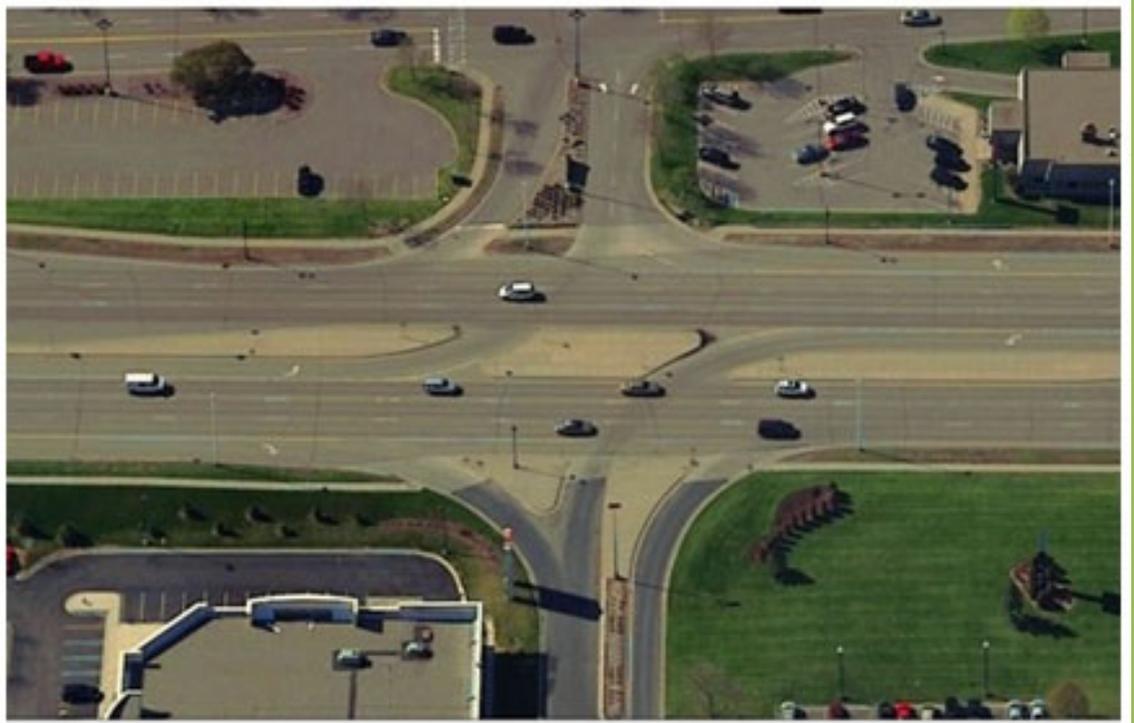


Orange County Transportation Services Agency Safety Plan



2022

Orange County Transportation Services

Orange County, NC

9/6/2022

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I. Agency Information

Transit Agency Name	Orange County Public Transportation			
Transit Agency Address	600 NC Highway 86 Hillsborough, NC 27278			
Name and Title of Accountable Executive	Nishith Trivedi, Orange County Transportation Services Interim Director			
Name of Chief Safety Officer or SMS Executive	Benjamin Clark, Transportation Administrator			
Mode(s) of Service Covered by This Plan	Bus	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5339, 5310, 5311	
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route Bus Transit , Complimentary Paratransit, Demand Response, Micro-Transit (Mobility-on-Demand)			
Does the agency provide transit services on behalf of another transit agency or entity?	Yes <input checked="" type="checkbox"/>	No	Description of Arrangement(s)	Coordinate regional transit needs in partnership with Go Triangle, Chapel Hill Transit (CHT) and Piedmont Authority on Regional Transportation (PART)
Description of Services	Orange County Transportation Services provides demand response services and operates three fixed routes with complimentary paratransit and Mobility-on-Demand.			

The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA’s Public Transportation Safety Program and the National Public Transportation Safety Plan.

