Committee: Directly to Council
Committee Review: N/A
Staff: Glenn Orlin, Senior Analyst
Purpose: Final action – vote expected
Keywords: #transitsafetyplan

Montgomery
County Council

AGENDA ITEM #4C
March 8, 2022
Action

SUBJECT

Approval and Certification of the Division of Transit Services' Agency Safety Plan

EXPECTED ATTENDEES

None

COUNCIL DECISION POINTS & COMMITTEE RECOMMENDATION

The T&E Committee has waived a review, as there is no significant change from the Plan transmitted two years ago.

DESCRIPTION/ISSUE

The Federal Transit Administration requires public transit operators to develop Agency Safety Plans regularly, certifying that each comply with federal requirements.

SUMMARY OF KEY DISCUSSION POINTS

None

This report contains:

Executive's transmittal memo	© 1
Draft adoption resolution	© 2
Agency Safety Plan	© 3-21

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Marc Elrich
County Executive

MEMORANDUM

February 16, 2022

TO: Gabe Albornoz, President
               Montgomery County Council

FROM: Marc Elrich, County Executive

SUBJECT: County Council Approval and Certification of the Montgomery County's
               Department of Transportation, Transit Services Agency Safety Plan (ASP)

I am requesting the County Council's approval of a resolution authorizing the certification of the Agency Safety plan mandated by the Federal Transit Administration.

The United States Department of Transportation, Federal Transit Administration, in accordance with the provisions of 49 CFR Part 673 requires that operators of public transportation under 49 U.S.C. Chapter 53 must develop Public Transportation Agency Safety Plans based on the Safety Management System approach. In accordance with 49 U.S.C. 5329(d)(1), § 673.13(a), each transit agency must certify its compliance with the federal requirements. Operators of public transportation systems will be required to implement the safety plans.

I am requesting County Council to introduce and approve the certification of the attached resolution. The Transit Services Agency Safety Plan is also attached for review and approval. I look forward to working with the County Council in adopting this resolution. Thank you in advance for your cooperation.

If you have any questions, please contact Tanya Nichols at 240-777-5809

ME:tn

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(1)

COUNTY COUNCIL
FOR MONTOGMERY COUNTY, MARYLAND

_____

By: County Council

_____

SUBJECT: <u>Authorization to approve and certify the Agency Safety Plan for Montgomery County</u>

<u>Department of Transportation, Division of Transit Services.</u>

Background

1. This resolution approves and certifies compliance of the Montgomery County Department of Transportation's, Division of Transit Services, Agency Safety plan . In accordance with 49 U.S.C. 5329(d)(1), § 673.13(a).

2. The Agency Safety Plan (ASP) will be reviewed and updated by the Accountable Executive (AE), Chief of Operations (COO), and the Chief Safety Officer (CSO) during the first week of July each year. The ASP will then be forwarded to the Montgomery County Council for approval and certification annually. After Montgomery County Council's approval, the ASP will be submitted to the Maryland Transit Administration (MTA) and the Federal Transit Administration (FTA). Changes in the organizational structure or changes in the basic service provided may trigger the need to update the ASP outside of the annual review process. The AE is responsible to conduct this review and update the ASP as appropriate.

3. It is required by the United States Department of Transportation, Federal Transit Administration, in accordance with the provisions of 49 CFR Part 673, that operators of public transportation under 49 U.S.C. Chapter 53 must develop Public Transportation Agency Safety Plans based on the Safety Management System approach. In accordance with 49 U.S.C. 5329(d)(1), § 673.13(a), each transit agency must certify its compliance with the federal requirements. Operators of public transportation systems will be required to implement the safety plans.

Action

The County Council for Montgomery County approves and certifies the following resolution:

1. The filing of the aforesaid agency safety plan is endorsed.

This is a correct copy of Council action.

_____

Selena Singleton
Clerk of the Council

Montgomery County Department of Transportation, Division of Transit Services

Agency Safety Plan

1. Transit Agency Information

Montgomery County, Maryland is located north of Washington DC and is part of the National Capital Region Transportation Planning Board (TPB) Metropolitan Planning Organization (MPO). The County's estimated population is just over one million and is part of the Washington-Baltimore-Northern Virginia combined statistical area with a population of over six million. The County's largest employers include the National Institutes of Health (approximately 18,000 employees) and the Food and Drug Administration (13,130 employees). Other large employers include the Walter Reed National Military Medical Center (11,690 employees), Marriott and Lockheed Martin (approximately 5,000 each), the National Oceanic and Atmospheric Administration (NOAA) (4,600 employees), Adventist Healthcare (approximately 4,300 employees), and many other public and private employers. Countywide, the population is forecasted to grow to over 1.2 million, while employment is forecasted to grow 40 percent to approximately 735,000 jobs by 2040.

Montgomery County's bus service, branded as Ride On, provides service throughout the County with a fleet of 368 buses. Roughly half of the buses (107 CNG and 66 diesel hybrid electric buses) use alternative fuels. Ride On routes and bus services may be viewed through the Ride On web site at: www.montgomerycountymd.gov/DOT-Transit/routesandschedules/rideonroutes.html. Ride On bus service coverage extends to 76% of residents and 89% of employers and provides service within ¼ mile to 81% of low-income households and 86% of households without cars. County buses are stored at the Silver Spring, Gaithersburg and Nicholson Court depots.

