

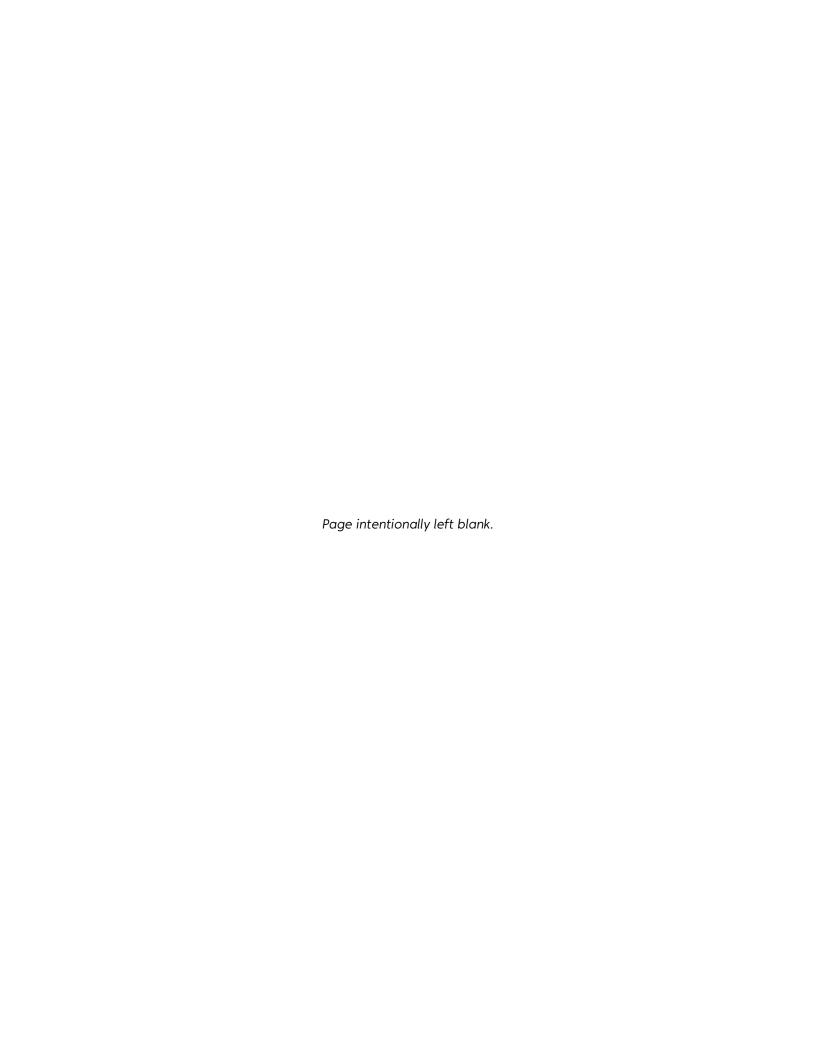
Public Transportation Agency Safety Plan (PTASP)

Fixed Route and Demand Response Public Bus Transit Services

> Prepared in accordance with the requirements of 49 C.F.R Part 673: Public Transportation Agency Safety Plan (PTASP) Final Rule

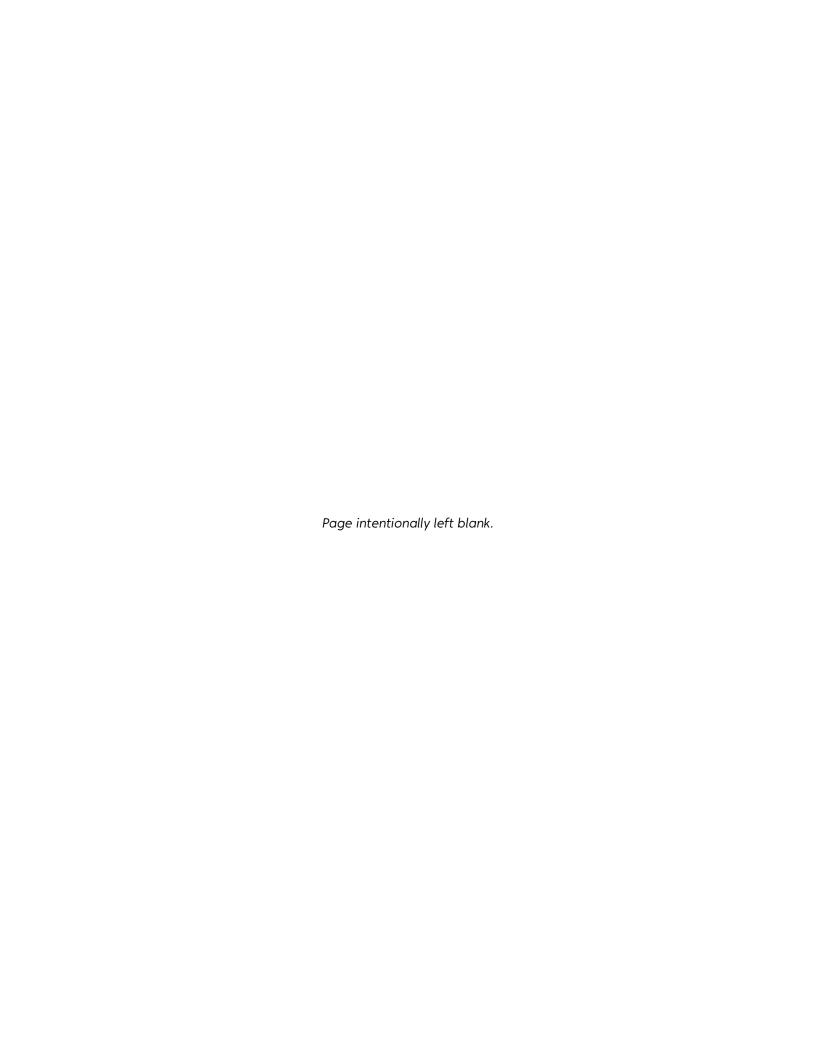
> > July 2022 R1 Update



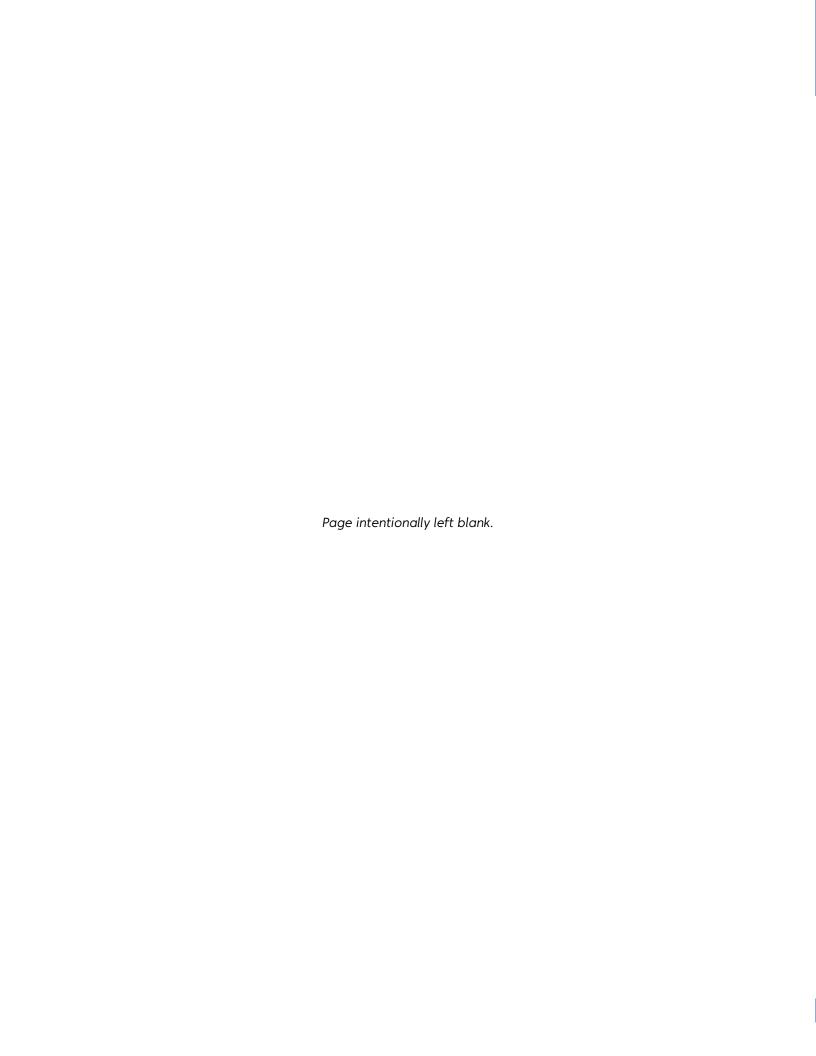


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#### Section 1 • Introduction

# Greater Bridgeport Transit Authority (GBT) Public Transportation Agency Safety Plan (PTASP)

Prepared in accordance with the requirements of 49 C.F.R Part 673: Public Transportation Agency Safety Plan Final Rule.

