SunTran

City of Ocala

Public Transportation Agency Safety Plan (PTASP)

APRIL 2026

Prepared for

Prepared by

RATP DEV USA

Contents

SECTION 1: Establishment of Public Transportation Agency Safety Plan (PTASP)

This document serves as the City of Ocala's Public Transportation Agency Plan (PTASP) for its Bus Transit system (SunTran) located in Ocala/Marion County Florida. It is intended to encompass all current and future operations, services and projects and applies to all activities which involve planning, design, procurement, installation and testing of equipment or facilities, operations, maintenance, support activities, and the environment in which the transit system operates.

1.1 Public Transportation Agency Safety Plan (PTASP) Rule

The City of Ocala (SunTran) is committed to comprehensive safety planning. As an operator of a small public transportation system that receives Federal Financial assistance under Title 49 of the United States Code (USC), the City of Ocala subject to FTA's 49 CFR Part 673 Final Rule and as delineated in Florida Administrative Code Section 14-90.004(1), has adopted the principles and methods of Safety Management Systems as the basis for enhancing the safety of its public transportation system. The plan incorporates the framework and principles of SMS for the City of Ocala (SunTran) Transit operations and all applicable Contract organization(s) to the extent practical and consistent with applicable requirements for each SMS component as indicated below:

The City of Ocala has established a Public Transportation Agency Safety Plan (PTASP) that meets or exceeds the General Requirements of 49 CFR Part 673 Final Rule and of Florida Administrative Code (FAC) 14-90.004 and establishes the SMS policies for the City of Ocala Administrative employees delegated with Administration oversight, authority and responsibility for SunTran's transit system as well as all employees for the Contractor organization awarded oversight, authority and responsibility for SunTran's Operation and Fleet Maintenance services. Each share a responsibility and commitment to comprehensive safety planning.

See Attachment RATP Dev PTASP
See Attachment RATP Dev Policy Statement
See Attachment RATP Dev Safety Management Policy

1.2 General PTASP Requirements

The PTASP adheres to the fundamentals and framework of SMS and reflects the specific safety objectives, standards and priorities for SunTran and the City of Ocala including the following required elements:

- ✓ The Safety Plan and subsequent updates will be signed by the Accountable Executive and approved by the City of Ocala City Council
- ✓ The Safety Plan documents the processes and activities related to SMS implementation
- ✓ The Safety Plan includes performance targets based on the safety performance criteria established under the National Public Transportation Safety Plan (NSP), and the state of good repair standards established in the regulations that implement the National Transit Asset Management System and included in the NSP.
- ✓ The Safety Plan will comply with the minimum performance standards authorized through the National Public Transportation Safety Plan (NSP)
- ✓ The City of Ocala will establish a process and timeline for conducting an annual review and update of the Safety Plan
- ✓ The City of Ocala and Contractor will maintain the Safety Plan in accordance with the recordkeeping requirements in subpart D of Part 673

1.21 Issuance and Update

The SMS plan will be reviewed and updated, as applicable, annually beginning on the date of issuance. Safety Committee are involved in plan development and updates, as required under 49 CFR part 673. The Safety Committee consist of an equal number of frontline transit worker representatives and SunTran management representatives.

Immediate changes to the Public Transportation Agency Safety Plan SMS procedures deemed paramount to safety mitigation may be authorized by the Operations/Fleet Maintenance Contractor's Regional Executive via a signed SMS Immediate Policy Amendment Change Memo that has been reviewed and approved by the City's Transit Manager/SMS Chief Safety Officer.

For these immediate changes, the Contractor General Manager (CONTR GM) will be responsible for ensuring communication to all concerned parties through established internal communication venues and the update will be noted on the PTASP Activity Log by the Contractor Operations Manager (CONTR OM).

1.22 Scope and Objectives

The SMS has been established consistent with business needs and regulatory impetus. The SMS is designed to reduce safety risks to an acceptable level through a continuous process of hazard identification and safety risk management practices to achieve the following goals:

- ➢ Reducing transit safety, employee, and environmental risks by better managing the City of Ocala's Transit's safety risks and setting goals to eliminate or reduce risks.
- ➢ Communication of safety risks to employees and their roles and responsibilities related to risks.
- ➢ Increase awareness of safety issues at all levels, thereby providing a better framework/structure for management to play a leadership role in addressing safety concerns
- ➢ Continuous improvement of Contractor organization SMS and risk controls.
- ➢ Compliance with all applicable state and federal regulations.

- Foster a culture of change management so that safety issues are identified, and risks are eliminated or reduced in the planning process and delays or other impediments to business goals are avoided.

The SMS applies specifically to all contract organizations subject to Florida Department of Transportation and the Federal Transit Administration regulation on SMS and all City of Ocala Transit operations.

1.23 Agency Overview

Marion County is in north central Florida and is bordered by seven counties: Alachua and Putnam to the north, Volusia and Lake to the east, Sumter and Citrus to the south, and Levy to the west. According to the 2010 Census, the county includes a total area of 1,663 square miles, with 1,585 square miles of land and 78 square miles of water. The population of Marion County is concentrated in the county seat of Ocala, which is also the largest city, located in the geographic center of the county.

SunTran has been in operation since 1998 and provides fixed-schedule service on seven routes in Marion County, mostly centered in Ocala, with one route operating from Ocala to the Silver Springs Shores area southeast of Ocala. Most routes operate 5:00 AM–10:00 PM on weekdays and Saturdays.

On July 1, 2019, SunTran moved from the oversight of the Ocala Marion Transportation Planning Organization (TPO) to the City of Ocala and is now a division of the City's Growth Management Department. All transit system administration, planning and fiscal oversight is conducted by the City's Growth Management Department. The SunTran system's seven fixed bus routes daily operations and maintenance are contracted through a third-party company, (RATPDEV). RATPDEV contracts SunTran's paratransit services through Marion Transit Services (MTS).
Capital assets that SunTran owns, operates, and has a direct capital responsibility comprises the following asset categories:

Rolling Stock
- Fifteen (15) Vehicles for transporting of passengers;
- Five (5) Non-revenue service vehicles for use in its daily operations

Equipment
- One (1) Rotary Lift used for vehicle maintenance

Facilities
- One (1) Maintenance Facility located on the City of Ocala Annex property at 1805 NE 30th Avenue, Building 900, Ocala, Florida
- Two (2) hubs serving as major transfer stations for the fixed-route services, including the Downtown/Central Transfer Station, also known as Ocala Union Station, and the Marion County Health Department Transfer Station.

1.24 Transit Agency Information

City of Ocala – Public Transit Bus System	
Transit Agency Name	SUNTRAN
Transit Agency Address	201 SE 3rd St., 2nd Floor, Ocala , FL 34471
Name and Title of Accountable Executive	Tom Duncan, Transit Administrator - Growth Management

City of Ocala – Public Transit Bus System			
Name of Chief Safety Officer or SMS Executive	Tom Duncan, Transit Administrator - Growth Management Chief Safety Officer/SMS Executive		
Mode of Service Covered by this Plan	Fixed Route; ADA Paratransit	**List All FTA Funding Types (e.g. 5307, 5310,5311)**	5307, 5309, 5339
Mode of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route; ADA Paratransit		
Does the Agency Provide Transit Services on Behalf of Another Transit Agency or Entity?	NO		
Description of Arrangement(s)	N/A		
Name and Address of Transit Agency or Entity for Which Service Is Provided	N/A		

1.3 Plan Development Approval and Certification of Compliance

The City of Ocala certifies that it has established this Public Transportation Agency Safety Plan (PTASP) meeting all requirements of Part 673 by the required deadline from the final rule.		
Name of Entity That Drafted This Plan	City of Ocala Growth Management Transit Division	
Signature of Chief Safety Officer	Signature of Chief Safety Officer	11-18-2020 Date
	Signature of Chief Safety Officer	**Date**
Signature of the Accountable Executive		11/18/2020 Date
	Signature of Accountable Executive	**Date**
Approval by Ocala City Council	Signature of City Manager	11/18/20 Date
	Signature of City Manager	**Date**
Certification of Compliance	FTA CALLED @ 8:51 AM CERTIFIED Name of Individual/Entity That Certified Plan	11/19/2020 Date
	Name of Individual/Entity That Certified Plan	**Date**
Relevant Documentation (Title and Location)	**A copy of the approved Public Transportation Agency Safety Plan (PTASP) is maintained on file in the Growth Management Department Transit Division Office of the Transit Manager/Chief Safety Officer**	

1.31 Plan Development Approval and Certification of Compliance

The City of Ocala Growth Management Department's Transit Manager/City SMS Executive ensures that the Public Transportation Agency Safety Plan is developed, implemented, and maintained in an appropriate and effective manner. The Contract Operator (RATP Dev) with members of the Safety Committee are involved in the process developing/updating the plan, identifying, and assisting with mitigating hazards to include operator assaults.

The Safety Management System operates under a principle of continuous improvement. Therefore, the PTASP will also have ongoing updates as necessary including changes that will be implemented immediately. Any changes in policy, organization, rules, regulations, or operations necessitating plan adjustments are to be accomplished within the established approval guidelines of this plan and require review and approval by the Accountable Executive and/or Chief Safety Officer. All updates to the plan will be recorded on the PTASP activity log of this plan.

1.32 Plan Annual Review and Modification

The City Transit Manager (CSO) and Contract Operator (RATP Dev) will jointly review and update the PTASP by **June 1st of each year**. The process for reviewing and revising the PTASP includes a thorough review of the current PTASP by the Growth Management Department Transit Management Team and the Contract Operator (RATP Dev) with Oversight of SunTran's Operations and Fleet Maintenance Department.

The annual review will include updates as needed to reflect changes in SunTran's organizational structure, procedures, equipment, facilities, and operating environment. At the time of the annual review, participants will also discuss performance targets and any other safety hazards identified previously. The Transit Manager will notify the Florida Transportation Department of Transportation (FDOT) and Marion County TPO staff in writing of any proposed changes to the Public Transportation Agency Safety Plan (PTASP) for review and approval as appropriate prior to making changes.

The Chief Safety Officer will then present the updated PTASP to the Accountable Executive for review and approval. The Accountable Executive will approve and then submit to the City of Ocala City Council for approval and certification of compliance by July 15th of each year. All annual review updates to the plan will be recorded on the PTASP activity log of this plan.

1.33 Plan Review and Modification

Revision Number	Section/Pages Affected	Reason for Change	Date Issued
Original	All document	New Document	November 17, 2020
1		FDOT 2021 Triennial Review Recommendations	July 17, 2021
2	1, 2, 3, 4, 6	Updated FTA Regulations 1. Bipartisan Infrastructure Law Updates 2. Safety Performance Targets Guide	Feb 17, 2022
3	TOC page 4 Position Title Changes page 7 Plan Review Page 9	Annual Updates The City of Ocala's Public Transportation Agency Safety Plans 2025 Updates includes minor updates, and includes	5-15-2025

Revision Number	Section/Pages Affected	Reason for Change	Date Issued
	Updated Measures Page 14 Update Target Page 14 Staff Contact Information page 22 SMS Organizational Chart Page 23 Annual Certification Position Updates Page 26 Updated Measures Page 42 Attachments: • Approval Page • Safety Committee Meetings • SMS Commitment Page • NTD Reports • RATP Dev PTASP • RATP Dev Policy Statement • RATP Dev Safety Management Policy • LYTX System • Monday.com • Florida Administrative Code 14.90	but is not limited to the following. Addition of Approval Page Position and Title Changes Members of the Safety Committee Safety Performance Measures Targets LYTX System Monday.Com System RATP Dev PTASP SMS Commitment Page	
4	Updated Position Change Page 8 Update SMS Organizational Chart Page 23 Update Targets Page 14	Position Change Staff Changes Updated Data	4-20-2026 4-19-2026 4-20-2026

1.4 Safety Objectives and Performance Targets

It is the mission of SunTran to provide safe reliable public transit services to the City of Ocala and its community. To implement the City of Ocala's safety policies, goals and objectives; this plan requires coordination, integration, communication, and cooperation among all directors, managers, supervisors, departments and SunTran employees.

The City of Ocala has set the following performance measures for the Safety Committee to set targets for the safety risk reduction program, as required by 49 U.S.C. 5329(d) and 49 CFR § 673.19(d)(2). Under the new Bipartisan Infrastructure Law requirements, the Safety Committee must establish these targets using a 3-year rolling average of the data the agency submits to the NTD.

In addition to the requirements set forth in the NSP, the safety performance targets for System Reliability correlate to the requisites identified in 49 CFR 625 for the City of Ocala TAM, which is further referenced in the NSP. In accordance with 49 CFR 673, the following Performance Criteria are measured:

1. Major Events
2. Major Events Rate
3. Collision
4. Collision Rate
5. Pedestrian Collisions
6. Vehicle Collisions
7. Fatalities
8. Fatalities Rate
9. Transit Workers Fatalities
10. Injuries
11. Injuries Rate
12. Transit Workers Injuries Rate
13. Assault on Transit Workers
14. Assault on Transit Workers Rate

To define SPT rates, SunTran must first identify its Safety Performance Indicators (SPI). SPIs are specific data points that must be monitored to track the agency's overall safety performance. SPIs illustrate the ability of SunTran to fulfill its SPTs. Data sets that support performance metrics include, but are not limited to:

	National PTASP Numbering	Measure
1	Measure 1a	Major Safety Events
2	Measure 1b	Major Safety Events - Rate per 100,000 Revenue Miles
3	Measure 1	Collisions
4	Measure 1.1	Collisions - Rate per 100,000 Revenue Miles
5	Measure 1.1.1	Pedestrian Collisions - Rate per 100,000 Revenue Miles
6	Measure 1.1.2	Vehicular Collisions - Rate per 100,000 Revenue Miles
7	Measure 2a	Fatalities
8	Measure 2b	Fatalities - Rate per 100,000 Revenue Miles

9	Measure 2.1	Transit Worker Fatalities - Rate per 100,000 Revenue Miles
10	Measure 3a	Injuries
11	Measure 3b	Injuries - Rate per 100,000 Revenue Miles
12	Measure 3.1	Transit Worker Injuries - Rate per 100,000 Revenue Miles
13	Measure 4a	Assaults on Transit Workers
14	Measure 4b	Assaults on Transit Workers - Rate per 100,000 Revenue Miles
15	Measure 5	System Reliability (Mean Distance Between Major Mechanical Failures)

PERFORMANCE INDICATORS		
Safety Performance Target Criteria	**Safety Performance Indicators**	**Description**
Major Events	a). Major Event Rate	This includes all safety and security major events as defined by the NTD.
	b). Collision Rate	This includes all collisions reported to the NTD, divided by VRM.
	c). Pedestrian Collision Rate	This includes all collisions "with a person," as defined by the NTD, divided by VRM.
	d). Vehicular Collision Rate	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.
Fatalities	a). Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
	b). Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
Injuries	a). Injury Rate	This includes all injuries as defined by the NTD, divided by VRM.
	b). Transit Worker Injury Rate	This includes all transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
Assault on Transit Worker	a). Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD
System Reliability	a). Mean distance between major mechanical failures, by mode	This includes Major Mechanical System failures as defined by the NTD.

For all SPT rates, the total number of events will be multiplied by 100,000 Vehicle Revenue Miles (VRM), then divided by the total number of VRMs traveled in the previous fiscal year.

The formula used in determining the event rate is detailed below:

MODE EVENT RATE = $\frac{\text{EVENT COUNT X 100,000 VRM}}{\text{TOTAL NUMBER OF (MODE) REVENUE MILES}}$

Once the actual event rate is established, SunTran will use any of the following strategies to establish the initial SPT per the NSP:
1. Five -Year Trends
2. Number and Rate Reduction
3. Benchmarking

1.41 Fatality Rate

A reportable fatality is a death due to any of the following:

1. Collision, including suicides
2. Fire
3. Hazardous Materials Spill
4. Act of God (i.e., hurricane, earthquake)
5. Other safety events

Fatalities that occur because of illnesses or other natural causes - including individuals who are
found deceased, are not reportable and are thus not required to be measured as part of the Safety
Performance criteria.