Transit Agency Name	Montgomery County Department of Transportation, Division of Transit Services		
Transit Agency Address	101 Monroe Street, 5th Floor, Rockville, Maryland 20850		
Name and Title of Accountable Executive	Dan Hibbert, Chief, Division of Transit Services		
Name of Chief Safety Officer or SMS Executive	Jeff George, Chief of Safety, Training, and Security		
Mode(s) of Service Covered by This Plan	Bus	**List All FTA Funding Types (e.g., 5307, 5310, 5311)**	5307,5310,5311, Discretionary grants.

Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Directly Operated Bus Service			
Does the agency provide transit services on behalf of another transit agency or entity?	Yes ☐	No ☒	Description of Arrangement(s)	Large Urban/JARC and Rural Routes
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	Maryland Transit Administration (MTA)			

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Montgomery County Department of Transportation, Division of Transit Services	
Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
	Dan Hibbert Dan Hibbert (Dec 1, 2021 12:17 EST)	Dec 1, 2021
Approval by the Board of Directors or an Equivalent Authority	**Name of Individual/Entity That Approved This Plan**	**Date of Approval**
	Montgomery County, County Council	
	Relevant Documentation (title and location)	
	Authorizing Resolution	
Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	Montgomery County, County Council	
	Relevant Documentation (title and location)	

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Version Number and Updates			
Record the complete history of successive versions of this plan.			

Version Number	Section/Pages Affected	Reason for Change	Date Issued
2	Page 1	Updated Description of Agency	6/28/21
	Page 3	2021 Performance Targets	6/28/21
	Page 7, 13, 19, & 18	Delete TSS and add PMII	6/28/21
	Page 15	Added Attachments S, T, and U	6/28/21

Annual Review and Update of the Public Transportation Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.

The Agency Safety Plan (ASP) will be reviewed and updated by the Accountable Executive (AE), Chief of Operations (COO), and the Chief Safety Officer (CSO) during the first week of July each year. The ASP will then be forwarded to the Montgomery County Council for approval. After Montgomery County Council's approval, the ASP will be submitted to the Maryland Transit Administration (MTA) and the Federal Transit Administration (FTA).

Changes in the organizational structure or changes in the basic service provided may trigger the need to update the ASP outside of the annual review process. The AE is responsible to conduct this review and update the ASP as appropriate.

3. Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

Mode of Transit Service	Fatalities	Injuries	Safety Events	System Reliability	Other	Other	Other
Bus	0	62	101	219			
Rate	0	.38	.62	73959			

Safety Performance Target Coordination

Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

The agency's Safety Performance Targets are established by analyzing the agency's safety performance data for the last three fiscal years. All established Safety Performance Targets are approved by the Accountable Executive (AE) and are measurable, realistic, and achievable. Safety Performance Targets are monitored and tracked daily by the Chief Safety Officer (CSO). Safety Performance Targets are reported daily to transit leadership and workforce through the agency's Daily Safety Report. (See Attachment I)

The four required Safety Performance Targets are defined as follows:
- Fatalities – Total number of National Transit Database (NTD) reportable fatalities.
- Injuries – Total number of NTD reportable injuries.
- Safety Events – Total number of NTD reportable events.
- System Reliability – Average distance, measured in Vehicle Revenue Miles (VRM) between Major Mechanical Failures.

Safety Performance Target rates are calculated as follows:
- Fatality Rate = Total Fatalities / 100,000 VRM.
- Injury Rate = Total Injuries / 100,000 VRM.
- Safety Event Rate = Total Event Rate / 100,000 VRM.
- System Reliability = Total VRM / Total Major Mechanical Failures.

The Accountable Executive of Montgomery County Department of Transportation, Division of Transit Services will make safety performance targets available to the Metropolitan Washington Council of Governments (MWCOG) after this PTASP has been finalized, approved and certified and will, to the maximum extent practicable, coordinate with MWCOG in the selection of MWCOG safety performance targets.

Submission of the approved and certified ASP to Maryland Transit Administration (MTA) ensures safety performance targets are available to the State and supports coordination regarding the statewide selection process.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Maryland Transit Administration (MTA)	10/31/2021

Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Metropolitan Washington Council of Governments (MWCOG)	10/31/2021

4. Safety Management Policy

Safety Management Policy Statement

Include the written statement of safety management policy, incorporating safety objectives.

_ _Montgomery County Transit Services (Ride On) recognizes that the management of safety is a core value of our business. The management team at Ride On will embrace Safety Management System (SMS) as our safety oversight approach. Ride On is committed to developing, implementing, maintaining, and constantly improving safety and operational management processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are accountable to safety and understand that safety is a primary responsibility.

