metro transit

Public Transit Agency Safety Plan

City of Madison – Metro Transit

Version 5.0

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0.1 Executive Summary

Fixing America's Surface Transportation Act (FAST Act) grants the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee the safety of public transportation throughout the United States. As a component of the safety oversight framework, the FAST Act requires recipients of FTA funding to develop and implement a Public Transit Agency Safety Plan (PTASP) that addresses performance measures, strategies, and staff training opportunities.

The FAST Act expands the regulatory authority of the FTA to oversee safety, providing an opportunity for FTA to assist transit agencies in moving toward a performance-based approach in Safety Management Systems (SMS). The FAST Act puts the FTA in a position to provide guidance that strengthens the use of safety data to support management decisions, improves the commitment of transit leadership to safety, and fosters a culture of safety that promotes awareness and responsiveness to safety risks.

The PTASP for Metro Transit is consistent with and supports a SMS approach to safety risk management. SMS is an integrated collection of policies, processes, and behaviors that ensure a formalized proactive and data-driven approach to safety risk management. The aim of SMS to increase the safety of transit systems by proactively identifying, assessing and controlling safety risks. The approach is flexible and scalable, so that transit agencies of all types and sizes can efficiently meet the basic requirements of the FAST Act. The PTASP for Metro Transit addresses the following elements:

- **Policy Statement** – Establishing commitment to continual safety improvement
- **Document revision and control** – Description of the regular annual review processes and updates
- **Description of core safety responsibilities** – Accountabilities and authority of the accountable executive, chief safety officer, and key members of the safety management team
- **Safety Promotion** – Training and communication methods/objectives
- **Safety Risk Management** – Processes utilized to identify hazards, risk analysis, and evaluation
- **Prioritized Safety Risks** – Description of the most serious safety risks to the public, personnel, and property
- **Risk Control Strategies** – Strategies and actions utilized to minimize exposure of the public, personnel, and property to hazards
- **Safety Assurance** – Safety performance monitoring and measurement through performance indicators and targets. Management of change and continuous improvement

- **Safety Risk Reduction Program** -- for transit operations to improve safety performance by reducing the number and rates of safety events, injuries and assaults on transit workers.

- **Contagious Virus Response Plan**

0.2 Agency Information

Metro Transit
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Introduction

Metro Transit is a bus only public transit agency located in Madison Wisconsin serving Madison and several nearby communities. Mainline, heavy bus operation is directly operated with a fleet of 218 40ft buses and 315 Transit Operators. All ADA complementary paratransit service is contracted to private paratransit service providers with Metro oversight.

This plan covers both directly operated fixed route and contracted paratransit modes of service

We are committed to the safety of all employees and people who utilize public transit service within our service area. This Public Transportation Agency Safety Plan will help maintain and grow a positive safety culture within our organization which will in turn reduce the risk of accidents both involving employees and the public.

Service Area and Partnerships

Metro Transit serves the City of Madison, the City of Middleton, the City of Verona, the City of Fitchburg, the Town of Madison, and the City of Sun Prairie. All communities border Madison and are within Dane County Wisconsin.

Metro has agreements with several partner organizations to provide service as described below. Each service partner has a formal contract with Metro that describes the service provided and the method by which the contribution made by the partner for the service provided is calculated. Basically, the contribution is calculated by multiplying the total system's average operating cost per hour by the service hours provided to each partner, then reducing this by each partner's share of fare revenue and federal and state grant funds. The Cities of Verona and Sun Prairie apply for their own state funding, so Metro does not allocate to them any of the system's state or federal 5307 funds that are used for operating costs. These two cities do get a share (as do all the other partners) of federal grant funding that was used to purchase capital assets (5307, 5337 and 5339 grants). This is applied as an offset against depreciation expense. Each partner is invoiced an estimated amount during the year the service is provided and then a final reconciliation is performed after the year is over and financial results have been finalized.

The Cities of Middleton and Fitchburg and the Town of Madison receive core fixed route and paratransit service every day of the year. The Cities of Sun Prairie and Verona receive commuter service during the morning and afternoon rush hours on all weekdays, other than holidays during the year. Paratransit service is not provided to those communities. The University of Wisconsin receives fixed route service circulating throughout the campus every day of the year. Paratransit service is also provided within the campus area. The Madison Metro School District receives supplemental fixed route service during the morning and late afternoon that assists middle and high school students get to school. This service is provided every day that schools are in session. Paratransit service is provided as part of the overall service area within the City of Madison. Madison College and the University Of Wisconsin Hospital – North have portions of fixed routes that provide service to their campuses every day of the year. Paratransit service is included.

Federal Funding

The Federal Transit Administration (FTA) issued a final rule effective July 19th, 2019 adding a new part 673 "Public Transportation Agency Safety Plans" to Title 49 C.F.R. One year after the effective date, each state, local governmental authority, and any other operator of a public transportation system that receives Federal financial assistance under 49 U.S.C Chapter 53, must certify it has a Public Transportation Agency Safety Plan (PTASP).

Metro Transit receives funding from the following sections:

- 5307 Urbanized Area Formula Funding Program
- 5310 Enhanced Mobility for Seniors and Individuals with Disabilities
- 5337 State of Good Repair
- 5339 Bus and Bus Facilities

The core areas of the PTASP are as follows:

- Safety Management Policy
- Safety Risk Management
- Safety Assurance
- Safety Promotion

Designated Accountable Executive, Ayodeji Arojo, Chief Operations Officer

The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented, throughout the agency's public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive.

Designated Chief Safety Officer, Justin Maki, Safety Coordinator

Designated by the Accountable Executive, the Chief Safety Officer has the authority and responsibility for day-to-day implementation and operation of an agency's Safety Management System (SMS). The Chief Safety Officer must hold a direct line of reporting to the Accountable

Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer.

0.4 Plan Adoption

This plan, drafted by the City of Madison Metro Transit, is the adopted 2020 City of Madison (Metro) Transit Public Transit Agency Safety Plan (PTASP). 49 Code of Federal Regulations Chapter VI Part 673.1 applies to any State, local governmental authority, and any other operator of a public transportation system that receives Federal financial assistance under 49 U.S.C. Chapter 53 which includes Metro Transit.