#### Applicability §673.1(a)

This Public Transportation Agency Safety Plan (PTASP) has been prepared by Greater Bridgeport Transit in accordance with, and meets the applicable requirements of, 49 C.F.R Part 673 (Part 673) and is in conformity with the National Public Transportation Safety Plan (NPTSP January 2017).

The requirement for the development, implementation and maintenance of this plan is applicable to GBT as a public transportation system that receives federal financial assistance under 49 U.S.C. Chapter 53.

This safety plan is the first iteration and is about the development of approaches and processes to address safety agency-wide. It is not an exhaustive list of every hazard known to GBT. As the agency's Safety Management System (SMS) matures, the plan will become more encompassing. It was developed and will be communicated and implemented by the agency's leadership whose authorities, accountabilities and responsibilities are detailed in the plan.

This plan addresses all applicable requirements and standards of the Federal Transit Administration's (FTA) Public Transportation Safety Program and the National Public Transportation Safety Plan (NPTSP).

#### **Transit Agency Information**

For the purposes of Part 673. The agency is considered a "Small Public Transit Provider"

#### **SMALL PUBLIC TRANSIT PROVIDER**

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

#### **Administrative and Maintenance Facilities**

Greater Bridgeport Transit Authority (GBT) One Cross Street Bridgeport, Connecticut 06610 Tel: (203) 366-7070

Email: dholcomb@gogbt.com

URL: gogbt.com

#### **Public Bus Station**



710 Water Street Bridgeport, Connecticut 06610 Tel: (203) 366-7070

Email: dholcomb@gogbt.com

URL: gogbt.com

#### Modes of Service Provided and Covered in this PTASP

#### Fixed Route - Directly operated

- Fleet 57
- Boardings 5.2M Annually

### Demand Response - Provided through contract with MV Transportation (as of this writing)

- Fleet 30
- Boardings 100,000 Driver Assisted, Door-to-Door Trips Annually

#### Funding Used in the Provision of Service by GBT

The agency is a designated recipient of federal funding. Federal funding under Sections 5307, 5339 and Various FTA Discretionary Grants are all used in the provision of the agency's public transportation services.

# Provision of Transit Services on Behalf of Other Transit Agencies

As of this writing, the agency does not provide any transit services on behalf of any other entity.

# Accountable Executive (AE) and Chief Safety Officer (CSO) §673.5 and §673.23(d)(1) and (2)

Section 673.5 requires PTASPs to identify both an Accountable Executive and a Chief Safety Officer. The Accountable Executive is the single person who has ultimate responsibility for carrying out the PTASP of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and has control or direction over the human and capital resources needed to develop and maintain the agency's PTASP. The Chief Safety Officer is an adequately trained individual who has responsibility for safety and reports directly to a transit agency's Accountable Executive. For GBT, these individuals include:

#### **Accountable Executive**

Douglas C. Holcomb, AICP General Manager/Chief Executive Officer dholcomb@gogbt.com

The Accountable Executive (AE) ensures the agency's SMS is effectively implemented and that action is taken, as necessary, to address substandard performance in the SMS. The AE has control and direction over the personnel and financial resources needed to develop and maintain the Agency Safety Plan (ASP or "the Plan") as well as the Transit Asset Management (TAM) Plan. The AE may delegate specific responsibilities. However, the ultimate accountability for GBT's safety performance cannot be delegated and always rests with the AE.

#### **Chief Safety Officer (CSO)**

Bernie Bausch, Manager of Transportation Operations bbausch@gogbt.com

GBT's Chief Safety Officer (CSO) is its Manager of Transportation Operations, designated by the AE with a direct line of reporting to the AE. The Manager of Transportation Operations/CSO has bottom-line responsibility for all aspects of the day-to-day operation of the Transportation Department including, but not limited to operational safety and the Department's efficiency and effectiveness. This position oversees all field supervision, dispatch operations, safety training, compliance with federal drug and alcohol testing requirements and procedures, the development of operator assignments, capital planning, operational budgeting, technology and communication systems and staffing. A copy of the CSO's complete job description is available from the CEO.

#### SAFETY MANAGEMENT SYSTEM (SMS)

A Safety Management System (SMS) is a comprehensive, collaborative approach to managing safety. It brings management and labor together to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more precisely.

### Leadership and Key Staff - Authorities, Accountabilities, and Responsibilities §673.23 (d)(4)

While every employee has a role to play in safety, key staff members, in addition to those serving as Accountable Executive and Chief Safety Officer include:

- Deputy General Manager/Chief Operating Officer
- Manager of Transportation Operations
- Assistant Manager of Transportation Operations
- General Manager Demand Response Division (MV Transportation)
- Manager of Maintenance Operations
- Assistant Manager of Maintenance Operations
- Manager of Facility and Grounds
- Risk Manager
- Director of Planning and Service Development
- Chief Financial Officer

The authorities, accountabilities and responsibilities of these key personnel are detailed on page 23 in the Section entitled "Safety Performance Monitoring and Measuring §673.27(b) (1-4)".

Collectively, these staff members represent positions of bottom-line responsibilities for their respective divisions. All have the following safety language in their job descriptions:

"Responsible for contributing to a safe and secure work environment. Is cognizant of surroundings and acts in a safe manner at all times. Is knowledgeable of and adheres to OSHA, GBT and other safety standards, directives and advisories, both written and verbal. Uses safety equipment and protective clothing as appropriate and necessary. Maintains good housekeeping habits in work area to avoid injury to self or others. Immediately reports to supervisor or risk manager any safety or security issue, and makes recommendations for improvement. Observes building access restrictions and locks doors when not present. Knows the nearest two safety exits and participates in safety drills."

Together, they represent GBT's Safety and Risk Management Leadership Group, detailed later in this report, and are responsible for the implementation of GBT's Safety Management System (SMS).

A copy of GBT's organizational chart is available from the office of the CEO.

It is important to note that GBT's demand contractors is housed in the same facilities as GBT's directly operated services, all maintenance and administration functions. As such, items posted throughout the facility reach all employees. Additionally, GBT's interacts with the contractor daily regarding all aspects of the operation including safety.

#### Plan Development, Approval and Updates §673.13

Under Part §673.13 (Certification of Compliance), GBT must certify that it has established a PTASP meeting the requirements within one year after July 19, 2019. Further, on an annual basis, GBT must certify its compliance with this part through its annual FTA Certifications and Assurances. This plan is approved and agreed to by the AE and approved by GBT's Board of Commissioners.

# Signature of Accountable Executive/ Certification of Compliance (§673.13)

See signature page near the end of this document, page 32.

#### Dates of Approval of GBT Board of Commissioners

- Initial Approval: June 10, 2020
- Annual Approval 2021
- Annual Approval 2022
- Annual Approval 2023
- Annual Approval 2024
- Annual Approval 2025

## Safety Management System Policy Statement §673.23(a)

The management of safety and security are core GBT functions and form the foundation for all services and operations. GBT is committed to developing, implementing, maintaining, and constantly improving safety functions and processes to ensure that all of our transit service delivery activities occur under a hearty and balanced allocation of organizational and financial resources, aimed at achieving the highest level of safety performance and meeting established standards and targets.

The GBT Board of Commissioners, all levels of management and all employees and contractors are accountable for the delivery of this highest level of safety performance, beginning with the General Manager/Chief Executive Officer (GM/CEO). GBT's CEO is the Accountable Executive and ensures that the Agency Safety Plan and SMS are effectively implemented and that actions are taken, as necessary, to address substandard performance in the SMS.

The Safety Management Policy below is GBT's documented commitment to safety, which defines GBT's safety objectives as well as the accountabilities and responsibilities of our employees in regard to safety.