Ride On is committed to:

- Communicating the purpose and benefits of the Safety Management System (SMS) approach through our Safety Management Policy (SMP) to all staff, managers, supervisors, and employees. Documenting the duties, responsibilities, and accountabilities for employees throughout the organization and providing adequate safety related information and training to ensure employees are competent in safety management matters.
- Supporting 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.
- Establishing and operating hazard identification and analysis, safety risk evaluation activities, including an employee safety reporting program as a fundamental source of identifying safety concerns and hazard identification, in order to eliminate 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.
- Ensuring that no punitive or retaliatory action will be taken against employees who disclose safety concerns through the reporting program, unless disclosure indicates an illegal act, gross negligence or deliberate or willful disregard of regulations or procedures.
- Establishing safety performance targets that are measurable, realistic, achievable, and data driven.
- Providing employee safety training on an annual and follow-up basis.
- Sharing safety information and data with employees to create awareness and cultivate the safety culture.
- Continually improving safety performance, through management processes, that ensure appropriate safety management action is taken and is effective.

Safety Management Policy Communication

Describe how the safety management policy is communicated throughout the agency's organization. Include dates where applicable.

All policies approved by Montgomery County Transit Services, including the Safety Management Policy, are available electronically and hard copy. Newly hired employees are given a copy of all policies and procedures during the initial training period. Policies are also communicated to employees during operator meetings and depot safety meetings. In addition, information is posted in each depot and presented on the depot information monitors. All policies are available on computers, located in each depot, designated for employee use. Operator communication meetings are conducted every four months with the workforce.

Authorities, Accountabilities, and Responsibilities

Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's Safety Management System (SMS).

Accountable Executive	The Accountable Executive (AE) has ultimate ownership, accountability, and responsibility for overseeing, managing, and executing the Agency Safety Plan (ASP) and the Asset Management Plan (AMP) for Montgomery County's Department of Transportation, Division of Transit Service. (See Attachment J) Specific responsibilities of the AE include: • Ensuring SMS is effectively implemented throughout the agency's public transportation system. • Ensuring action is taken as necessary to address substandard performance in the agency's SMS. • Directing the day-to-day operation. • Developing the SMS Implementation Plan. • Setting safety objectives and establishing safety performance targets. • Developing and implementing the safety risk management and safety assurance plans. • Reviewing and analyzing information related to safety, service, schedule, planning, and financial reports. • Allocates human and capital resources to develop and maintain the agency's safety and asset plans. • Development of emergency and security policies.

	• Establishing training requirements for each employee position.
Chief of Operations (COO)	Chief of Operations (COO) - The Chief of Operations is responsible and accountable for developing and implementing the Agency Safety Plan. Responsibilities of the COO include: • Ensuring all Depot Section Chiefs, Transit Operations Supervisors, Transit Service Supervisors, Bus Operators, and other employees, have the ability to report any safety concerns using the appropriate plans, policies, and procedures. • Overseeing the safety and security of employees and facilities of the transit division. • Ensuring that all employees are trained in SMS and understand the Agency Safety Plan and their roles in implementing the SMS Implementation Plan. • Ensuring all operational employees receive annual and follow-up safety training in defensive driving, safety work methods, security, customer service, and SMS. • Coordinating with Emergency Responders as the Emergency Operations Center transit representative. • Tracking the reporting of incidents by employees and reviewing the data on a daily basis. • Supporting Safety Risk Assessment activities as a daily activity. • Identifying and establishing safety targets and measures for performance measurement. • Supporting the activities of Safety Committees
Chief Safety Officer or SMS Executive	The Chief Safety Officer (CSO) - The CSO has the authority and responsibility for day-to-day implementation and operation of the agency's SMS. The CSO holds a direct line of reporting to the AE. The CSO is responsible for: • Ensuring the safety and security of employees and facilities of the transit division. • Ensuring the agency has appropriate safety and security plans, policies, and procedures required to operate the transit service safely and efficiently. • Developing an effective Employee Safety Reporting Program (ESRP) which includes hazardous hazard identification and analysis, risk assessment, and mitigation. Reviewing the results of the reporting program daily. (See Attachment P) • Identifying and addressing non-compliance with operating and maintenance procedures. • Ensuring effectiveness of safety risk mitigations. • Assuring, through effective training, that all employees and management are aware of the agency's plans and have appropriate knowledge, skills, and abilities to follow the plans, policies, and procedures. • Identifying and establishing safety targets and measures for performance measurement. • Overseeing the activities of each depot Safety Committee. • Updating SOP's regarding accident investigation and prevention. • Reviewing and updating continuity of operation plans and emergency management plans.
Key Staff	The Key Staff reports directly to the Accountable Executive. Listed below are the staff positions and a brief description of the position. (See Attachment J – Organizational Chart) **Customer and Operations Support Section Chief** - The Chief of Customer & Operations Support has the responsibility for implementation, IT support and maintenance of the tools (software and reports) and associated infrastructure to track incidents and provide analytics to assess the causes for accident/incidents and reported hazards. The responsibility also includes being the initial point of all customer concerns in order to track each item as well as assigning the responsible party to address the customer concern.

Operational Planning Section Chief - The Planning & Implementation section is responsible for the fixed route network design in Montgomery County MD for Ride On. This includes coordination with WMATA which serves as the Washington DC regional transportation provider and supplies approximately forty percent of the fixed route bus service in Montgomery County. The section is also responsible for the design of Micro-transit service throughout the County. The Section also manages 5,400 bus stops, four Transit Centers and fifteen Park & Ride lots throughout Montgomery County. In addition, to upgrading Ride On and WMATA bus stops to ensure ADA compliance.