1.42 Injury Rate

An injury is defined as harm to a person, requiring that person to be transported from the scene of an incident to a hospital or medical facility for treatment. This includes any damage or harm to persons that requires immediate medical attention away from the scene because a reportable event must be reported as an injury. Reportable events further require monitoring of serious injuries as well as injuries where an individual seeks medical care several hours after an event or in the days following an event. The Injury Rate is thus based on NTD Reporting Criteria.

1.43 Safety Event Rate

A Safety Event also referred to as an Event, is defined as any Accident, Incident, or Occurrence.
The Safety Event Rate by mode is calculated using the following equation:

1.44 Safety Event Rate

Safety and performance of SunTran are collectively dependent, in part, on the condition of its assets. When transit assets are not in the state of good repair, the likelihood of a consequential event occurring increases, as well as the likely impact against the system. Therefore, system reliability metrics illustrate the relationship between safety and asset condition. The data collected for system reliability should support and provide input into The City of Ocala TAM.

1.45 Risk Reduction Performance Targets

SunTran's Safety Committee shall establish performance targets for the risk reduction program using a 3-year rolling average of the data submitted by the City of Ocala to the National Transit

Database under section **5335. 5329(d)(4)(A)**. SunTran shall establish a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit employees based on data submitted to the National Transit Database. 5329(d)(1)(I)

SunTran's risk reduction program shall include:

- Vehicular and Pedestrian Accidents – reduction of vehicular and pedestrian accidents involving buses that includes measures to reduce visibility impairments for bus operators that contribute to accidents, including retrofits to buses in revenue service and specifications for future procurements that reduce visibility impairments 5329(d)(1)(I)(i)

- Transit Worker Assaults – the mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators when a risk analysis performed by the safety committee determines that such barriers or other measures would reduce assaults on transit workers and injuries to transit workers. 5329(d)(1)(I)(ii)

- SunTran's Safety Committee Meetings will meet on a regular basis. See Attachment – Safety Committee Meetings.

National PTASP Numbering	Safety Performance Targets Performance Targets are based on collected data from the previous five years for SunTran.	Safety Performance Targets are based on collected data from the previous five years for SunTran.
Measure 1a	Major Safety Events	0
Measure 1b	Major Safety Events - Rate per 100,000 Revenue Miles	0
Measure 1	Collisions	1
Measure 1.1	Collisions - Rate per 100,000 Revenue Miles	0
Measure 1.1.1	Pedestrian Collisions - Rate per 100,000 Revenue Miles	0
Measure 1.1.2	Vehicular Collisions - Rate per 100,000 Revenue Miles	0
Measure 2a	Fatalities	0
Measure 2b	Fatalities - Rate per 100,000 Revenue Miles	0
Measure 2.1	Transit Worker Fatalities - Rate per 100,000 Revenue Miles	0
Measure 3a	Injuries	0
Measure 3b	Injuries - Rate per 100,000 Revenue Miles	0
Measure 3.1	Transit Worker Injuries - Rate per 100,000 Revenue Miles	0
Measure 4a	Assaults on Transit Workers	0
Measure 4b	Assaults on Transit Workers - Rate per 100,000 Revenue Miles	0
Measure 5	System Reliability (Mean Distance Between Major Mechanical Failures) VRM Failures	19,000

Safety Performance Targets ADA Performance Targets are based on collected data from the previous five years for SunTran.							
Mode of Transit Service	Fatalities Total	Fatalities (per 100,000 vehicle revenue miles (VRM)	Injuries Total	Injuries (per 100,000 vehicle revenue miles (VRM)	Safety Events Total	Safety Events (per 100,000 vehicle revenue miles (VRM)	System Reliability (VRM/failures)
ADA Paratransit	0	0	0	0	0	0	0

1.5 Commonly Used Acronyms

The following acronyms apply to all related information in this manual:

Acronym	Term
ADA	Americans with Disabilities Act of 1990
AE	Accountable Executive
ALARP	As Low as Reasonably Practicable
ASP	Agency Safety Plan (also referred to as PTASP in Part 673)
CFR	Code of Federal Regulations
CONTR	Contractor
CSO	Chief Safety Officer
DIR	Director
CONTR GM	Contractor General Manager
CONTR OM	Contractor Operations Manager
CONTR FM	Contractor Fleet Manager
FAC	Florida Administrative Code
FDOT	Florida Department of Transportation
FTA	Federal Transportation Administration
NSP	National Public Transportation Safety Plan
NTD	National Transit Database
NTSB	National Transportation Safety Board
PTASP	Public Transit Agency Safety Plan (Replaces SSPP)
SA	Safety Assurance
SMS	Safety Management System
SMT	Site Management Team
SRA	Safety Risk Assessment
SRM	Safety Risk Management
SSP	System Security Plan
SSPP	System Safety Program Plan (Replaced by TASP)
TASC	Transit Agency Safety Council
TAM	Transit Asset Management

1.51 Definitions of Terms Used in the Agency Safety Plan

The following definitions apply to all related information in this manual.

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 transit vehicles; an evacuation for life safety reasons; at any time, whatever the cause.

Accountable Executive –a single, identifiable person who has ultimate responsibility for carrying out the agency's Public Transportation Agency Safety Plan (PTASP) and Transit Asset Management Plan (TAMP); and control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAMP, in accordance with 49 U.S.C. 5326.

Audit – an examination of records and related materials, including, but not limited to, those related to financial accounts.

Chief Safety Officer or SMS Executive- an adequately trained individual who has the responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer.

Contractor –entity that provides operations or maintenance services to a transit agency under a contract and is accountable on the terms of the contract.

Corrective Action Plan – a plan developed by recipient that describes the actions the recipient will take to minimize, mitigate, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency (FDOT), or FTA may require SunTran to develop and carry out a corrective action plan.

Equivalent Authority –an entity that carries out duties similar to that of a Board of Directors for a recipient or sub recipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or sub recipient's Public Transportation Agency Safety Plan.

External Service Provider – performs operations, maintenance, safety, or risk management services related to transit service delivery from outside a recipient's immediate organizational structure and work is performed under an inter or intra governmental agreement, statute or regulation, not a contract.

Event – any Accident, Incident, or Occurrence.

Florida Department of Transportation (FDOT) – state agency that administers rules and regulations as outlined in Florida Administrative Code Chapter 14-90

Florida Administrative Code Chapter 14-90 – is the official compilation of the administrative rules and regulations of state agencies that outlines state law regarding bus systems specific to operational, maintenance, and safety rules concerning public transportation.

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 of the transit system or damage to the environment.

Hazard Report – a report filed regarding a hazard identified in the workplace.

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 the operations of the transit agency.

Investigation – the process of determining the casual and contributing factors of an accident, incident or hazard for purpose of preventing reoccurrence and mitigating risk to the lowest manageable level practicable.

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

Near Miss – a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations.

Near Miss Report – a report filed from a narrowly avoided collision or other accident.
Occurrence - an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of the transit agency.
Operator –a public transportation system provider of public transportation as defined under 49 U.S.C. 5302.
Performance Measure –an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets as prescribed by the National Public Transportation Safety Plan for the following: 1) fatalities; 2) injuries; 3) safety events; and 4) system reliability
Performance Target – a specific quantifiable safety performance level related to safety management activities established in the National Public Transportation Safety Plan (NSP)
Public Transportation Agency Safety Plan (PTASP)– a documented comprehensive agency safety plan as required by 49 U.S.C. 5329 and Part 673.
Recipient – a State or local government authority, or any other operator of public transportation that receives financial assistance under 49 U.S.C. Chapter 53. The Ter, "recipient" includes State Safety Oversight Agencies.
Recordable Injury – Injury resulting in lost time at work.
Reporting Manager – An employee's direct supervisor.
Risk – the composite of predicted severity and likelihood of the potential effect of a hazard
Risk Assessment - – a systematic study or examination and determination of a hazard to establish the significance or value of the risk.
Risk Mitigation – a method or methods to eliminate or reduce the effects of hazards to its lowest manageable level practicable.
Root Cause – The exact cause of an incident or accident where had the root cause found not to be present, the accident or incident would not have happened.
Safety Assurance – the processes within the 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 and activities through the collection, analysis, and assessment of information.
Safety Management Policy – the transit agency's documented commitment to safety, which defines the agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
Safety Management System – the formal, top-down organization-wide approach to managing safety risk and assuring effectiveness of the agency's safety risk mitigation. SMS includes effective systematic procedures, practices, and policies for managing risks and hazards.
Safety Performance Target – a performance target related to safety management activities.
Safety Promotion –a combination of training and communication of safety information to support SMS policy and procedure practices throughout the transit agency as applied to the agency's public transportation system.
Safety Review - an on-site assessment to determine if a bus transit system has adequate safety management controls in place and functioning in accordance with the safety standards provided and incorporated by reference in this rule chapter.
Safety Risk Management – a process within the transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious Injury – an 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 an 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 sub recipient of Federal financial assistance under 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 –the condition in which a capital asset can operate at a full level of performance.

State Safety Oversight Agency – an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329€ and the regulations set forth in 49 CFR part 659 or 49 CFR part 674.

SunTran – the City of Ocala's Fixed Route/ADA public transportation system serving the City of Ocala and Marion County, Florida

Transit Agency –an operator of a public transportation system

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

Transit Asset Management Plan (TAMP) – a plan developed for SunTran pursuant to 49 CFR part 625 that includes, at minimum, capital asset inventories and condition assessments, decision support tools, and investment prioritization.

SECTION 2: Safety Accountability and Responsibilities

The City of Ocala establishes the necessary authorities, accountabilities, and responsibilities for the management of safety among the following individuals: City of Ocala Transit Agency (SunTran), the awarded Contractor for Operations and Fleet Maintenance (RAPT Dev), and members of the Safety Committee, as they relate to the development and management of SMS.

The Safety Committee consist of an equal number of frontline transit worker representatives and SunTran management representatives. Each functional area provides distinct roles and carries out specific safety management responsibilities to ensure the protection of passengers, employees, the community served and City of Ocala property.

All employees at all levels are expected to conduct work in the safest manner possible in accordance with approved site procedures and policies that enhances employee health and safety. Active employee engagement in the promotion and safe reporting of hazards is paramount to the SMS Framework and the success of the City's Public Transportation Agency Safety Plan (PTASP) at both the City level and Contractor level. The Contractor's Key SMS Staff is responsible for implementing SMS processes outlined in the City of Ocala's PTASP fostering a safety culture that promotes safety awareness, training and encourages effective employee safety reporting and communication. The

Contractor will perform Safety Assurance activities, including documentation, internal controls, monitoring and auditing of their departmental compliance with the PTASP and other supporting programs, plans and procedures. The Contractor is also responsible for identifying and reporting all safety hazards to the Chief Safety Officer working together to develop and implement strategies to eliminate and/or mitigate hazard risk to the lowest level practicable.

The SMS Safety Council is the driving force for ensuring that reported safety items are appropriately addressed, concluded and tested. The City of Ocala Transit Manager and the Contractor (RAPT Dev) General Manager will also implement and use safety committees to review and evaluate SunTran's safety- related processes, activities, and issues.

2.1 SMS Organizational Structure and Roles and Responsibilities

The City of Ocala has developed an SMS organizational structure for SunTran that ensures effective and efficient operation of the Public Transportation Agency Safety Plan (PTASP) and gives assurance that, with visible and explicit support from executive management and through an open communication system for employee safety reporting, all staff will have a proactive role in fostering a safety culture that promotes Safety as its number one (1) priority.

2.11 City of Ocala SMS Key Staff Roles and Responsibilities

(Accountable Executive) - City Growth Management Department Transit Administrator

The City of Ocala Growth Management Transit Administrator has been designated as the Accountable Executive for the Public Transportation Agency Safety Plan (PTASP) and meets the requirements specified in 49 CFR Part 673.5 and 673.23(d)(1). The Administrator is accountable for ensuring that the PTASP is effectively implemented throughout the SunTran transit system, and ensuring action is taken, as necessary, to address any substandard safety performance in SunTran's PTASP. The Administrator may delegate specific responsibilities, but the ultimate responsibility and accountability for the implementation and maintenance of the Public Transportation Agency Safety Plan (PTASP) and Transit Asset Management (TAM) Plan for SunTran; with control or direction over the human and capital resources needed to develop and maintain both the PTASP in accordance with 49 USC 5329; and the TAM Plan in accordance with 49 USC 5326; rests with the Administrator.

(Chief Safety Officer/City SMS Executive) - City Growth Management Transit Manager

The Accountable Executive has designated the Growth Management Department Transit Manager as the City's Chief Safety Officer (CSO) / SMS Executive who has authority and responsibility for development of SMS policies and procedures and day-to-day implementation and operation of the City's PTASP. The Transit Manager holds a direct line of reporting to the Transit Administrator and will assist in ensuring that resources are available to achieve the outcomes of the SMS. The Chief Safety Officer/City SMS Executive has key responsibility to include but not limited to the following:

- Full implementation of the SMS across the SunTran Transit System reviewing and updating the PTASP at least annually
- Provide guidance of SMS processes to all delegated City staff that have line and technical management responsibilities for SunTran under the SMS
- Ensure integration with Public Safety and Emergency Management personnel that have input into, or output from the SMS for emergencies and abnormal operations and return to normal operations developing plans and procedures in support of the transit system's public safety and emergency management activities
- Develop criteria and establish the provision and use of performance measure dashboards to monitor SMS safety performance targets and overall Operations and Fleet Maintenance activities for SunTran with collaborative support from the Contractor (RATP Dev) identified Key SMS employees.

See Attachment Safety Committee.

2.12 Contractor SMS Key Staff Roles and Responsibilities

(Site SMS Executive) - General Manager

The General Manager has been designated as the Site SMS Executive and is responsible for providing strategic direction and leadership in accordance with the City's PTASP assuring full compliance from all contractor level employees in accordance with all rules and regulations outlined in the PTASP and the City of Ocala's contractual agreement for Operations and Fleet Maintenance of SunTran's transit system.

The General Manager in coordination with members of the Safety Committee are responsible for ensuring accountability for SMS performance at the highest level and throughout the agency to meet all safety performance objectives outlined by the City of Ocala (Suntran) Transit System and that appropriate allocation of resources are available (i.e. funding, staffing, training materials, etc.).

The Site SMS Executive has key responsibility to include but not limited to the following:

- Ensure safety information moves up, down, and across the agency
- Effectively communicate roles and responsibilities to all relevant individuals with support from the City of Ocala and Corporate Regional Executive(s)
- Ensure that all system changes are evaluated, coordinated, documented and approved by the Chief Safety Officer in compliance with the risk management and safety assurance processes adopted within the PTASP
- Ensure that all employees will be adequately trained in safety performance and awareness fostering a culture where Safety is number one (1) priority
- Ensure that the employee safety reporting program component is implemented without reprisal.

See Attachment Safety Committee.

(SMS Manager / Site Operations Safety Liaison) - Operations Manager

The Chief Safety Officer has appointed the Contractor Operations Manager (CONTR OM); having ***subject matter expertise*** in SMS implementation, day-to day operation of SMS, and the tools and activities required for SMS documentation; as the SMS Manager to assist with the development of the Public Transportation Agency Safety Plan (PTASP) and provide assistance for the implementation phases of the PTASP for the City and at the site level. The SMS Manager has key responsibility to include but not limited to the following:

- Assist the City Chief Safety Officer with the three SMS Implementation Phases (Phase 1 – Planning, Organization and Policy Development, Phase 2 - Safety Risk Management and Phase 3 – Safety Assurance)
- Draft the Public Transportation Agency Safety Plan (PTASP) and other safety policy documents related to SMS implementation for the City of Ocala and Contractor (RATP Dev)
- Establish criteria and guidance for the activities and tools for hazard identification and analysis at the site level
- Develop hazard identification, analysis, safety risk evaluation and mitigation documentation; and develop and deliver training to relevant personnel at site level
- Assist with development of SunTran's employee safety reporting program
- Assist with development of safety performance monitoring and measurement tools and activities and provide periodic reports on safety performance advising senior management on safety matters

- Maintain all SMS safety management documentation
- Plan and organize safety training and
- Assist with Transit Agency Safety Council / Safety Committee planning

In addition, the Operations Manager as Site Operations Safety Liaison will provide department leadership in the implementation, operation, and performance of all SunTran Operations SMS activities in compliance with the PTASP with assistance from the Site Safety Officer and other Dispatch personnel.