This plan was certified to be in compliance with 49 CFR Part 673 on June 24th, 2020

The FAST Act requires recipients of FTA funding to develop and implement a Public Transit Agency Safety Plan (PTASP) that address performance measures, strategies, and staff training opportunities. The purpose of this plan is to increase the safety of transit systems by proactively identifying, assessing and controlling safety risks. Metro Transit will maintain these documents for a minimum of three years after they are created. Metro Transit will certify compliance with 49 CFR Part 673 each year by July 31.

The Chief Safety Officer is the person designated by Metro Transit to manage and implement this Public Transit Agency Safety Plan.

Please reference appendix for signed version of this plans adoption.

Accountable Executive Contact Information

Title:	Chief Operations Officer
Name:	Ayodeji Arojo
Address:	1 South Ingersoll, Madison, WI 53703
Phone:	608-264-9245
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Chief Safety Officer Contact Information

Title:	Safety Coordinator
Name:	Justin Maki
Address:	1 South Ingersoll, Madison, WI 53703
Phone:	608-266-5961
Email:	jmaki@cityofmadison.com

Section 1 – Safety Management Policy

1.1 - Safety Management Policy Statement

Metro Transit is committed to the implementation and continuous improvement of an effective safety management system (SMS) aligned with applicable transit standards. The primary Objectives of the Metro Transit SMS are to:

- Promote early identification of safety hazards and risks
- Take proactive steps to reduce identified safety hazards and risks
- Promote and enhance our safety culture to support the SMS
- Establish and continuously maintain an acceptable level of safety throughout Metro Transit

Metro Transit will promote safety as a critical component of the SMS and safety culture development. Positive safety culture must be generated by all employees. The actions, attitudes, and decisions at the all-employee levels must demonstrate a genuine commitment to safety. Safety must be recognized as the responsibility of each employee with the ultimate responsibility resting with the General Manager and governing board of Metro Transit.

This policy will be promoted agency wide utilizing promotional events such as the annual safety banquet, mailings, postings, display boards, internal mail, and email.

Metro Transit will provide the necessary resources to implement, control, and oversee the SMS. Metro Transit will implement safety risk reduction practices into management decisions modeled throughout the entire agency.

Metro Transit is committed to safety as a top priority in transit operations. To achieve this, Metro Transit encourages reporting of safety events that may compromise the safe conduct of operations. Every employee and contract service provider are responsible for the communication of information that may affect the integrity of transit safety. In cooperation with frontline transit workers representatives, Metro Transit will maintain a safety committee that has equal representation from management and its frontline workers.

_____ _____

Ayodeji Arojo, Chief Operations Officer Date
Accountable Executive, PTASP

1.2 - Document Log

Date	Ver.	Changes	Signature	Comments
6/24/2020	1.0	Original Document	Phil Gadke	
7/31/2021	2.0	Organizational updates	Phil Gadke	
7/6/2022	3.0	Updates to: • Staff • Organizational Structure • Risk Register • Risk Matrix • BIL PTASP updates • Section 2.2 Risk Assessment • Committees • Safety Performance Targets and their Review Period Eliminated Section 2.3 Risk Priority and changed to Risk Mitigation.	Justin Maki	
3/21/2023	3.1	Organizational updates Accountable Executive update	Justin Maki	
6/6/2023	3.2	1.3 Updated Organizational Roles and Safety Responsibilities	Justin Maki	
7/6/2023	4.0	0.3 Updates to approval process	Justin Maki	
6/6/2024	5.0	All changes to PTASP Requirements provided by the FTA in April 2024	Justin Maki	
7/23/2024	5.1	Updated Safety Performance Targets in accordance with changes made to the National Safety Plan in April 2023	Justin Maki	

1.3 - Organizational Roles and Safety Responsibilities

General Manager
Plan, organize, direct and administer safety programs, services, and staff of Metro Transit encompassing the operation and maintenance of a fixed-route transit and para-transit system.

Chief Operations Officer, Accountable Executive
Provide overall supervision, direction, coordination and monitoring of the daily and long-term operations of the Operations unit which included training and safety. This position is rresponsible for carrying out the Public Transportation Agency Safety Plan of a transit agency, in accordance with FTA definitions at Accountable Executive at §673.5 and §673.23(d)(1). The Accountable Executive is accountable for ensuring that the transit agency's SMS is effectively implemented, throughout the transit agency's public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the transit agency's SMS. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive.

(i) The Accountable Executive of a large, urbanized area provider must implement safety risk mitigations for the safety risk reduction program that are included in the Agency Safety Plan under § 673.11(a)(7)(iv).

(ii) (ii) The Accountable Executive of a large, urbanized area provider receives and must consider all other safety risk mitigations recommended by the Safety Committee, consistent with requirements in §§ 673.19(d) and 673.25(d)(6).

Chief Administration Officer
The purpose of this position and the responsibilities thereof is to provide executive administrative direction and oversight over the activities and functions of Finance, Human Resources, Diversity, Equity, and Inclusion, Labor/Employee Relations and Equal Opportunity, IT, Civil Rights/DBE, Ethics Programs, Procurement, and Contract Administration and its services for the organization. The Chief Administrative Officer is responsible for the control, guidance, and direction of all administrative functions which include day-to-day practices and process improvement. This position is responsible for infusing racial equity, social justice and inclusion goals, principles, and tools, into all aspects of work at Metro Transit and the City of Madison.

Chief Maintenance Officer
This position assumes full management responsibility for managing activities and operations, through subordinate managers, all maintenance activities related to the successful deployment and lifecycle management of Metro's fleet and infrastructure assets. The position is expected to identify and implement new approaches and technologies to improve customer service, performance, safety, and teamwork on a continuous basis. This position is responsible for infusing racial equity, social justice and inclusion goals, principles, and tools, into all aspects of work at Metro Transit and the City of Madison. The position shall exemplify and set the tone for continuous improvement throughout the organization and assure cost-effective use of available resources.

