is a condition or object with the potential of causing injuries to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function. The potential for harm is defined as **safety risk**. It refers to the chance that people, equipment, or the environment could be harmed by the consequences of a hazard.
- What is done to address and reduce that risk is **mitigation**.
- **Consequence** means an effect of a hazard, involving 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.
- **Event** means any accident, incident, or occurrence.

This SMS plan will be reviewed periodically to continuously improve in our mitigation of safety risk. We will review and continuously improve our practices to drive continuous improvement. Effectiveness at the site level will be determined at least annually through the Safety Director audit. Reviews may occur more frequently.

This plan outlines the SMS activities for all employees and contractors employed by Valpo Transit. Additional manuals and procedures should be referenced for more in-depth procedural detail. We will work with the transit agency at the site-location level to ensure these activities are also featured in their Agency Safety Plan.

1.3   Operations and Maintenance Procedures

It is the policy of Valpo Transit that company operations and all personnel will comply with all applicable requirements federal and state safety regulations .

The system will be monitored for compliance with and sufficiency of operations and maintenance procedures. Non-compliance will be addressed through training, coaching, and management oversight, among other approaches. Non-compliance may result in disciplinary action, in accordance with our policies and procedures. Insufficient procedures will be addressed through the Safety Risk Management process outlined in this plan. Any task that cannot be done safely should not be attempted until it can be done safely.

It is the responsibility of the operator to perform thorough Daily Vehicle Inspections (DVIs) and submit those reports to dispatch personnel. It is the responsibility of the mechanics to review and repair all defects before the vehicle goes back into service. The procedure is listed out in greater detail in our Maintenance Manual. Monthly audits of facilities including yard and surrounding areas will also be conducted to verify OSHA compliance and hazard identification, mitigation, and resolution.

A vehicle with a safety defect is reported immediately by the operator. The vehicle shall be removed from service and not returned until repaired or replaced as soon as possible. In cases when the defect prevents the vehicle from being safely driven back to the garage, it is towed using a contracted service.

No operator or other authorized employee is asked, required, or permitted to drive a vehicle with a known major safety defect and is required to wear a safety vest as well as any other appropriate PPE.

As outlined in our Maintenance Manual, it is the responsibility of the maintenance manager to provide the general manager with a detailed account of the day's vehicle status and maintenance activities. The maintenance manager shall ensure the operations manager is kept up to date on all daily meetings and reports.

It is the policy of Valpo Transit that maintenance managers are responsible to ensure all fleet vehicles are systematically inspected, maintained, and repaired. The preventative maintenance intervals shall conform to the OEM service specifications, FTA standards, and contractual requirements. (MP-03-02 – Preventative Maintenance). All seasonable maintenance services are to be conducted in accordance with OEM standards. (MP-03-10 – Seasonal Maintenance).

Please refer to the Maintenance Shop Safety Manual and Maintenance Manual for further detail outlining policies and procedures, as well as our Safety Vest Policy S-46 and Yard Safety Procedures.

Safety in Design, Acquisition and Procurement

Operational safety and passenger safety are the highest priorities when defining vehicle and facility design requirements. Design criteria are established to ensure the equipment meets or exceeds all safety, flammability and environmental requirements and meets all state and federal standards and regulations. Valpo Transit's Procurement Department owns the procurement process and works closely with all impacted departments.

Conditions covered in the Contract Specifications include verification of compliance, commencing with the design phase and periodic inspections and testing during the construction phase performed by qualified consultants. A thorough inspection and system testing is performed before the equipment is conditionally accepted.

The Procurement Group works in conjunction with the maintenance, safety, and operations department when purchasing personal protective equipment for employees, controlling chemicals and other hazards in the workplace, mandating safety requirements in specific contracts and requiring compliance from specific vendors and clients with Valpo Transit's safety requirements.

1.4   Employment and Recruitment Selection

Valpo Transit follows industry practices when hiring employees and contractors, including employment, criminal background, and MVR reports as required. Our hiring practices are compliant with FTA regulations on pre-employment / new hire testing and onboarding.

1.5   Drug and Alcohol Program

The Drug and Alcohol Program Manager is responsible for administering the corporate program. The location Designated Employer Representative (DER) are responsible for location program compliance. The policies and procedures conform to the drug and alcohol regulations of the United States Department of Transportation's (DOT), Federal Transit Administration (FTA) and/or the Federal Motor Carrier Safety Association (FMCSA), based on the service environment that the agency and contract operates under. The policy identifies that employees are subject to testing and includes the testing requirements, prohibited behavior, consequences of positive results and resources for employee assistance and rehabilitation.

Valpo Transit is committed to a Drug and Alcohol-free workplace through a Zero Tolerance policy. Participation by covered employees in Valpo Transit's prohibited drug use and alcohol misuse program is a condition of employment. Supervisors must not permit a safety-sensitive employee to perform his/her job function if the employee has violated any provision of the Policy. Our Drug and Alcohol-Free policy extends to contractor personnel in safety-sensitive positions.