(Site Fleet Safety Liaison) - Maintenance Manager

The Maintenance Manager as Site Fleet Safety Liaison will provide department leadership in the implementation, operation and performance of all SunTran Fleet Maintenance SMS activities in compliance with the PTASP with assistance from the Site Safety Officer. The Maintenance Manager will manage and coordinate function related reporting, monitoring and auditing of the Maintenance department ensuring that safety measures and procedures are in place for system reliability.

(Site Safety Officer) – Dispatch Supervisor

The Site Safety Officer will assist the SMS Manager/Operations Manager with the Safety Risk Management and Safety Assurance components at the site level ensuring that appropriate safety procedures and guidelines are followed for evaluating and mitigating safety hazards to the lowest level reasonably practicable. The Safety Officer will also serve as chairperson for the Site Safety Committee and will conduct field observations.

Supervisors

Supervisors are tasked with familiarizing employees under their supervision of all safety requirements and hazards associated with the work to be performed through open communication and training. They will work and collaborate with the Safety Officer and Department Managers responding to identified hazards and incidents that impact safety performance and targets and assist with risk mitigation to eliminate and/or minimize the risk to the lowest level reasonably practicable.

Frontline Employees

All employees are required to become familiar with the safety procedures for their assigned work activity and adopt a culture where safety is priority. Employees are expected to perform their work safely and call attention to hazards that may impact that safety performance. All mishaps and incidents must be reported to the immediate Supervisor and/or Safety Liaison in accordance with established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

2.13 SMS Safety Council/Committee Roles and Responsibilities

Transit Agency Safety Council - TASC

The Transit Agency Safety Council (TASC) is comprised of key staff from both the city level and contractor level that have the capability to employ multiple disciplines for SunTran; having access to high level budgeting solutions; to meet and mitigate hazards to the lowest level reasonably practicable. The council will work to develop action plans to ensure adequate resources are available to achieve the outcomes of SMS. TASC meetings will be held monthly (or as often as needed).

Safety Committee

SunTran will establish a Safety Committee that is convened by a joint labor–management process and that consists of an equal number of frontline employee representatives and management Representatives per 49 U.S.C § 5329(d)(5)(i) and 5329(d)(5)(A). The Safety Committee will bring Contractor level management and employees together to achieve and maintain a safe, healthy workplace.

2.14 SunTran's SMS Key Personnel Contact Information

City of Ocala SMS Key Personnel

Name	Position/SMS Role	Contact Information
Tom Duncan	Transit Administrator - Growth Management SunTran 201 SE 3rd Street, 2nd Floor, Ocala	(352) 209-1771

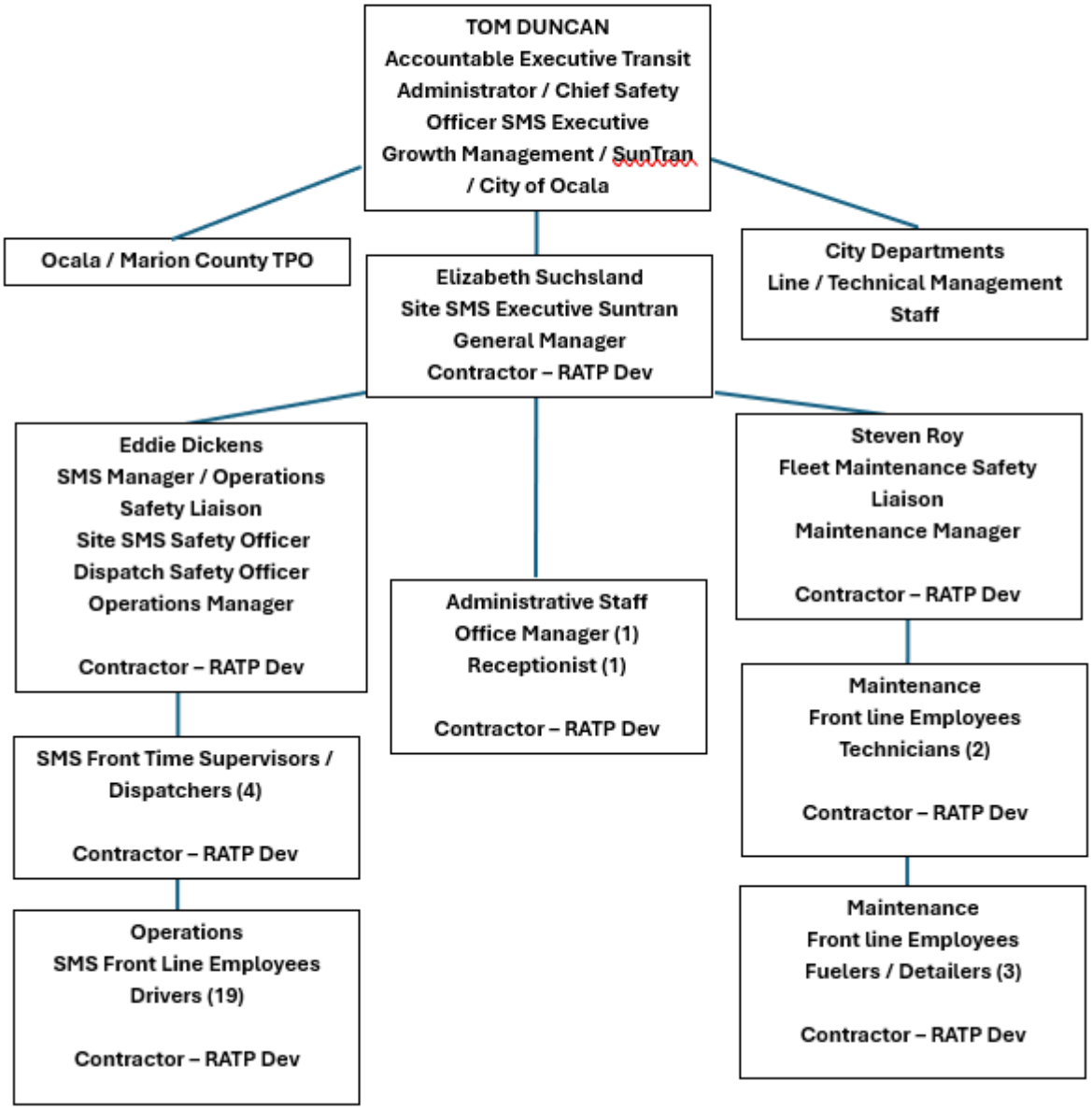
Contractor (RATP Dev) SMS Key Personnel

Name	Position/SMS Role	Contact Information
Elizabeth Suchsland	General Manager / SMS Site Executive 1805 NE 30th Ave, Building 900, Ocala	(352) 401-6939
Eddie Dickens	Operations Manager/SMS Manager/SMS Operations Safety Liaison 1805 NE 30th Ave, Building 900, Ocala	(352) 401-6958
Steven Roy	Maintenance Manager/SMS Fleet Safety Liaison 1805 NE 30th Ave, Building 900, Ocala	(352) 401-6746
Eddie Santiago	Dispatch Supervisor/SMS 1805 NE 30th Ave, Building 900, Ocala	(352) 401-6475
Gary Simpson	Bus Operator 1805 NE 30th Ave, Building 900, Ocala	(786) 897-7713

2.141 Safety Committee Responsibilities

- Approving the ASP and any updates to the ASP
- Identify and recommend risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment [49 U.S.C § 5329(d)(5)(A)(iii)]
- Identify mitigations or strategies that maybe ineffective, inappropriate, or were not implemented as intended [49 U.S.C § 5329(d)(5)(A)(iii)]
- Identifying safety deficiencies for purposes of continuous improvement [49 U.S.C §5329(d)(5)(A)(iii)]
- Establishing performance targets for the agency's risk reduction program
- The committee will review and jointly evaluate all safety hazards reported and make recommendations to improve safety. Meetings will be held bi-monthly (or as often as needed) and may include program reviews, injury reviews, and reviews of employee concerns.

SunTran's SMS Organizational Chart



SECTION 3: Safety Management Policy

3.1 Introduction

Component 1 of the SMS structure is the **Safety Management Policy**. The Safety Management Policy is the keystone of SunTran's SMS and it provides direction for effective Safety Risk Management, Safety Assurance, and Safety Promotion. **Per 49 CFR 673**, SunTran must establish the following sub-components of the Safety Management Policy including the new requirements as listed in the **Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d)**:

- 673.23(a) Safety Management Policy Statement.
- 673.23(a) Organizational Accountabilities and Responsibilities.
- 673.23(b) Employee Reporting Program
- 673.11(6)(b) Integration with Public Safety and Emergency Management
- 673.23(d) Accountabilities and Responsibilities
- 673.31 Documentation and Recordkeeping

The Safety Management Policy thus assists the City of Ocala in assuring management's involvement and commitment to the SMS and agency-wide safety improvement by laying out the policies and procedures required to carry out the SMS. This is only accomplished through a clearly defined statement that defines the organizational structures, effectively identifies accountabilities and SMS planning efforts.

SunTran's Safety Management policy will be communicated throughout the organization.

See Attachment SMS Commitment Page.

3.2 SunTran's Management Policy Statement

The City of Ocala is committed to providing a safe, comfortable, and accessible transit service as a viable means of mobility to the citizens and visitors of Ocala/Marion County. Safety is the number one (1) priority and is a core value to SunTran. To ensure the highest level of safety performance, the City of Ocala will implement, develop and improve strategies, management systems, and the processes to ensure that all our activities uphold to the highest level of safety performance.

We will develop and embed a safety culture in all our activities that recognizes the importance and value of effective safety management and acknowledge that safety is paramount always. Delegated Executive Management will lead all transit service activities, from project planning through operations and maintenance with a balanced allocation of organizational resources to support this goal. Any outside contractor who is in service to SunTran has the duty to adhere to the City's Public Transportation Agency Safety Plan (PTASP); to recognize, report and correct hazards; to work in a safe manner; to promote safety awareness; and to actively assist in accident prevention.

All levels of management and all employees are accountable for the delivery of the highest level of safety performance, starting with the Director of Growth Management. The Transit Manager is responsible for ensuring that all employees and contractors will support safety management by ensuring that hazards are identified and reported and that all reasonable steps are taken to perform activities established as part of the Safety Management System (SMS). Each department manager is also responsible for implementing the SMS in their

transit area of responsibility and actively support and promote the SMS ensuring staff compliance with all processes and procedures. We will also work to ensure that all frontline transit employees are provided with adequate and appropriate safety information and training and are competent in safety matters.

For passengers and employees of SunTran, the city will minimize the safety risk associated with transit service to its lowest level practicable and whenever possible, exceed legislative and regulatory requirements and standards. We will foster an open communication system whereby employees at all levels are encouraged to report all safety hazards and concerns without fear of reprisal.

The City of Ocala has established safety performance targets for SunTran to help measure the overall effectiveness of its processes and ensure the transit system meets the City's PTASP safety objectives. The city will evaluate ongoing SunTran's SMS performance by analyzing key safety performance indicators, reviewing inspections, investigations and corrective action reports, and auditing the processes that support the SMS which will become the basis for revising or developing safety objectives, safety performance targets and plans with the goal of continuous safety improvement.

The City of Ocala will:

- Provide appropriate resources to comply with all federal, state, and local safety-related requirements, rules, and standards for development and implementation of SMS activities within the Public Transportation Agency Safety Plan (PTASP).

- Enhance hazard identification and analysis, and safety risk evaluation activities to include: (1) establish and measure our safety performance against realistic, data-driven safety performance indicators and targets; (2) develop an employee safety reporting program that supports continuous improvement and (4) ensure externally supplied systems and services meet all transit safety performance standards.

- Ensure 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).

The SMS Executive Management Team for (SunTran) hereby adopts the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

The signatures in this section attest that this plan is understood, accepted and approved; and that the Key SMS Management Team is fully committed to implementing SMS through the City's Public Transportation Agency Safety Plan (PTASP) and achieving its safety goals and objectives.

See Attachment for Signatures

SIGNATURE	TITLE	DATE
	Accountable Executive Transit Administrator	
	Chief Safety Officer/SMS Executive Transit Administrator	
	SMS Site Coordinator	

	Contractor General Manager Signature	
	SMS Executive Contractor Regional Manager Signature	

Annual Safety Certification and Adoption

Date: XXXX
Name: City of Ocala
SunTran
Address: 1805 NE 30th Avenue
Building 900
Ocala, FL 34470

In accordance with FTA 49 CFR Part 673 Final Rule, the bus system named above hereby adopts and certifies to the following:

1. The adoption of the City of Ocala Safety Management System (SMS) for calendar year 2025-2026

2. Compliance with adopted standards of the Public Transportation Agency Safety Plan (PTASP), for calendar year 2025-2026

3. Performance of safety inspections on all buses operated in accordance with Rule 14-90.009, for calendar year 2025-2026

Signature: _____
Name: Peter Lee
Title: City of Ocala, City Manager

Signature: _____
Name: Tom Duncan
Title: Transit Administrator • Growth Management/SunTran

3.3 Safety Management Policy Communication

In accordance with 673.29(b), the City of Ocala will ensure that all employees are aware of any policies, activities, and procedures that are related to their safety-related roles and responsibilities. Employee engagement is crucial to a functioning Safety Management System. All employees and contractors will support safety management by ensuring that hazards are identified and reported.

The City of Ocala (SunTran) recognizes that communication is the essential component to the promotion of its safety objectives, target and safety culture and will use a variety of methods to communicate issues important to the operation of the SMS. The Public Transportation Agency Safety Plan (PTASP) will be made available to all employees and will be maintained and kept in an accessible electronic file and in hard copy format by Key SMS Personnel in locations accessible to all employees under their supervision and management.

Additionally in accordance with 49 U.S.C § 5329(d)(1)(H), SunTran shall establish a comprehensive staff training program for the operations and maintenance personnel and personnel directly responsible for safety of the recipient that includes the completion of a safety training program, continuing safety education and training, and **de-escalation training**.

3.31 Safety Management Policy Communication Methods

Communication systems will be put in place to enable greater awareness of SunTran's safety objectives and performance targets as well as provide on-going safety communication from top, down and across the agency. This strategy will complement existing safety communication channels to make everyone aware of SMS-related safety issues and their roles and responsibilities related to those issues.
Safety communication will comprise both internal and external communication tools/venues to include face to face meetings and interactions, posting and/or distribution of bulletins, department notices, and memoranda. All posted information can be found at a central location in each department area easily accessible to employees. Other communication methods include posters, signs, brochures, training materials, rule books, and operating procedures.

3.311 Internal Communication

SunTran's comprehensive employee safety communication program includes the following elements:

- Initial SMS Training for all existing employees and new hires with signed acknowledgement
- Regular Employee Bulletin Board Announcements and Safety Alerts
- Intranet/Telephone and/or Email Communications
- Regular safety meetings and/or training sessions
- Safety advisories (local and corporate)
- Facility/department safety inspections and audits with written reports and follow-up responses to employees as appropriate

3.312 External Communication

The City of Ocala recognizes that certain information may not be appropriate for external communication to the public unless required by federal, state or local regulations.
Therefore, any information regarding general SMS operation and specific risks identified will only be communicated to the appropriate governing body in consultation with Risk

Management/Accountable Executive/ Chief Safety Officer and other City Administrator entities where appropriate.

3.4 Employee Safety Reporting Program

The City of Ocala understands that SMS is dependent upon ongoing management commitment to communication. One of management's most important responsibilities under SMS is to encourage and motivate others to want to communicate openly, authentically and without concern for reprisal.

The City of Ocala and its Contract Provider (RATP Dev) communicates safety and safety performance information throughout SunTran that 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 an employee safety reporting program, among other information.