Through this policy statement and efforts in support of its PTASP, GBT is committed is to:

- 1. Ensuring safety and security in our services for customers, staff and communities;
- Protecting facilities and assets;
- Supporting the management of safety through the provision of appropriate resources, that result in a
  culture that fosters safe practices, encourages effective employee safety reporting and communication,
  and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;

- 4. Integrating the management of safety among the primary responsibilities of all leaders, key staff and employees;
- 5. Clearly defining for all staff, managers and employees and contractors, their accountabilities and responsibilities for the delivery of GBT's safety performance and the performance of the SMS;
- 6. Establishing and conducting hazard identification and analyses, and safety risk evaluation activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a level consistent with expected safety performance and established targets;
- 7. Ensuring that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- 8. Complying with, and wherever possible exceeding, legislative and regulatory requirements and standards;
- 9. Ensuring that sufficient skilled and trained employees are available to implement safety management processes;
- 10. Ensuring that all employees are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are assigned only tasks commensurate with their skills;
- 11. Establishing and measuring our safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- 12. Continually improve our safety performance through management processes that ensure that appropriate safety management action is taken and is effective;
- 13. Ensuring externally supplied systems and services to support our operations are delivered or performed meeting our safety performance standards; and
- 14. Ensuring the proper retention of all safety related materials.

# Safety Management Policy and ASP - Dissemination and Communication §673.23(c)

This PTASP is a "living document", updated regularly, disseminated and in the possession of leadership staff. While GBT's leadership and key staff members were involved in the development of the plan elements, it is important that the plan be made available to others within GBT and the community. To ensure awareness and compliance with the plan, GBT has posted its Safety Management Policy in each division and taken the following steps:

- All department leaders receive a copy of the Plan and updates for dissemination to respective staff members;
- New employees are briefed on the contents of the Plan during on-boarding;
- GBT's Accountable Executive notifies all department leaders when revisions are made to the document;
- GBT presents the plan update annually at a regular public meeting of the Board of Commissioners;
- GBT's Plan is available to staff and members of the public at GBT's website gogbt.com;
- Copies of the Plan and any updates are made available in hardcopy in all departments;
- GBT includes a link from time-to-time on its internal newsletter known as "All Call".
- GBT's demand response contractor plays an important role in supporting and implementing GBT's PTASP. GBT provides a copy of its Plan to its contractor periodically and the contractor is responsible for ensur-

ing the dissemination of the plan to its staff. The General Manager of the contracted serves is a member of GBT's leadership management team and attends safety related meetings. Working within the same facility, she/he and has immediate access to GBT's management in the event of an emergency. The policy statement is posted throughout GBT's facilities and available to both GBT employees and any contractors working with GBT.

#### Additionally:

- A final copy of the PTASP has been transmitted to the regional Metropolitan Planning Organization;
- A final copy of the PTASP has been transmitted to the Connecticut Department of Transportation, Bureau of Public Transportation; and
- A final copy of the PTASP has been uploaded into the Federal Transit Administrations TrAMS System.

#### Safety Performance Targets §673.11(a)(3)

The Safety Performance Targets set forth in the section below were developed in consultation with the State of Connecticut Department of Transportation (CTDOT), the Metropolitan Council of Governments (METROCOG) and the Bridgeport/Valley Metropolitan Planning Organization and are derived from the Federal Transit Administration's (FTA) National Public Transportation Safety Plan (January 2017).

#### SAFETY PERFORMANCE TARGET (SPT)

A safety performance target is a quantifiable level of performance or condition expressed as a value for the measure related to safety management activities to be achieved within a set time period (§673.5). A safety performance measure is a quantifiable indicator of performance or condition that is used to establish targets related to safety management activities, and to assess progress toward meeting the established targets (§673.5).

#### **Definitions §673.5**

**Accident** - Means 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; whatever the cause.

**Incident -** Means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Occurrence - Means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

Serious Injury - Means 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.

**Event - Means any Accident, Incident, or Occurrence.** 

**Performance Target -** Means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a specific period of time.

### Section 2 • Safety Performance

### Safety Performance Target (SPT) - Means a Performance Target related to safety management activities.

As prescribed in the NPTSP, GBT has established, by mode, seven SPTs in four categories:

#### **Fatalities:**

- 1. The total number of fatalities reported to NTD.
- 2. Fatality rate per total vehicle revenue miles (VRM) for Fixed Route (FR) and Demand Response (DR).

#### **Injuries:**

- 3. The total number of injuries reported to NTD.
- 4. The rate per total VRM for FR and DR services.

#### **Safety Events:**

- 5. The total number of safety events reported to NTD.
- 6. The rate per total VRM for FR and DR services.

#### System Reliability:

7. Mean distance between major mechanical failures by mode.

# Fixed Route Safety Performance Measures and Targets

#### **Safety Performance Measure 1: Fatalities**

(Total number of reportable fatalities and rate per 100,000 vehicle revenue miles by mode)

Preventing fatalities is a top priority. Staff works continuously to understand the factors involved in any fatality in order to prevent further occurrences. Measuring the number of fatalities over vehicle revenue miles, by mode, provides a fatality rate from which to assess future performance.

| FR | Fatalities                     | 2019 | Target Goal |
|----|--------------------------------|------|-------------|
|    | Preventable                    | 0    | 0           |
|    | Non-Preventable                | 0    | 0           |
| 1  | Total                          | 0    | 0           |
|    | Rate Per VRM - Preventable     | 0    | 0           |
|    | Rate Per VRM – Non-Preventable | 0    | 0           |
| 2  | Rate Per VRM – All             | 0    | 0           |

#### Safety Performance Measure 2: Injuries

(Total number of reportable injuries and rate per 100,000 vehicle revenue miles by mode)

While GBT has had some success in the recent past in reducing the number of preventable accidents in its services, injuries do occur and can be attributed to a broad variety of conditions and circumstances. Analyzing the factors that relate to injuries is a significant step in developing actions to prevent them. Again, measuring the number of injuries by mode, over vehicle revenue miles provides an injury rate from which to assess future performance.

| FR | Injuries                       | 2019 | Target Goal |
|----|--------------------------------|------|-------------|
|    | Preventable                    | 9    | 9           |
|    | Non-Preventable                | 26   | 26          |
| 3  | Total                          | 35   | 35          |
|    | Rate Per VRM - Preventable     | .50  | .50         |
|    | Rate Per VRM – Non-Preventable | 1.45 | 1.45        |
| 4  | Rate Per VRM – All             | 1.95 | 1.95        |

#### Safety Performance Measure 3: Safety Events

(Total number of reportable events and rate per 100,000 vehicle revenue miles by mode)

The safety events measure captures all reported safety events that occur during transit operations and the performance of regular supervisory or maintenance activities. A reduction in safety events will support efforts to reduce fatalities and injuries, as well as damage to transit assets. Measuring the number of safety events by mode over vehicle revenue miles provides a safety event rate from which future performance can be compared.

| FR | Safety Events      | 2019 | Target Goal |
|----|--------------------|------|-------------|
|    | Preventable        | 32   | 32          |
|    | Non-Preventable    | 48   | 48          |
| 5  | Total              | 80   | 80          |
| 6  | Rate Per VRM – All | 4.46 | 4.46        |

#### Safety Performance Measure 4: System Reliability

(Mean distance between major mechanical failures by mode)

The system reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as mean distance between major mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. This is a measure of how well a fleet of transit vehicles is maintained and operated.

| FR | System Reliability                           | 2019          | Target Goal |
|----|--|---------------|-------------|
| 7  | Mean Distance Between<br>Mechanical Failures | 7,339 (Miles) | 7,000       |

#### **GBT Additional Performance Measures**

In addition to the performance measures and targets prescribed in the NPTSP, GBT has adopted three additional metrics:

- 8. Preventable Accident Rate
- 9. Driver Assaults
- 10. Threats Against Drivers



FTA has determined that the PTASP regulation is the best approach to achieving the statutory objective of protecting public transportation operators from the risk of assault...

— FTA Notice from Acting Administrator K. Jane Williams 5/24/2019

### Safety Performance Measure 8: Preventable Accidents

(Preventable Accidents per 100,000 Miles)

Part §673 defines an Accident as – "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; whatever the cause." In the case of every accident, GBT makes a determination regarding whether or not the accident/event was preventable. Understanding the cause and preventability is essential in refining policies, procedures and training, developing mitigation measures and determining discipline.

The CSO uses the National Safety Council (NSC) definition for a preventable accident: "The driver failed to do everything that they reasonably could have done to avoid a collision" and assigns a preventable/non-preventable grade to all accidents.