Chief Development Officer
This position directs and oversees the activities of personnel, consultants and contractors engaged in planning, design, construction, project management, and dispute resolution functions associated with the execution of Metro major initiatives and capital programs while also maintaining Metro partnerships and directing customer service/outreach activities. This position is responsible for analyzing the engineering, financial, and performance data regarding project delivery to effectively manage and implement programs, align resources to ensure agency objectives are accomplished. This position is responsible for infusing racial equity, social justice and inclusion goals, principles, and tools, into all aspects of work at Metro Transit and the City of Madison.

Chief Safety Officer or Safety Management System (SMS) Executive – Designated by the Accountable Executive, a Chief Safety Officer or SMS Executive has the authority and responsibility for day-to-day implementation and operation of a transit agency's SMS. The Chief Safety Officer or SMS Executive must hold a direct line of reporting to the Accountable Executive in accordance with FTA definitions as Chief Safety Officer at §673.5 and §673.23(d)(2)

Operations Manager - Implement operations unit safety policies. Review and update existing policies as necessary. Develop and recommend new policies as required. Monitor adherence to policies and initiate follow-up as required. Ensure consistency of application by subordinate supervisors. Coordinate impact of unit policies with other Metro Transit managers.

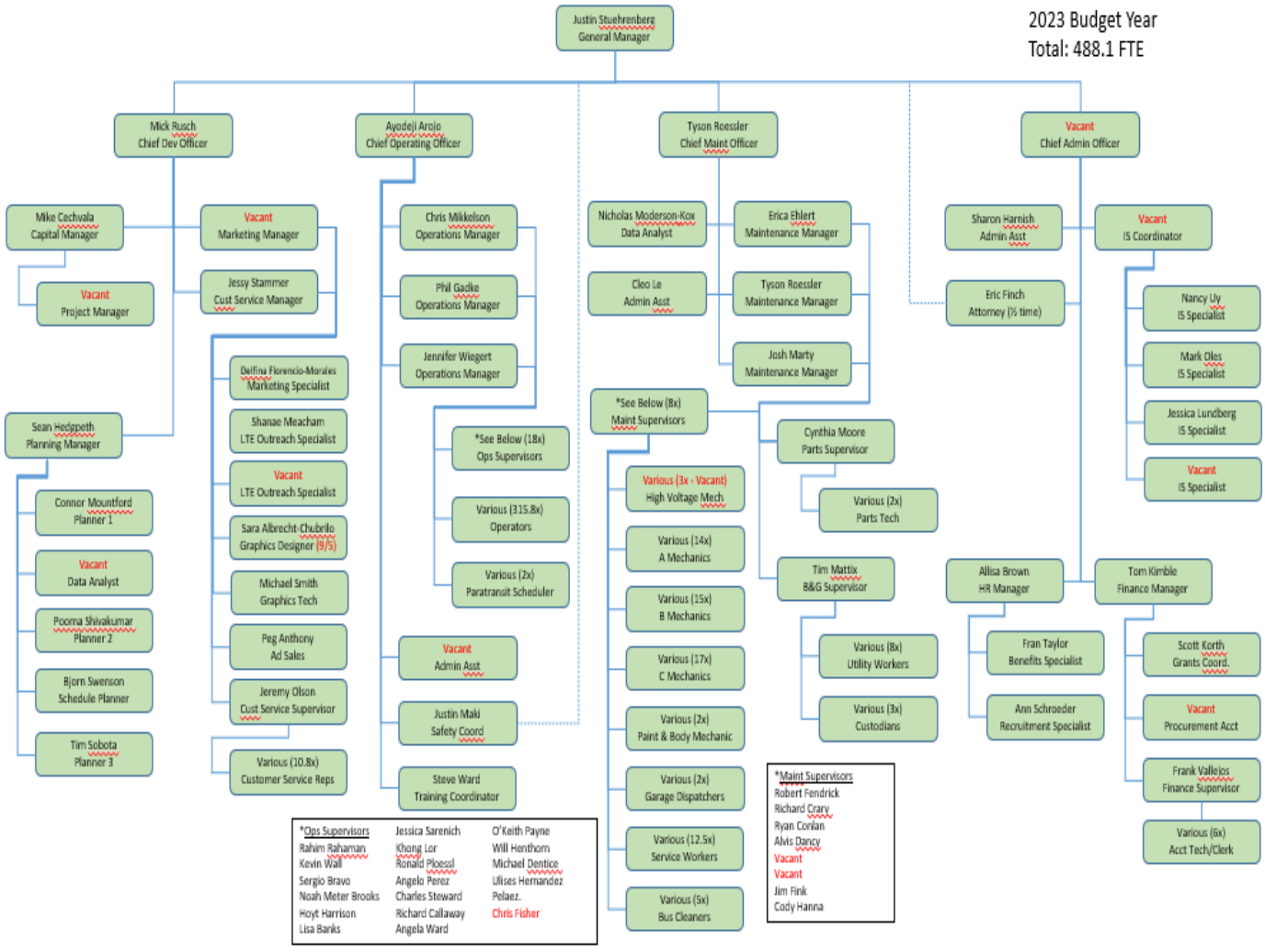
Maintenance Manager - Develop, coordinate and/or administer development of unit safety and training programs implemented by subordinate supervisors and staff in the Maintenance, Parts and Building and Grounds units.

Planning Manager - Direct and/or perform Metro Transit operational, strategic and long-range planning. Develop program improvements and modifications to such things as transit system design, service, schedules and standards.

Finance Manager - Develop and administer Metro Transit's accounting operations, including systems and procedures, financial reporting and budgeting, and capital asset accounting. Recommend policy changes and implement revisions to established accounting procedures. Interpret data in reports and financial statements. Conduct or coordinate internal audits of records and systems used for internal control.

Information Systems Coordinator – Manage Metro Transit's information systems and service needs. Recommend, develop, coordinate, and implement appropriate technological enhancements, processes, and standards. Identify and recommend related budgetary information and priorities. Identify the need for and respond to related staff training.

1.3.1 - Organizational Structure



1.4 – Teams

Safety Planning Team (SPT) – Team responsible for planning, reviewing, and revising the Public Transit Agency Safety Plan and all associated processes and procedures. All SPT updates and recommendations are reviewed through the SAFE and SMT.