Management Services Section Chief - The Chief of Management Services is responsible for securing background checks are completed and health status review is completed prior to offering the safety sensitive position to candidates. The Chief, MS is also responsible for guaranteeing fiscal responsibility for all contracts and resources to provide the transit service.

Medicaid and Senior Transportation Section Chief - The Chief of Enhanced Mobility and Senior Services is responsible for operating, overseeing and implementing the Division's special transportation services, which serves older adults, individuals with disabilities and low-income residents, and also compliments Ride On, public transit system. The Chief provides guidance, administers, and monitors the safe operation of transportation services, by numerous transportation vendors, using various modes to transport County residents, while adhering to established safety and quality standards.

Depot Section Chiefs (SC) and Program Manager II (PMII) are responsible and accountable for the implementation of SMS in their respective depot location. Each Depot Chief is accountable for safety and safety performance measures. Safety elements are included in performance appraisals and incentive systems.

Responsibilities include:
- Providing leadership and direction to employees as related to safety and security matters.
- Participating in Safety Committee activities on monthly basis.
- Having full knowledge of all standard and emergency operating procedures.
- Providing SMS training and education to all employees reporting to the depot.
- Implementing the Employee Safety Reporting Program (ESRP) and training affected employees in the process.
- Providing an effective Employee Safety Reporting Program (ESRP) which includes hazardous hazard identification and analysis, risk assessment, and mitigation.
- Reviewing all reported safety hazards and conditions on a daily basis.
- Ensuring direct communications with the employee when safety hazards are identified.
- Collecting, analyzing data, and tracking information in Trapeze.
- Storing the Employee Safety Reporting (ESR) form electronically in the county V:
- Retaining data as required by FTA regulations.
- Re-training employees to eliminate and prevent risks that may lead to accidents, incidents, or injuries.
- Continually improving safety performance, through management processes, that ensure appropriate safety management action is taken and is effective.
- Sharing safety information and data with employees to create awareness and cultivate the safety culture

Transportation Operations Supervisors (TOS) – Report directly to the Depot Chief.

Responsibilities include:
- Supervising the transit agencies front line employees.
- Conducting SMS training with all employees under their direct supervision.
- Conducting annual and follow-up safety training to eliminate and prevent risks that may lead to accidents, incidents, or injuries
- Actively involved and accountable for the ERSP process.

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	Safety & Training Supervisors (STS) / **Instructors** (STI) – Report to the CSO.
	Responsibilities include: • Training new bus operators during a five - week training program. • Training focused on SMS, Vehicle Operations, Emergency Management, Bus and Facility Security, and Customer Relations. • Maintaining current and relative training material that best reflects the practices established by the transit industry. • Actively involved and accountable for the ERSP process.

Employee Safety Reporting Program

Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection).

Employees are encouraged to identify and report all safety hazards and concerns encountered. An effective Employee Safety Reporting Program (ESRP) includes hazard identification and analysis, risk assessment, and mitigation. Hazards may exist inside and outside of depots, in transit centers, at service stops, in vehicles, and on the roadways. (See Attachment A and O)
Hazardous conditions and concerns may be reported as follows:
- Reporting to Central Communications – When employees are on road, employees may report unsafe and hazardous conditions to Central through radio transmission. Employees reporting in this manner will formally document the concern on an Employee Safety Report (ESR) form by the end of the business day and submitted according to written procedures.
- Reporting directly to any Supervisor or Manager utilizing the ESR form.
- Reporting to a desk coordinator and completing the Employee Safety Reporting (ESRP) form.
- Reporting anonymously by completing the ESR and placing in a locked comment box in the driver area.

The agency ensures that it practices a non-punitive approach to employee safety reporting and that no punitive or retaliatory action will be taken against employees who disclose safety concerns through the employee reporting program, unless disclosure indicates an illegal act, gross negligence, a deliberate act, a willful disregard of regulations or procedures.

5. Safety Risk Management

Safety Risk Management Process

Describe the Safety Risk Management process, including:

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards.*

- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards.*

- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.*

Safety Risk Management (SRM)

The success of the Agency's Safety Plan is dependent on SRM. The agency has developed and implemented an SRM process. SRM is comprised of activities including identifying safety hazards, assessing safety risks, and mitigating safety risks.

Several key terms must be defined to understand the SRM process.
- Event – Any accident, incident, or occurrence.
- Hazard – Any real or potential condition that may cause injury, illness, death, property damage, and/or loss.
- Risk – Exposure to possible harm, injury, or loss.
- Risk mitigation – The method to eliminate or reduce the effects of a hazard.
- Consequence – An effect of a hazard involving injury, illness, death, and/or damage to property.

Depot Section Chiefs will be responsible for the SRM process when hazards are identified. Listed below are the three sections of SRM. (See Attachment O for Section 5)

Safety Hazard Identification – The agency has established methods and processes to identify hazards and the consequences of the hazards. This process is described in Attachment O. Data and information provided by the oversight authority and the FTA will be reviewed as part of the hazard identification process.