1.6   Workplace Violence Program

Valpo Transit is firmly committed to providing a workplace free from acts of violence or threats of violence. In keeping with this commitment, the Company has established a policy strictly prohibiting any employee from threatening or committing an act of violence in the workplace, while on duty, while on company related business, or while operating any vehicle or equipment owned or leased by the Company.

Assistance is needed from all employees to achieve a workplace secure and free from violence. VALPO TRANSIT is committed to a "zero tolerance" policy and compliance with this policy in respect to workplace violence is every employee's responsibility. Any and all incidents involving an act or threat of violence must be reported immediately to the employee's supervisor or the Human Resources department. Any employee may do so without fear of retaliation of any kind. After the incident is reported to a supervisor, he/she will report the matter to the Human Resources department, who will investigate and take appropriate action.

Any employee who engages in or contributes to violent or threatening behavior may be subject to disciplinary action, up to and including termination.

1.7   Fitness for Duty

Fitness for duty is determined by Human Resources and Safety Management. It is the policy of Valpo Transit that all drivers are professionals that manage fatigue and come to work well rested and prepared to provide a full measure of safe and reliable customer service.

All employees that take medical leave must provide a return-to-work release from his/her health care provider prior to returning to work. The return-to-work statement should be submitted to the Leaves Manager in the Benefits department.

Employees returning to work after 30 days or more break in service will be required to undergo a background check, return-to-work physical and drug test, as permitted or required by applicable federal or state law which includes but is not limited to regulations and requirements set forth by the DOT, FMCSA, OSHA and ADA, FTA, 49 U.S.C. 5326 and 49 CFR part 625.

1.8   Policies and Procedures Review

All policies and procedures require periodic reviews for applicability and accuracy. Policies and procedures include a revision date to ensure that all copies of the document are current. Specific policies and procedures are reviewed by department managers with the assistance of the Human Resources Department. Changes to policies and procedures will be made at the corporate level after a thorough review has been performed.

The contractor's safety policies and procedures will also be reviewed periodically for accuracy and compatibility with Valpo Transit policies and procedures.

To submit a request for revision, individuals must complete a Change Request. Details of the request must include the policy or procedure, description of the requested process change, any known impact, and implementation efforts.

1.9   Employee Safety Reporting Program (ESRP)

Our front-line employees are our best source of information for identifying hazards. Nobody knows more about the actual safety performance of the transit system than the employees who deliver the service.

The Employee Safety Reporting Program (ESRP) is intended to help the Accountable Executive and other senior managers get important safety information from across the transit agency. It can be an agency's most important source of safety data.

There are two types of safety reporting programs: mandatory and voluntary.

- **Mandatory**: Employees must report hazards that are compliance-based and address regulatory issues. Employees are required to immediately report every incident and accident. An employee's failure to report or provide false information of an unsafe hazard or act could result in disciplinary action.
- **Voluntary**: Employees are strongly encouraged to report hazards and can report anonymously. Every employee is empowered to report any unsafe hazard / risk to their supervisor or senior management without fear of retribution or penalty.

Employees will have the option to report anonymously to maintain confidentiality. The ESRP is non-punitive, and employees will not be disciplined for the act of reporting the Hazard or Near Miss. However, employees must report hazards that are compliance-based and address regulatory issues. Record falsification, Drug & Alcohol violations, gross negligent behavior, and failure to report accidents/incidents and serious safety hazards are examples of employee behaviors that may result in disciplinary action.

Forms of reporting can include submitting a completed SMS Hazard/Risk Report Form (found in the Appendix) or utilizing a centrally located Safety Suggestion Box at the division location. The transit agency may also have an additional form of Employee Safety Reporting.

The Hazard/Risk Report Form shall be completed immediately, so proactive measures can be taken as soon as possible. Depending on the perceived level of risk and severity, the report shall be submitted immediately or by the end of their shift.

Input by employees into the ESRP can include safety concern reporting, operational system description, hazard identification, safety deficiencies, risk assessments, potential consequences of hazards, or recommended safety risk mitigations.

Examples of reports may include the following.

- Safety hazards in the operating environment (for example, county road conditions)
- Policies and procedures that aren't working as intended (for example, insufficient time to complete pre-trip inspections)
- Events that senior managers might not otherwise know about (for example, near misses)
- Information about why a safety event occurred (for example, radio communication challenges contributed to an incident)

The information we receive through this source will help us resolve the reported hazard and notify the supervisor or senior management of changes that may need to be made to mitigate safety hazards in the future.

The Safety Department will lead the effort on collection, analysis, resolution, and monitoring of hazards and feedback entered through the ESRP. The Safety Department will take the lead on the Safety Risk Management process, with inputs from subject-matter experts in operations and maintenance.

Information collected through our ESRP will feed into our hazard identification and analysis process. Please reference that section of the plan for further information on mitigation, resolution, and communication.