Safety Committee– Consists of an equal number of frontline transit worker representatives and management representatives. It is the team responsible for identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment. Team will also be responsible for identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended. Metro's safety committee meets the requirements of § 673.19.

Senior Management Team (SMT) – Team comprised of all unit managers responsible for reviewing policy changes and making recommendations to the Transportation Policy and Planning Board (TPPB) and Transportation Commission (TC)

Operations Management Team (OMT) – Team responsible for operational staff performance review. OMT reviews all critical incidents and accidents, operational safety issues, and the status of projects underway in operations. Recommendation and implementation group responsible for operator and supervisor hiring, training, work scheduling, and performance.

Maintenance Management Team (MMT) – Team responsible for maintenance staff performance review, addressing safety issues with equipment, facilities, and employees.

Service Development Committee (SDC) – Team responsible for bus routing, scheduling, bus stop location, and annual service changes. SDC addresses on-street safety related issues pertaining to bus stop design, turning movements, and on-time performance issues.

Paratransit Team (Para) - Recommendation and implementation group responsible for program management, Supervisor and coordinators hiring, training, work scheduling, and performance.

Team Leaders

Name	Role	Contact	Phone
Justin Stuehrenberg	General Manager (SMT)	jstuehrenberg@cityofmadison.com	608-267-8777
Ayodeji Arojo	Chief Operations Officer (OMT)	aarojo@cityofmadions.com	608-264-9245
Tyson Roessler	Chief Maintenance Officer (MMT)	troessler@cityofmadison.com	608-264-9264
Mick Rusch	Chief Development Officer (SDC)	mrusch@cityofmadison.com	608-266-6532
Justin Maki	Safety Coordinator (SPT, Safety Committee)	jmaki@cityofmadison.com	608-266-5961
Phil Gadke	Operations Manager (Para)	pgadke@cityofmadison.com	608-267-8762

1.5 - Plan Approval

Metro Transit's PTASP plan approval was a process consisting of Metro team approvals, concurrence from the Madison Area Transportation Planning Board and Wisconsin Department of Transportation, and approval of the City of Madison's Transportation Commission.
MPO Correspondence: See Appendix A
Transportation Commission Approval Date: June 24th, 2020,
Certification of Compliance with Part 673 Date: June 24th, 2020

1.6 - Plan Updates and Process

Metro Transit's agency safety plan will be updated annually by July 31 of each year. The SPT will initiate any review and updates. SC, MMT, and OMT will review and concur or recommend modifications to annual updates from SPT. SMT will have the final authority prior to signature by the Chief Safety Officer and Accountable Executive. Updates will include performance reporting on safety targets, safety assessments and system reviews, facility safety and security assessments; completed risk assessment matrices, identified hazards and mitigation efforts, annual completed safety risk log, completed safety performance matrices.

Safety target performance and updates will be communicated annually by July 31 to the MPO, Wisconsin Department of Transportation and stakeholders.

Every four years, the entire agency safety plan will be updated and reviewed for approval using the process for initial plan approval: Approval by the City of Madison Transportation Commission.

1.7 - Safety Performance Targets

Metro Transit has established Safety Performance Targets. To arrive at these targets, Metro Transit inventoried its current safety measures to identify which were aligned with the Public Transportation Agency Safety Plan (PTASP) and then identified areas where performance indicators needed additional measures to fulfill the objectives above. Metro Transit's PTASP long range goal is to attain the established targets for each safety performance indicator. With these objectives in mind, the following safety performance indicators have been established. Each safety performance target will be evaluated annually over a one-year period beginning January 1st through December 31st.

Annual Safety Performance Targets		
Category	**Bus Transit**	**Paratransit**
Fatalities	0	0
Fatalities (per 100,000 VRM)	0	0
Injuries	10	1
Injuries (per 100,000 VRM)	.15	.15
Safety Events (Transit Mutual Insurance Claims)	300	20
Safety Events (per VRM 100,000)	4.62	3.07
System Reliability (per 100,000 VRM)	4	1.82
Major Events	0	0
Major Events (per 100,000 VRM)	0	0

- *Fatalities = Any fatal accident involving a Metro Transit vehicle regardless of fault*
- *Injuries = any harm to persons as a result of a safety event that requires immediate medical attention away from the scene*
- *Safety Events = any accident, incident, event, or occurrence.*
- *VRM = vehicle revenue miles*
- *System Reliability/State of Good Repair = VRM between on-road, mechanical failure.*
- *Major Events = A fatality within 30 days; An injury that requires transport away from the scene for medical attention; estimated property damage of $25,000 or more*

Performance targets have been shared with the Wisconsin Department of Transportation, the MPO, and coordinated with the State and MPO in the selection of safety performance targets to the extent practicable. See Appendix A for correspondence to the State and MPO. See Appendix A for State concurrence. See Appendix A for MPO concurrence.

Section 2 – Safety Risk Management (SRM)

2.1 – Hazard Identification

Metro Transit has established methods to effectively collect information identifying hazards and potential consequences of hazards. Hazard identification data plays a key role in maintaining a proactive position on safety risk and hazard mitigation. Some of the methods include:

- Trend monitoring
- Incident reporting
- Safety surveys
- Customer feedback
- Employee Reporting
- Data collection from employees
- Data collected from the FTA, MPO, Transportation Commission, WISDOT, and other oversight sources.
- Data and information regarding exposure to infectious disease provided by the CDC or State health authority
- Safety concerns identified through Safety Assurance activities carried out under § 673.27

2.1.1 – Safety Hazard Reporting

Metro Transit has established a reporting system which allows all transit workers to report safety concerns, including assaults on transit workers, near-misses and unsafe acts and conditions without fear of discipline or retaliation. Existing work rules indicate in Section 22.1 of the Collective Bargaining Agreement that Metro Transit will not discipline without just cause.

When a transit worker becomes aware of a hazardous situation, they may report to any Metro Transit supervisor without fear of discipline. The supervisor or safety coordinator will follow-up with updates for the employee involved. The issuance of infractions, training, or coaching methods are not to be considered discipline.