Management observations and the ESRP are the primary sources for safety hazard identification. Employees will utilize the Employee Safety Reporting (ESR) form to notify the management team of potential hazards or existing hazards found in the workplace. Safety Hazard Identification is provided to the agency through various means including:

- Pre-trip and post trip vehicle condition reports identifying bus safety concerns to fleet as well as depot leadership.
- Hazards are identified and analyzed by routine observations of the workplace by all management personnel and through regular ride checks.
- Hazardous conditions are reported and assessed monthly with the safety committees in each depot.
- Other sources utilized by employees to report hazardous conditions or behavior include near misses, accident reports, maintenance reports, system inspections, and passenger feedback.
- The County 311 program provides an avenue for county residents to assist in the SMS process by reporting unsafe behavior or hazardous facility and equipment conditions.
- The agency regularly conducts public forums with county residents.
- The Transit Advisory Group (TAG) is made up of riders, organization members and community leaders. TAG meets each quarter to discuss operational needs and service requirements within the county.
- Fleet Maintenance monthly meetings address reoccurring equipment issues and discuss resolution.

Once the safety hazard has been identified by the agency, the next step in the SRM process is to complete the risk assessment.

Safety Risk Assessment is the process to evaluate safety risks associated with identified hazards. A safety risk represents the likelihood that people could be harmed, or equipment could be damaged, by the potential consequences of a hazard. Safety risk is expressed and measured by the predicted probability, severity of a hazard's potential consequences. The agency has established methods and processes to assess the safety risks associated with identifying hazards. The assessment includes the likelihood and consequences of the hazards and current mitigations plans.

To assess risks effectively, the following process will be followed. A depot Section Chief, or a designated supervisor, will follow this procedure to assess the safety risk. See Attachment O.

- Utilzing the Probablity Form For Risk Assessment (Attachment B), determine the probability: *Frequent, Probable, Likely, Occasional, Remote, or Improbable* and document the findings on the ESR form.
- Next, use the Severity Form For Risk Assessment (Attchment C) to determine the severity of the event, hazard or incident: *Catastrophic, Critical, Moderate, Minor or Insignificant* and document the findings on the ESR form.
- The final step is to utilize the Risk Assessment Matriz For Decision Making form (Attachment D) to determine the hazard risk. This form is color coded and has numerical values and letters, associated with the risk.
- The color red is *Unacceptable* and must be mitigated immediately.
- The color orange is *Undersirable* and mitigation is required.
- The color yellow is *Acceptable but requires additional review and possible mitigation.*
- The green color is *Acceptable without further review.* The findings should be documented on the ESR form.

After completing the risk assessment, safety risk mitigation may be required.

Safety Risk Mitigation is the action taken by the agency to reduce the likelihood and severity of the potential consequences of a hazard. Existing mitigations must be considered when determining whether further measures are required to mitigate the consequences. The initial mitigation will require ongoing review and revised when necessary. The Section Chief, in each operation/depot, will approve risk mitigation and monitoring processes. Each mitigation should align with the agency's safety performance targets.

Mitigation actions may involve:
- Eliminating the hazard.
- Controlling the hazard through an engineering design.
- Implementing corrective action to reduce severity and or probability.
- Posting signage to reduce the risk.
- Assuming the risk.

Mitigation follow up is required to:
- Monitor the effectiveness of the mitigation.
- Monitor for unexpected hazards and consequences.
- Ensuring the mitigation resolution do not create a hazard.

Examples of Mitigation
- Pedestrian crosswalk accidents – Operator training related to approaching intersections and rock and roll techniques.
- Slips, trips, and fall injuries – Safe work methods training for employees and follow up training for the injured employee.
- Tree limbs blocking clear view of intersections – Contact authorities responsible for the roadway and request assistance with trimming trees. Notification to the workforce to reduce the safety hazard.

Finalizing the SMS Process

Employee Follow Up and Workforce Communications
- The reporting employee will receive direct feedback when the hazard is mitigated.
- Safety committees shall review the identified hazards data and discuss mitigations during the monthly safety committee meetings.
- SMS data should be reported to the depot employees utilizing the safety board.

ESR Closure
- The Section Chief, or a designated supervisor, will close the safety concern in Trapeze when the mitigation is in place.
- The original ESR form will be update and the final resolution will be noted.
- The ESR and other documentation related to the safety concern and mitigation will be retained in the SMS electronic folder located in the S:

Management Activities – Monitoring the SMS Process
- Daily the COO, CSO, and SC's will review the depot SMS electronic folder located in the S: and review Trapeze entries to evaluate the process. Trapeze is the tool used to track all SMS data.
- Daily the CSO will send the Daily Safety Report to the management team. This report will contain Accident, Injury, and SMS data. The daily safety report will be shared with employees and posted on the depot safety board.
- Weekly the COO and SC's will discuss SMS during a scheduled staff meeting.
- Monthly the AE, COO, CSO and SC's will review and discuss SMS data during the scheduled Operations Meeting.
- Monthly the AE, COO, CSO will review and discuss SMS during the scheduled AE's staff meeting.

6. Safety Assurance

Safety Performance Monitoring and Measurement

Describe activities to monitor the system for compliance with procedures for operations and maintenance.