GBT's preventable accident rate is expressed as follows: Preventable Accidents/100,000 Miles (All Miles Traveled)

| FR | Preventable Accidents                        | 2019 | Target Goal |
|----|--|------|-------------|
| 8  | Average Monthly Preventable<br>Accident Rate | 1.7  | 1.5         |

#### Safety Performance Measure 6: Driver Assaults

The NPTSP recommends that transit agencies assess the need for protection of bus drivers:

"Preventing Transit Worker Assaults Rule - The FAST Act requires FTA to issue an NPRM to establish "rail and bus safety standards, practices, or protocols" for "protecting rail and bus operators from the risk of assault." In the proposed rulemaking, the Secretary shall consider different safety needs of drivers of different modes, differences in operating environments, the use of technology to mitigate driver assault risks, existing experience, from both agencies and operators that already are using or testing driver assault mitigation infrastructure; and the impact of the rule on future rolling stock procurements and vehicles currently in revenue service." (NPTSP January 2017 P.7)

GBT has added to its fleet, driver assault mitigation measures in the form of driver barriers. As of this writing, 61% of GBT's fixed route fleet is outfitted. GBT will incorporate driver protection barriers in all future procurements of fixed route buses.

| FR | Driver Assaults         | 2019 | Target Goal |
|----|-------------------------|------|-------------|
| 9  | Driver Assaults         | 0    | 0.00        |
| 10 | Threats Against Drivers | 0    | 0.00        |

# Demand Response Safety Performance Measures and Targets

#### **Safety Performance Measure 1: Fatalities**

(Total number of reportable fatalities and rate per 100,000 vehicle revenue miles by mode)

Preventing fatalities is a top priority. Staff works continuously to understand the factors involved in any fatality in order to prevent further occurrences. Measuring the number of fatalities over vehicle revenue miles, by mode, provides a fatality rate from which to assess future performance.

| DR | Fatalities                     | 2019 | Target Goal |
|----|--------------------------------|------|-------------|
|    | Preventable                    | 0    | 0           |
|    | Non-Preventable                | 0    | 0           |
| 1  | Total                          | 0    | 0           |
|    | Rate Per VRM - Preventable     | 0    | 0           |
|    | Rate Per VRM – Non-Preventable | 0    | 0           |
| 2  | Rate Per VRM – All             | 0    | 0           |

#### Safety Performance Measure 2: Injuries

(Total number of reportable injuries and rate per 100,000 vehicle revenue miles by mode)

While GBT has had some success in the recent past in reducing the number of preventable accidents in its services, injuries do occur and can be attributed to a broad variety of conditions and circumstances. Analyzing the factors that relate to injuries is a significant step in developing actions to prevent them. Again, measuring the number of injuries by mode, over vehicle revenue miles provides an injury rate from which to assess future performance.

| DR | Injuries                       | 2019 | Target Goal |
|----|--------------------------------|------|-------------|
|    | Preventable                    | 2    | 2           |
|    | Non-Preventable                | 3    | 3           |
| 3  | Total                          | 5    | 5           |
|    | Rate Per VRM - Preventable     | .39  | .39         |
|    | Rate Per VRM – Non-Preventable | 1.19 | 1.19        |
| 4  | Rate Per VRM – All             | 1.59 | 1.59        |

#### Safety Performance Measure 3: Safety Events

(Total number of reportable events and rate per 100,000 vehicle revenue miles by mode)

The safety events measure captures all reported safety events that occur during transit operations and the performance of regular supervisory or maintenance activities. A reduction in safety events will support efforts to reduce fatalities and injuries, as well as damages to transit assets. Measuring the number of safety events by mode over vehicle revenue miles provides a safety event rate from which future performance can be compared.

| DR | Safety Events      | 2019 | Target Goal |
|----|--------------------|------|-------------|
|    | Preventable        | 2    | 2           |
|    | Non-Preventable    | 6    | 6           |
| 5  | Total              | 8    | 8           |
| 6  | Rate Per VRM – All | 1.59 | 1.59        |

#### Safety Performance Measure 4: System Reliability

(Mean distance between major mechanical failures by mode)

The system reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as mean distance between major mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. This is a measure of how well a fleet of transit vehicles is maintained and operated.

| DR | System Reliability                           | 2019         | Target Goal |
|----|--|--------------|-------------|
| 7  | Mean Distance Between<br>Mechanical Failures | 15,598 Miles | 15,000      |

#### **GBT Additional Performance Measures**

In addition to the performance measures and targets prescribed in the NPTSP, GBT has adopted three additional metrics:

- 8. Preventable Accident Rate
- 9. Driver Assaults
- 10. Threats Against Drivers

#### Safety Performance Measure 8: Preventable Accidents

(Preventable Accidents per 100,000 Miles)

Part §673 defines an Accident as – "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; whatever the cause." In the case of every accident, GBT makes a determination regarding whether or not the accident/event was preventable. Understanding the cause and preventability is essential in refining policies, procedures and training, developing mitigation measures and determining discipline.

The CSO uses the National Safety Council (NSC) definition for a preventable accident: "The driver failed to do everything that they reasonably could have done to avoid a collision" and assigns a preventable/non-preventable grade to all accidents.

GBT's preventable accident rate is expressed as follows: Preventable Accidents/100,000 Miles (All Miles Traveled)

| DR | Preventable Accidents                        | 2019 | Target Goal |
|----|--|------|-------------|
| 8  | Average Monthly Preventable<br>Accident Rate | .39  | .39         |

#### Safety Performance Measures 9 and 10: Driver Assaults

The NPTSP recommends that transit agencies assess the need for protection of bus drivers:

"Preventing Transit Worker Assaults Rule - The FAST Act requires FTA to issue an NPRM to establish "rail and bus safety standards, practices, or protocols" for "protecting rail and bus operators from the risk of assault." In the proposed rulemaking, the Secretary shall consider different safety needs of drivers of different modes, differences in operating environments, the use of technology to mitigate driver assault risks, existing experience, from both agencies and operators that already are using or testing driver assault mitigation infrastructure; and the impact of the rule on future rolling stock procurements and vehicles currently in revenue service." (NPTSP January 2017 P.7)

| DR | Driver Assaults         | 2019 | Target Goal |
|----|-------------------------|------|-------------|
| 9  | Driver Assaults         | 0    | 0.00        |
| 10 | Threats Against Drivers | 0    | 0.00        |

### **Section 3 · Coordination & Reporting**

Safety Performance Measures/Targets - Coordination with the Metropolitan Planning Process §673.15(a) and (b)

#### **ABOUT METROCOG**

MetroCOG is a multi-discipline, regional planning organization with six member communities — Bridgeport, Easton, Fairfield, Monroe, Stratford and Trumbull — centered on the City of Bridgeport, Connecticut.

Under Part §673.15, GBT is required, to the maximum extent practicable, to coordinate with the Metropolitan Planning Organization (MPO) in the selection of the safety performance targets developed and used in this plan. GBT is a member of the Greater Bridgeport/Valley Metropolitan Planning Organization. In the development of the Safety Performance Targets detailed above, GBT met with representatives of MetroCOG including the Principal Planner and the Executive Director, and staff from the Connecticut Department of Transportation (CTDOT) on multiple occasions to transmit targets and present the draft plan. The details of the consultation are included in the table below.

# Safety Performance Target Coordination – State (CTDOT) and MPO

| Targets Transmitted to | Entity  | Date Targets<br>Transmitted   |
|------------------------|---|---|
| State of Connecticut   | Connecticut Department of<br>Transportation, Bureau of<br>Public Transportation | Consultation by Telephone: April, 22, 2020  Targets Transmitted: April 26, 2020  Plan Presented: May 21, 2020 |

| Targets Transmitted to                     | Entity   | Date Targets<br>Transmitted  |
|--|--|--|
| MPO/Metropolitan Council of<br>Governments | Greater Bridgeport/Valley<br>Metropolitan Planning<br>Organization | Targets Transmitted: April 26, 2020  Plan Presented to Staff: May 21, 2020  Plan Presented to Full Council of Governments: June 25, 2020 |

It is noteworthy that GBT has a strong working relationship with MetroCOG and is a voting member of the Greater Bridgeport/Valley MPO. Agency staff are consulted and involved in the development of the regional Unified Planning Work Program (UPWP) and the region's Long-Range Transportation Plan (LRTP).

#### METROPOLITAN PLANNING ORGANIZATION

A Metropolitan Planning Organization (MPO) is a federally mandated and federally funded transportation policy-making organization in the United States that is made up of representatives from local government and governmental transportation authorities. They were created to ensure regional cooperation in transportation planning. MPOs were introduced by the Federal-Aid Highway Act of 1962, which required the formation of an MPO for any urbanized area (UZA) with a population greater than 50,000. Federal funding for transportation projects and programs is channeled through this planning process. Congress created MPOs in order to ensure that existing and future expenditures of governmental funds for transportation projects and programs are based on a continuing, cooperative, and comprehensive ("3 C") planning process. Statewide and metropolitan transportation planning processes are governed by federal law (23 U.S.C. §§ 134–135). Transparency through public access to participation in the planning process and electronic publication of plans now is required by federal law. As of 2015, there are 408 MPOs in the United States.