1.10 Authorities, Accountabilities & Responsibilities

Safety accountabilities and responsibilities span from corporate organizational roles to contract management and front-line employees. All employees are responsible for safe operations, as outlined in our Commitment to Safety statement.

The **CEO** provides strategic direction and has the responsibility for providing the leadership and resources to carry out the Safety Management System plan.

- *Agency Leadership and Executive Management are tasked and authorized with making sure that the organization safety policies and procedures are followed and communicated to their direct reports, general managers, managers and front-line supervisors. They will provide positive leadership and direction in maintaining the safety policy as a major priority in all operations. This group is responsible for providing resources to acquire and maintain safety and health equipment, devices, and programs. They will support safety standards and behaviors ensuring that steps are made to identify and mitigate hazard and risk. The Accountable Executive meets all the requirements in §673.5 and §673.23(d)(1) in that this position is ultimately responsible for:*

  o *Carrying out the ASP and the TAM Plan,*

  o *Controlling or directing the human and capital resources needed to develop and maintain the ASP and the Transit Asset Management (TAM) Plan, and Ensuring that the agency's SMS is effectively implemented, and action is taken, as necessary, to address substandard performance in the agency's SMS.*

The **Safety Leadership team**, including the Accountable Executive, Chief Safety Officer, General Manager, Maintenance Manager, Operations Manager and Safety Manager has the authority and responsibility for making sure the safety policies and procedures are adhered by and promoted by senior management, department supervisors and managers, area safety directors and key safety team members. The Safety Leadership team will stay informed of law changes or updates concerning employee safety and record keeping and will amend safety policies as required. This group will conduct periodic reviews of safety standards to remain current with federal and state requirements. They will provide guidance in maintaining a high standard of safety training programs and assist in analyzing safety data to identify future mitigation strategies. The Directors of Safety will conduct an annual audit to ensure compliance with Federal, State and Local rules and regulations as well as company policies and procedures. The Chief Safety Officer/SMS Executive meets the requirements in §673.5 and §673.23(d)(2) in that the CSO is an adequately trained individual who is responsible for safety and reports directly or holds a direct line of reporting to the Accountable Executive and has the authority.

Key Staff, including Department Supervisors, Managers, and all other employees, are tasked with following all company safety policies to include, but not limited to, FTA, 49 U.S.C. 5326 and 49 CFR part 625, FMCSA, USDOT, ADA safety regulations. Managers and Supervisors are responsible for staying current on all internal and external safety training. They are also responsible with reporting or responding to accidents, injuries, near misses, unsafe working conditions and potential hazards within their scope of influence. Supervisors and Managers will evaluate employee performance ensuring each employee's safe behavior and work methods and coach, retrain and discipline as required. They will conduct monthly facility audits to ensure compliance. They are also responsible for promoting the ESRP and reviewing and resolving all submissions responsibility.

In addition to the above overview of safety roles and responsibilities by group, the following highlights the site-specific roles and responsibilities. This is in addition to the responsibilities listed out in our Commitment to Safety (page 4) and SMS plan objectives (page 2).

Accountable Executive: Ultimate responsibility for the safety performance of the location and authorizes activities to support an effective SMS.
Chief Safety Officer: Responsible for promoting operational safety and adhering to our policies and procedures.
General Manager: Responsible for the day-to-day implementation and operation of the SMS.
Maintenance Manager: Responsible for OSHA compliance and site-specific maintenance activities.
Trainers / Instructors: Responsible for ensuring that we are training every employee to proficiency in accordance with our performance standards.
Supervisors: Responsible for playing an active role in SMS activities, including sufficient road observations and identifying potential safety hazards with recommended solutions.
Location Safety Committee: Responsible for ensuring that reported safety items are reviewed and addressed, as well as discussing proactive measures to mitigate future risk.

1.11 Emergency Management Integration and Procedures

Every site location is to maintain an updated Emergency Action Plan. The purpose of the Emergency Action Plan is to assist employees and management in making quality decisions during times of crisis, and to comply with regulatory standards for Emergency Action Plans.

The Facility Emergency Action Plan will be reviewed and updated annually. Certain practice drills are to be planned and carried out for preparedness during emergency scenarios.

The Emergency Action Plan is available on our intranet site and should be printed and stored in the division.

1.12 SMS Documentation and Records

Processes that require documentation or forms to support an effective SMS are listed out in this plan within the corresponding section.

Site locations that are subject to the PTASP Final Rule will be required to maintain documentation and recordkeeping for a minimum of 3 years *after they are created and must be made available upon request by the FTA or other Federal entity, or a State Safety Oversight Agency having jurisdiction.*

2. Safety Risk Management

The FTA defines Safety Risk Management as a process within the agency's Public Transportation Agency Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk.

Through risk identification and assessment, a determination is made of the Likeliness and severity of potential losses. Safety and loss control programs are developed to modify and eliminate or reduce the risks of these exposures.