Safety performance monitoring focuses monitoring the safety performance of the agency's operations and maintenance activities. The data generated by SMS must be evaluated to determine whether implemented safety risk mitigations are appropriate and effective. In addition, it allows the agency to evaluate how well the safety performance is in line with the safety objectives and safety performance targets. Examples of safety performance monitoring activities include the following:

- Monitoring the system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance.
- Monitoring the agency's operations to identify and safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.
- Conducting investigations of safety events to identify causal factors.
- Monitoring information submitted through the agency's ESRP. (See Attachment O)
- Monitoring on-board camera footage to assess operator incidents and accidents.
- Conducting regular vehicle inspections and preventative maintenance.
- Conducting informal inspections.
- Conducting and reviewing audits and safety surveys.
- Conducting safety reviews of any changes to existing service or before beginning new service.
- Evaluating data gathered and monitoring of data relating to the service.
- Reviewing feedback between leadership and all levels of the agency.

Results from the above processes are compared against recent performance trends annually by the CSO to determine where further corrective action is required. Any areas of the operation, including recent mitigation actions, if found to out of compliance or ineffective will be entered back into the SRM process for re-evaluation by management leadership and safety committees.

Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

The effectiveness of mitigations will be monitored by the AE, COO, SC's and CSO annually utilizing performance data trends. Ineffective mitigations will be re-evaluated via the SRM process. Performance data comparisons will be based on the previous three years of accident, incident, and safety event data. Employee safety committees will assist the agency during the re-evaluation process.

Describe activities to conduct investigations of safety events to identify causal factors.

When accidents, incidents, hazards, or safety events occur, the agencies' road coordinators are dispatched to the location to begin an investigation. Actions include:
- Investigating and identifying causal factors. (See Attachments A, F, G, H, M, and U)
- Checking the status of individuals involved in the accident/incident and requesting medical assistance as required.
- Taking pictures of the accident or incident scene.
- Obtaining statements from the employee and witnesses (See Attachment H).
- Preparing a diagram of the scene and obtaining police information.
- Securing the vehicle video surveillance when appropriate.
- Clearing the scene of the event and completing a report.
- Retaining accident/incident reports and video surveillance electronically.
- Reporting hazards using the employee safety reporting form.

Employee Injury Investigation
- Investigated by the SC, TOS, or TSS.
- Investigation facts are documented on the Injury Investigation Report. (See Attachment M)
- The root cause of the injury is identified and documented.
- Injuries are reported formally to the agency and insurance provider. Appropriate care is provided.
- Follow up training is conducted with injured employee. (See Attachment L)
- Accident follow up training conducted with employee. (See Attachment K)
- Communication with workforce to create awareness and review methods to prevent future injuries/accidents.

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Following the initial investigation of safety events, the CSO reviews and analyzes the data as follows:
- Safety data is review and tracked on an Excel worksheet by the CSO daily.
- Safety data is retained and analyzed by the CSO.
- Specific data includes the causal factors, the type and severity of the accident or event, location and time of accident, employee's length of service, number of previous accidents/incidents, and data concerning injured employee and/or passengers.
- Preventability of the accident or incident is determined initially by the COO, CSO, and the SC. This process is a requirement of the agency's Collective Bargaining Agreement. If an employee wishes to appeal the initial decision of preventability, an Appeal Review Committee with determine the final decision. (See Attachments F, G, H, and N).

Following the safety investigation and after the mitigation strategy is identified, the SC will document the process in Trapeze, and will execute the mitigation. Following this procedure will ensure that risk and severity of the safety events are mitigated to prevent future occurrences. The findings of the investigation will be reported back to the affected and reporting employee(s). Current policies and procedures will be reviewed and modified as appropriate to eliminate similar occurrences.

Describe activities to monitor information reported through internal safety reporting programs.

The COO, CSO, and SC's monitor safety information reported and documented through the ESRP daily. Data and documents are tracked in the agency's Trapeze program. (See Attachment O) All investigation forms are retained electronically in the agency's V: and all management has access to the V: In addition, the CSO will compile and email a summary of the previous day's safety events to the AE, COO and SC's. By reviewing and analyzing current data, the agency can monitor any changes and safety trends. Staff meetings will occur each week in the depots and monthly operational meetings are scheduled with the AE, COO, CSO, and SC's to further review ESRP data.

Management of Change

Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance.

The planning and operations section will communicate upcoming service changes to the agency. When this occurs the COO, CSO, and SC will meet with the planning section and assess how changes may introduce new hazards or impact safety performance. The SRM process will be utilized to recognize potential risk that could be introduced to the system through the management change. New equipment, new service processes and procedures, will require new policy development.
After assessing the new service changes using the SRM process, the CSO will initiated safety strategies to address change. Training programs will be provided for employees operating the new service. Train the trainer classes will be provided by manufacturers of new buses and this training will be passed on to employees. New maintenance programs will be established to provide training on new equipment operation and vehicle maintenance.

Examples of management change:
- Recently, the agency introduced a new on demand service named the Flex. Employee training was modified to meet the change in equipment and service. New maintenance requirements and schedules were adopted to adjust to the changes.
- In 2020 the agency introduced new service operating sixty- foot articulated buses and electric buses. New operating plans and employee training is required for the service. Maintenance training and equipment service requirements are currently being established to meet the service demands.