#### **Employee Safety Reporting Program §673.23(b)**

GBT's safety reporting program allows all employees, including those with in-depth knowledge of facilities, equipment and operations to report unsafe conditions or events to management without fear or reprisal to assist in risk management and improve deficient systems or processes. Outreach materials located throughout GBT's facilities encourage a safe work environment and all employees are expected to report:

- Safety hazards in the operating environment;
- Policies and procedures not followed or not working as intended;
- Events that managers may not otherwise know about;
- Information about why a safety event occurred; and
- Information about industry trends related to safety.

#### **Risk Management Reporting Structure**

While all employees are encouraged to report unsafe conditions or operations, GBT has a hearty safety reporting structure which includes an Accident Investigation Committee, a Service Review Committee, a Staff Level Safety Committee and a Safety and Risk Management Leadership Committee. The work of these committees and other elements of GBT's safety reporting structure is described below.

- Accident Investigation Committee Accidents are investigated immediately by staff from the operations
  and other departments. Any safety issues identified during the investigation are addressed immediately if
  possible. GBT's Accident Investigation Committee meets generally monthly to review the accident investigation work of the staff. The identification of safety event causal factors which may have contributed to
  a safety event include, but is not limited to, equipment and infrastructure, environmental factors, factors
  outside of the control of the agency, human and organizational factors.
- Staff Level Safety Committee Led by GBT's Risk Manager and comprised of staff from all areas of service delivery (Operations, Facilities, Maintenance, Administration), the Staff Level Safety Committee meets monthly to provide the representatives of each division the opportunity to speak to safety issues relayed to them by their colleagues. These minutes are summarized and shared with leadership so that any areas of safety concern can be addressed.
- 3. Service Review Committee (SRC) Specific to GBT's Operations Division, this is an ad-hoc group assembled to discuss all aspects of bus operations and is comprised of drivers, trainers and union representatives. Members are encouraged to discuss any safety concerns they may have.
- 4. Customer Feedback An important element of the safety program is consideration of comments and complaints from passengers or other members of the community. GBT holds weekly meetings with key staff members (Maintenance, Planning and Operations) to review every complaint that is received by GBT's feedback portals (phone, web, social media and mail). Any safety concerns raised through this feedback is addressed by the appropriate staff.
- 5. Union Consultation and Communications Leadership works closely with members of Amalgamated Transit Union Local 1336 toward common ground on safety. Recently, and in cooperation with the Union, GBT installed protective driver barriers, the Protran pedestrian protection system and audio surveillance. Additionally, through work on the Service Review Committee (SRC), the union has the opportunity to participate in service planning the development of routes, stop locations and schedules.
- 6. Oversight Authorities The Connecticut Department of Transportation (CTDOT), Federal Transit Administration (FTA), U.S. Department of Transportation (U.S. D.O.T.), and other regulatory authorities provide information regarding hazard identification in the industry and inform GBT's safety program.

- 7. **Documentation** GBT will maintain documentation of employee or contractor reporting of hazards or safety concerns. This documentation may include, but is not limited to, notes placed in suggestion boxes, customer reports of safety concerns received through customer service, emails sent to GBT's hazard reporting email (safety@gogbt.com), OSHA inspections, in person meetings or calls placed to GBT's office of Risk Management, and the meeting summaries of the Safety Committee and Accident Review Committee.
- 8. Contractor Reporting of Safety Concerns While GBT's contractor for demand response services can, and is encouraged to, report safety concerns at any time, the current contractor, MV Transportation, has its own hazard reporting program and shares information from that program with GBT management at regular meetings or immediately if necessary.

#### **Anti-Retaliation Policy**

GBT does not permit retaliation against employees who raise or report safety concerns. GBT's approach to safety reporting is designed to receive and respond appropriately to employees' safety concerns (i.e., concerns about hazards) and to prevent and address retaliation against employees who raise or report concerns. GBT does not want hazards or safety concerns to go unreported because employees fear retaliation for reporting concerns or feel frustration over the lack of effective resolution of their concerns. An anti-retaliation approach enables all members of the workforce, including permanent employees, contractors and temporary workers, to voice their concerns without fear of retaliation. Such an approach not only helps staff ensure that they are following safety procedures and complying with federal, state and local laws related to safety, but also contributes to a positive workplace culture.

Employee Behavior Excluded from Protection – Protection following the disclosure of information related to safety or the reporting of hazards through formal or informal communication to management does not include a communication concerning policy decisions that lawfully exercise discretionary authority unless the employee providing the disclosure reasonably believes that the disclosure evidences— (1) any violation of any law, rule, or regulation; or (2) gross mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety or (3) if disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

#### Safety Risk Management (SRM) Process §673.25(a)

GBT has developed and implemented a Safety Risk Management (SRM) process for all elements of its public transportation systems. As of this writing, GBT's process is "decentralized" with employees performing SRM with the assistance of leadership and key personnel. This process includes:

- Safety Hazard Identification;
- Safety Risk Assessment; and
- Safety Risk Mitigation

#### **DEFINITIONS**

#### Risk:

- A measure of severity and likelihood combined.
- Predicted in the future, has not happened vet.
- Measures the potential effects of a hazard, not the hazard itself.

#### Hazard:

- A real or potential condition not an event.
- Real Hazard An observable condition.
- Potential Hazard Condition that does not exist, but could exist if a change is made in the system.

#### Consequence:

• Potential consequences are the focus of risk management.

#### **Event:**

- Something that happened, not a condition of system state.
- May reveal hazard(s).
- Used for reporting.

# Process for Safety Hazard Identification §673.25(b)(1) and (2)

There are numerous ways that GBT identifies safety concerns and risks in its system, along with the associated potential consequences.

1. Staff Observations and Direct Reporting to Supervision/Management - The first level of hazard identification is staff observation. All staff are encouraged to work safely and to report safety concerns to their supervisors. Drivers, maintenance staff, on-road supervisors, administrative staff, security and other contractors help GBT identify any elements that pose a safety concern. The following language has been incorporated into every GBT job description:

"Responsible for contributing to a safe and secure work environment. Is cognizant of surroundings and acts in a safe manner at all times. Is knowledgeable of and adheres to OSHA, GBT and other safety standards, directives and advisories, both written and verbal. Uses safety equipment and protective clothing as appropriate and necessary. Maintains good housekeeping habits in work area to avoid injury to self or others. Immediately reports to supervisor or risk manager any safety or security issue, and makes recommendations for improvement. Observes building access restrictions and locks doors when not present. Knows the nearest two safety exits and participates in safety drills."

- 2. **Staff and Contractor Inspections** Staff conduct regular inspections of operations. Driver trainers conduct in-service reviews of all operators annually. Maintenance and facility staff members conduct vehicle, equipment and facility inspections regularly. GBT hires numerous contractors to inspect its facility systems to identify safety concerns or items which may impact service reliability.
- 3. **Staff Reporting** Individual and Through Committee Detailed in this plan, GBT has a hearty safety committee structure which provides avenues for all staff to report safety concerns.
- 4. **Customer Reporting** GBT relies heavily on reports of safety issues from its riders and other members of its community. With new surveillance systems on-board, GBT is able to follow-up on customer complaints, address concerns and inform driver training programs.
- 5. **Safety and Operational Metrics** Insurance experience, injury settlements, preventable accidents, accident contributing factors, and maintenance experience.
- 6. **Compliance Audits** From time-to-time, GBT's Risk Manager will retain the services of an outside contractor to conduct audits for compliance with federal and state regulations (OSHA). The outcome of these inspections informs GBT's operations, facilities, training and capital programs.
- 7. **Operations and Facility Inspections** From time-to-time, staff will retain the use of a contractor to conduct specific types of safety reviews such as facility security and active shooter planning.
- 8. **Industry Trends** Staff monitors industry trends regarding emerging safety issues such as protecting drivers from assault and protecting pedestrians from turning vehicles.
- 9. **Equipment Vendors** GBT maintains close relationships with its vehicle and equipment vendors for notifications regarding equipment safety concerns.
- 10. **Security Staff** GBT contracts for security services at its public bus facility. The security contractor reports any safety or security issues observed by guards.
- 11. Hazard Analysis and Documentation Staff in various departments are involved in the analysis and documentation of identified/reported hazards. Documentation includes tracking of the agency safety experience against established targets, GBT's risk assessment registry, and various meeting summaries.