II. Plan Development, Approval and Updates

Name of Entity That Drafted This Plan	Orange County Transportation Services	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
Approval by the Orange County Board of County Commissioner	Name of Individual/Entity That Approved Plan	Date of Approval
	Orange County Board of County	
	Relevant Documentation (title and location)	
	Governing Body Adopting Resolution	
Certification of Compliance	Name of Individual/Entity That Approved Plan	Date of Certification
	Relevant Documentation (title and location)	

Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	New Document	

Annual Review and Update of the Public Transportation Agency Safety Plan
<p>OCTS management will review the ASP annually, update the document as necessary, and implement the changes within a timeframe that will allow the agency to submit the annual self-certification of compliance in a timely manner and no later than July 15. Annual self-certification will consist of the Executive Director reviewing, approving and signing the document and submitting to the OCTS Board for their approval. Necessary updates outside the annual update window will be handled as ASP addenda which will be incorporated in the body of the ASP. The OCTS ASP updates will be shared with the relevant MPOs, FTA and NCDOT.</p>

III. Safety Performance Targets

Performance Measures:

SAFETY PERFORMANCE MEASURE: FATALITIES (total number of reportable fatalities and rate per total vehicle revenue miles by mode).

- Customers, employees and the public
- DATA – Fatalities by mode and Revenue miles by mode

SAFETY PERFORMANCE MEASURE: INJURIES (total number of reportable injuries and rate per total vehicle revenue miles by mode)

- Customers, employees and the public
 - DATA – Accidents with injuries by mode DATA – Revenue miles by mode
- SAFETY PERFORMANCE MEASURE: SAFETY EVENTS (total number of reportable events and rate per total vehicle revenue miles by mode)
 - Combined above with reportable incidents for customers, employees and the public
 - DATA – Safety incidents by mode and Revenue miles by mode
 - DEFINE – Safety incident vs. other incidents
- SAFETY PERFORMANCE MEASURE: SYSTEM RELIABILITY (mean distance between major mechanical failures by mode)
 - Relationship with TAM Plan – State of Good Repair (SGR) by mode
 - DATA – Definition of system SGR in TAM
 - DATA – Annual target data by mode
 - DATA – Reference to TAM plan policies impacting system reliability
 - DATA – Include annual System Reliability
 - DATA – Revenue miles by mode
 - DATA – Major mechanical failure by mode with dates
 - DEFINE – Major mechanical failure
- Towed from service
- Greater than \$X of repairs
- Greater than X days out of service

Safety Performance Targets							
<i>Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.</i>							
Mode of Transit Service	Fatalities	Fatality (per 100k VRM)	Injuries	Injuries (per 100k VRM)	Safety Events	Safety Events (per 100k VRM)	System Reliability
Fixed Route Bus	0	0	1	1	1.5	1.5	2
Demand Response	0	0	1	1	1.5	1.5	2
Safety Performance Target Coordination							
<p>The Accountable Executive and Board of Directors shares the OCTS ASP, including safety performance targets with the North Carolina Department of Transportation (NCDOT), Burlington/Graham MPO and Durham Chapel Hill Carrboro MPO, year after the board have adopted the plan and OCTS staff have assured that its content has met the requirements of CFR 49, part 673; <i>Public Transportation Agency Safety Plan.</i></p>							
Targets Transmitted to the State	State Entity Name			Date Targets Transmitted			
	Integrated Mobility Division NCDOT						
Targets Transmitted to the Metropolitan Planning Organization	Metropolitan Planning Organization Name			Date Targets Transmitted			
	Burlington/Graham Urban Area MPO						
	Durham Chapel Hill Carrboro MPO						

IV. Staff and Public Process

Staff Involvement
<p>The ASP contains feedback received from front line workers (e.g., drivers and dispatchers) along with operation and leadership staff. Drivers filled out a survey (Appendix) and participated in periodic staff meetings with leadership. Survey results are highlighted below:</p> <ul style="list-style-type: none"> • Communicating the purpose and benefits of the Safety Management System (SMS) to all managers, supervisors, and employees.
Public Process
<p>The ASP was approved through a public process using the following steps:</p> <ul style="list-style-type: none"> • July 20, 2022 - Original ASP presented to Orange Unified Transportation Board (OUTBoard). <ul style="list-style-type: none"> ○ Each OUTBoard meeting is open to the public, no comments were received by OUTBoard on the ASP. • August 17, 2022 – Revised ASP presented to OUTBoard for recommendations to BOCC • September 2, 2022 – BOCC action
Driver Feedback
<p>Hard copies of the 2022 Agency Safety Plan were provided to the driver’s breakroom. Drivers were encouraged to review the plan and provide any feedback.</p> <ul style="list-style-type: none"> • No comments were received from drivers during this update.