Continuous Improvement

Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies.

The agency's AE, COO, and CSO will conduct a quarterly evaluation of SMS to ensure that the system is effectively and efficiently allowing the agency to meet safety objectives and performance targets. Any deficiencies identified during the safety performance assessment, will require the agency, under the direction of the AE, to develop and carry out specific action plans to address the identified safety deficiencies.
In addition, an annual review of overall safety performance will be conducted each July. Examples of activities include:
- Addressing underlying hazards and potential consequences through SRM.

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- Changing data collection or analysis techniques to better understand the reality of the process.
- Testing and evaluating new approaches to the SMS process.

7. Safety Promotion

Competencies and Training

Describe the safety training program for all agency employees and contractors directly responsible for safety.

The agency has established and implemented a comprehensive safety training program for all agency employees in the agency's public transportation system. (See Attachment S). The training program includes annual refresher training. The agency does not utilized contractors for safety training.

The agency communicates safety and safety performance information throughout the agency's organization utilizing a daily safety report. The daily safety report is sent to each operation via email by the CSO. (See Attachment I) The agency conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety action taken in response to reports submitted through the ESRP. See Attachment O)

The agency's Safety and Training department provides initial safety training to all new employees. In addition, the depot management team attends a three-day train the trainer refresher course each year. The Transportation Operations Supervisors (TOS) are responsible for annual/refresher training for the employees reporting to the depot. Below is a brief description of the training department.

Training Department
- The training staff includes the CSO, a compliance manager, two safety and training supervisors, and six safety and training instructors. (See Attachment R)
- The Montgomery County Driver Training Facility (MCDTF) is located at 8751 Snouffer School Road Gaithersburg, Md. The facility is equipped with a thirty-seat classroom, office space for all staff, and a large skills pad for driver training.
- The department utilizes training material from Transportation Safety Institute (TSI) and Smith System Institute.
- Safety and training supervisors and instructors attend a five-day train the trainer course conducted by Smith System and are certified trainers.
- Montgomery County is certified by Maryland Motor Vehicles as a Career/Employee Testing program.
- This program allows our staff to train new bus operators with a learner's permit.
- After the training period, the agency can conduct MVA/CDL testing instead of taking the employee to MVA.
- MVA issues a CDL to the employee that successfully pass the test.

Annual/Refresher training and follow up training (for accidents, injuries, and incidents) is provided to each employee. Listed below is training provided by position title.

Management Training – Annual/Refresher – Conducted by Safety and Training Instructors
- Three-day train the trainer class includes customer service, emergency management, security, SMS, safe Work methods, and vehicle operations
- Skills pad training and testing
- Pre-trip and post trip Inspection —
- On road training and evaluation
- Smith System Space Cushion driver training and evaluation
- SMS online training available through TSI

New Operator Training – Conducted by Safety and Training Instructors
- New bus operators attend a five-week training program at MCDTF.
- Classroom training and testing including customer service, emergency management, security, SMS, safe work methods, and vehicle operations

- Smith System Space Cushion driver training and evaluation
- Drug and Alcohol Training
- Safe Work Methods (SWM) to reduce employee injuries
- Agency specific policies and procedures
- Skills pad training and testing
- ADA training
- Radio Communications
- SMS online training available through TSI
- After the completion of the five-week training program, new operators are assigned to a depot.

Lead Operator Training – Annual/Refresher - Conducted by Safety and Training Instructors
- As an extension to the five-week training program, the agency utilizes Lead Operators to mentor and train new operators for a minimum of two-week period after the new operator reports to the assign depot. During the mentoring process, the operators receive route and revenue service training.
- Lead operators receive annual training as a requirement to performing this duty. Platform operator training includes:
- Three-day training conducted by safety and training
- Classroom training and testing including customer service, emergency management, security, SMS, safe work methods, and vehicle operations
- Smith System Space Cushion driver training and evaluation
- Safe Work Methods (SWM) to reduce employee injuries
- Agency specific policies and procedures
- Skills pad training and testing
- ADA training
- Pre-trip and post trip Inspection
- On road training and evaluation
- SMS online training available through TSI

Bus Operator Training – Annual/Refresher – Conducted by TOS
- Customer Service
- Security
- SMS online training available through TSI
- Space and visibility on road training and evaluation
- Safe work methods/ policies and procedures
- Follow-up accident and injury training as required

Coordinator Training – Annual/Refresher – Conducted by TSS
- Customer Service
- Security
- SMS online training available through TSI
- Space and visibility on road training and evaluation
- Safe work methods/ policies and procedures
- Follow-up accident and injury investigation as required

Motor Pool Attendant – Annual/Refresher – Conducted by TOS
- Customer Service
- Security
- SMS online training available through TSI
- Space and visibility on road training and evaluation
- Safe work methods/ policies and procedures
- Follow-up accident and injury investigation as required

Information Technicians– Annual/Refresher – Conducted by TOS
- Customer Service
- Security
- SMS online training available through TSI
- Space and visibility on road training and evaluation
- Safe work methods/ policies and procedures
- Follow-up accident and injury investigation as required. (See Attachment R, K, and L)

Maintenance Staff Initial and Refresher Training – Is provided by the Safety Manager of Fleet Services. (See Attachment T)

Safety Communication

Describe processes and activities to communicate safety and safety performance information throughout the organization.