All reports will remain confidential. Employees may submit reports in writing, e-mail, or verbally.

2.1.2 - Employee Discipline

Metro Transit follows an investigation process including investigatory hearings and pre-determination hearings before making a determination of the nature of discipline to be issued. Employees found to be in violation of Articles 22.2 and 22.3 of the Collective Bargaining

Agreement work rules could be subject to discipline. The nature of the infraction, employee work history, and environmental factors all play a role in how each case is handled. Generally, corrective measures such as coaching, training, and counseling are attempted before the issuance of discipline. Metro Transit has a past practice of helping employees in error before the issuance of discipline. Employees are subjected to discipline if found to be intentionally violating the following work rules:

Behaviors that could result in termination without warning:

- Failure to stop at a railroad crossing.
- Conviction of a morals offense making the employee unacceptable to the public as a bus operator.
- Performing assigned duties while under the influence of or in possession of a controlled substance or alcohol.
- Theft or embezzlement.
- Misconduct of a serious nature (with union agreement)
- Permitting an unauthorized person to perform operating duties.
- Unexcused absence from work for 2 consecutive days without notice to employer except where the notice cannot reasonably be given.
- Fighting on premises or while on duty.
- Operating while suspended/revoked.
- Willful damage to employer's property and/or willful damage to any property on employer's premises.
- Possession of a firearm, bow and arrow, or any instrument specifically to do bodily harm.
- Violation of the personal electronic device usage policy.

Behaviors that could result in suspension without warning:

- Failure to turn in cash or fare media
- Misconduct resulting in a chargeable accident
- Loss or expiration of commercial motor vehicle license
- Conduct resulting in being charged with a morals offence but may be cause for suspension as a bus operator but not termination from all employment.
- Willful refusal or failure to carry out a direct order or instruction.
- Off route without authorization (intentionally).
- Abandoning coach or failure to wait for relief.
- Leaving coach unsecured.
- Falsification of sick leave.
- Proven dishonesty

2.2 – Safety Risk Assessment

At Metro each identified hazard will be reviewed by SPT or the chief safety officer and run through our risk assessment matrix. Each hazard will receive an individual assessed risk value ***(severity + likelihood)*** for the categories of people, assets, environment and reputation. The total score from each category will determine the hazards total assessed risk value. Based on the individual or total assessed safety risk value ***(people + assets + environment + reputation)*** the hazard risk will be categorized as unacceptable, undesirable, acceptable with review and

acceptable without review. Each individual assessed safety risk score may fall into different safety risk categories which will be addressed by SPT. The results of the process will help determine whether the safety risk is being appropriately managed or controlled.

Hazards determined by the SPT to be acceptable in practice will be monitored and regularly reviewed. Hazards determined by the SPT to be unacceptable will be taken to the safety committee for mitigation review and then back to SPT and CUSS for approval. Finally, it will be distributed to the Unit for mitigation and recommendation to SMT. SMT will decide on whether the action is feasible or make recommendation for further changes.

For hazard mitigation that does not require Transportation Commission (TC) approval, SMT has the authority to delegate the project to the appropriate unit. For hazard mitigation that requiring TC approval, SMT authorizes submission to the TC for review and approval. The Chief Safety Officer tracks and oversees the overall progress of the hazard mitigation process.

Hazard Severity

Hazards are rated according to their effect on Metro customers, employees, the public, and metro operations. The hazard severity rating is a subject measure of the worst-case consequence that would result from design deficiencies; components failure of malfunction; human error or negligence; environmental conditions; or operations or maintenance practice, and procedure deficiencies.

Severity Category	Description	People	Assets	Environment	Reputation
5	Catastrophic	Multiple fatalities and/or numerous severely injured	Total loss of equipment or system disruption, requiring months to rectify ($1 million +)	Irreversible environmental impact	Ongoing media coverage, severe to irreparable reputational damage, governmental intervention, Weeks to Months
4	Critical	Singular fatality and/or several severely injured	Significant loss of equipment or system disruptions, requiring weeks to rectify ($250K to $1 mil)	Reversible significant environmental impact	Prolonged media coverage, serious reputational damage, sustained government involvement, Days to Weeks
3	Marginal	Severe injuries and/or numerous minor injuries	Some loss of equipment or system disruption, requiring < 7 days to rectify ($10k to $250K)	Reversible moderate environmental impact	Adverse media coverage, reputational damage, government involvement, Days
2	Negligible	Severe injury and/or multiple minor injuries	Some loss of equipment, no system disruption, requiring < 24 hours to rectify (Less than $10K)	Minimal environmental impact	Local media coverage and some reputational damage, Day
1	Insignificant	Minor injuries or No injuries	Minor damage to equipment, no system disruption, no immediate repair necessary	No Environmental Impact	No adverse media coverage or reputational damage

Hazard Likelihood

The probability that a hazard will occur during the planned life expectancy of the system element, sub-system or component is described qualitatively, in potential occurrences per unit of time, events, population, items, or activity. A qualitative hazard probability is derived from research, analysis, and evaluation of safety data from the operational experience of Metro's system or from historical data from comparable agencies.

Hazard Likelihood Rating System

Probability Category	Probability Description	Specific Individual Item	Fleet or Inventory	Frequency
5	Frequent	Likely to occur frequently in the life of an item	Continually experienced	Greater than 25 incidents per year
4	Probable	Will occur often in the life of an item	Will occur regularly	Less than 25 but more than 12 times per year
3	Occasional	Likely to occur sometime in the life of an item	Will occur a few times	Greater than 5 but less than 12 times per year
2	Remote	Unlikely but possible to occur sometime in the life of an item	Possible to occur in the life of the system	1 to 5 times per year or less
1	Improbable	So unlikely, it can be assumed that occurrence may not be experienced	It can be assumed it will not occur	Less than 1 time per year

Risk Assessment Matrix

SEVERITY	Likelihood				
	5-Frequent	4-Probable	3-Occasional	2-Remote	1-Improbable
5-Catastrophic	25	20	15	10	5
4-Critical	20	16	12	8	4
3-Marginal	15	12	9	6	3
2-Negligible	10	8	6	4	2
1-Insignificant	5	4	3	2	1

Individual Safety Risk Decision Criteria

Category		Safety Risk Score
	Unacceptable– Senior Management Review Required	25,20,16,15
	Undesirable – Manager Level Review Required	12,10
	Acceptable w/ review – SPT/CUSS Level Review Required	9,8,6,5
	Acceptable w/o review– Acceptable without further review	4,3,2,1

Total Assessed Safety Risk Decision Criteria

Category		Safety Risk Score
	Unacceptable – Senior Management Review Required	50-100
	Undesirable – Manager Level Review Required	37-50
	Acceptable w/review – SPT/CUSS Review	17-36
	Acceptable w/o review – Acceptable Without Further Review	1-16

After the assessment has been completed, the follow-up actions will be implemented as follows.