2.1 Accident and Incident Reporting and Response

It is the policy of Valpo Transit to minimize injury, damages, pain and suffering for people involved in vehicular mishaps involving VALPO TRANSIT vehicles, to promptly respond, report and to thoroughly investigate these occurrences.

All incidents, including near misses and minor events, should be reported as soon as possible – whether or not the incident did or could have resulted in personnel injuries, illnesses, or property damage.

The incidents shall be immediately reported from the scene. Operator at scene shall immediately contact Dispatch and provide incident details.

When possible, it is the responsibility of the General Manager to make sure that a manager or supervisor responds to the accident to ensure care for our driver and equipment, secure the incident site, preserve evidence, review of accident investigation and proper review of company liability.

The initial accident/incident claim line information sheet should be completed with details to convey to our claims and insurance companies.

Accident and incident response procedures will vary depending on the severity of an incident ("major" vs. "minor" definition thresholds outlined in the Safety Policy. All employees, supervisors and managers should be knowledgeable on response procedures outlined in The Accident Procedures guideline and High Priority Event notification procedures.

The General Manager and Safety Manager are responsible for ensuring a timely investigation and report is completed.

Reports are reviewed by the Transit Manager, who determines preventability. Reports may also be reviewed by Risk Management and the Director of Safety. Additional actions and activities may be requested from the Risk Management department or City Transit Manager.

Copies of the accident/incident reports and a summary are kept for review and reporting as necessary.

Work Injuries

Work injuries include any injury, occupational disease, or disability that arises out of, or in the course of, any work-related activity and requires first aid or medical treatment. Worker's compensation OSHA-related injuries are considered work injuries for the purpose of this policy.

Injuries should be reported by the injured employee or a witness to dispatch or his/her immediate supervisor as soon as possible. If the injured employee needs medical attention, the appropriate response by coworkers (dispatch, supervisor, manager) is to:

- Assess the injury.
- Call 911 if necessary.
- Begin emergency medical treatment, if willing and able.
- Continue treatment until emergency responders arrive.
- Inform Management or Director of Safety.
- Complete a written report as soon as possible.

The injured employee must complete an Employee Injury Report for the Human Resources and Safety department as soon as possible. In compliance with OSHA regulations, all reportable employee injuries will be recorded by a representative from the Safety department and a summary will be posted from February 1 to April each year for employee review.

The General Manager will investigate to determine the casual factors of the incident surrounding the injury. The General Manager will issue a written report for review by Risk Management, Transit Manager – Maintenance Manager, and Area Safety Director. Recommendations may be issued and will follow normal channels of communication. Investigative resources will include the Employee Injury Report, eyewitness accounts, employee interviews, equipment testing, and any other reasonable means to determine casual factors. Injury reports will be kept on file for future analysis.

Accident and Incident Investigation

It is the policy of Valpo Transit to investigate all incidents/injuries, to identify causes, and to correct deficiencies, if any. Effective incident investigation is an essential step towards making improvements in the system or process that can prevent future incidents from similar causes. It is the key to correcting and improving unsafe behavior in the workplace.

Identifying all factors that came into play to cause an incident, accident, or injury, and getting down to the Casual Factors, is the only way to ensure proper steps will be taken to prevent a recurrence. This includes examining driving and work procedures and revising them if found faulty; and identifying violations of MV, OSHA, DOT, FTA 49 U.S.C. 5326 and 49 CFR part 625 , or other procedures, rules, or regulations. As part of the investigation, the Transit Manager will **identify any causal or latent organizational factors that may have contributed to the safety event, or example:**

- Environmental factors (the characteristics of the environment in which the people and vehicles were operating that contributed to the safety event)

- Organizational factors (the elements of the management, policies, and procedures of the transit agency operating the transit vehicles that contributed to the safety event)
- Outside factors (the larger context in which the transit agency is operating Safety where factors outside the control of the agency contributed to the safety event)
- Human factors (the errors, rule violations, and characteristics of the people involved that contributed to the safety event)

After corrective actions have been identified and put in place, the management team or Transit Manager will follow-up to ensure that corrective actions remain in place and have effectively corrected incident causes.

2.2 Safety Hazard Identification and Analysis

Hazards identifications could be submitted directly or could be derived from trends or other data analyses.

Hazards can be identified through a variety of sources, including.

1. Reviews (internal audits)
2. Observations (Ride a-longs)
3. Investigations (record reviews)
4. ESRP (Employee Safety Reporting Program)
5. Passenger feedback

When a hazard has been identified, it will be tracked in a Safety Risk Register log, using the FTA template provided. This includes the description of the risk, rating of the risk, the action to address it, and how we are going to monitor that action for its effectiveness.

The hazard will be rated with an "as reported" risk assessment ranking, which will be followed up for a re-evaluation after a mitigation strategy has been implemented.