# Process for Safety Risk Assessment §673.25(c)(1) and (2)

GBT has established methods and processes to assess the risks associated with identified hazards. This includes an assessment of the likelihood and severity of the consequences of the hazards, mitigations, and a general prioritization of the hazards based on the identified safety risk. This process applies to GBT's demand response contractors, to the extent that hazards are reported to GBT management by GBT's contractor or its staff. The formal process of risk assessment is typically undertaken by the leadership team from the department from which the potential hazard was reported, with the assistance of GBT's Risk Manager. It is noteworthy that GBT may reduce safety risk including the likelihood and/or severity of the consequences of a hazard, however, a single safety risk mitigation measure may not do both.

Once a safety concern, risk or hazard is identified, GBT will generally look at the following for assessing risk:

- Assess Likelihood of Occurrence Eliminate any risks which, after consideration, staff believes will occur. Roughly classify the remaining risks as very likely or not likely to occur.
- Assess Severity of Impact Evaluate each risk in terms of its possible impact on GBT's operations, employees and customers. Eliminate any risks, which staff believes have no, or only trivial impact on services or safety. Roughly classify the remaining risks as large or small impact.
- Impact Horizon Assign either short term or long term. The ultimate goal is to assign a precise date when you expect the potential risk event to occur.
- **Controllability** Staff also reviews the extent to which the event or activity is within the control of GBT or subject to the influence of forces beyond the control of the agency.
- Prioritize Risk On the basis of the rough assessments, staff assigns a prioritization number for the potential risk event/activity using the likelihood of occurrence severity of impact, the impact horizon, and controllability.

#### Risk Assessment Matrix

| Severity/<br>Likelihood | 1<br>Catastrophic | 2<br>Critical | 3<br>Marginal | 4<br>Negligible |
|-------------------------|-------------------|---------------|---------------|-----------------|
| A - Frequent            | High              | High          | High          | Medium          |
| B - Probable            | High              | High          | Medium        | Medium          |
| C - Occasional          | High              | Medium        | Medium        | Low             |
| D - Remote              | Medium            | Medium        | Low           | Low             |
| E - Improbable          | Medium            | Low           | Low           | Low             |

Source: PTASP Participant Guide, Providence, RI January 2020.

#### Where:

**Frequent =** Likely to Occur Frequently

**Probable =** Likely to Occur Several Times

Occasional = Likely to Occur Sometime

Remote = Very Unlikely to Occur

**Improbable =** Almost inconceivable that the event will occur

#### And where:

**Catastrophic** = Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact or monetary loss equal to or exceeding \$10M.

**Critical** = Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M.

Marginal = Could result in one or more of the following: injury or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1M.

**Negligible =** Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact, or monetary loss less than \$100K.

And where the outcomes are defined as:

High Risk = Unacceptable - Action is required. Safety risk must be mitigated or eliminated.

**Medium Risk = Undesirable –** Management decision. Leadership must decide whether to accept the risk with monitoring or require additional action.

**Low Risk = Acceptable** with review/monitoring. Safety risk is acceptable while pending management review or while being monitored.

#### Process for Risk Mitigation §673.25(d)

GBT has adopted risk mitigation handling options which include:

**Low Risk - Assume/Accept:** Acknowledge the existence of a particular risk, and make a deliberate decision to accept it without engaging in special efforts to control it. Approval of project or program leaders is required.

Low Risk - Monitor: Monitor the environment for changes that affect the nature and/or the impact of the risk

Medium Risk - Control: Implement actions to minimize the impact or likelihood of the risk.

**High Risk - Avoid:** Adjust program requirements or constraints to eliminate or reduce the risk. This adjustment may involve a change in funding, schedule, or technical requirements.

**Medium or High Risk - Transfer:** Reassign organizational accountability, responsibility, and authority to another stakeholder willing to accept the risk.

A copy of GBT's "Risk Assessment Register" spreadsheet is maintained, and available from, GBT's Risk Manager. The register includes the following fields:

- Hazard Description
- Hazard Type (Technical, Operational, Environmental, Other)
- Identification Date
- Analysis Date
- Potential
- Existing Mitigation(s)
- Severity
- Likelihood
- Risk Assessment Index Outcome (A1, E4 etc.)
- Further Mitigation Actions
- Revised Assessment Index Outcome
- Revised Assessment Date
- Department Responsible for Mitigation
- Estimated Completion Date
- Contact Person

#### Process for Safety Assurance §673.27(a)

GBT's safety assurance process has been prepared to ensure that safety mitigation measures are implemented and effective. This is accomplished through the collection of data and information, the analysis of trends and patterns and comparison to safety performance targets and indicators.

# Safety Performance Monitoring and Measuring §673.27(b) (1-4)

GBT continuously monitors its operations, facilities and grounds and maintenance divisions in order to understand safety performance to assess the extent to which GBT is meeting safety objectives and targets. While GBT has a designated Risk Manager, the responsibility for the monitoring of mitigation measures typically falls under the direction of the cognizant department head (Administration, Contractor, Maintenance, Facilities, Planning, Operations). These leadership positions monitor the sufficiency of procedures and help the agency to ensure that the procedures have the desired outcomes. Division leaders and their respective authorities, accountabilities and responsibilities are detailed in the table below.

| Position  | Authorities   | Safety Related Accountabilities  | Safety Related<br>Responsibilities  |
|---|---|--|---|
| Deputy GM/COO   | Bottom line Accountability for all Transportation and Maintenance Operations. | Safety, System Reliability,<br>System Continuity and<br>Resilience. Accountable<br>to the CEO.   | Staffing, Training,<br>Compliance,<br>Budgeting, Labor<br>Relations.                |
| Manager of Transportation Operations (CSO)                                    | Day-to-Day Oversight of GBT's Transportation Operations Division.             | Safety, System Reliability,<br>System Continuity and<br>Resilience. Accountable<br>to the Deputy GM/COO<br>and AE.   | Staffing, Training,<br>Monitoring, Safety<br>and Compliance.                        |
| Assistant<br>Manager of<br>Transportation<br>Operations                       | Supports the Manager of Transportation Operations.                            | Accountable to the Manager of Transportation Operations (CSO) Conducts Accident Investigations and Investigates Customer Complaints Accountable to the Manager of Transportation Operations. | Accident Investigation, Complaint Investigations, Discipline Safety and Compliance. |
| General<br>Manager<br>– Demand<br>Response<br>Division (MV<br>Transportation) | Bottom-line<br>Responsibility for All<br>Demand Response<br>Services.         | Safety, Operational<br>Performance, Customer<br>Service, Maintenance<br>of Budget, Compliance<br>Accountable to the<br>Deputy General<br>Manager/COO.  | Operation of GBT's<br>Demand Response<br>Services.                                  |

| Position                                    | Authorities  | Safety Related Accountabilities   | Safety Related<br>Responsibilities  |
|---|--|---|---|
| Manager of<br>Maintenance<br>Operations     | Authority Over All GBT<br>Fleet Maintenance<br>Operations.   | Day-to day Maintenance<br>of the Fleet, Accountable<br>to the Deputy General<br>Manager/COO.                                    | Staffing, Scheduling,<br>Supplies, Technical,<br>Specifications, Safety<br>and Compliance.  |
| Assistant Manager of Maintenance Operations | Supports the Manager of Maintenance Operations.  | Day-to day Maintenance<br>of the Fleet, Accountable<br>to the Manager of<br>Maintenance Operations.                             | Staffing, Scheduling,<br>Supplies, Technical,<br>Specifications, Special<br>Projects, Safety and<br>Compliance.   |
| Manager of<br>Facilities and<br>Grounds     | Bottom-line Responsibility for the Proper Maintenance of GBT Facilities and Federal Assets Other than Rolling Stock.   | Accountable for Proper<br>Maintenance and Asset<br>Manager Related to GBT<br>Facilities and Grounds.<br>Accountable to the CEO. | Capital Planning and Programing, Facility Maintenance Planning and Execution, Contractor Management, Procurement, Safety and Compliance.  |
| Risk Manager                                | Support to Department<br>Leaders in all divisions<br>in the identification<br>or safety issues<br>and hazards and<br>the development,<br>implementation<br>and monitoring of<br>mitigation measures. | Reports to the Deputy<br>General Manager/COO.   | Conducts on-going safety assessments of GBT facilities, Conducts on-going safety training of GBT staff. Participates in the review of accidents. Monitors insurance claims related to injuries. |

| Position  | Authorities  | Safety Related Accountabilities  | Safety Related<br>Responsibilities   |
|---|--|--|--|
| Director of<br>Planning<br>and Service<br>Development | Bottom-line responsibility for ensuring safety in all aspects of service development including route design, schedule design, the development of driver assignments and the planning and installation of bus stop amenities. | Accountable for considering safety and risk in route development. Accountable for considering safety and risk in the development of schedules and the development of driver assignments. Accountable to the Chief Safety Officer regarding identified operational hazards related to routing, schedule design and the development of driver assignments. | Responsible for monitoring safety in relations to route and schedule design using information for all other divisions including operations, maintenance, supervision and customer service. Responsible for reviewing accident, insurance, and other data/information and its relation to service design. |
| Chief Financial<br>Officer                            | Bottom-line responsibility for budget development ensuring proper resources are available for GBT's safety activities.   | Accountable to the CEO.  | Develop budgets,<br>monitor insurance<br>claims and<br>premiums, oversees<br>procurements.   |

The methods, activities and information used by the key staff to investigate safety events and ensure compliance with safety procedures, processes and mitigation measures are detailed in the list below.