Unacceptable: The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development. The Senior Management Team must be informed and approve how the hazard will be mitigated.
Undesirable: A hazard at this level of risk must be mitigated by SPT and CUSS and then approved by the senior management team. A unit manager may issue a documented decision to manage the hazard until resources are available for full mitigation.
Acceptable with review: SPT and CUSS team must determine if the hazard is adequately controlled or mitigated as is.
Acceptable without review: The hazard is reviewed by SPT and does not require further mitigation or control.

2.3 – Safety Risk Mitigation

The assessment process may indicate that certain hazards have an acceptable level of risk, while others require mitigation to an acceptable or tolerable level. Metro Transit will further manage risk by having its SAFE committee review each hazard's risk score and make recommendations on how to eliminate or mitigate the hazard down to an acceptable or tolerable level.

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

1. **Physical Defenses:**

These include objects and technologies that are engineered to discourage, or warn against, or prevent inappropriate action or mitigate the consequences of events (e.g. traffic control devices, fences, safety restraining systems, transit controls/signals, transit monitoring systems, etc.)

2. **Administrative Defenses:**
   These include procedures and practices that mitigate the likelihood of accident/incident (e.g. safety regulations, standard operating procedures, personnel proficiency, supervision inspection, training, etc.)
3. **Behavioral Defenses:**
   These include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior of motorists, passengers and pedestrians; factors outside the control of the agency (e.g. Vision Zero)

2.4 - Monitoring

All identified hazards will be reviewed and revised as necessary by Metro Transit on a regular basis as part of the safety review process within the Safety Planning Team. This process will include evaluation of change, communication, and re-assessment of hazards as mitigations are implemented. Clear, timely communication back to the employee first reporting the hazard is a priority as the hazard moves through Risk Assessment process. This review will occur annually but more frequently as warranted.

The Safety Planning Team will review the safety risk scores and logs as needed on no less than a quarterly basis reporting to the Senior Management Team.

Metro Transit will monitor the system for compliance utilizing several different methods including but not limited to:

- Compliance reviews
- New employee, targeted, and annual refresher training programs
- Transit Mutual ride check program
- Internal audits and reviews of system safety performance

The Chief Safety Officer is responsible for identifying, tracking, and monitoring safety risk mitigations. The hazard log will be reviewed on a no less than a quarterly basis.

Section 3 – Safety Assurance

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

3.1 – Safety Performance

Safety Goals: General, long term safety targets encompassing a large-scale impact on the entire agency. An example of a Safety Goal would be "Develop an agency-wide safety culture utilizing the SMS framework and principals".

Safety Objectives: Specific statements that define measurable results. These objectives cover relevant aspects of Metro Transit's overall safety goals, management's commitment, realistic, measurable safety milestones, and desired outcomes. An example of a Safety Objective would be "Build a Safety Committee comprised of staff at varying levels from all units."

Targets: Safety performance targets are created in relation to each safety objective. Performance targets are measured and monitored in conjunction with the use of safety performance indicators.

Indicators: Safety performance indicators are generally data-based frequency of occurrence of events, incidents, or reports. The indicators chosen should correspond to and support the relevant safety objectives.

3.1 – Safety Event Investigation Process

Metro Transit investigates all safety events internally using established processes and supervisory personnel. For events involving law enforcement response, the responding agency (dependent on jurisdiction), will conduct their own investigation with the aid of Metro supervisory staff if needed. Metro has established relationships with various law enforcement agencies within the multiple jurisdictions of Metro's service area and although law enforcement conducts a separate investigation, lines of communication are maintained as well as the sharing of information. Metro's internal investigation is completed separate from law enforcement.

Metro also maintains a strong relationship with its insurance carrier, Transit Mutual Insurance. Transit Mutual may be called upon to aid in an investigation if needed.

Safety event investigations are initially conducted by an assigned supervisor and reviewed by the Chief Safety Officer. Causal factors are determined by the Chief Safety Officer in conjunction with the assigned investigating supervisor. The SPT will review all safety events and determine whether there is a need for further action. Causal factors, frequency of occurrence, severity, and consequences will be considered when determining whether to develop a mitigation or not. The Chief Safety Officer documents and closes all safety event investigations.

All reported safety events are reviewed by the Chief Safety Officer and either closed or moved into the investigation process.

3.2 – Safety Performance Measures

Performance measurement is the regular systematic collection, analysis, and reporting of data that track resources used, work produced, and whether specific outcomes were achieved.

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

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

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

3.2.1 Metrics

System safety data can be collected through a variety of sources, including:

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

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

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

- **Fatalities**
    1. Total number of reportable fatalities
    2. Rate of reportable fatalities per total vehicle revenue miles
- **Injuries**
    3. Total number of reportable injuries
    4. Rate of reportable injuries per total vehicle revenue miles

- **Safety Events**
    5. Total number of reportable safety events
    6. Rate of reportable safety events per total vehicle revenue miles
- **System Reliability**
    7. Mean distance between major mechanical failures

In addition, Metro will add the following area as a safety performance target, as recommended by FTA.

- **Major Events**
    - All safety and security major events as defined by NTD
    - All safety and security major events as defined by NTD, divided by VRM.

In 2024, FTA made its first major update to the PTASP regulation and added the following mandatory safety performance targets as part of the new safety risk reduction program.