V. Safety Management Policy

Safety Management Policy Statement

The Orange County Board of County Commissioners and Transportation Services Director strive to provide a safe environment for employees, customers and guests of OCTS facilities and services. OCTS aims to support a robust safety culture, and achieve a high level of safety performance. We also work to ensure that all employees are provided with adequate and appropriate safety information and training. We have established safety performance targets to help us measure the overall effectiveness of our processes.

OCTS is committed to the following safety objectives:

- Communicating the purpose and benefits of the Safety Management System (SMS) to all managers, supervisors, and employees.
- Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through OCTS's Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.
- Identifying hazardous and unsafe work conditions and analyzing data from all sources. (After analyzing provided data, the OCTS Safety Committee will develop processes and procedures to mitigate safety risk to an acceptable level.)
- Establishing safety performance targets that are realistic, measurable, and data driven. Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective

Safety Management Policy Communication

Employee engagement is crucial to a functioning Safety Management System (SMS). Communication is in place to enable awareness of OCTS safety objectives/safety performance targets as well as to provide on-going safety communication up, down, and across the organization. Management proactively engages employees and works to keep the lines of safety communication honest and open. All employees are made aware of the importance of OCTS's SMS through the distribution of OCTS's Safety Management Policy Statement to each employee. OCTS also posts copies of the Safety Management Policy Statement in all facilities.

Employee Safety Reporting Program (ESRP)

OCTS is committed to the safest transit operating standards possible. To achieve this, it is imperative that OCTS have uninhibited reporting of all incidents and occurrences which may compromise the safe conduct of our operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. OCTS encourages employees who identify safety concerns in their day-to-day duties and to report them to senior management in good faith without fear of retribution.

OCTS encourages participation in the ESRP by protecting employees that report safety conditions in good faith. However, OCTS may take disciplinary action if the safety report received by OCTS is from a source other than the employee, or involves an illegal act, gross negligence, or a deliberate or willful disregard of promulgated regulations or procedures.

Authorities, Accountabilities, and Responsibilities**Accountable Executive**

The Transportation Services Director serves as OCTS's Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:

- Responsible for ensuring an SMS culture for OCTS operations employees
- Controls and directs human and capital resources needed to develop and maintain the ASP and SMS and 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
- Designates a Chief Safety Officer who reports directly to the Accountable Executive

Chief Safety Officer or SMS Executive

The Accountable Executive designates the Director of Commuter Operations as OCTS's Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:

- Promotes safety awareness throughout the organization ensuring that safety management has a high priority;
- Ensures that ASP documentation is current and accessible to all employees, communicating changes to all personnel;
- Monitors the effectiveness of safety mitigations;
- Provides Safety Risk Management advice and supports the Executive Director and personnel who conduct and oversee Safety Assurance activities.

Agency Leadership and Executive Management

Agency Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of OCTS's SMS under this plan. OCTS Agency Leadership and Executive Management include:

- Transportation Administrator
- Transit Operations Manager
- Transit Operations Supervisor

OCTS Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:

- Participate as members of OCTS's Safety Committee as called upon;
- OCTS Safety Committee: Reported safety hazards are evaluated by the Safety Committee. Safety Committee members include the Chief Safety Officer, Operations Manager, Safety/Training Manager and the Field Operations Specialist.
- Oversee day-to-day operations of the SMS in their departments;
- Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executive or the Chief Safety Officer.

The Safety/Training Manager has the following additional authorities, accountabilities, and responsibilities:

- Provides safety related training to employees;
- Maintains full knowledge of all standard and safety operating procedures;
- Ensures that employees make safety a primary concern when on the job;
- Listens and acts upon any safety concerns raised by OCTS staff;
- Oversees day-to-day implementation and operation of OCTS's SMS; and
- Maintains OCTS's Safety Event Log.