- Employee Safety Reporting
- Operational Data
- Review of Asset Condition
- Preventative Maintenance Inspections and Tracking
- Safety Audits
- Formal and Informal Inspections
- Video and Audio Surveillance Reviews
- In-Service Driver Reviews
- Safety Surveys
- Safety Meetings
- Accident and Incident Investigations
- Project Level Safety Review
- Employee Input
- Labor Interaction
- Monitoring of Industry Trends

In its measuring and monitoring of safety compliance, the Risk Manager generally uses the following framework:

| Procedures Monitored and Measured                 | If Yes                         |
|---|--------------------------------|
| Inadequate compliance?                            | Address non-compliance         |
| Insufficient?                                     | Evaluate hazard                |
| Safety Risk Mitigation Monitoring and Measurement | If Yes                         |
| Ineffective?                                      | Evaluate hazard                |
| Inappropriate?                                    | Identify new measurement       |
| Not implemented?                                  | Address non-compliance         |
| Safety Event Investigation                        | If Yes                         |
| Information collected?                            | Use to monitor other processes |
| Causal factors identified?                        | Evaluate hazard                |

#### Safety Risk Mitigation Register

GBT uses the FTA provided Safety Risk Mitigation Tables for Safety Performance Monitoring which include the following fields:

- Consequences
- Safety Performance Indicator (SPI)
- SPI Value
- Safety Performance Target
- Time Frame (Mitigation Measure)
- Monitoring Means
- Responsible Department

# Safety Promotion – Training and Communication §673.29(a)

A key element of any SMS is the promotion of safety. Training, safety awareness and communication efforts to promote safety are detailed below.

#### Competencies and Training §673.29(a) - Fixed Route

GBT has established a hearty training program for its employees, which includes elements of safety specific to each division - both initial and refresher training. The aim of the training is to ensure staff have and maintain the knowledge, skills and abilities required to safely fulfill their respective responsibilities.

Operations – drivers receive both initial (new hire) training and refresher safety training. The initial training program extends for approximately eight weeks and refresher training is provided quarterly (generally).

**TSI Training** - During initial training drivers are instructed using the Transportation Safety Institute (TSI) "Vehicle Operations Program". This program includes extensive safety training related to:

- Bus Inspections
- Bus Maneuvers
- Intermediate Bus Maneuvers
- Service Stops
- Special Conditions
- Operating on Expressways and Freeways
- Special Driving Problems
- Defensive Driving
- Transit Security
- The Operator and Safety

The detailed syllabus for this course and all GBT safety training programs is available from the GBT's Manager of Transportation Operations. The complete curriculum materials are available in the office of the CSO.

### TRANSPORTATION SAFETY INSTITUTE (TSI)

Since its establishment in 1971, Transportation Safety Institute (TSI) has assisted the U.S. Department of Transportation's (DOT) modal administrations and other leading transportation agencies and entities in fulfilling their mission-essential training requirements. The mission of the TSI is to improve the safety of the worldwide transportation system through the training of transportation safety professionals across federal, state, local and international governments, as well as private industry.

**National Safety Council Training (NSC)** - All operators also receive training under the NSC DDC4 Program Defensive Driving, Accident Follow-up and Report Writing.

**Refresher Training** - During refresher (generally quarterly) driver training, GBT trainers cover a variety of topics ranging from DDC4 and various safety policies and procedures. Trainers will also address "hot spot" training which focuses on current safety issues.

**In-Service Reviews** – All GBT operators generally receive an annual "In-Service" review. During this review, GBT trainers ride along with operators and complete a comprehensive assessment of the driver's performance. This is followed by a briefing with the drivers and remedial training if warranted. A copy of the in-service assessment form is available from GBT's Manager of Transportation Operations.

**Post-Accident Training** – As determined by the Chief Safety Officer, post-accident training may be offered or required.

All of the training materials for GBT Operators are maintained by the Manager of Transportation Operations/CSO.

Risk Manager – GBT's Risk Manager has the responsibility of auditing each department to ensure that safety trainings have been conducted as required and that the agency is in compliance with OSHA and other safety regulations and requirements. The Risk Manager also provides safety training throughout Maintenance, Administration and Facilities and Grounds via direct facilitation and/or acquiring outside professionals to provide the initial safety training for certain areas such as: Bloodborne Pathogen Training, Active Shooter Training, Respiratory Training, Hearing Testing and Conservation Training and Housekeeping and Storage Training.

Outside professional trainers for the above include:

- American Red Cross Bloodborne Pathogen Training
- Bridgeport Emergency Operations Center Scott Appleby, CEM and Tarron Jones, EPC; The Schegg Group Active Shooter Training
- CTTransit Respiratory Training for Bus Body Repairman and Painter
- The Hearing Center, LLC Hearing Testing and Conservation Training
- Jeffrey E. Saltus, Occupational Safety Officer of CONN-OHSA Housekeeping & Storage Training

GBT has an ongoing relationship with CT-OSHA consultants and from time to time, call in OSHA consultants for a voluntary review. In the past two years, areas reviewed by the consultants included The Proper use of Personal Protective Equipment (PPE), Safety Lock-Out/Tag-Out Program and Housekeeping.

Maintenance – All maintenance employees, from Specialist to the Janitor, prior to performing any work which requires using special tools, motorized equipment, chemicals, grinding machines and any items which can pose a hazard or injury to themselves or someone else, receive safety training on how to perform the job, the Personal Protective Equipment (PPE) to use as needed or any other training from the Foremen. All trainings are documented and placed in each employee's personnel file.

GBT's Risk Manager also facilitates weekly "five-minute safety talks" with maintenance staff covering a variety of subjects including:

- Fire Safety and Emergency Exits
- Slips, Trips and Falls
- Housekeeping and Storage
- First Aid Kits
- Fire Extinguishers
- Lockout/Tagout
- Labeling Secondary Containers

• Personal Protection Equipment

**Administration** – Training of administrative staff generally includes reporting hazards, keeping work areas clean and free of hazards, fire drill exercises, active shooter training and safety when moving about GBT facilities. All departments are encouraged to have employees participate in the Safety and Health Committee.

Facilities and Grounds – GBT's Risk Manager works with the Manager of Facilities and Grounds to ensure that all chemicals/fluids/materials used are received with SDS and training is provided, lockout/tagout procedures are implemented as needed and the exercising of Hazard Assessment, Housekeeping & Storage, Chemical Mixing & Usages, wearing of Personal Protective Equipment (PPE) when & where needed and maintain clean grounds and disposing of debris.

**Volunteer Bus Program Curriculum** – In January 2020, GBT's Manager of Transportation Operations/Chief Safety Officer completed the Bus Personnel Volunteer Training Program, sponsored by the USDOT (recommended by FTA) covering:

- 1. SMS Awareness (Online course)
- 2. Safety Assurance (E-Learning course)
- 3. SMS Principles for Transit
- 4. Effectively Managing Transit Emergencies Transit Bus System Safety
- 5. Fundamentals of Bus Collision Investigation

**Training Needs Assessment** – Training needs are assessed by key staff and department leaders on an on-going basis and training curriculums updated accordingly.

# Competencies and Training §673.29(a) – Demand Response

Training for the operators and staff of GBT's Demand Response Division includes:

#### Operator Development Course (ODC) - Classroom Training

- Course Syllabus- The syllabus lists classroom program and the hours required for Behind-the-Wheel training and includes twenty-eight DVD classroom programs.
- The Classroom Trainer's guide provides clear instructions on how to teach the class and have discussion, questions and to review guiz guestions and answers.
- Operators receive a study guide to follow along with DVD and take notes.
- The classroom course consists of forty hours of classroom training

### Operator Development Course (ODC) – Behind the Wheel Training

- A newly hired operator will be evaluated for skills before they can drive the bus with passengers.
- This course takes them through several obstacles and focuses on maneuvering.
- This part of the program consists of forty hours in revenue service with an experienced operator.