All employees have the responsibility to report any adverse safety conditions; events or acts; any observed or foreseeable hazards; and any safety concerns. Employees may report via the following methods:

- Reporting directly to a Key SMS staff member of their own area or another area
- Reporting directly to the Department Manager
- Reporting directly to the Dispatch Safety Committee Chairperson
- Reporting directly to the General Manager and or City Transit Manager
- Reporting via email, text, voice or written document to any of the above
- Reporting directly (in person) to the immediate supervisor

All employees also have the option of reporting anonymously at any time. Employees who do not report anonymously will receive feedback from the key SMS staff member in their area as to the disposition of the report.

Any person receiving a report of a hazard will immediately notify the key SMS staff member in his or her department.

All reports will be documented and investigated in a timely manner. All Hazards determined to be unacceptable and undesirable by the Safety Liaison for the Operations and/or Fleet Maintenance Department will be referred to the City Transit Manager/Chief Safety Officer and Contractor General Manager/SMS Executive to ensure it is addressed immediately with mitigation or elimination. The hazard will be tracked by the SMS Manager and the corrective action plan will be monitored through full resolution by the designated SMS Executive and FDOT when appropriate. (Further outlined in Part II Section 5 Safety Risk Management Process).

3.41 Employee Protected – Self Reporting

The following self-reported (employees committing violations and subsequently reporting themselves to management) violations can be reported as an initial instance without disciplinary action:

- Traffic Signal violations not resulting in an accident, injury or damage to property.
- Failure to report an adverse event immediately, but within 4 hours of occurrence. All information connected to the investigation of the reported event will fall under this protection
- Hours of Service violations.
- Reporting a safety concern that investigation reveals is not valid.
- Failure to wear proper PPE.

- ❖ Operating a revenue vehicle without proper equipment and uniform, including carrying the CDL on the employee's person.
- ❖ Fatigue that presents an unacceptable hazardous condition if duties are continued.

A second instance of a self-reported violation will be evaluated by SunTran's General Manager or the appropriate Department Manager to determine if circumstances warrant disciplinary action.
A third instance of the same violation will result in disciplinary action, whether self-reported or not.

3.42 Employee Unprotected - Self Reporting

No willful violations will be subject to self-reporting protections. This includes but is not limited to any violations of Drug and Alcohol policies or requirements, criminal acts, or failure to report any criminal acts immediately.

3.5 Integration with Public Safety and Emergency Management

The Emergency Management Division of the Marion County Sheriff's Office is Marion County's lead agency for coordination of emergency and disaster response activities to ensure a cooperative effort in response to all aspects of disasters. The Emergency Management Division is responsible for developing and coordinating programs that protect the public's health and safety from large scale hazards and natural disasters. Emergency management's objective is to provide a comprehensive and aggressive emergency preparedness response, recovery, and mitigation program to save lives, protect property and reduce the effects of disasters in Marion County.
The City of Ocala and Marion County Comprehensive Emergency Management Plan (CEMP) provides a framework that allows staff to plan, prepare for and respond to disaster events. The CEMP also lays out the purposes necessary to allow the Ocala community to recover from a wide range of disasters that adversely affect health, safety, or general welfare of Ocala residents. The City's CEMP is required to integrate with the State of Florida's Plan so that all efforts complement each other's. Per Marion County's Comprehensive Emergency Management Plan (CEMP), the Marion County Transit Services is the lead agency for any type of transportation emergency support. However, The City of Ocala and SunTran system is trained and ready to provide transportation support as needed.

Marion County Emergency Management will coordinate emergency operations Countywide to ensure a cooperative effort in response to all aspects of disasters. The objectives of the plan include:

- ❖ Minimize suffering, loss of life, personal injury, and damage to property resulting from emergency and disaster conditions
- ❖ Minimize disaster related material shortages and service system disruptions which would adversely affect the City's residents and economy
- ❖ Provide immediate relief for our community and enhance short and long-range recovery following a disaster; and
- ❖ Provide training and support to enable City personnel to respond adequately to disastrous situations.

Periodic exercises, drills, and training sessions will occur to test the City's department plans, to assure that all personnel and departments are familiar with the CEMP and assure that the CEMP remains valid and effective.

SunTran's Contractor (RATP Dev) General Manager and Management Team will coordinate and plan the activities for emergency and disaster response involving the City of Ocala's transit services.

3.6 SMS Plan Documentation and Recordkeeping

The City of Ocala understands the importance of continuous monitoring and reporting of the status of the SMS program. At all times, the City of Ocala/(SunTran) maintains documents that set forth and support its Public Transportation Agency Safety Plan, including implementation of SMS and results from SMS processes and activities that are included in whole, or by reference, that describe the programs, policies, and procedures that the City of Ocala uses to carry out the PTASP. The City of Ocala maintains these documents for a minimum of three years.

In addition to any documents or records required elsewhere by Part 673, SunTran maintains perpetually records of:

- Safety risk mitigations developed in accordance with 673.25
- Results from SunTran performance assessments as required under 673.27; and
- Employee safety training taken for purposes of compliance with this part and in accordance with the requirements of **49 CFR 673.**

In accordance with the City's PTASP, the Contractor SMS Manager is responsible for the maintenance of the documentation for SunTran's Safety Risk Management Process and Safety Hazard and Risk Assessment Log for the transit site. Each month, a report will be submitted to the Contractor General Manager and City Transit Manager on the status of SMS deficiencies and failure; corrective actions for SMS gaps identified; and internal control department safety audits and corrective actions. The Site SMS Executive/Contractor General Manger will provide a monthly status summary to the Chief Safety Officer/City Transit Manager on issues needing immediate attention regarding SMS compliance, including unacceptable or undesirable hazards, and resource allocation for corrective action. (Plan documentation and recordkeeping is further described in Section 5.5).

The PTASP will be kept in electronic as well as hard copy format and will be readily available for access upon request by the FTA, other Federal entities as required, the Florida Department of Transportation (FDOT), Marion County TPO and all SunTran transit personnel.

SECTION 4: Safety Risk Management Process

4.1 Introduction

The City of Ocala has established a Safety Risk Management (SRM) process for all elements of its public transportation system including employees, contractors, infrastructure, vehicles and equipment, revenue and non-revenue service activities as well as collaborations with emergency management personnel (i.e. first responders or other local agency employees). All management, staff, contractors, and suppliers are required to implement safety risk management methodology and safety and system assurance throughout the planning, testing, and operational phases of public transportation projects. Safety Hazards that cannot be eliminated are to be controlled by mitigation to the level that is "as low as reasonably practicable" (ALARP). Safety Risk hazard identification and resolution is a system process managed by the City's Transit Manager/ Chief Safety Officer (CSO) with assistance from the Contractor SMS Site Manager for (RATP Dev) and other Key SMS Organizational staff. The City's Transit Manager/Chief Safety Officer with support from the Transit Agency Safety Council (TASC) and Contractor Key SMS Staff will conduct formal analyses for all identified safety hazards resulting from system audits, operational or other changes, safety analysis in design and procurement contracts to include the following:

Identification of potential/existing safety hazards

- Assessment of severity and probability of occurrence/reoccurrence of each potential safety risk
- Timely awareness of safety hazards for those who must resolve them
- Ability to track and control safety risks through all phases of a project's life cycle; and
- Formal Safety and Security Certification where applicable

The SRM component is comprised of the processes, activities, and tools necessary to identify and analyze hazards and evaluate safety risks in its operations and supporting activities. The City of Ocala recognizes the need to ensure use of both a proactive (i.e., employee safety reporting) and reactive (i.e., safety event investigation) approach to the reporting and investigation of safety hazards and the need to carefully examine whether the agency has taken sufficient precautions to minimize the harm, or if further mitigations are necessary. Safety hazard identification, assessment and mitigation is the core element of the City's PTASP, requiring timely correction of unsafe conditions, ideally before serious accident, injury or damage occurs. The methodology employed by the formal SMS process for safety hazard identification and risk management of resolution allows the City of Ocala to examine how organizational factors such as (i.e,. allocation of resources, established operational procedures, frontline supervision and training, and human performance issues) contribute to incidents, accidents, and near miss occurrences. SMS builds on this experience by increasing the focus on safety hazard identification across the agency and broadening the scope of safety data collection and assessment, promoting, and fostering a safety culture that encourages proactive safety reporting and safety risk management.

The Safety Risk Management process is comprised of the following activities each having specific procedures and accountabilities to ensure that the safety hazard has been mitigated to the level "as low as reasonably practicable".

- Identification, analysis, and evaluation of safety hazards,
- Safety risk assessment
- Safety risk mitigation, and
- Documented system SRM tracking
- Strategies to minimize exposure to infectious diseases, consistent with Centers for Disease Control and Prevention or State health authority guidelines

The following outlines in detail the established criteria for each of the above listed activities to identify, evaluate and prioritize the safety risk associated with potential consequences; and is committed to the allocation of resources necessary to address the potential consequences of these hazards.

4.2 Safety Hazard Identification and Analysis

The City's objective of hazard identification and risk assessment is to identify and define hazardous conditions likelihood and enter them into the hazard mitigation process before those conditions or associated actions cause or contribute to an accident. Although it is virtually impossible for the City to identify every hazard, there are two basic time-tested methods used for orderly identification of hazards: inductive and deductive.

The inductive hazard identification method consists of an analysis of system components to identify their respective failure modes and the effects they will have on the total system. This method assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem. The City of Ocala uses

inductive hazard identification at the onset of new capital projects to ensure that potential, but not yet realized, hazards are addressed.

Techniques commonly used for inductive hazard identification include:

- Preliminary Hazard Analysis (PHA)
- Sub-System Hazard Analysis (SSHA)
- Operating Hazard Analysis (OHA)

The deductive hazard identification method involves defining an undesired effect or event (e.g., collision, derailment, or fire) and then deducing the possible conditions or system component faults (or combinations thereof) which are necessary to cause the undesired effect or event. The technique most commonly used for deductive hazard identification is Fault Tree Analysis.

Conversely, accident analysis is an example of deductive identification of hazards that have been physically realized. SunTran deduces from the accident and the circumstances of the accident how the mitigation of hazards could take place.

4.3 Methods of Safety Hazard Identification

Every employee is required to report all hazard or unsafe conditions to his/her Supervisor, Department Manager or other appropriate authority as defined in the PTASP. However, employees may also communicate the identification of a potential hazard directly to the City's Transit Manager/CSO or any safety staff member verbally or in writing or by communicating through other established communication channels within the Employee Safety Reporting Program. The City of Ocala defines **hazard** and **risk** as the following:
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 of the transit system or damage to the environment*).
Risk - (*the composite of predicted severity and likelihood of the potential effect of a hazard*)
Safety hazards may be identified using different internal and external sources such as those listed in the following table. SunTran applies risk assessment criteria to the identified hazards based on their estimated severity and likelihood of occurrence to determine acceptance of the risk or need for corrective action to further reduce the risk to the lowest level reasonably practicable.

(*This table is intended to illustrate typical activities and is not intended to be all inclusive*).

Table 1 Typical Safety Hazard Identification Activities and Schedule

Activities	Schedule
Conduct formal analyses prepared and submitted by contractors	As required by contract
Conduct informal observations, inspections and analyses	Daily
Conduct design reviews as part of design process	As required by contract
Field inspections and observations during project construction and testing	Daily during project duration
Field observations and inspections of regular and special operations	Daily
Review of control logs, operations records and reports	Daily & Monthly Reporting
Review maintenance activities, reports and records	Daily & Monthly Reporting
Rules Compliance activities	Daily

Review and investigate employee and passenger observations and complaints	Daily
Perform safety trends analysis	Daily & Monthly
Perform investigations of hazards, adverse advents, close calls (near misses) and safety reports	As required
Formal inspections and audits	Per inspection and audit cycle
Review external agency reports and recommendations	As required
Participate in and conduct peer reviews of other transit properties	As required
Safety Committee, Drivers' and All Staff Meetings	Monthly

For SunTran, most safety hazards typically are identified in the field and reported to Dispatch and are entered on a Daily Operations Log completed by the Dispatch Supervisor on Duty. These hazards are addressed immediately by the responsible departments through established plans, protocols and procedures and corrective measures and ***do not require entry*** onto the Safety Hazard and Risk Assessment log as indicated in this plan.

Safety hazards which are not resolved at the operating, maintenance or other front-line department level are appropriately reported to and investigated by the affected Operations or Fleet Maintenance department SMS Safety Liaison. If the Department Safety Liaison assesses the reported safety hazard to be severe enough to require changes to operating procedures, maintenance procedures, and or training programs, the matter will then progress to the SMS Manager to record the safety hazard on the event log and present to the Site Safety Committee to assist with safety risk mitigation and/or elimination of the hazard. The Contractor Site SMS Executive will be the person responsible for monitoring all corrective actions through its full resolution. The CSO/Transit Manager for the City may also be notified to provide support through full resolution.

If there is a significant severity of the safety hazard (i.e., poses a real and immediate threat to life, property, or the environment) or risk frequency of the hazard, such as the occurrence of accidents, the CSO/Transit Manager for the City will be notified immediately and be brought to the attention of the Accountable Executive for immediate intervention/action. When the hazard requires other resources to eliminate or mitigate to lowest level reasonably acceptable, it may merit an assessment by the Transit Agency Safety Council (TASC). TASC will assess the severity and frequency of the risk and create a formal corrective action plan per its CAP process to mitigate or resolve the safety hazard. The CSO/Transit Manager is the person responsible for monitoring all formal corrective action plans through its full resolution.

In accordance with the FTA and FDOT standard requirements, if it is determined that the final risk assessment of the hazard identified is "unacceptable" using the criteria and assessment process specified in its PTASP, the City of Ocala will notify the FDOT within 24 hours following the determination. The City Transit Manager will transmit an electronic copy via email or a hard copy via fax of the appropriately completed worksheets, forms or other materials documenting the unacceptable hazard. Status reports of the unacceptable hazard investigation will be submitted via email at least monthly, by the 10th of each month, until the investigation is completed.

Upon the completion of the investigation of the "unacceptable" hazard, a Final Hazard Investigation report will be submitted to FDOT for review and final approval that includes a description of activities, findings, identified casual factors, and a corrective action plan, if applicable. The report is not to be considered final until all conditions are met and the report is approved by the FDOT.

4.4 Safety Risk Assessment / Safety Risk Assessment Process

The City of Ocala assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk. The City of Ocala defines hazard severity categories as a quantitative measure of the worst credible safety hazard resulting from a personnel error, environmental conditions, design inadequacies, and procedural deficiencies for a system or component failure or malfunction as indicated in Table II below.

Table II safety hazard severity table

category	description	hazard definition
1	Catastrophic	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause dire events resulting in major system loss, thereby requiring immediate cessation of the unsafe activity or operation.
2	Critical	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause severe harm to persons or major system damage thereby requiring immediate action including immediate cessation of the unsafe activity or operation.
3	Marginal	Operating conditions may cause minor harm or minor system damage such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies can be counteracted or controlled without serious injury, illness or major system damage.
4	Negligible	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies will result in no, or less than minor, harm or system damage.

The City of Ocala describes the likelihood that a hazard may occur in potential occurrences per unit of time, events, items or activity. The City of Ocala derives qualitative hazard probability from research, analysis, and evaluation of safety data from the operating experience of SunTran and/or other similar transit authorities.
A qualitative hazard likelihood ranking for SunTran is as follows in Table III:

Table III Hazard Likelihood Table

Frequency	Description	Probability
Frequent	A	Likely to occur frequently to an individual item. Continuously experienced in the fleet inventory.
Probable	B	Will occur several times in life of an item; will occur frequently in fleet/inventory.
Occasional	C	Likely to occur sometime in life of an item; will occur several times in fleet/inventory.

Frequency	Description	Probability
Remote	D	Unlikely, but possible to occur in life of an item; unlikely but can be expected to occur in fleet/inventory.
Improbable	E	So unlikely, it can be assumed occurrence will not be experienced to an individual item; unlikely to occur but possible in fleet/inventory.
Eliminated	F	Hazard is incapable of occurring.