The Transit Operations Manager has the following additional authorities, accountabilities, and responsibilities:

- Monitors OCTS's Safety Event Log and analyzes trends in hazards, occurrences, incidents, and accidents to maintain OCTS's Critical Asset Vulnerability Action Report as part of Safety Risk Management (SRM); and
- Identifies substandard performance in OCTS's SMS and develops action plans for approval by the Accountable Executive.
- Chairs the OCTS Safety Committee and coordinates quarterly meetings.

Key Staff

OCTS relies on Dispatch/Supervisors, Operators and Mechanics Technicians as front-line safety personnel take part in monthly Safety Meetings in support of the SMS:

- Safety Committee: All Safety Events are discussed as well as any activities that have been put in place to prevent future occurrences. Facility inspections and any hazards identified are also discussed. This committee's members include the Safety/Training Manager (chair), at least one Dispatch/Supervisor and one or more of the Transit Operators and Mechanics.

- All-Employee Safety Meetings: A permanent agenda item in monthly All- Employee Safety Meetings is dedicated to safety. Safety issues are discussed and documented. Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged.

Safety Training

Transit Operations Manager and Supervisor are certified by the Community Transportation Association of America (CTAA) and provide the following list of training to all transit operators:

- Passenger Assistance Safety and Sensitivity (PASS)
 - Wheelchair Securement
 - MDT Tablet
 - PASS safety
 - Ecolane
 - DA, Ambulatory
 - Non Ambulatory
 - Passenger Safety
 - Service Animal
-

VI. Safety Risk Management

Safety Risk Management Process

OCTS uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to OCTS's leadership. OCTS's SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary.

OCTS's Operations Manager leads OCTS's SRM process, working with OCTS's Safety Committee to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of OCTS's SRM process are documented in our Critical Asset Vulnerability Action Report and Assessment Log and referenced materials.

Safety Hazard Identification

Establishing effective hazard identification programs is fundamental to safety management at OCTS. Hazard identification can be reactive or proactive in nature. Occurrence reporting, incident investigation and trend analysis are essentially reactive. Other hazard identification methods actively seek feedback by observing and analyzing day-to-day operations. Common hazard identification activities include:

- Safety audits and inspections of vehicles and facilities;;
- Safety event and incident investigation and reporting;
- Review of vehicle camera footage;
- Results of training assessments;
- Review of performance data and safety performance targets;
- Observations from supervisors;
- Maintenance reports;
- OCTS ESRP
- Safety Committee, Drivers' and other staff meetings
- Evaluating safety related comments from customers and passengers;
- Federal Transit Administration (FTA) oversight

The practice of reporting and learning from accident precursors (drive-cam) is a valuable complement to other hazard identification practices. To be successful, hazard identification must take place within a just safety culture. Accident precursors are not only an opportunity to identify potential hazards, but also for supervisors to coach operators through various safety situations.

When a safety concern is observed by OCTS personnel it is reported to OCTS's Operations Manager—these reports are made in accordance with OCTS's employee reporting policy. OCTS's Operations Manager also receives customer comments related to safety, and the dispatch daily Operations Log. OCTS's Operations Manager reviews these sources for hazards and documents them in OCTS's Critical Asset Vulnerability Action Report.

OCTS's Operations Manager also may enter hazards into the Critical Asset Vulnerability Action Report based on their review of OCTS's operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

OCTS's Operations Manager may conduct further analyses of hazards and consequences entered into the Critical Asset Vulnerability Action Report to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment.

OCTS's Operations Manager will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities

Chief Safety Officer and Operations Manager will evaluate recommendations from the Safety Committee and any identified hazard that poses a real and immediate threat to life, property, or the environment will be brought to the attention of the Accountable Executive and addressed through the SRM process (with or without the full Safety Committee) for safety risk assessment and mitigation. This means that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or any state environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further SRM activity.

Safety Risk Assessment

Once hazards have been identified, OCTS will conduct an assessment to determine the potential consequences. Factors to be considered are the likelihood of occurrence, the severity of the consequences, and the level of exposure to the hazard. The Operations Manager and Safety Committee assess prioritized hazards using a Risk Assessment Matrix (RAM). Results of the risk assessment process will help determine whether the risk is being effectively managed by prioritizing combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- “High” hazard ratings will be considered unacceptable and require action from OCTS to mitigate the safety risk
- “Medium” hazard ratings will be considered undesirable and require OCTS's Safety Committee to make a decision regarding their acceptability
- “Low” hazard ratings may be accepted by the Chief Safety Officer without additional review.