Reviews
- Bus Video scored or coachable events – driver specific or aggregated trends of at-risk behaviors
- Monthly performance or quarterly reviews of both leading and lagging indicators.
- ESRP
- **Federal Transit Administration (FTA) and other oversight authorities (mandatory information source).**

Observations
- Road observations and ride checks
- Mystery rider program (if applicable at the site location)
- Customer/passenger comments
- Third-party notifications

Audits and Inspections
- Monthly facility inspection
- Daily walk-through
- Pull-out procedures
- New driver assessments
- Refresher training
- Annual safety director audit
- Maintenance audit

Investigations
- Accident and incident investigation
- Injury casual factors investigation

Safety Risk Assessment

Once a hazard has been identified, it must then be analyzed. Analysis may include a description of the hazard, supporting results documents, photos, and/or suggestions for resolution. Unless a hazard can be eliminated, it's safety risk must then be managed. We analyze this in terms of how likely it is to happen (Likeliness or frequency) and how bad it could be (severity). Hazard Likeliness Categories and Hazard Resolution Matrix see **Attachment A**, and then by determining the best method for remediation. Near Miss reporting will be collected through Dash Camera Systems, as well as encouraged through the ESRP. If not captured through a Dash Camera System, Near Miss reporting can be completed on the Hazard Risk Form and reported to the location Safety Manager or Supervisor. The safety risk assessment process assures the agency assesses the likelihood and severity of the **consequences of hazards** while taking existing mitigations into account. , *The Chief Safety Officer requests subject matter experts, and the relevant department head must provide access to experts such as mechanics, engineers, operations supervisors, etc., to assist the agency in assessing related hazards.*

2.3   Evaluation, Mitigation and Communication of Safety Risk

The last step is to develop possible mitigation strategies that address identified safety risks. In evaluating safety risks, identifying what is being done now vs. what can be done in the future is an important consideration.

The review must identify facts, establish casual factors, and suggest methods for mitigating or preventing recurrence.

Statistics from accident and incidents are tracked and compared to performance measures and targets to identify where mitigations may or may not be effective.

The identified hazards are reviewed and assessed, and a priority is set based on severity of risk using the Hazard Resolution Matrix.

The Location Safety Committee plays an important part of hazard reduction and hazard resolution. The committee should provide inputs/ideas to ensure a safe work environment is established and maintained.

Hazard Resolution and Communication

When the safety hazard and analysis has been completed, the location supervisor or manager who will then coordinate efforts with essential personnel to resolve the hazard in a timely manner. In cases where an immediate threat to safety exists, work will be immediately suspended by the location management while the hazard is addressed and mitigated.

Many hazards can be resolved through more than one means, but the general process for determining the best method should be by considering engineering controls, administrative work practices, or employee actions. The safety risk management process should include that the agency identifies mitigations necessary to reduce the likelihood and severity of the consequences of the hazards assessed during the safety risk assessment process.

Communication of resolution and status of SMS activities is listed out in section 4 of this plan.

3. Safety Assurance

The FTA defines Safety Risk Management as a series of processes within a transit agency's Safety Management System that function 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 Assurance subcomponents includes:

1. Safety Performance and Monitoring and Measurement
2. Management of Change
3. Continuous Improvement

3.1 Safety Performance and Monitoring and Measurement

Data is constantly collected through the transit agency's Safety Assurance activities. This will include both leading and lagging indicators.

Safety performance indicators will help measure inputs, outputs, outcomes, or impacts. It is a signal or early warning sign.

Safety performance targets are quantifiable and is the expected change over a period of time.

Environmental factors (the characteristics of the environment in which the people and vehicles were operating that contributed to the safety event)

Organizational factors (the elements of the management, policies, and procedures of the transit agency operating the transit vehicles that contributed to the safety event)

Outside factors (the larger context in which the transit agency is operating Safety where factors outside the control of the agency contributed to the safety event)

Human factors (the errors, rule violations, and characteristics of the people involved that contributed to the safety event)

See performance Targets in section **8** of this plan.

Mitigation Monitoring

The Mitigation Monitoring plan helps ensure safety performance monitoring and measurement activities are performed to confirm that mitigations are effective, appropriate, and fully implemented.

A Mitigation Monitoring plan may include the selected safety risk mitigation, the indicators or targets, description of how it will be monitored, timeframe, responsibility, and updates.

While the Mitigation Monitoring plan addresses the mitigation and monitoring activities, the Corrective Action Plan documents the corrective action and helps address short-term defects or compliance issues. The Corrective Action Plan is intended to eliminate the behavior that caused the event, while Mitigation Monitoring is to continuously monitor the hazard.

The Mitigation Monitoring process is owned by the location's management team, with assistance from the Regional Safety Director. The Mitigation Monitoring process requires periodic reviews to ensure that the risk level is being mitigated and reduction of the frequency of the hazard is taking place.

A periodic audit of contractor safety plans, Safety Data Sheets, and Personal Protective Equipment requirements will be conducted by the Safety Team and the General Manager.

Infectious Diseases:

All Valpo Transit revenue vehicles are cleaned and sanitized daily after being in service Driver have the duty to wipe down all touchable areas of the vehicle with a disinfectant at the end of their shift. On a weekly schedule they are sanitized with a fogging solution and AeroClave fogging machine suitable for disinfecting ambulance grade equipment.