Before implementation of any corrective action, The City of Ocala has established a hazard safety risk severity category (1 through 4) and a likelihood ranking (A through E) which are combined to form a numerical value called a Risk Index, reflecting both severity and probability of occurrence for each identified hazard. SunTran assigns a Risk Index to a hazard before implementation of any corrective action. The range of likelihood Risk Indices is shown in the following matrix.

Table IV Safety Hazard Risk Index

Frequency of Occurrence	1 Catastrophic	2 Critical	3 Marginal	4 Negligible
(A) Frequent	1A	2A	3A	4A
(B) Probable	1B	2B	3B	4B
(C) Occasional	1C	2C	3C	4C
(D) Remote	1D	2D	3D	4D
(E) Improbable	1E	2E	3E	4E
(F) Eliminated	N/A	N/A	N/A	N/A

4.42 Safety Risk Mitigation

The City of Ocala acts to eliminate identified safety hazards or to reduce the associated risk. In accordance with the risk acceptance criteria below, the City eliminates “unacceptable” hazards or reduces their associated risk to an acceptable level. If this is impossible or impractical, alternatives are recommended to the appropriate City’s transit management decision makers.

The risk assessment and acceptance criteria assist’s SunTran’s management in understanding the amount of risk involved by accepting the safety hazard relative to the costs (schedule, dollars, operations, etc.) to reduce the hazard’s risk to an acceptable level. The following table identifies the hazard acceptance criteria:

Table V Safety Hazard Risk Acceptance Criteria

	Hazard Risk Index	Decision Authority	Special Conditions
	1A, 1B, 2A, 2B, 3A	Unacceptable	Requires immediate resolution
	1C, 1D, 2C, 2D, 3B, 3C	Undesirable	Requires Chief Safety Officer review and concurrence from the Accountable Executive
	1E, 2E, 3D, 3E, 4A, 4B	Acceptable with Review	Requires Chief Safety Officer and Transit Agency Safety Council (TASC) review

	4C, 4D, 4E	Acceptable	None

The order of precedence for satisfying system safety requirements and resolving (eliminating or controlling) hazards for SunTran is as follows:

- **Design for Minimum Risk -** The primary safety effort during the design phase of a project will be an attempt to eliminate hazards through design selections (e.g., fail safe, redundancy).
- **Incorporate Safety Devices**. Hazards that cannot be eliminated or controlled through design selection are controlled to an acceptable level through use of fixed, automatic or other protective safety design features or devices, including PPE.
- **Provide Warning Devices -** Where it is not possible to preclude the existence or occurrence of a hazard through design selection or use of safety devices, warning devices will be installed for the timely detection of the hazard condition and the generation of an adequate warning signal.
- **Develop Special Procedures, Equipment and Training -** Where it is not possible to eliminate or reduce the magnitude of an existing or potential hazard through design selection or the use of safety and warning devices; special procedures, including the use of personal protective equipment, will be developed by (The City of Ocala or its Contractors, as required) to control the hazard. All applicable personnel are trained on the procedures and equipment in accordance with SunTran's Standard Operating Procedures.

See Attachment LYTX System

4.43 Safety Hazard Notifications, Thresholds and Reporting

This section describes the process used by SunTran to conduct accident/incident/hazard investigations, notify appropriate external agencies, and document these activities.

4.44 Safety Risk Management Meetings

To ensure an on-going involvement in SunTran's safety hazard management process, the FDOT will be invited to participate in meetings held at least quarterly in conjunction with the Transit Agency Safety Council (TASC) to review the Safety Hazard Risk Assessment and Tracking Log, Corrective Action Plan Monitoring Log, and the other SunTran activities associated with the hazard management process. The City Transit Manager will submit to FDOT a proposed date and location for the meeting and a proposed agenda.

During the meetings, FDOT may request and review any records maintained by SunTran documenting the results of its hazard management process. If these records are not available at the meetings, SunTran will transmit them via email or in hard copy via mail or fax after the conclusion of the meeting.

SunTran will prepare meeting minutes from each meeting, being sure to document any identified action items or required activities. The meeting minutes are prepared and submitted to the City Transit Manager for TASC committee approval at the next meeting.

4.45 Corrective Action Plan Procedures

SunTran applies risk assessment criteria to the identified hazards based on their estimated severity and likelihood of occurrence to determine acceptance of the risk or the need for corrective action to further reduce the risk. In accordance with FDOT requirements, SunTran

is required to develop corrective action plans for various deficiencies and hazards identified through on-site safety and security review process, accident or hazard investigations, internal safety or security reviews. Either THE FDOT or the City of Ocala may identify need for corrective actions. If the FDOT identifies a need for corrective action, it will notify the City of Ocala in writing.

4.46 Causes for Initiation of Corrective Action Plan:

- **On Site FDOT or FTA Safety and Security Review** – Upon receipt of the final report for an external regulatory agency safety or security review, the City of Ocala will develop a corrective action plan to correct identified deficiencies and submit the CAP as required
- **Accident/Incident/Hazard Investigations –** Regardless of the agency conducting the investigation process, any final report indicating findings and recommendations for addressing deficiencies or unsafe conditions with SunTran will be the primary responsibility of the City's Operations and Maintenance Contractor SMS Staff to correct. Upon receipt of the final report, the Contractor will have 15 calendar days to develop a corrective action plan or methodology to correct identified deficiencies.
- **Internal Safety and Security Review -** If the City of Ocala finds areas of non-compliance during internal audits of SunTran's Agency Safety Plan or Security and Emergency Preparedness Plan, those areas of non-compliance must be remedied by a corrective action plan within 30 calendar days. If FDOT rejects SunTran's annual safety or security audit report, the City will have **15 calendar days** to develop a corrective action plan to correct identified deficiencies.

4.47 Corrective Action Plan Required Components:

- Identified noted Hazard or deficiency.
- Date Corrective Action Plan was opened.
- Process, Plan or Mechanism to address and resolve deficiency.
- Deadline for implementation of Plan of Action.
- Departments and Persons who will be responsible for implementation.

4.5 Safety Hazard Risk Documentation and Monitoring / Safety Hazard and Risk Management Documentation

The Site Operations and Fleet Maintenance Safety Liaisons are responsible to appropriately document the following information for safety hazards identified in their respective areas, including:

- How the safety hazard was recognized and reported
- A description of the safety hazard and the immediate corrective action(s) taken
- The Initial Risk Assessment, based on the likelihood and severity of the hazard if nothing was done and using the risk assessment matrix in the City of Ocala's PTASP Chapter 5 Safety Risk Management Process (Sections 5.1.0 – 5.6.0)
- Results of the investigation, including the circumstances, events and causal factors(s) leading up to the safety hazard
- Additional corrective action that was or will be done to reduce the likelihood and/or severity of the safety risk (including schedule and responsibility)
- The Final Risk Assessment, based on the likelihood of the safety hazard to occur and its likely severity when the proposed corrective action/resolution is in place.

This information will be submitted at least weekly to the Site SMS Manager to review and monitor each department's compliance with Safety Risk Management (SRM) activities. The SMS Manager will ensure that any deficiencies or failures in this area are immediately documented and transmitted to the appropriate SMS personnel for corrective action.

4.52 Safety Hazard and Risk Assessment Tracking

The City of Ocala has established a Safety Hazard and Risk Assessment Log for SunTran which reflects the consolidation of information in the Safety Risk Management (SRM) process. The Safety Hazard and Risk Assessment log contains all safety hazards meeting the unacceptable or undesirable thresholds. The Log includes the following required information:

- **ID Number** – refers to the number assigned to the hazard by SunTran.
- **Safety Hazard Description** – refers to a brief narrative summary of the hazard – what it is; where it is located; what elements it is comprised of; and element of SunTran's operation affected by the hazard (i.e., facilities, vehicles, personnel training and procedures, etc.).
- **Date Identified** – refers to the date the hazard was identified at SunTran.
- **Safety Hazard Source** – indicates the mechanism used to identify the hazard, (i.e., operator report, near miss, accident investigation, results of internal safety or security review/audit, rules compliance or training program; maintenance failure, facility, equipment or vehicle inspection, trend analysis, formal hazard analysis, etc.).
- **Safety Hazard Risk Index** – refers to the hazard severity and hazard frequency (or risk index) ratings initially assigned to the hazard by SunTran.
- **Safety Hazard Mitigation/CAPs** – refers to the actions recommended by the City of Ocala on behalf of SunTran to address the hazard and bring it into a level of risk acceptable to management.
- **Status** – refers to the status of the recommendations. Status may be designed as pending, open, in progress, or closed.

In accordance with the City's PTASP the Contractor SMS Manager is responsible for the maintenance of the Safety Risk Management Process and Safety Hazard and Risk Assessment Log for the transit site. The Contractor SMS Manager will ensure that all defined criteria for safety hazard identification and safety risk assessment is entered and a safety risk rating has been assigned. The following are specific safety hazards that must be immediately reported to the Chief Safety Officer/City Transit Manager when identified; whether it is mitigated at the Contractor Management level and/or at the City of Ocala level:

- All Unacceptable Safety Hazard Risks;
- Safety Risks identified from audits from outside agencies (FDOT, SSO, FTA and OSHA);
- Safety Risks identified from accident investigations;
- Safety Hazards where corrective action will cost more than $5,000; or
- When warranted by the SMS Site Executive

Table VI Sample Safety Hazard and Risk Assessment Tracking Log

#	Identified Hazard	Hazard Description	Risk before Mitigation Measures			Risk Elimination or Mitigation Measures	Risk After Mitigation Measures			Verification
			Severity	Likelihood	Risk Hazard Index		Severity	Likelihood	Risk Hazard Index	
EXAMPLE	New large cutaways have a blind spot in the right front corner of the vehicles	Cannot see vehicles and pedestrians near the right front corner of the vehicle causing near misses and or possible vehicle and pedestrian strikes.	II	A	**High**	**1.Oder different model of cutaway going forward** **2.Attach blind spot mirrors and/or body cameras to increase visibility and reduce likelihood of an accident** **3. Provide training to all operators on blind spot avoidance and awareness techniques**	**II**	**C**	**Medium**	**Instances of near miss, pedestrian strikes, and vehicle strikes in small cutaways are zero for last year.**
1					**#N/A**					
2					**#N/A**					

The Tracking Log is submitted by the 10th of each month to the City of Ocala Transit Manager/Chief Safety Officer. The Transit Manager reviews the Monthly Safety Hazard and Risk Assessment Tracking Log and forwards any questions or requests for information to the Contractor (RATP Dev). In addition, the City of Ocala conducts at minimum quarterly meetings with the Contractor (RATP Dev) to review the Tracking Log and the other activities associated with the safety risk management process. An invitation along with an agenda will also be sent to the Grants Manager for FDOT and Marion County Transportation Planning Office (TPO) for the quarterly meeting. The quarterly safety risk management meetings are discussed further in other sections.

4.6 Exposure to Infectious Disease

SunTran has developed a safety plan for Exposure to Infectious Diseases to minimize the exposure
of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the Centers for Disease Control (CDC), and Prevention for a State health authority, minimize
exposure to infectious disease [49 U.S.C § (5329(d)(1)(D)].

- SunTran would consider identifying mitigations or strategies related to exposure to infectious diseases through the Safety Risk Management process described in Section 4.41: Safety Risk Assessment Process

SECTION 5: Safety Assurance

Safety Assurance is accomplished through implementation of safety oversight and risk monitoring activities. Safety performance measures are used to select improvement targets, monitor safety performance, and encourage continuous improvements in service delivery. As the City of Ocala implements its SMS, several activities will be initiated, and tools will be developed to support these safety oversight and risk monitoring activities. Safety assurance includes safety reviews, evaluations, inspections, as well as safety data collection, tracking and analysis from various resources, including investigations; and development of Key Performance Indicators (KPI's).

The City of Ocala has developed and implemented a safety assurance process for SunTran consistent with 49 CFR Part 673 to ensure SunTran complies with or exceeds the established safety standards set forth in the PTASP and Chapter 14-90, FAC Requirements. These processes will allow the City of Ocala to:

- ❖ Monitor SunTran for compliance with, and sufficiency of, the agency's procedures for operations and maintenance
- ❖ Monitor SunTran operations to identify hazards not identified through the Safety Risk Management process (per 49 CFR 673.25)
- ❖ Monitor SunTran operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended
- ❖ Conduct investigations of safety events, including the identification of casual factors; and
- ❖ Monitor information reported through any internal safety reporting programs.

Results from the above processes are compared against recent performance trends: monthly, quarterly, and annually by the City of Ocala and Contractor SMS Key Staff to determine where action needs to be taken. The Transit Manager/Chief Safety Officer will review the performance of individual safety risk mitigations during scheduled Safety Committee/Council meetings, based on the reporting schedule determined. The SMS Manager enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for re-evaluation by the Site Safety Committee and/or Transit Agency Safety Council (TASC) with oversight by the City of Ocala and Contractor SMS Executives (City Transit Manager and Contractor General Manager).

These processes will provide the confidence to the City of Ocala leadership that the organization and system is functioning at an acceptable level of safety.

See Attachment Approval Page.

5.1 Safety Performance Measuring and Monitoring Activities

The City of Ocala has established safety objectives; performance targets and performance measures in coordination with its Contract Provider (RATP Dev), FDOT and Marion County TPO in compliance with all requirements set forth in FTA's Public Transportation Safety

Agency Plan (PTASP) and the National Public Transportation Safety Plan (NSP). The initial focus of SunTran's performance measure and established safety performance targets is based on existing data delivered to the National Transit database (NTD) for:

- Major Safety Events
- Major Safety Events - Rate per 100,000 Revenue
- Miles
- Collisions
- Collisions - Rate per 100,000 Revenue Miles
- Pedestrian Collisions - Rate per 100,000 Revenue
- Miles
- Vehicular Collisions - Rate per 100,000 Revenue
- Miles
- Fatalities
- Fatalities - Rate per 100,000 Revenue Miles
- Transit Worker Fatalities - Rate per 100,000
- Revenue Miles
- Injuries
- Injuries - Rate per 100,000 Revenue Miles
- Transit Worker Injuries - Rate per 100,000
- Revenue Miles
- Assaults on Transit Workers
- Assaults on Transit Workers - Rate per 100,000
- Revenue Miles
- System Reliability (Mean Distance Between Major

See Attachment NTD Reports.
See Attachment Monday.com

Mechanical Failures)Collection and Analysis, Internal Safety Audit Processes, Accident and Incident Reporting and Investigation, Internal System Safety Audit and Review, Drug and Alcohol Program and Medical Monitoring, and Employee Safety Reporting and Training.

SunTran will maintain 100% compliance with all safety performance requirements through use of the following performance measure activities:

- ❖ Safety audits; informal inspections
- ❖ Regular safety review of onboard camera footage to assess drivers and specific incidents
- ❖ Employee safety reporting program
- ❖ Investigation of safety occurrences
- ❖ Daily data gathering and monitoring of data related to service delivery; and
- ❖ Regular vehicle inspections and preventive maintenance.
- ❖ Adherence to schedules set and acceptable measures
- ❖ Appropriate corrective action plans (CAPS) for findings and reasonable timeframe for closure of CAPS in coordination with federal, state, and local oversight agencies as necessary

5.2 Transit Asset Management/State of Good Repair

The City of Ocala also addresses the requirements of 49 CFR Parts 625 and 630, Transit Asset Management (TAM) and State of Good Repair (SGR), through the City's *Transit Asset Management Plan*, which includes TAM and SGR performance measures. The TAM Plan allows SunTran to predict the impact of its polices and investment justification decisions on the condition of its assets throughout the asset's life cycle and enhances the ability to maintain SGR by proactively investing in an asset before the asset's condition deteriorates to an unacceptable level. The goal of these policies is to allow the City of Ocala to determine and predict the cost to improve SunTran asset condition(s) at various stages of the asset life cycle while balancing prioritization of capital, operating, and expansion needs. The two foundational criteria of SGR performance measures are ULB and Condition.