The Operations Manager schedules safety risk assessment activities on the Safety Committee agenda. During the meeting, the Operations Manager reviews the hazard and its consequence(s) and reviews available information on severity and likelihood. The Chief Safety Officer and/or Operations Manager may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the Operations Manager will facilitate completion of relevant sections of the Critical Asset Vulnerability Action Report, using the OCTS Safety Risk Assessment Matrix, with the Safety Committee. The Operations Manager will document the Safety Committee's safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Critical Asset Vulnerability Action Report. The Operations Manager will maintain on file Safety Committee agendas, additional information collected, and the Critical Asset Vulnerability Action Report and Assessment Tool entries for a period of three years from the date of generation.

Safety Risk Mitigation

OCTS's Operations Manager and the Safety Committee also review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards. If the risks are unacceptable, OCTS will take steps to lower the risk to an acceptable or tolerable level, or to remove or avoid the hazard. The level of risk can be lowered by:

- Reducing the severity of the potential consequences;
- Reducing the likelihood of occurrence and/or;
- Reducing the exposure to that risk; or
- Some combination of 1, 2 or 3 above.

In general, OCTS will take the following safety actions to mitigate risk. These actions can be grouped into three broad categories, including:

- **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, etc.).
- **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.).
- **Behavioral Defenses:** These include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior.

OCTS's Operations Manager tracks and updates safety risk mitigation information in the Critical Asset Vulnerability Action Report and makes the Register available to the Safety Committee and to other OCTS staff upon request.

Safety Committee

The current Safety Committee consisted of the Transit Operations Manager and one driver. Hard copies of the ASP was provided to all the drivers in their break room. However, no feedback was provided. The Safety Committee further reviewed the ASP and approved it on July 31, 2022. Their approval is provided below.



TRANSPORTATION SERVICES DEPARTMENT
TRANSIT SAFETY COMMITTEE



31 JUL 2022

TO: Board of County Commissioners

FROM: OCPT Transit Safety Committee

SUBJECT: OCTS Agency Safety Plan (ASP) Approval Recommendation

This document (OCTS Agency Safety Plan) after being reviewed by all the members of the OCPT Transit Safety Committee is hereby being released and recommended with effect from July 2022 for final approval and adoption by the Orange County Board of County Commissioners (BOCC) for the purpose of all agency safety activities to be conducted henceforth.

Reviewed by:

Melonie Hill, Operator, Member	
Lesa Fleming, Operator, Member	
Recco Bullock, Dispatcher, Member	

I do hereby approve the ASP for the aforesaid purpose.

11 19 2022
 Chairman
 Jamael L. Wiley
 Transit Safety Committee

VII. Safety Assurance

Safety Assurance provides the necessary feedback to ensure that the SMS is functioning effectively and that OCTS is meeting or exceeding its safety objectives. Safety assurance requires a clear understanding of how safety performance will be evaluated, or in other words, what metrics will be used to assess system safety and determine if the safety management system is working properly. Having decided on the metrics by which success will be measured; safety management requires using these metrics within the organization for ongoing performance improvement.

Through our Safety Assurance process, OCTS:

Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;

- Investigates safety events to identify causal factors; and
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions.

Safety Performance Monitoring and Measurement

One purpose of the OCTS SMS is to ensure that OCTS is tracking and addressing safety concerns of all types that arise within OCTS services and facilities. OCTS has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures including:

Monitoring Activities:

- Facility and Bus Inspections
- Safety Meetings
- Training Activities
- Accident Investigation Reports
- Injury Reports
- Preventative Maintenance of Vehicles
- Comprehensive Vehicle Maintenance Review
- Ride-along Evaluations (Driver and Route)
- Security Officers and Cameras

The safety data collected from the above sources will be analyzed by OCTS for potential safety impacts. Data are compared against performance trends by the Operations Manager to determine where Actions needs to be taken. OCTS is committed to using the data collected and information learned from mitigation efforts to inform decision making and instill positive change. The main objective of all safety mitigations is the improvement of transit system safety. The mechanism for monitoring safety risk mitigations varies depending on the mitigation. OCTS's Operations Manager and OCTS's Safety Committee monitor operations to identify mitigations that may be ineffective, inappropriate, or not implemented as intended.