3.2   Management of Change

Our operating environment has many areas that can and will be subject to a change. Prior to implementation of a proposed change, an assessment will be performed by using the Hazard/Risk Report form to determine if the change will impact safety performance or if there are any new hazards that will be present.

If a new hazard is identified, it is put through the SRM process and evaluated. A risk mitigation strategy will be created or modified to mitigate risk for that change. Once the change is made it will be monitored for effectiveness.

The size and scope of the change can vary from something small to something as large as new service or routes. Efforts will be made to assess if there is a possible impact to safety prior to operations taking place.

3.3   Continuous Improvement

The overall safety performance of the system and the performance of SMS activities will be continuously measured and evaluated to determine the effectiveness and appropriateness of risk mitigations.

The data and information that will be collected through Safety Assurance activities will tell us how we are doing and what areas we can improve on.

Insight through these sources may trigger more frequent reviews and a revised strategy to ensure that mitigations are effective.

Local management will work with the agency to determine frequency of meetings with the contractor management to review the SMS process.

4. Safety Promotion

4.1   Competencies & Training

It is the policy of Valpo Transit that all employees will undergo new hire training based upon type of service and experience level. Mastery is verified through evaluations prior to being released to revenue service.

Job-specific training programs have been developed to enhance safety skills necessary for safe, secure, and reliable customer service. This includes training for operators, trainers, supervisors, maintenance staff, operations, and management personnel.

Valpo Transit maintains a continuous safety communication campaign through the form of safety meetings. Every month, a fleet safety and injury prevention topic will be reviewed to refresh the fundamentals and key learning points. Annual refresher training on key areas will also be conducted along with periodic promotion of prevention activities.

Maintenance monthly training will focus on OSHA compliance for shop safety. The training complies with current state and federal standards and covers potential safety and health hazards as well as safe work practices and procedures to eliminate or minimize hazards.

Information concerning safety hazards or issues is provided to employees through new hire orientation, location safety committee meeting minutes, company-wide or departmental meetings, Safety Team briefings, monthly safety meetings, bulletin board postings, memos, or other written communications.

All Valpo Transit operators will receive refresher or remedial training, as necessary, throughout their employment with the Company. This can include, but is not limited to, defensive driving techniques, ADA and Wheelchair Securement activities, Fatigue Management, Pedestrian and Bicyclist awareness, as well as hands-on training. This training provides a procedure for evaluation job skills and determining subsequent retraining needs or employees

who are returning to work after an extended leave, employees who have been involved in an accident and refresher skill training.

Training, retraining, proficiency checks, and safety meeting attendance will be recorded and documented.

Training records are kept by the department supervisors and managers and will include:

- Date of training
- Employee names
- Copies of training materials
- Training subject
- Location of training
- Name of trainer
- Signature of trainer and trainee

A training audit and training needs assessment will be conducted at least bi-annually, or as a result of activities that come out of the SRM process.

Safety Culture

Our Vision is to deliver the *Best Customer Experience* with industry-leading Safety, Reliability, and Innovation. Our fundamental safety belief is that Safety is a core business value and there is nothing more important than promoting and maintaining a safe operation.

Our Safety Culture Guide outlines the importance of implementing initiatives at the local level to promote a positive safety culture.

To foster a positive safety culture, supervisors and management should make every effort to demonstrate their commitment to safety, offering the highest level of respect and dignity and a genuine concern for the welfare of their workers. Supervisors and management will exhibit the behaviors they want to see as part of their location's safety culture.

Elements of our Safety Culture Guide include:

- Employee engagement and buy-in
- Accountability and ownership of employees
- Positive recognition
- Reinforcement of safe behaviors
- Safety award programs
- Safety campaigns and blitzes
- Incentive and reward contests

Supervisors and managers will pay attention to, measure, and publicly acknowledge the desired behaviors and performance outcomes by workers. The purpose of this and other safety-related programs is to focus our employees on working safely, and then reward them for their success.

4.2   Safety Communication

Communication of the SMS

A variety of methods may be used to communicate the SMS plan, including updates or memos. Communication can include updates related to SMS concerns/issues, lessons learned, analysis, new requirements or tracking mechanisms, and/or roles and responsibilities.

It is the responsibility of the location management to train employees on how to identify and report hazards. Management and supervisors will encourage employees to report their safety concerns or hazards.

Safety actions that are taken in response to reports submitted through the ESRP will be communicated to employees during the safety meetings or posted in a common area.

Our Policy and Commitment to Safety statement will be distributed to all managers to be reviewed with all employees during initial onboarding. This will be reviewed at least annually to continuously promote a safe work environment and communicate our commitment to an incident and injury free workplace.

Our policies, procedures, written statements, and formalized plans that support our SMS activities are available to all managers through our intranet site.

Continuous Awareness and Safety Communication

Management and supervisors will facilitate in daily safety communication and planning engagement blitzes and campaigns accordingly.