- **Collision Rate**
    - This includes all collisions reported to the NTD, divided by VRM
- **Pedestrian Collision Rate**
    - This includes all collisions "with a person," as defined by the NTD, divided by VRM
- **Vehicular Collision Rate**
    - This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM
- **Transit Worker Fatality Rate**
    - This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," Transit Vehicle Operator," and "Other Transit Staff," divided by VRM
- **Transit Worker Injury Rate**
    - This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," Transit Vehicle Operator," and "Other Transit Staff," divided by VRM
- **Assaults on Transit Workers**
    - This includes all assaults on transit workers as defined by the NTD
    - This includes all assaults on transit workers as defined by the NTD, divided by VRM

These safety performance measures are used to select improvement targets for these eleven measures and for each mode of transit, to encourage improvements and monitor the safety performance of delivering transit services.

Metro Transit will make its safety performance targets available to the Wisconsin Department of Transportation and the Madison Area Transportation Planning Board (MPO). To the maximum extent practicable, Metro Transit will coordinate with both in the selection of safety performance targets. Targets will be adopted into local Transportation Improvement Plans (TIP) or TIP amendment.

The safety data collected from the previously noted sources will be analyzed by the Chief Safety Officer for potential safety impacts. Identified areas of concern will be reported to appropriate personnel in the form of specific project reports, memos, and recommendations from the Safety Planning Team and Safety Committee.

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

Metro Transit understands that if it fails to meet any of the safety performance targets under the safety risk reduction program it must allocate at least 0.75% of its section 5307 funds in the following fiscal year to safety-related projects eligible under section 5307 that are reasonably likely to assist the agency in meeting the target in the future. In addition, if Metro Transit does not meet an established target, it will assess the associated safety risk using the methods or processes established under section 673.25(c) and mitigate associated safety risk based on the results of the safety risk assessment.

3.3 - Integration

Metro Transit is committed to using the data collected and information learned to inform decision making and incorporate positive change. The main objective is the continuous improvement of system safety. When performance goals are not met, Metro Transit will work to identify why and what action can be taken to minimize the gap in achieving defined objectives and goals.

Uses of Performance Results include:

- Identify and focus on performance gaps
- Help make informed resource allocation decisions
- Identify training needs
- Development of a positive safety culture encompassing all employees
- Support planning efforts
- Identify best practices through benchmarks
- Accountability

3.4 - Monitoring Performance and Evaluating Results

Metro Transit will monitor system operations utilizing several different methods including but not limited to:

- Field observation

- Customer feedback
- New employee, targeted, and annual refresher training programs
- Transit Mutual ride check program
- Internal audits and reviews of system safety performance

The Chief Safety Officer monitors and reviews safety data reported internal safety programs; by employees, customer feedback, Safety Planning Team and the safety committee meeting minutes. After the review process, concerns are brought to SPT for analysis through the Safety Risk Management process.

The Safety Committee (SC)) is responsible for identifying, tracking, and monitoring safety risk mitigations. The processes listed above are some of the methods used to identify hazards and monitor performance of mitigations. SPT will maintain a hazard log and ensure the effectiveness of hazard mitigations based on observations and data. The hazard log will be reviewed on a no less than a quarterly basis.

3.5 – Sustaining SMS

Commitment to the Safety Management System principals and sustaining the program will rely on key concepts. Metro Transit will ensure that processes are established and maintained to instill an organizational foundation from the top-down.

- **Create a measurement friendly culture –** All staff should be actively engaged in promoting performance measurement as a means of continuous safety improvement. Senior managers will also lead by example and utilize performance metrics in the decision-making process.
- **Build Organizational Capacity –** Investment in developing skilled human resources (employees) is essential to sustaining a Safety Management System. Both technical and managerial skills will be needed for data collection and analysis. Managing staff and the governing board will commit the financial resources required for organizational capacity and maintenance of a SMS.
- **Reliability and Transparency –** The SMS will be able to produce, and report results both positive and negative. Performance information should be transparent and made available to all stakeholders. Messengers should be protected to preserve the integrity of the measurement system. The focus should be on improvement rather than blame.
- **Demonstrate continuous commitment to measurement and improvement –** Visible commitment to using metrics is a long-term initiative. Metro Transit will demonstrate a commitment to performance measurement by establishing a formal process of reporting performance results. Safety performance measurement is a standing agenda item at the City of Madison Transportation Commission meetings. Metro Transit is committed continuous safety performance improvement. Adherence to continuous review and assessment of Metro's safety performance utilizing SPT and the SRM processes to identify and address safety performance deficiencies is essential. This is under the direction of the Accountable Executive.

- **Management of Change –** Commitment to the management of change involves a pro-active approach to assessing changes that may introduce new safety hazards. Metro will utilize its Safety Planning Team to evaluate proposals utilizing the SRM processes. This process minimizes the number of new hazards that may impact safety performance and increase the safety risk to the public and employees. Metro develops service changes beginning in December from implementation the following August. SPT will evaluate proposed changes using the SRM process.

Each of these concepts will be examined and developed to arrive at the appropriate level for Metro Transit.

Metro Transit will allocate its safety set-aside in the following fiscal year to safety related projects eligible under 49 U.S.C. 5307 that are reasonably likely to assist the transit agency in meeting the safety performance target in the future.

Section 4 – Safety Promotion

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

4.1 - Safety Culture

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

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

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

2. **A Just Culture**
   - Employees know and agree on what is acceptable and unacceptable behavior
   - Human errors must be understood, but negligence and willful violations cannot be tolerated

3. **A Reporting Culture**
   - Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action

- When safety concerns are reported, they are analyzed, and appropriate action is taken

4. A Learning Culture

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

4.2 - Communication

Metro Transit has established channels to communicate with field employees. These channels will be utilized to convey information on hazards and safety risks relevant to employee roles and responsibilities. They will also be used as a means to communicate in response to reported hazards through the employee hazard reporting process.