The agency has established processes and activities to communicate safety and safety performance with the workforce. Listed below are common activities.

- Open Door Meetings – This is a process to promote communications with employees each month. The AE, COO, and Depot Section Chiefs meet with employees and discuss a variety of safety and other work-related topics. These meetings normally last one hour.
- Operation Meetings – Communication meetings are conducted in each depot every four months. These meetings correspond with the driver pick. Speakers attending the meeting include the AE, COO, CSO, a route planning representative, a police officer, and a service technician. During the meetings the agency discusses safety trends, route changes, safety and security concerns, issues requiring police assistance, and a discussion related to equipment concerns. Meetings are schedule in the AM and PM to allow more contact with employees.
- The CSO sends a daily safety messages and a safety report to leadership and frontline supervisors. The daily report is posted on the depot safety board in the workplace for all employees to review. (See Attachment I)
- In addition, electronic monitors located in the depots are utilized to communicate daily changes to normal operations. The messages typically include the daily safety tip, detours, and upcoming events.
- Each depot has an active safety committee. Committees meet once each month to discuss safety events, accidents, incidents, injuries, equipment concerns, SMS, old business, and any new business/safety concerns. Minutes from the safety meeting are posted on the Safety Board for all employees to review. Employees are encouraged to express safety concerns without fear of retaliation. Safety committees also evaluate and make recommendations regarding safety reporting, assessment, and mitigation. (See Attachment P)
- The AE conducts management staff meets monthly to discuss safety results and strategies to improve safety.
- Safety Driving Awards are issued to bus operators each year for zero preventable accidents in a calendar year. Operators awarded, receive a safety certificate and appropriate safety awards.
- The Annual Bus Roadeo is another form of employee recognition and communication. Participants demonstrate their skill level as professional bus operators during this event. The agency follows APTA rules as the official standards. The roadeo includes individual and team completion. The first through third place participants in both categories are awarded trophies. The first-place individual winner represents the agency at the National APTA roadeo and all expenses are paid for this winner.

Additional Information

Supporting Documentation

Include or reference documentation used to implement and carry out the Safety Plan that are not included elsewhere in this Plan.

Attachment A: Employee Safety Reporting (ESR) Form
Attachment B: Probability Chart
Attachment C: Severity Chart
Attachment D: Risk Decision Making Matrix Chart
Attachment E: Description of Service
Attachment F: Accident Investigation Report Form
Attachment G: Incident Investigation Report Form
Attachment H: Operator Incident/Accident Investigation Report Form
Attachment I: Daily Safety Report
Attachment J: Organizational Chart

Attachment K: Space and Visibility Ride Form
Attachment L: Safe Work and Methods Training Form
Attachment M: Injury/Illness Investigation Report
Attachment N: DOT Accident/Incident Review Procedure
Attachment O: SOP Employee Safety Reporting Program and Safety Risk Management
Attachment P: SOP Safety Committees
Attachment Q: Safety and Training Organizational Chart
Attachment R: Operator Training Defined
Attachment S: Training Roster
Attachment T: Maintenance Training
Attachment U: Checklist for Incidents

Definitions of Special Terms Used in the Safety Plan

Term	Definition
Accident	An event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation 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	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; 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.
Chief Safety Officer	An adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
Equivalent Authority	An entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
Event	Any Accident, Incident, or Occurrence.
FTA	The Federal Transit Administration, an operating administration within the United States Department of Transportation.
Hazard	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.
National Public Transportation Safety Plan	The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
Occurrence	An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

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Operator of a public transportation system	A provider of public transportation as defined under 49 U.S.C. 5302 (14).
Performance measure	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.
Performance target	A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).
Public Transportation Agency Safety Plan	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard.
Risk mitigation	A method or methods to eliminate or reduce the effects of hazards.
Safety Assurance	Processes 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	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)	The 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.
Safety Management System (SMS) Executive	A Chief Safety Officer or an equivalent.
Safety performance target	A Performance Target related to safety management activities.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety risk assessment	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	A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received. (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (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.

Small public transportation provider	A recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.
State	A State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.
Stare of good repair	The condition in which a capital asset is able to operate at a full level of performance.
State Safety Oversight Agency	An agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.
Transit agency	An operator of a public transportation system.
Transit Asset Management Plan	The strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
AE	Accountable Executive
APTA	American Public Transportation Agency
ASP	Agency Safety Plan
COO	Chief Operations Officer
CSO	Chief Safety Officer
ESR	Employee Safety Report
ESRP	Employee Safety Reporting Program
MTA	Maryland Transit Administration
MWCOG	Metropolitan Washing Council of Governments
NTD	National Transit Database
PMII	Program Manager II
SC	Section Chief
SMS	Safety Management System
STI	Safety and Training Instructor
STS	Safety and Training Supervisor

TAG	Transit Advisory Group
TOS	Transit Operations Supervisor
TSI	Transportation Safety Institute
VRM	Vehicle Revenue Miles