5.3 Operations and Maintenance Rules and Procedures

Bus Operations are strictly governed by policies and procedures outlined in the Standard Operating Procedures (SOPs) Rule Book, and Operations Manuals prepared by the Contractor Organization. Fleet Maintenance rules and procedures are contained in the Maintenance Plan and manufacturers' manuals. These publications cover all rules and procedures that are necessary to operate a safe and efficient bus system.

Review of Operations and Maintenance Rules and procedures are conducted as necessary by the Chief safety Officer and Contractor General Manager. These reviews are conducted when system monitoring and data analysis imply that either the SOPs or rules are not effective or when change or expansion occurs. Review also occurs annually during the internal safety audit process.

All rules compliance findings of non-compliance are evaluated by the Contractor General Manager and Chief Safety Officer, and where appropriate, are managed through SunTran's safety hazard risk management process in compliance with Part II (Safety Risk Management) of this Safety Plan.

5.4 Operations Personnel Rules Compliance

Daily inspections of operators are required prior to pull-out. Dispatch Supervisors enforce rules and procedures in the field by observing, correcting, and documenting safety-related behaviors and activities of operators and system elements. Daily and weekly operational checks are made in the field that include but are not limited to:

- Speed checks (yards, intersections)
- Observation checks for time and load
- General observations of vehicles, signals, and system for deficiencies; and
- Follow up on patron complaints
- Performance of ride checks to ensure operator rules compliance during revenue operations

Periodic spot checks are made as result of an accident, request, and/or at random. Management may also conduct random checks that include but are not limited to:

- General vehicle operation
- Attention to duty
- Signal compliance
- Door operation

5.5 Maintenance Personnel Rules Compliance

Maintenance Supervisors enforce rules and procedures by observing and monitoring employee and contractor performance on the bus system and at worksite. Rules and procedures monitored and observed for compliance include but are not limited to:

- General safety
- Proper use of tools, equipment and machinery
- Proper use of personal protective equipment
- Right-of-way safety
- Fire safety
- Material handling and storage
- Quality Assurance inspections, and audits of procedures, including rule compliance

5.6 Facilities and Safety Equipment Inspections

An essential element of SunTran's Safety Management program is regular inspection of all bus system facilities and safety-critical equipment on a regular basis according to company policies and SOPs, equipment manufacturer's guidelines and recommendations, and as required by local, state, and federal regulations. In addition, facilities and equipment are also inspected by departments and/or Safety staff as result of accident reports. Inspections are documented on checklists, filled out at time of inspection to assure a consistent level of monitoring and general maintenance. The checklists and written reports are issued following the inspections and all action items are put into the work order system.

All Sun Tran administrative and maintenance buildings comply with applicable code requirements and have various fire/life safety features that may include:

- Fire extinguishers and alarms
- Handrails and guardrails
- Fences and gates
- Sprinkler systems
- Emergency exits and lighting
- Emergency communications systems
- Emergency shower
- Eyewash stations
- Chemical/paint safety

Facility inspections are performed monthly. Critical items/conditions disclosed during inspection are repaired immediately. Non-critical items/conditions are cycled through work order procedure. Any items identified by maintenance as critical issues are evaluated by the City's Facility Director, and where appropriate, are managed through SunTran's hazard management process in compliance with this PTASP.

The frequency of equipment inspections depends upon the level of hazard associated with operation, industry standards, and contractor supplier recommendations.

5.7 Vehicle Maintenance and Inspections

The Fleet Maintenance Director is responsible for ensuring that a Maintenance Plan that follows FAC 14-90 has been developed and implemented by the agency and that all vehicles operated are regularly and systematically inspected, maintained, and lubricated according to the agency's Maintenance Plan and Preventative Maintenance Guidelines.

Suntran's vehicle maintenance plan will ensure that all buses operated, and all parts and accessories on such buses, including those specified in Rule 14-90.007, F.A.C., and any additional parts and accessories which may affect safety of operation, including frame and frame assemblies, suspension systems, axles and attaching parts, wheels and rims, and steering systems, are regularly and systematically inspected, maintained, and lubricated to standards that meet or exceed the bus manufacturer's recommendations and requirements.

The Fleet Maintenance Department has several audit checks in place to ensure that inspections are being properly conducted and completed. These audit checks include performing audits of the maintenance inspection and testing, doing monthly reviews of number inspections scheduled vs. number completed, and ensuring equipment is thoroughly checked through the preventive maintenance program procedures.

5.71 Pre-Trip and Post Trip Inspections

Drivers are required to perform daily Pre-Trip and Post-Trip vehicle inspections prior to operating the assigned vehicle, during routes, and after all route schedules are completed. The pre-trip inspection includes an inspection of the following parts and devices to ascertain that they are in safe condition and in good working order:

- Service brakes
- Parking brakes
- Tires and wheels
- Steering
- Horn
- Lighting devices
- Windshield wipers
- Rear vision mirrors
- Passenger doors
- Exhaust system
- Equipment for transporting wheelchairs
- Safety, security, and emergency equipment

During the scheduled trips and at the end of the day, the operator will note any additional findings and submit the daily vehicle inspection forms. The process and form(s) to be utilized for daily vehicle inspections is included in the agency's preventative maintenance guidelines. The daily vehicle inspection forms must be complete with the operator's signature and a check in each box to document that the items are "OK" or a defect is noted in the comments section. If the driver finds any mechanical or other problems that could compromise the safety of the vehicle at any point, the drivers will immediately inform the Maintenance Director and the vehicle will not be scheduled for service until repaired. Failure to report deficiencies by drivers may result in an administrative action taken against the employee.

The Maintenance Director will review the daily inspections and document the corrective actions taken as a result of any deficiencies identified by the operator. Daily inspection records will be retained for a minimum of two weeks. The Maintenance Director will periodically conduct vehicle inspections behind the drivers who have completed the vehicle inspections to ensure that the daily vehicle inspections are adequately performed. Once defects are noted they will be prioritized and sorted into categories for repairs. Once a defect is noted on the inspection form and repaired, the documentation will be attached to the work/repair order and filed in the maintenance files.

5.72 Preventative Maintenance

A preventative maintenance schedule is implemented to inspect for safety hazards and to

maintain vehicles in a manner conforming to safety regulations.

Suntran will perform scheduled preventive maintenance on all vehicles at every 6,000 miles according to the agency's maintenance plan. As preventative maintenance inspections are scheduled by projected mileage, the agency will allow ±600 miles deviations in mileage interval, so long as the actual mileage interval meets the manufacturer's recommended maintenance schedule. Inspections are performed in 6,000 miles intervals.

Table VI Preventive Maintenance Inspection Table

❖ Vehicle Equipment	❖ Cycles
Revenue and Non-Revenue Vehicles	Fluids, including, but not limited to, oil and antifreeze are tested regularly as part of the general maintenance warranty, and contract compliance procedures. A preventive maintenance plan is in place for all ADA-mandated accessibility features. Maintenance checks are performed for wheelchair lifts on bus fleet. Lifts are routinely scheduled for maintenance at the manufacturer's recommended intervals.

When a vehicle is due for an inspection; it will be taken out of service until the inspection is completed. This allows a series of repairs to be carried out while minimizing costs and optimizing the number of operational vehicles. If a vehicle is "down" for an extended period of time due to unavoidable circumstances, preventative maintenance will be temporarily suspended until the vehicle can be returned to service. However, the annual inspection will be conducted on all vehicles regardless of "up/down" status and/or mileage accrued.

Preventive maintenance activities are continuously monitored by the Maintenance Fleet Director and assigned Maintenance personnel. The Maintenance Director will regularly perform Quality Control (QC)/Quality Assurance (QA) checks to ensure that the inspections and repairs, both in-house and contracted, are completed, and documented properly. Each vehicle will have a written record documenting preventive maintenance, regular maintenance, inspections, lubrication, and repairs performed. Such records will be maintained for at least four years and include, at a minimum, the following information:

- Identification of the bus, the make, model, and license number or other means of positive identification and ownership
- Date, mileage, description, and each type of inspection, maintenance, lubrication, or repair performed
- If not owned by Suntran, the name of any person furnishing a vehicle
- The name and address of any entity or contractor performing an inspection, maintenance, lubrication, or repair

For tracking purposes, a maintenance log will be kept containing vehicle ID, make and type of vehicle, year, model, special equipment, inspections, maintenance and lubrication intervals, and date or mileage when services are due.

5.73 Bus Safety Inspections

Bus Safety inspections are also part of the maintenance inspections and are performed at least once every year on all buses operated by Suntran and contracted service providers. The Maintenance Director is responsible for ensuring that each individual performing a bus safety inspection is qualified as follows:

- Understands the requirements set forth in Rule 14-90 and can identify defective components.

- Is knowledgeable of and has mastered the methods, procedures, tools, and equipment used when performing an inspection.

- Has at least one year of training and/or experience as a mechanic or inspector in a vehicle maintenance program and has sufficient general knowledge of buses owned and operated by the bus transit system to recognize deficiencies or mechanical defects.

Each bus receiving a safety inspection shall be checked for compliance with the requirements for safety devices and equipment as referenced or specified by Rule 14-90. Specific operable equipment and devices as required by Rule 14-90 include the following as applicable to Type I and II buses:

- Horn
- Windshield wipers
- Mirrors
- Wiring and batteries
- Service and parking brakes
- Warning devices
- Directional signals
- Hazard warning signals
- Lighting systems and signaling devices
- Handrails and stanchions
- Standee line and warning
- Doors and brake interlock devices
- Step-wells and flooring
- Emergency exits
- Tires and wheels
- Suspension system
- Steering system
- Exhaust system
- Seat belts
- Safety equipment
- Equipment for transporting wheelchairs
- Working speedometer

A safety inspection report will be prepared by the individual(s) performing the inspection and will include the following:

- Identification of the individual(s) performing the inspection

- Identification of the bus transit system operating the bus

- The date of the inspection

- Identification of the bus inspected

- Identification of the equipment and devices inspected including the identification of equipment and devices found deficient or defective

- Identification of corrective action(s) for any deficient or defective items found and date(s) of completion of corrective action(s)

Records of annual safety inspections and documentation of any required corrective actions will be retained for a minimum of four years for compliance review. Daily inspection reports will be kept for a minimum of two weeks.

5.74 Vehicle Equipment Program Documentation

Maintenance personnel maintain a variety of vehicle maintenance documentation including accurate time records on each vehicle, service dates, work order details (inspections, repairs, and overhauls), and all Preventative Maintenance Inspection (PMI) data, as well as documentation for facility/equipment inspections. Preventive, corrective, and scheduled maintenance is tracked through spreadsheets and/or database to perform failure analyses and determine remedial actions. Records of each vehicle are sufficiently detailed to quickly determine the life of sub-assemblies, and to enable trend analysis. The City of Ocala and SunTran management also review equipment trends for planning purposes.

The scope of the bus/non-revenue vehicle maintenance plan is to provide safe, clean, reliable transit service to SunTran customers through the adoption and implementation of sound maintenance practices as prescribed by law and based on SunTran's experience and expertise. The bus/non-revenue vehicle maintenance plan is implemented daily through the conduct of normal business operations. All bus/non-revenue vehicle maintenance checklists include recommended manufacture, supplier, or builder procedures, programs, and guidelines. The current systems provide notification to management if scheduled intervals are missed, and corrective action is taken.

5.8 Safety Data Acquisition and Analysis

The City of Ocala understands that implementing and maintaining a robust SMS requires acquiring safety-related data from various sources and analyzing and distributing that data to adequately control hazards, ensure continuous improvement, inform SunTran management and staff of safety-related system status, ensure the appropriation of sufficient resources to address system hazards, and identify appropriate mitigations for newly emerging or latent hazards as well as meet external reporting requirements. Trend analysis is performed on safety data as a means of identifying hazards, effective or ineffective mitigations, and contributing factors of adverse events.

5.81 Data Acquisition

Safety data is collected, documented and analyzed from numerous sources by all departments. Sources include but are not limited to:

- Accident/Incident Reports
- External agency Reports and Publications
- City Official Concerns
- Claims Reports
- Daily Operations Reports
- Maintenance Reports
- Employee Concerns
- Employee Occupational Injury Reports
- FTA Bulletins and Safety Advisories
- Homeland Security Alerts
- Internal Audit Reports
- FDOT/FTA Reviews
- Passenger Concerns

- Field Inspections, Assessments and Observations
- Safety Meetings
- Special Occurrence Reports
- Police Reports, concerns and investigations

Safety data collection also involves obtaining technical information, data and reports for use in systems development of program elements. Sources for such data include but are not limited to:

- Department of Homeland Security (DHS)
- Environmental Protection Agency (EPA)
- Federal Transit Administration (FTA)
- FDOT
- State & Federal Statutes
- Safety Data Sheets (SDS)
- National Transportation Institute (NTI)
- Occupational Safety and Health Administration (OSHA)

Other data and information sources include building codes and professional society guidelines, and information technology and cybersecurity standards organizations.

5.82 Safety Data Analysis

Used as part of the hazard management process, data collection and analysis are used to identify hazards before they cause accidents by such techniques as trend analysis. Analysis of safety data will help the City of Ocala improve system performance, not only in respect to safety, but also in overall delivery of service to the public. The results of such analysis will be shared with agency staff and law enforcement agencies on, at minimum, an annual basis for awareness and support.

SunTran's Operations and Fleet Maintenance departments under the direction of Key SMS Personnel collect and track their safety-related data to identify causal factors and undesirable trends, including those related to hazards. The investigation may include interviews, testing and analysis of related documentation. Identified hazards are tracked and findings requiring corrective action are submitted to the SMS Manager and the other SunTran department(s) for review, assessment, concurrence, and discussion of further appropriate mitigations. The City's Transit Manager/Chief Safety Officer reviews all safety data analysis, and verifies compliance with SMS and this PTASP, and provides expert advice to SunTran Management and the Transit Agency Safety Council (TASC).

5.83 Safety Data Access

To ensure that all departments can properly fulfill their respective responsibilities for collecting, analyzing, and distributing hazard-related data, SunTran's respective departments collect, analyze and report on requisite data as indicated in Table VII.

Table VII Data Access Table

Minimum Required Data	Provider
Accident records, near-miss records, employee injury forms, and related accident data	Operations
Operator training programs and records	Operations Training
Maintenance training programs and records	Maintenance Training
Accident/incident investigation reports, complaints and hazards	Operations/City and SunTran Administration

Minimum Required Data	Provider
Medical Services information	Operations, Human Resources
Right-of-Way Allocation records	Growth Management Infrastructure/Procurement/Operations
Safety records of individual division employees relative to accidents and rule violations	Operations
Records of inspections, maintenance work, accident-related activities and emergency responses	Maintenance
Modifications to equipment and facilities	Maintenance and City Growth Management Capital Program
System-wide policies and procedures, operating orders and general notices	Chief Safety Officer/ Growth Management/Infrastructure
Complete and current personnel files	Contractor General Manager/Human Resources
Contractor's safety-related programs and procedures	Contractor General Manager/City Growth Management Transit Manager
List of hazardous materials and equipment	Maintenance, Operations
Employee Concerns	All Departments & Functions

Please note this table represents major categories of data, and does not list all sources or data collected, analyzed, and reported upon by the City of Ocala for SunTran.

5.84 Internal Safety Audit Process

Internal safety reviews and inspections are critical components of an integrated system safety program. All departments are required to assess internally their own compliance with SMS through the authority and oversight of the Key SMS Personnel in each department. The SMS Executives for both the City and Contractor (City Transit Manager and Contractor General Manager) will provide both support to the programs in development of compliance documentation and assessment checklists, and direct oversight of the program by means of its own safety and security audit program under the direction of the City Growth Management Director/Accountable Executive.

The internal audit program will encompass all SMS requirements as laid out in this PTASP, and in the departmental documentation detailing how the SMS program is implemented within each department/functional area and will be conducted starting November 1 of each calendar year and ending prior to the end of the same calendar year utilizing the internal audit checklist included in the Appendix.