Dispatchers will play an active role in this process by delivering safety radio announcements.

The Daily Safety Message will be printed and posted throughout the facility.

Material that supports the monthly fleet safety topic and/or injury prevention topic that is distributed from corporate will be displayed throughout the facility.

Additional means of communication includes:

• New Hire Orientation Training • Operational Safety Calls • Safety Meetings • One-on-one dialogue between supervisors and employees • Safety Briefings/Toolbox Talks	• Safety Bulletin Board • Safety Committees • Posters, Flyers, & Memos • E-mail Communications • Internal Websites • Video/TV Displays

5. Supporting Resources

Maintenance, Facility & Fleet	Operator Safety	General Procedures & Regulatory Compliance

|		
Maintenance Shop Safety Handbook	Employee Handbook	Code of Federal Regulations (CFR)
Vehicle Maintenance Plan (PM)	Safety Manual	Crime Prevention Environmental Design (CPTED)
Aerial Platform Certification	New Hire Orientation	Emergency Action Plan
Powered Industrial Truck (Forklift) Certification	Fitness for Duty Evaluation	Fire Prevention Plan
Clean Air Act (608,609)	Operations Policies and Procedures Handbook	HAZCOM Plan
Noise Protection	Recruiting and Hiring Practices	Hearing Conservation Program
Lock Out/Tag Out	Incident Management and Investigation	Heat Illness Prevention
Personal Protective Equipment	Safety Audits/Inspections	Lockout Tagout Program
Respiratory Protection	Safety Reports and Forms	Safety and Security Program
Welding, Cutting and Brazing Safety	Safety Communication TV Displays	System Safety Program plan
OSHA 10-Hour	Wheelchair Certifications	System security and Emergency Preparedness Plan
OSHA 30- Hour	Defensive Driving Program	Monthly Safety Meetings
Heat Stress	Operator Refresher Training	Customer Service Training
Housekeeping	Safety Committees	Continuity of Operations Plan
HAZCOM	Safety Calendar – Weekly & Monthly Topics	
Bloodborne Pathogens	Bi-monthly Safety Stand-down	
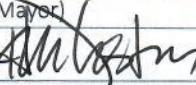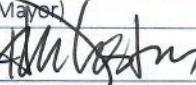
6. Transit Agency Information

Transit Agency Name	Valpo Transit		
Transit Agency Address	166 W. Lincolnway Valparaiso, IN 46383		
Name and Title of Accountable Executive	Beth Shrader Planning / Transit Director		
Name of Chief Safety Officer or SMS Executive	Don Lorntzen Transit Manager		
Mode(s) of Service Covered by This Plan	Fixed Route, Commuter Bus	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, CMAQ
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	MB, CB All Transportation Services Provided By Royal Excursion		

Does the agency provide transit services on behalf of another transit agency or entity?	Yes ☐	No XX	Description of Arrangement(s)	None	
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	Valpo Tranit 406 Don Hovey Dr. Valparaiso IN, 46383 (Contracrted service provided by Royal Excursion)				

7. Plan Development

7.1   Approval and Updates

Name of Entity That Drafted This Plan	VALPO TRANSIT		
Signature by the Accountable Executive	Signature of Accountable Executive		Date of Signature
	Beth Shrader Planning/Transit Director		July 12,2024
	Signature		
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan		Date of Approval
	Jon Costas (Mayor)		July 12, 2024
	Signature		
	Relevant Documentation (title and location)		
Certification of Compliance	Name of Individual/Entity That Certified This Plan		Date of Certification
	Don Lorntzen Chief Safety Officer/FTA Triennial		July 12,2024
	Relevant Documentation (title and location)		

7.2   Version Updates

Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	Creation	10/20/2020
2	8.1 Page 20	Update 2021 Safety performance measures	11/11/2021
3	8.1 and 1.9	Update on safety measures local safety committee	12/13/2022
3	8,1 and page 20	Update on safety performance measures 2024	2/23/2024
4	3.1-page 14	Update Infectious Disease Mitigation and language	7/12/2024

7.3   Annual Audit and Review of Plan

Annual Audit & Review and Update of the Public Transportation Agency Safety Plan

During the second quarter the Safety Plan Committee will meet and review current SMS plan and make changes accordingly and update this PTASP document. A communication will be sent out with an explanation of changes and a pdf copy of the updated plan will be made available via e-mail or web.

The Executive Director is to review any updates to the ASP during the months of April and May for authority of approval of all updates to the ASP. The executive Director will work with the Chief safety Officer and request approval from the Board of works and safety before the ASP is sent to the MCO and the INDOT with updated revisions in June.

Valpo Transit will make this documentation available upon request to the FTA or other oversight agencies.