When performance goals are not met, OCTS will work to identify why such goals were not met and what actions can be taken to minimize the gap in achieving defined goals.

- Identify why the mitigations were unsuccessful
- Identify unrealistic expectations that may have been hampering process
- GAP analysis
- Create new mitigation strategies
- Help make informed resource allocation decisions
- Identify improvements
- Reassessment

Internally reported safety concerns can be recorded through an incident report or through the ESRP. These safety concerns are either handled immediately by the Safety/Training Manager and/or brought to the attention of OCTS Safety Manager and the Safety Committee as needed. All concerns are filed for data/record keeping purposes.

VIII. Safety Promotion

Competencies and Training

OCTS's Accountable Executive and Agency Leadership must complete FTA's SMS Awareness online training and an executive session on safety management sponsored by CT's transit insurance pool.

OCTS's safety training program applies to all employees directly responsible for safety, including:

- Bus vehicle operators,
- Dispatchers,
- Maintenance technicians,
- Managers and supervisors, and
- Safety/Training Manager

Basic training requirements for OCTS's employees, including frequencies and refresher training, are documented by the Safety/Training Manager.

Operations safety-related skill training includes the following:

- New-hire bus vehicle operator classroom and hands-on skill training,
- Bus vehicle operator refresher training,
- Bus vehicle operator retraining (recertification or return to work),
- Classroom and on-the-job training for dispatchers,
- Classroom and on-the-job training for operations supervisors and managers,
- Accident investigation training for operations supervisors and managers.
- Driver Evaluations,
- Personal Protective Equipment,
- Lockout/Tagout training
- Bloodborne Pathogens and
- NCDOT Minimum Safety Standards

Vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance technician skill training,
- Ongoing skill training for vehicle maintenance supervisors,
- Personal Protective Equipment,
- Bloodborne Pathogens,
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
- Lockout/Tagout training

Safety Communication

OCTS believes safety promotion is critical to the success of an SMS and aids in ensuring that the organization understands 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.

OCTS's safety communication activities focus on requirements established in 49 CFR Part 673 (Part 673): That a transit agency must communicate safety and safety performance information throughout its organization which conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the employee safety reporting program.

OCTS maintains safety communication through:

- Employee trainings,
- Safety Communication Board,
- Daily Safety Announcements/Messages,
- Monthly Safety Meetings for Drivers and Maintenance Techs,
- Driver Award Programs, and
- Safety section of employee handbook.

Positive safety culture must be generated from the top-down. 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 Transportation Services Director of OCTS. Employees must trust that they will have management support for decisions made in the interest of safety while recognizing that intentional breaches of safety will not be tolerated.

The primary goal of safety promotion at OCTS is to develop a positive safety culture that allows SMS to succeed. A

positive safety culture at OCTS is defined as one which is:

A. An Informed/Learning Culture

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

B. A Just Culture

- Employees know and agree on what is acceptable and unacceptable behavior per policies outlined in their respective employee handbooks; and
- Human errors must be understood but negligence and willful violations cannot be tolerated.

C. A Reporting Culture

- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action; and
 - When safety concerns are reported they are analyzed and appropriate action is taken.
 - Employees are updated on safety issues by management and safety reports are fed back to staff so that everyone learns the pertinent lessons.
-

IX. Risk Reduction Program

Risk Reduction Program and Control Process

The Risk Reduction Program and Control Process involves the analysis and corrective action taken to reduce the risk associated with an identified hazard to the lowest practical level. Using the assessment and evaluation results, hazards are mitigated to an acceptable level by one or more of the below described methods, also known as the hierarchy of controls:

Design for Elimination or Minimum Risk: Where possible, hazards will be eliminated through design. In many cases, hazards are inherent and cannot be eliminated through design. In other cases, eliminating the hazard is not practical or financially feasible. If the hazard cannot be eliminated, it will be reduced to an acceptable level by incorporating the principles of system safety, using fail-safe devices and principles in design, incorporating high-reliability system components, and using redundant or backup hardware and software devices.