5.85 System Safety and Security Audit Objectives

The Internal Safety and Security Audit Process is a proactive approach to verify that the City of Ocala's SMS is robust, has been properly implemented, all foreseeable hazards have been identified and properly mitigated, and continuous improvement is achieved. Additionally, compliance with this PTASP is assessed through the audit process. Specifically, the Internal Safety and Security Audit Process is implemented to:

- To assess the effectiveness of safety and security programs
- To identify process deficiencies

- To identify hazards in the operational system and verify current mitigations are effective
- To identify weaknesses in system safety and system security programs
- To verify that corrective actions are being closed efficiently and to evaluate their effectiveness
- To recommend system safety and system security improvements
- To provide management with an assessment of the system safety and system security program
- To assure continuing evaluation of safety and security-related programs, issues, awareness, and reporting.

5.86 Corrective Actions

In accordance with FDOT requirements, SunTran is required to develop corrective action plans for various deficiencies and hazards identified through on-site safety and security review process, accident or hazard investigations, and internal safety or security reviews. Either THE FDOT or the City of Ocala may identify the need for corrective actions. If the FDOT identifies a need for corrective action, it will notify the City of Ocala in writing. All Corrective Actions will be appropriately reported to the FDOT per SunTran's procedures previously outlined in Section 4 - Safety Risk Management Process.

5.87 Compliance with Local, State and Federal Requirements

All SunTran employees are required to comply with all applicable federal, state and local statutory requirements. This includes licensing, motor vehicle and street operations statutes, and labor law.

5.88 Drug and Alcohol Program and Medical Monitoring

SunTran maintains a Zero Tolerance drug and alcohol program in compliance with U.S. Department of Transportation and Federal Transit Administration regulations and to ensure the safe operation and maintenance of systems and equipment. The program includes criteria for random testing of safety sensitive personnel and testing for cause either accident related or from observed behavior.
Drug and alcohol testing and information about drug and alcohol abuse is included in SunTran's Drug and Alcohol Policy. The program is administered by SunTran's Drug and Alcohol Substance Abuse Program Manager which includes verification of compliance with the program and training. Training is given to all employees during orientation training. Revisions to the program are distributed to all employees and if necessary, follow-up training is also provided. Compliance and knowledge of the program is accomplished through direct supervision of employees and annual refresher training.

SunTran's Medical Examination requirements include a pre-employment examination for applicants, an examination at least once every two (2) years for exiting drivers, and a return to duty examination for any driver prior to returning to duty after having been off duty for 30 days or more due to an illness, medical condition, or injury. Employees may be required to take physical examinations at other times if management deems it necessary. SunTran will not allow a driver to operate a transit vehicle without having on file a completed medical examination certificate dated within the past 24 months.

5.9 Accident and Incident Reporting, Investigation and Corrective Action Plans

This section outlines the actions to be taken by all employees for any safety event related to SunTran Transit vehicles, passengers, employees or property while either operating vehicles and/or performing other job -related tasks. An event is defined as any accident, incident or occurrence. Each is further defined as follows:

The definition of an **accident** is 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 transit 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. The definition of an **incident** is 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. The definition of an **occurrence** is an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of the transit agency. The definition of a **near miss** is a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations.

Any event involving a bus or taking place on property controlled by a transit system and resulting in a fatality, injury, or property damage will be investigated by Suntran. All events included but not limited to the following, will be investigated:

- A fatality, where an individual is confirmed dead within 30 days of a bus transit system related event, excluding suicides and deaths from illnesses.
- Injuries requiring immediate medical attention away from the scene for two or more individuals.
- Property damage to bus transit system buses, non-bus transit system vehicles, other bus system property or facilities, or any other property. SunTran will have the discretion to investigate events resulting in property damage less than $1,000.
- Evacuation of a bus due to a life safety event where there is imminent danger to passengers on the bus, excluding evacuations due to operational issues.
- Injuries involving medical attention away from the scene for two or more individuals.
- SunTran senior staff will review incident log to track and trend issues annually.

5.91 Procedures for Reporting Accident, Incident or Occurrence

Operators shall immediately report the accident to the dispatcher by radio. The dispatcher will contact the supervisor and the police. Operators should report any injury so that the dispatcher can send ambulance service if required. Supervisors will be sent to the scene depending on the severity of the event at the discretion of the Operations Manager.

The following are the procedures for reporting accidents, incidents or occurrences for the Contract Provider (RATP Dev) Operations and Maintenance department personnel:

5.92 Employee Responsibilities:

- All employees must immediately report any accident, incident or occurrence to the Department Manager/Supervisor or Dispatcher on duty regardless of injury or property damage
- Employees must complete all required reporting paperwork providing details and supporting documentation as necessary on the same day or next day if after hours

5.93 If the event involves a passenger vehicle:

- Remain calm and assess the situation
- Secure the vehicle (Set Brake, place in neutral & turn on 4-way hazards)
- Contact Dispatch via radio
- Provide dispatch with exact location, description of accident, number and type of injuries
- Secure the scene (Not to move the vehicle unless directed by emergency responders or Supervisors. Place triangles and assist passengers with first aid (if warranted)
- Request passengers to fill out courtesy comment cards and obtain other witness statements if available
- Obtain facts about the other vehicles involved and begin filling out accident or incident paperwork
- Give only information requested by Law Enforcement (DO NOT discuss the accident with anyone other than law Enforcement and Supervisor and DO NOT make any statements concerning liability).
- Under no circumstances should an operator leave the scene of an accident prior to the arrival of Law Enforcement unless directed to do so by a supervisor or other accident investigator.
- Supervisor on scene will be the primary accident investigator and will secure medical assistance and or triage the scene to mitigate further damage or injury.
- The primary accident investigator will take photos, collect witness/passenger courtesy comment cards, interview passengers and other witnesses if allowed, review video, and begin supervisor incident reporting paperwork. They will also be responsible for determining post-accident FTA drug and alcohol testing as applicable.
- The Employee Accident or Incident report should be completed and submitted to the department Manager the same day during working hours, or, next day if the accident or incident occurred during non-business hours.

5.94 Supervisor/Manager Responsibilities:

- Once report is submitted to the appropriate department Manager, all information regarding the accident or incident will then be reviewed, investigated, and forwarded to the Contractor General Manager for final review.
- The original report with all signatures and supporting documentation should be followed by mail or hand delivery within two (2) business days to the SMS Manager.
- The City Transit Manager will be notified of all accidents or incidents that involve loss of life, serious injury and or property damage or loss

5.95 Procedures for Reporting Near Miss

The City of Ocala's PTASP requires proactive reporting of safety hazards or safety concerns on the part of all employees to maintain a proactive position on risk. Each employee, regardless of his or her position within the organization, is expected to cooperate in all aspects of safety reporting. When an employee becomes aware of a hazard or near miss,

they shall submit a report at the end of the shift using one of the following two reporting forms: 1) SunTran's Hazard Incident Report Form or 2) SunTran Driver's View Form for any system deficiencies, road hazards, passenger concerns, etc. that require the attention of management for resolution.
A full investigation may not be required for all near misses. In this case, the Department Manager/Safety Liaison, will determine the level of investigation appropriate to effectively address the report and will forward the final completed investigation report and other documentation to the SMS Manager who will be responsible for documenting and recording on the hazard event tracking log.
When the contributing or causal factor is not readily determined the SMS Safety Liaison for the respective department will review and conduct the follow-up investigations using same procedures as outlined for other safety events.

5.96 Accident or Incident Investigation and Corrective Action

As with any investigation, time is of the essence, therefore SunTran's SMS Management team will promptly and thoroughly investigate all safety events that result in product, service, and employee safety risk. Every effort will be made to conclude investigations within 7 business days of the incident. Investigations are a methodical search into an event where information relating to factors that may have caused or contributed to the event are discovered.
The investigation process is comprised of the following three phases:

1) **Phase 1 - Initial Investigation and interview** – (In this phase, all relevant and pertinent information is obtained and documented accordingly)
2) **Phase 2 - Root Cause Determination** – (In this phase contributing or causal factors are identified, assessed)
3) **Phase 3 - Prevention/Corrective Action stage** – In this phase recommendations/strategies for corrective action to eliminate or reduce risk is implemented

Assigned personnel will gather all relevant documentation and forward their initial report findings along with supporting documentation to the Site SMS Manager for entry into the Hazard Safety Log. The following documents are required to be submitted in the event of an **accident or incident**:

- Accident or Incident Report from Employee and Supervisor Report
- Police report (if apply)
- FTA Post Accident Drug and Alcohol Testing Decision Form
- Any additional documentation (optional)

The following documents are required to be submitted in the event of **occurrence or near miss**:

- SunTran Driver View Form and/or SunTran Incident Report
- SMS Hazard Near Miss Employee Reporting Form
- Any additional documentation (optional)

The SMS Site Manager with assistance from the Department Safety Liaisons and Safety Officer will review and evaluate documentation provided to determine causal or contributing factors from findings that identify risk that require further course of actions. Based on the hazard analysis matrix included herein the appropriate mitigation will be implemented for acceptable and non-acceptable hazards.

As detailed in SunTran Risk Management Process an investigation report is prepared and submitted to the Safety Committee for review for all safety events to determine if:

- the safety event was preventable or non-preventable,
- requires discipline and/or retraining
- the causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
- the accident appears to involve underlying organizational causal factors beyond just individual employee behavior.

The SMS Site Manager will then forward findings to the appropriate departments to develop a corrective action plan (CAP) where appropriate. A formal corrective action process may not be necessary for every safety event. In all cases all pertinent information for each safety event will be tracked on the hazard log and followed through to completion. The CAP form will be assigned a number and placed on the hazard log with the corresponding hazard for tracking purposes.

The corrective action plan will contain:

a. Action to be taken
b. Proposed completion date
c. Individual or department responsible for implementation

The SMS Site Manager will follow up the accident or incident accordingly and inform Contractor General Manager and City Chief Safety Officer of the progress. The Site SMS Manager will also submit at minimum monthly updates as well as a copy of all reports identifying need for a formal corrective action plan. When corrective actions are completed, the Site SMS Manager will enter a close date on the Hazard Safety Log.

5.97 SMS Documentation and Recordkeeping for Safety Events

The City of Ocala maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, or near miss as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established by the City and State. The Chief Safety Officer has assigned the SMS Site Manager to maintain all documentation of SunTran's investigation policies, processes, forms, checklists, activities, and results. Accident or incident documentation will be filed and maintained in electronic and paper copy in the SMS Site Manager/Operation's Manager's office.

SECTION 6: Safety Promotion

This section outlines SunTran's commitment to safety communication and competencies and training for all employees and contractors directly responsible for safety including refresher training.

6.01 Safety Communication

The City of Ocala fosters open and robust communication regarding safety between all levels of SunTran and understands that SMS is dependent upon ongoing management commitment to communication. In addition, the Chief Safety Officer supports all other departments in ensuring that safety messaging and awareness are communicated effectively within each department.

One of management's most important responsibilities under SMS is to encourage and motivate others to want to communicate openly, authentically and without concern for reprisal. Representative of the City's commitment is our employee safety reporting policy and program as described in Section 3 - Safety Management Policy of the PTASP. The Employee Safety Reporting Program sets forth the requirements for both the formal and informal reporting that supports our SMS. Employees are required and encouraged to report hazards, take responsibility for safety in their tasks and work areas, educate themselves on safety in addition to formal training, and attend safety briefings, trainings, activities and events.
Finally, all levels of the agency are required, through formal and informal communications, to ensure that safety information is disseminated throughout the agency. SunTran uses notices, posters and bulletins to ensure all employees are aware of the agency's and their own safety commitments and requirements.

6.02 Communication Method

SunTran communicates safety and safety performance information throughout that 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 an employee safety reporting program, among other information.
Methods of communicating safety information to SunTran employees include face-to-face meetings and interactions, posting and/or distribution of bulletins, department notices, and memoranda. Posted information can be found at a central location in each department easily accessible to employees. Other communication methods include posters, signs, brochures, training materials, rule books, and operating procedures.
SunTran's comprehensive employee safety program includes the following elements:

- Facility/location safety inspections and audits with written reports and follow-up responses to employees as appropriate;
- Periodic employee awareness training;
- Monthly safety committee meetings;
- Special request employee safety training programs;
- Safety posters and notices

6.03 Safety Competencies and Training

The City of Ocala has established a comprehensive safety training program for operations, maintenance, and personnel directly responsible for the safety of SunTran which includes the completion of a safety training program, continuing safety education and training, and **de-escalation training. 5329(d)(1)(H)**
Additional areas of focus for training include:

- **Safety and Security Training**: Training is consistent with the employee's responsibilities to includes safety and security overviews including continuing safety education and training, incident/accident investigation, report requirements, emergency preparedness, and hazard identification.

- **Operator Training**: The Safety Security & Training Department is responsible for operator training for the Fixed Route which includes BOS and BRT, Paratransit, and Trolley Operators, which includes standard bus operating procedures, defensive driving, common bus emergencies, passenger relations, workplace violence, active shooter response, de-escalation training, continuing safety education and training, and emergency communications.

- **Maintenance Training**: The Superintendent of Training and Technical Services is responsible for the training of maintenance personnel. Training for bus maintenance personnel consists of instruction in maintenance best practices/industry standards, maintenance policy/procedures, de-escalation training, continuing safety education and training, and hazardous materials control.

Training mechanisms include classroom, written and video communications, field exercises, and drills. There are formal training programs for operators and employees involved in maintenance activities. These include training classes, training manuals, lesson plans and field observation.
Testing is conducted as necessary to ensure training effectiveness and all safety training is documented. Tests are given to all new operators to ensure knowledge. Refresher and In-Service training of operators can occur as result of accident investigations, long-term absences, and observations. General refresher training for all operators is scheduled on annual cycle. The frequency and amount of training conducted by the various departments depends upon regulatory requirements and the level of hazard associated with the operation. The Chief Safety Officer will work together with SunTran's Operations and Maintenance Contract service provider to ensure that safety elements are included in the curricula and that safety information is disseminated to affected employees. More specifically, this effort includes:

- ❖ Identifying requirements for all RTA training as it impacts safety. This encompasses New Employee and Refresher training related to procedures and equipment including manufacturers training and retraining requirements identified as result of accident investigations.
- ❖ Reviewing all training programs for safety adequacy
- ❖ Assessing the effectiveness of training courses and on-the-job experience
- ❖ Providing specific training with specialized curricula to operators, mechanics, and emergency response personnel with the introduction of new vehicle technologies.

6.11 Policy 1 – Employees must actively participate in new employee training relevant to the specific job being performed.

- ❖ Training curriculum must be based on federal, state, local, company and contract requirements, incorporating national standards when applicable.
- ❖ Training curriculum must be comprehensive and sufficient in length to enable employees to safely and confidently operate in their work environment.
- ❖ Employees must be trained for all assigned tasks and equipment used on the job.
- ❖ Employees must complete all required hours of each training program.
- ❖ Employee performance must be evaluated and documented upon completion of each training program.
- ❖ Employees must complete a final written exam upon completion of applicable training programs.

- Training curriculum must be linked to the performance objectives for which employees will be evaluated while on the job.
- Supervisors and Managers will not authorize or instruct any employee to perform work for which employee has not been trained.

6.12 Policy 2 – Employees must actively participate in refresher training or in-service education programs when new requirement, duties, tasks, systems or processes are added or introduced as part of job requirements.

- New requirements include but are not limited to:
- Vehicles, equipment, machinery, tools
- Chemicals or materials
- Laws, regulations, standards, policies or procedures
- Transfer to a new job
- Leave of absence
- Special circumstances or conditions requiring additional training
- Supervisors must coordinate refresher training for employees based on current operating trends. Refresher training should be used for accident prevention and trend reversal.
- Supervisors must ensure that refresher training is provided annually for each employee based on state and contract requirements.
- Supervisors must inform employees when in-service training is required, and provide information regarding the date and time of training.
- Employees who refuse to comply with refresher or in-service training requirements will be subject to disciplinary action.

6.13 Policy 3 – Employees must attend and participate in mandatory, regularly scheduled safety meetings.

- Supervisors must inform employees of the date and time of safety meetings.
- Supervisors must arrange for make-up meetings in event that an employee is absent from a safety meeting.
- Supervisors must ensure that employees have access to and check bulletin boards, orders, and safety notices daily.