8. Safety Performance

8.1   Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan. Implemented for the period of June 30,2019-June 30,2020

Mode of Transit Service	Fatalities Total	Fatalities (Per 100k VRM)	Injuries (Total)	Injuries (Per 100kVRM)
Commuter Bus	0	0	0	0
Motor Bus	0	0	0	0
Mode of Transit Service	Safety Events (Total)	Safety Events (Per 100k VRM)	Number of Vehicles OOS	System Reliability (VRM/Failures)
Commuter Bus	3	0.84	4	27121

Motor Bus	1	1.14	36	4743

8.2   Safety Performance Target Coordination

Safety Performance Target Coordination: the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

City of Valparaiso Transit Manager will communicate regularly with the assigned City planning Director in the office of the Valparaiso Planning and transit director. This review of safety activities will be reviewed at each scheduled quarterly meeting with NIRPC. Valpo Transit staff will have documentation of these activities available at these meetings.

Additionally, City of Valparaiso will make its safety performance targets available to Northwest Indiana Regional Planning Commission (NIRPC) and The Indiana Department of Transportation (INDOT) after this PTASP had been finalized , approved, and certified and will coordinate in the section of State safety performance targets to the maximum extent practicable, coordinate with NIRPC in the selection of MPO safety performance targets and (INDOT) in the selection of State Entity.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Indiana Department of Transportation (INDOT)	2,23,2024

Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Northwest Indiana Regional Planning Commission (NIRPC)	2,23,2024

List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
ASP	Agency Safety Plan
SMS	Safety Management System
SMP	Safety Management Policy
ESRP	Employee Safety Reporting Program
PTASP	Public Transit Agency Safety Plan
INDOT	Indiana Department of Transportation
MPO	Metropolitan Planning commission
NIRPC	Northwest Indiana Regional Planning Commission
Valpo	Valparaiso

Terms Used in the Safety Plan

Term	Definition
Hazard	is a condition or object with the potential of causing injuries to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function.
Safety Risk	It refers to the chance that people, equipment, or the environment could be harmed by the consequences of a hazard.
Mitigation	What is done to address and reduce risk.
Consequence	Means an effect of a hazard, involving 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.
Event	Means any accident, incident, or occurrence.

Attachment A

Hazard Likeliness Table

| Likeliness Level	Description
A – Frequent	Likely to occur frequently. Continually experienced in the fleet/inventory.
B – Likeliness	Likely to occur several times in life of an item. Likely to occur frequently in the fleet/inventory.
C – Occasional	Likely to occur sometime in life of an item. Likely to occur several times in the fleet/inventory.
D – Remote	Unlikely, but possible to occur in the life of an item. Reasonably expected in the fleet/inventory.
E – Unlikely	So unlikely, occurrence is not expected. Unlikely to occur, but possible in the fleet/inventory.

Risk Assessment Frequency/Severity Matrix

Frequency	Severity			
	1 Catastrophic	2 Critical	3 Marginal	4 Negligible
A – Frequent	1/A	2/A	3/A	4/A
B – Likeliness	1/B	2/B	3/B	4/B
C – Occasional	1/C	2/C	3/C	4/C
D – Remote	1/D	2/D	3/D	4/D
E – Unlikely	1/E	2/E	3/E	4/E

Hazard Resolution Table

Severity / Frequency	Resolution
1/A | 1/B | 1/C | 2/A | 2/B | 3/A |	Unacceptable—correction required.
1/D | 2/C | 2/D | 3/B | 3/C |	Unacceptable—correction may be required after review by CEO.
1/E | 2/E | 3/D | 3/E | 4/A | 4/B |	Acceptable—with review by CEO.
4/C | 4/D | 4/E |	Acceptable—without review.

Attachment B

Valpo Transit SMS Hazard/Risk Report Form	
This report concerns:	☐ Hazard ☐ Risk ☐ Near Miss ☐ Other
Hazard Type:	☐ Policy/Procedure ☐ Operational ☐ Environmental ☐ Equipment/Design ☐ Training
REPORTED BY:	☐ Employee ☐ Customer/Passenger ☐ Other: le FD or PD

NAME:	LOCATION:

Description of Safety Concern:

PHOTOS:	☐ Yes ☐ No

Hazard Analysis: According to Hazard Severity Matrix	☐ 1 Catastrophic ☐ 2 Critical ☐ 3 Marginal ☐ 4 Negligible

Recommended Safety Risk Mitigation:

Supervisor/Safety Manager Comments/Actions:

Supervisor/Safety Manager:	

Is Hazard/Risk corrected "On the Spot"?	☐ Yes ☐ No	If the answer is "No" then proceed with the steps below:

This report must be forwarded to the SAFETY DEPARTMENT; report is assigned to specific department(s) for hazard rectification; report is assigned a priority

Priority:	☐ High ☐ Medium ☐ Low		
Hazard/Risk/ Near Miss deficiency corrected?	☐ Yes ☐ No	**Date closed if "Yes"**	Date

If answer is NO, notify Safety department to begin continuing action for resolution, and send to the Safety Team or Staff for recommendations.

List how the Hazard/Risk/Near Miss was resolved

Date Resolved	Click or tap to enter a date.