- Newsletters
- Employee notification by internal mailbox
- Incident reporting
- Bulletin board postings
- Electronic displays
- On-board messaging and voice communications
- Mediated round table discussions during annual refresher trainings
- Text messages

Regular team meetings also promote communication across the organization. SPT and SMT meet bi-weekly and consist of representatives from all units. SC meets monthly. SPT communicates directly with the safety committee with channels to SMT.
All employees are encouraged to report concerns and hazards directly. Updates and hazard resolution are communicated back to the reporting employee directly by the employee's supervisor.

It has been established that Metro staff understands and supports employees in error and will provide tools and training to resolve and prevent future errors. All operators are required to attend and complete annual refresher training courses built around trends and information that may need to be communicated to drivers. Metro staff also conducts a "Safety Roundabout" exercise with all groups of operators attending refresher trainings (approx. 5-7 operators at a time). This has proven to be a very effective method to gather information and identify hazards. Reporting operators are also provided status updates throughout the hazard mitigation process.

4.3 – Training

The training unit is comprised of Training Specialist and sixteen operator/instructors within the operations unit. Instructors operate buses between training sessions and development. The operations management team oversees planning, organization, and all training unit operations.

New Employee Training

Metro Transit utilizes US Department of Transportation – Transportation Safety Institute (TSI) operator training curriculum for all new employees required to possess a Commercial Driver's License. This training is completed by both represented and non-represented, supervisory, employees within the Operations and Maintenance units.

Operator Refresher Training

All bus operators are required to attend annual refresher training. This training is typically comprised of 2 to 3 sessions per day with groups of 5 to 7 bus operators. The training curriculum is developed annually by the Operations Management Team, Training Specialist and Instructor staff. It is based on safety trends, customer feedback, and any other issues that may have developed over the course of the year. All Metro Transit employees are required to attend harassment training on a tri-annual basis which would also be conducted during the refresher training timeframe. Annual refresher training will include the topic of de-escalation and safety concern identification and reporting.

Transportation Safety and Security Program Certificate (TSSP)

The Safety Coordinator and 2 Operations Managers have completed and received their TSSP certificate. 2 Operations Supervisors are working toward their TSSP certificates.

Public Transportation Safety Certification Training Program Certificate (PTSCTP)

The Safety Coordinator has completed TSI's PTSCTP certificate.

TSI Instructors Course for Transit Trainers

One Operations manager and most operator/instructors possess the TSI Instructors Course for Transit Trainer certificate. Operator/Instructors are sent to this course as part of their initial training when the course is available.

Maintenance Training

All bus mechanic employees are required to attend New Employee Training which includes the topic of de-escalation before beginning training in their areas. Upon completion of the new employee training program, mechanics train with their peers across all jobs within their job classification. Maintenance staff also conduct refresher training on an annual basis which will include the topic of de-escalation. Original equipment manufacturer (OEM) training will be conducted as needed or new technology is introduced. The designated Maintenance Supervisor oversees all maintenance unit training and maintains all required training certifications.

Paratransit Contractors

All contracted paratransit service providers are required to maintain an employee safety training program. These documents are on file with Metro Transit.

Section 5 – Risk Reduction Program

5.1 Purpose

This program is designed to improve safety by reducing the number and rates of accident, injuries and assaults on transit workers, based on data submitted to the National Transit Database. This program will go into effect when the FTA updates the National Transportation Safety Plan with the three-year average and goals.

5.2 Process

The risk reduction program will include reduction of vehicular and pedestrian accidents involving buses. As part of this program, Madison Metro will address measures to reduce visibility impairments for bus operators that contribute to accidents, including retrofits to existing buses and specifications for future procurements that reduce visibility impairments. This program will also address the mitigation of assaults on transit workers.

Section 6 – Exposure to Infectious Diseases Plan

6.1 Purpose

The purpose of the Exposure to Infectious Diseases Plan is to provide leadership and staff of Madison Metro Transit with guidance that will be both necessary and critical to contain and minimize the organizational impact of an outbreak of disease. Contagious Virus or infectious diseases emergencies can range from the naturally occurring illnesses to emerging infectious diseases (e.g., SARS, avian influenza) or intentional acts of bioterrorism (e.g., anthrax). The circumstances of these emergencies vary by type, magnitude of exposure, and means of transmission. Planning and preparing in advance are essential activities to delivering an effective response to this type of emergency.

6.2 Scope

This plan and its resulting actions are intended to align with the guidelines put forth by the Centers for Disease Control and Prevention (CDC) and Public Health – Madison and Dane County to minimize exposure to infectious diseases. The goal of this plan is to ensure that there is an understanding of the contagious virus and then to curtail the negative effects upon the organization, and the health of its personnel and customers.

6.3 Mitigations and Strategies

In the event of an outbreak of disease, Madison Metro will follow the guidelines put forth by the CDC and Public Health – Madison and Dane County. We will also utilize the strategies and

mitigations outlined in the City of Madison Pandemic Influenza Incident Plan and Metro's Continuity of Operations Plan (COOP).

Section 7 – Driver Assault Prevention Plan

7.1 Purpose

The purpose of the Driver Assault Prevention Plan Section is to provide leadership and staff of Madison Metro Transit with guidance that will be both necessary and critical to reduce the occurrences of driver assaults. Madison Metro Transit is aware that driver assaults are continuing to rise nationwide and committed to reducing the occurrence and/or likelihood of assaults through engineering and administrative controls. Planning and preparing in advance are essential activities to delivering an effective prevention and if necessary, response to this type of emergency.

7.2 Process

The Safety Planning Team will review all driver assault incidents to develop and implement recommended mitigations to leadership. The committee will also look for any and all areas in which driver security can be increased to discourage the likelihood of assault incidents occurring.

7.3 Mitigations and Strategies

As these mitigations and strategies are implement and developed, they will be added to the ASP as addendums. To date, the committee has implemented the following mitigations:

- Assault Awareness and De-Escalation training has been delivered to all Motor Coach Operators and Fleet Maintenance Technicians. It will be provided to all new Motor Coach Operators and Fleet Maintenance Technicians as part of on-boarding training.
- Signs have been placed on all buses to discourage the public from assaulting drivers.
- Driver Barriers are currently on all but 15 of our buses and will be installed on all new bus builds moving forward.