Utilize Safety Devices: Hazards that cannot be eliminated or controlled through design selection shall be controlled to an acceptable level using fixed, automatic, or other protective safety design features or devices. These are permanent system design features that improve safety by automatically controlling the risk of hazard without human interaction. Provisions shall be made for periodic functional checks of safety devices.

Install Warning Devices: When either design or safety devices cannot effectively eliminate or control an identified hazard, warning devices can be used to detect the hazardous condition and to generate an adequate warning signal to correct the hazard or provide for personnel evacuation. Warning devices should be standardized to minimize the probability of incorrect reaction of personnel to these warning signals.

Develop Procedures and Instruction: When it is impossible or impractical to eliminate hazards through design selection or adequately reduce its associated risks through safety or warning devices, then approved procedures and training programs must be used. However, this is the lowest level of control, and relies on training to recognize the hazard and personnel actions to avoid the hazard. Procedures may include the use of personal protective equipment. Precautionary notations and warning signs must be standardized.

Hazard resolution often requires a combination of the methods of control. The use of warning, caution and other forms of written advisories alone to control undesirable risks will be carefully reviewed to ensure that no other additional measures are possible. Hazards classified as “unacceptable” are not permissible.

Accident Prevention Program

The Accident Prevention Program (APP) is the agency's written plan describing its total health and safety program to prevent accidents, illnesses, and injuries on the job. The program is tailored to the needs of OPTS Transit's workplace/operation and to the types of hazards involved.

This program covers the Employee Health and Safety group's responsibilities, and describes agency policy and general procedures concerning employee health and safety. Included programs, procedures, and processes:

- Job hazard analysis
- Safety inspections
- Safety reporting
- Accident investigation (employee injury/accident)
- Hazard control process
- Accident and incident recordkeeping
- Safety orientation
- Safety communication
- Hazard specific programs and plans
- SOPs to support the above programs and procedures

The APP is available to all employees and initially introduced to new employees during their initial Core Safety Training.

Preventing Assault on Transit Workers

The Bipartisan Infrastructure Law instituted recent changes to the Public Transportation Agency Safety Plan (PTASP) requirements at 49 U.S.C. § 5329(d) and establishes compliance deadlines for implementing these new provisions. One of these changes requires all public transit agencies update their ASP to include de-escalation or assault prevention training. OCTS provides its staff the following resource to obtain the necessary training:

- Federal Transit Administration (FTA) - [Assault Awareness and Prevention for Transit Operators](#)

X. Additional Information**Supporting Documents**

This PTASP was developed from information in other Orange County Public Transportation documents, policies and procedures and manuals. Those documents are listed below:

- Orange County Public Transportation Employee Handbook
 - Safety and Security Plan (SSP)
 - Vehicle Maintenance Plan
 - Facility Maintenance Plan
 - Training Manual
-

XI. Definitions in ASP

Term	Definition
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.
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; or an evacuation for life safety reasons, at any location, at any time, whatever the cause.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure belonging to OCTS; or damage to the environment.
Risk	Composite of predicted severity and likelihood of the potential effect of a hazard.
Risk Mitigation	Method(s) to eliminate or reduce the effects of hazards.
Safety Assurance	Processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
Safety Event	Is any accident, safety incident or safety occurrence (defined below).
Safety Incident	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 transit operations.

<p>Safety Management Policy</p>	<p>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.</p>
<p>Safety Management System</p>	<p>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.</p>
<p>Safety Occurrence</p>	<p>An event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt transit operations.</p>
<p>Safety Performance Target</p>	<p>A performance target related to safety management activities.</p>
<p>Safety Promotion</p>	<p>A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.</p>
<p>Safety Risk Assessment</p>	<p>The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.</p>
<p>Safety Risk Management</p>	<p>A process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.</p>
<p>Serious Injury</p>	<p>Any injury which: (1) requires hospitalization for more than 48 hours, commencing within 7 days from the date 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.</p>

XII. List of Acronyms

Acronym	Word or Phrase
ASP	Agency Safety Plan
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
SMS	Safety Management System
SRM	Safety Risk Management
VRM	Vehicle Revenue Miles