Copies of these materials are available from GBT's General Manager of Paratransit Services

#### Remedial/Refresher Training

Following a preventable accident, the operator goes through four to six hours of retraining. They are taken to the scene of the accident to review the event with the Safety Manager including how it may have been prevented.

#### Safety Communication §673.29(b)

GBT ensures that all personnel are aware of information relevant to their roles and responsibilities. Leadership shares information about known hazards and risks and relates to employee actions taken in response to reported hazards or safety issues. GBT safety communications include, but are not limited to:

**Safety Alerts** – GBT staff in the Operations and Maintenance divisions communicate information about safety through the regular issuance of Safety Alerts. These are typically one-page alerts issued in memorandum form covering a wide range of safety and operational topics.

**Electronic Communication Boards** – Located in three areas of the One Cross Street Facility (operations, maintenance and administration), GBT uses electronic bulletin boards to communicate a variety of topics including safety.

**Bulletin Boards** – GBT has bulletin boards located throughout its facilities (Operations, Maintenance, Administrative, Driver Room at 710 Water Street), which are used for the posting of safety and other alerts. The local Union is also provided with a board for its communications which often include safety related matters.

Five Minute Talks – Lead by GBT's Risk Manager, maintenance staff receive a five-minute talk periodically (typically once each week) on topics related to safety and safety compliance.

**Staff Meetings** – Staff communicates safety information through regular staff meetings held in all divisions including operations, maintenance, supervision, facilities and administration.

"All Calls" – When there is an urgent safety concern in GBT operations, staff from supervision will issue an "All Call" to drivers on the road through GBT's vehicle location and communication system.

**Safety Training** – GBT's Risk Manager holds regular training for employees at the One Cross Street facility including maintenance, administrative and facilities and grounds staff. Additionally, Safety issues or "Hot Spots" related to safety are discussed by leadership in the operations divisions and quarterly training sessions with GBT operators.

**Discipline** – On occasion, during an investigation of a customer complaint or a supervisor report, staff will be counseled or disciplined. These occasions are commonly used to communicate directly to an employee, a violation of a safety rule or regulation.

**Safety Communication Required by Regulation** – In the event that a safety hazard is not reported internally and a complaint is made to CT-OSHA, GBTs response to the safety concern is posted at the location of the reported hazard.

**Safety Awards** – GBT holds an annual safety award ceremony to recognize employees who distinguish themselves through their safety records.

# Section 4 • Documentation & Certification Annual Review of the PTASP and Updates §673.11(a) (5)

GBT staff will meet annually regarding the implementation of the PTASP elements. The PTASP may be updated at any time but must be presented to GBT's Board of Commissioners annually.

The annual review of the PTASP will be led by the CSO, the Deputy General Manager and the key leadership staff noted in this plan. While this plan is a "living document" and subject to change at any time, the annual review will take place in the Spring of every year and adoption of the plan will take place on or about the annual meeting of GBT's Board of Commissioners in June.

Additionally, the plan will undergo a review when:

- 1. GBT staff determines that its approach or an approach in the PTASP is deficient or ineffective in mitigating one or more safety issues;
- 2. When GBT makes any significant changes to service delivery including the re-procurement of any contracted services;
- 3. When there is a need to introduce any new processes or procedures that may have an impact on safety;
- 4. When there is a change in resources available to support the safety management elements of the PTASP; or
- 5. There are any significant changes in GBT's organizational structure or changes in leadership.

# Safety Plan and Associated Documents/Retention §673.31

At all times, GBT will maintain documents that set forth its Public Transportation Agency Safety Plan, including those related to the implementation of its Safety Management System (SMS), as well as the results from SMS processes and activities. GBT will maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that GBT uses to carry out its Public Transportation Agency Safety Plan. Staff is advised that these documents must be made available upon request by the Federal Transit Administration or other federal entity, or a State Safety Oversight Agency having jurisdiction. GBT will maintain these documents for a minimum of three years after they are created.

# Certification of Compliance §673.13(a) and §673.13(b)

GBT's Board of Commissioners certifies that it has established a Public Transportation Agency Safety Plan (PTASP) meeting the requirements of 49 C.F.R Part 673 and adopted the initial PTASP on June 10, 2020. GBT's Board of Commissioners will annually receive a report from GBT's GM/CEO and certify its ongoing compliance with Part 673.

#### **Accountable Executive**

Douglas C. Holcomb

Douglas C. Holcomb, AICP General Manager/Chief Executive Officer

A copy of the formal adoption of this document by the GBT Board of Commissioners is included Below. Questions about the resolution and the Board's consideration of this plan should be directed to GBT's Clerk of the Board of Commissioners at cmichaels@gogbt.com

#### **RESOLUTION 6-8-22-2**

Acknowledge the Review of and Adopt the GBT Public Transportation Agency Plan (PTASP).

On a motion made by Commissioner Doug Sutherland, seconded by Commissioner Ginnie Preuss, it is hereby resolved to Acknowledge the Review of and Adopt the GBT PTASP as Required Under FTA Regulations.

The members cast the following voting units on the foregoing resolution:

|   | Aye  | Nay  |
|---|--|--|
| BRIDGEPORT  Mark Anastasi  Andrew Ifill  Andrea Kovacs  Ginnie Preuss | 1 x2.00= 2<br>1 x2.00= 2<br>1 x2.00= 2<br>1 x2.00= 2                       | 0 x2.00= 0<br>0 x2.00= 0<br>0 x2.00= 0<br>0 x2.00= 0 |
| FAIRFIELD<br>Pierre Ratzki<br>Michael Mears                           | $\begin{array}{c c} 0 & x1.65 = & 0 \\ \hline 0 & x1.65 = & 0 \end{array}$ | 0 x1.65= 0<br>0 x1.65= 0                             |
| STRATFORD<br>Jennifer Sheldon<br>Joe Kubic                            | 0 x1.43= 0<br>1 x1.43= 1.43  | 0 x1.43= 0<br>0 x1.43= 0                             |
| TRUMBULL<br>Vacant<br>Doug Sutherland                                 | 0 x1.00= 0<br>1 x1.00= 1<br>TOTAL 10.43                                    | 0 x1.00= 0<br>0 x1.00= 0<br>TOTAL 0                  |

The resolution was passed.

#### **CERTIFICATION**

I, Christine Michaels, Clerk of the Board of Commissioners of the Greater Bridgeport Transit Authority, do hereby certify that the foregoing resolution was adopted by the ballots depicted above at a meeting of that body, duly called and held on Wednesday, June 8, 2022.



#### **Definitions §673.5**

As used in this PTASP:

**Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

Accountable Executive means 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 GBT's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both GBT's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and GBT's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

Chief Safety Officer means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system. Equivalent Authority means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

**Event** means any Accident, Incident, or Occurrence.

FTA means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

**Hazard** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

**Incident** means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

**Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

**National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

Operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).

**Performance Measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

**Performance Target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

**Public Transportation Agency Safety Plan** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

**Safety Assurance** means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

**Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

**Safety Management System (SMS)** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation.

SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety Management System Executive means a Chief Safety Officer or an equivalent.

Safety Performance Target means a Performance Target related to safety management activities.

**Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

**Safety Risk Assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

**Safety Risk Management** means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Small Public Transportation Provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

**State of Good Repair** means the condition in which a capital asset is able to operate at a full level of performance. State Safety Oversight Agency means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part §674.

**Transit Agency** means an operator of a public transportation system.

**Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part §625.

#### List of Acronyms and Abbreviations

(From National Public Transportation Safety Plan – NPTSP)

APTA - American Public Transportation Association

**DOT** - Department of Transportation

FAST - Fixing America's Surface Transportation Act

FTA - Federal Transit Administration

MAP-21 - Moving Ahead for Progress in the 21st Century Act

NTD - National Transit Database

NPRM - Notice of Proposed Rulemaking

NTSB - National Transportation Safety Board

PTSCTP - Public Transportation Safety Certification Training Program

Section 5329 - Public Transportation Safety Program, 49 U.S.C. 5329

SGR - State of Good Repair

SMS - Safety Management System

SSO - State Safety Oversight

SSOA - State Safety Oversight Agency

**TAM - Transit Asset Management** 

#### **Additional Resources**

Federal Register Final Rule - https://www.govinfo.gov/content/pkg/FR-2018-07-19/pdf/2018-15167.pdf

FTA Public Transportation Agency Safety Plan Technical Assistance Center - https://www.transit.dot.gov/ PTASP-TAC

**National Public Transportation Agency Safety Plan -** https://www.transit.dot.gov/regulations-and-guidance/safety/national-public-transportation-safety-plan