6.14 Policy 4 – New Operators must complete all required hours of New Operator Training, including both classroom and Behind-The-Wheel (BTW) hours.

- New Operator curriculum must be based on national training standards, incorporating all federal, state, local, company, and contract requirements.
- New Operators must be evaluated after completion of each Classroom and Behind-The-Wheel (BTW) training module.
- Hours are defined as actual driving hours behind the wheel, or “hands on the wheel time.”
- Make-up driving or classroom sessions must be provided for employees who are absent or short on hour requirements.

- ❖ Operators must complete a final written exam upon completion of New Operator Training.
- ❖ Training progress and verification of program completion must be documented and kept in the employee's file.
- ❖ Supervisors or Managers will not authorize or instruct any Operator to operate vehicles for which the Operator has not received proper training.
- ❖ Supervisors must ensure that training curriculum meets all required hours as mandated by specific client, state, local or contractual requirements.
- ❖ Supervisors must ensure that all Instructors have access to standardized training materials in order to teach key subject areas appropriately.
- ❖ Training curriculum must be reviewed and evaluated annually to ensure that training content is relevant, appropriate, and up to date.

6.15 Policy 5 – Operators must successfully pass on-board evaluations at the end of the training process and before being released to revenue service.

- ❖ Supervisors or other qualified personnel must board the bus and observe the Operator while operating the vehicle.
- ❖ Operator Evaluation forms must be completed and kept in the Operator's file.
- ❖ Supervisors or other qualified personnel must conduct an additional evaluation within 30 days after release into the field for all new Operators.

6.16 Policy 6 – Employees responsible for operating a vehicle must actively participate in post-accident training following a preventable accident.

- ❖ Post-accident training content will be based on the root cause of the accident.
- ❖ Operators must complete post-accident training prior to returning to driving duties.
- ❖ Operator performance must be documented and kept on file, showing that the Operator re-mastered the learning points/driving skills associated with the accident.

6.17 Policy 7 - System-wide SMS Training

All Key SMS personnel, including Departmental Key SMS personnel, the SMS Executive, and the Chief Safety Officer must receive their FTA certifications through TSI according to the requirements above within 3 years from the date of this Plan. The Accountable Executive will be certified through the FTA-mandated training for that position once FTA has implemented the requisite training program through TSI.

SunTran has also implemented an internal SMS training program to educate all employees on their roles in SMS and the requirements of the Safety Plan. This training is tailored to the employee's responsibilities and is broken down into three levels:

1) Executive Management Level, also including Departmental Key SMS Personnel
2) Technical Management Level (Supervisors, Superintendents, area Managers)
3) Front Line Employees

This training will be implemented over the next 2 years as the City of Ocala implements its SMS program system-wide; the program will then be ongoing through SunTran's New Employee Training program. All employees will receive training in the PTASP and their SMS responsibilities before they begin work at SunTran.

6.18 Policy 8 – Safety Related Training

To ensure that all operations and maintenance personnel performing safety-related work are appropriately trained, qualified, and certified on an ongoing basis as needed, SunTran has established the following categorized safety-related training programs.

Safety-related work at SunTran is defined as vehicle operation; maintenance of vehicles, equipment, infrastructure, and facilities; operations and maintenance direct supervision; and operations dispatch.

Table I Safety-Related Work Training Categories

Training	Operator	Supervisor	Maintenance
Bus Operator Training	✓		
Bus Equipment Maintenance Training			✓
Service Supervisor Training		✓	
Maintenance Inspection Training			✓
Post-Accident Retraining	✓		
Operator Extended Absence Training	✓		
Communications/Dispatch Training		✓	
Standard Operating Procedures (SOP) Training	✓	✓	✓

SECTION 7: State of Florida Rule 14-90 Requirements

6.18.0 Security Program Plan

In accordance with Rule 14-90, The City of Ocala (SunTran) Transit Division has adopted, and implemented a Security Program Plan (SSP), which covers the security portion of the system safety program. The SSP contains information about prevention, mitigation, preparedness, response, recovery, and associated organizational responsibilities.

Per Rule 14-90, the SPP has been adopted separately from the SMS. Bus transit systems are prohibited by Section 119.071(3) (2), Florida Statutes, from publicly disclosing the SPP, as applicable under any circumstance. The document is maintained in a secured location by management and given only to the applicable personnel within the agencies and departments responsible for activities in the plan. On site access to the SPP is granted to regulatory authorities (FDOT, FTA, etc.) on an as needed basis. Select portions of the SPP may be shared with employees depending on their job responsibilities.

6.18.1 Hazard and Security Plan Training

SunTran offers all drivers training on Safety and Security – the training program is as follows: Transit Safety Institute (TSI) computer-based training offers a classroom setting and discussion to ensure material is adequately covered.

- Inspecting for Security
- Identifying threat
- Threats and Management Steps

National Safety Institute and FTA Federal Transit Administration. Directs and offers presentations in a classroom discussion in following areas.

- System Security Awareness (Warning Signs) 20 min Video
- Vehicle Pre-Trip Inspection and Post Trip Inspection - Drivers are instructed in classroom and instructed when performing an actual inspection. All Drivers perform a pre-trip inspection before taking any vehicle on the road. This is part of the training for a new driver as well as continued training for all SunTran Drivers. This education is part theory and part practical training.
- Drivers receive instruction for hazardous materials on the bus. The information is reviewed at the start of new hire bus orientation, during quarterly refresher training, including Emergency Management training that details what is hazardous that should not be transported.
- Observation by Employees includes suspicious activity. Drivers receive instruction from (TSI) Transportation Safety Institute training program with discussion and videos giving drivers a look at how to handle situations, and how to identify threats on their daily route.
- Driver Management Security Situations – The Customer Service training has detailed instruction that includes how an operator should respond to passenger situations.

    a. Review the rules with the passengers
    b. Complaints and defusing arguments – reviewed in driver training
    c. Calling into dispatch for back-up
    d. Maintaining control of the vehicle and reporting all incidents.

All Drivers must report any Incident or Hazard concern to the Dispatcher and or Supervisor. All drivers will receive instruction on how to report or write up any safety event or incident that takes place on or during the daily route.

6.18.2 State of Florida Minimum Operational, Safety and Maintenance Requirements

To establish a plan for selecting and training operators. The Contractor Operations Manager is responsible for overall compliance with all operating and driving requirements including the recruiting, training, and supervision of employees including drivers pursuant to Rule 14-90.

6.18.3 Qualification and Background Checks

The Contractor Operations Manager is responsible for ensuring that the following minimum standards are met when hiring new drivers:

1. Completed Employment Application
2. Must possess Valid Class B or C Florida driving license with "P" endorsement.
3. Successful completion of the DOT pre-employment drug test.
4. Conduct Criminal background check and driving records check including, but not limited to, the following items.

- Valid Driver's License check
- Social Security Number validations
- Criminal history background check
- Employment reference checks
- Employment physical including, eye examination, Federal Transportation Administration (FTA) alcohol and drug-screening test

5. Signed acknowledgement of receipt and agreement to comply with drug-free workplace policy
6. Successful completion of required orientation, training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus before driving on a street or highway.
7. Signed acknowledgement of receipt of operational policies and procedures manual(s)

The Contractor Operations Manager shall ensure that all driver license records are reviewed and copies of the review results indicating the licenses are valid are placed in personnel files and maintained for five (5) years. A Driver License Verification List will be used to track the expiration dates of all licenses to ensure validity. Per the Employee handbook, all drivers are required to report to the supervisor immediately of receiving a ticket or having an accident while in their personal vehicle. Employees must notify management within two (2) weeks if there are any other changes in the status of driver licenses. The General Manager will perform criminal background and Motor Vehicle Record checks annually.

6.18.4 Medical Exams (Pre-employment and During employment)

The Contractor General Manager must administer an acceptable medical examination program for CDL driver positions and other applicable personnel. This includes the following:

- Employees may be required to take physical examinations at other times if management deems it necessary. Physical examinations will be scheduled for the employee by the administrative staff. Continued employment is contingent upon taking and satisfactorily passing physical examinations.

- All examinations will be recorded on Form 725-030-11 for transit system

drivers. The medical examinations will be performed by an approved licensed, Doctor of Medicine or Osteopathy, Physician Assistant, registered Nurse practitioner, or ophthalmologist/optometrist (visual section only). The health professional performing the examination will maintain the original executed form and issue a certification copy to the Transit Operator that will be placed in the employee's file. The Contractor Operations Managers will not allow any driver to operate a transit vehicle without having a completed medical examination certification dated within the past twenty-four (24) months. All employee records are retained for a minimum of four years past employment.

- All information will be in a DOT Drivers Physical Exams Log. The log will provide employee name, next due date, years approved. A file of original DOT paperwork will be kept for reference. The operator will receive a copy to comply with driving standards.

6.18.5 Training, Testing, and Supervision

The safe operation of vehicles and the safe transportation of passengers is one of SunTran's highest priorities. Our passengers depend on the knowledge, judgment, and skills of the drivers for their safety and welfare. The training program prepares drivers for these responsibilities but must also go beyond the initial new hire training.

The Operations Manager will develop and maintain a Training Manual for new hire training and testing of employees as part of the Safety Training Program. The training manual shall include but not be limited to the following topics:

1. Communication and handling of unsafe conditions, security threats, and emergencies.
2. Familiarization and operation of safety and emergency equipment, wheelchair lift/ramp equipment, and restraining devices.
3. Application and compliance with all applicable federal and state laws, rules and regulations.
4. Communications- Cellular and electronic devices policy.
5. Drug free workplace Policy.
6. Daily vehicle inspection form completion pursuant to Rule 14-90.006, F.A.C.
7. Training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus. A vehicle checklist filled out and signed by the operators and driver trainees will be maintained documenting completion of training and testing.
8. Bus transit systems shall provide written operational and safety procedures to all bus drivers before driving on streets or highways unsupervised.
9. A Driver Final Road Evaluation will be conducted by the General Manager before releasing a driver out on their own
10. In addition, all drivers will complete a defensive driver course and a distracted driving course. This includes a Driver evaluation every three (3) years that will review vehicle inspection, Wheelchair loading and Securement, following a Behind the Wheel road test.

The assigned Driver Trainer is responsible for training all New Hire's and Continuing Education. All driver training adheres to (Rule 14-90.004). Records detailing administered training for each employee shall be maintained for five (5) years. At a minimum training will include:

TRAINING TOPICS	
Transit system safety and operational policies/procedures (TAPTCO / TSI)	Vehicle & Equipment Inspections
Basic operations and maneuvering	Equipment Familiarization
Boarding and alighting passengers	Operation of wheelchair lifts & ramps
Handling of emergencies & security threats	Radio Procedures
Defensive driving (must be taken every three years)	Use of electronic devices/wireless communications
Passenger assistance and securement	Driving conditions
Security & threat awareness	SMS Principles & Employee Safety Hazard Reporting
Applicable Local, State, & Federal laws, rules, & regulations	Substance abuse policy

6.18.6 Refresher Training/Continuing Education

SunTran will provide ongoing opportunities for drivers to practice their skills. Annual refresher quarterly training and continuing education will be provided and designed to keep the drivers up to date on safety issues/trends and to build confidence to better perform job duties in a safe accident-free manner. The types of instruction will include:

Classroom instruction – eLearning.
Behind the Wheel Evaluations.
Safety Instructional Videos.
Safety alerts and continuing education on current changes or topics that may affect Transit drivers.

6.18.7 Substance Abuse (Drug & Alcohol) Testing

SunTran is committed to providing safe, dependable, and economical transportation service to its passengers. It is the agency's goal to provide a safe, healthy and satisfying working environment, free of the potential dangers posed by a safety-sensitive employee's use of prohibited drugs or misuse of alcohol. In meeting these goals, it is our policy to:

- Assure that employees are not impaired in their ability to perform assigned duties in a safe productive and healthy manner.
- Create a work place environment free from the adverse effects of drug and alcohol abuse or misuse.
- Prohibit the unlawful manufacture, distribution, dispensing, possession, or use of controlled substances.
- Encourage employees to seek professional assistance when substance abuse adversely affects their ability to perform their assigned duties.

This complies with the Federal Transit Administration regulations codified as 49 CFR Part 655, as amended and USDOT regulations codified as 49 CFR Part 40. All other provisions are implemented under the authority of the United States Department of Transportation (USDOT) and the Federal Transit Administration (FTA).

The General Manager and Operations Manager are responsible for the administration and oversight of the program. This includes all testing and reporting to FTA. Along with the Drug and Alcohol Management Information System (DAMIS) reporting on a yearly basis.

6.18.8 Employee Training

Safety-sensitive employees will receive at least 60 minutes of training on the effects and consequences of prohibited drug use on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use. Including, 60 minutes on the physical, behavioral and performance indicators of probable alcohol use.
Supervisors who make reasonable suspicion determinations shall receive at least 60 minutes of training on the physical, behavioral and performance indicators of probable drug use and 60 minutes on the physical, behavioral and performance indicators of probable alcohol use.
All employees receive a copy of the Substance Abuse Management Policy. This includes ongoing annual training requirements for safety sensitive employees.

6.18.9 Preventive Maintenance

A preventative maintenance schedule is implemented to inspect for safety hazards and to maintain vehicles in a manner conforming to safety regulations. SunTran will perform scheduled preventive maintenance on all vehicles at A-6,000 miles, B-12,000 miles, C-24,000 miles, D-48,000 miles, and E-72,000 miles.), every 6,000-mile interval following the sequence “A”, “B”, “A”, “C”, according to the agency’s maintenance plan. As preventative maintenance inspections are scheduled by projected mileage, the agency will allow ±500 mile deviations in mileage interval, so long as the actual mileage interval meets the manufacturer’s recommended maintenance schedule. Inspection “A” will be performed every 6,000 miles, inspection “B” will be performed every 12,000 miles, and inspection “C” will be performed every 24,000 miles on each vehicle. D is performed at 48,000 miles and E at 72,000 miles. Safety inspections are part of the maintenance inspections and will be performed at least once every year with inspection type “C” on each vehicle. When a vehicle is due for an inspection, it will be taken out of service until the inspection is completed. This allows a series of repairs to be carried out while minimizing costs and optimizing the number of operational vehicles. If a vehicle is “down” for an extended period due to unavoidable circumstances, preventative maintenance will temporarily be suspended until the vehicle can be returned to service. However, the annual inspection will be conducted on all vehicles regardless of “up/down” status and/or mileage accrued.

SunTran’s Fleet Maintenance Manager will regularly perform Quality Control (QC)/Quality Assurance (QA) checks to ensure that the inspections and repairs, both in-house and contracted, are completed and documented properly. Each vehicle will have a written record documenting preventive maintenance, regular maintenance, inspections, lubrication and repairs performed. Such records will be maintained for at least four years and include, at a minimum, the following information:

- Identification of the bus, the make, model, and license number or other means of positive identification and ownership.
- Date, mileage, description, and each type of inspection, maintenance, lubrication, or repair performed.
- The name and address of any entity or contractor performing an inspection, maintenance, lubrication, or repair.

For tracking purposes, a maintenance log will be kept containing vehicle ID, make and type of vehicle, year, model, special equipment, inspections, maintenance and lubrication intervals, and date or mileage when services are due. When needed a report can be printed for auditing purposes.

6.19 Bus Safety Inspections

Safety inspections are part of the maintenance inspections and are performed at least once every year on all buses operated by SunTran and contracted service providers. The

Contractor Fleet Maintenance Manager is responsible for ensuring that each individual performing a bus safety inspection is qualified as follows:

- ❖ Understands the requirements set forth in Rule 14-90 and can identify defective components.
- ❖ Is knowledgeable of and has mastered the methods, procedures, tools, and equipment used when performing an inspection.
- ❖ Has at least one year of training and/or experience as a mechanic or inspector in a vehicle maintenance program and has sufficient general knowledge of buses owned and operated by the bus transit system to recognize deficiencies or mechanical defects.

Each bus receiving a safety inspection shall be checked for compliance with the requirements for safety devices and equipment as referenced or specified by Rule 14-90. Specific operable equipment and devices as required by Rule 14-90 include the following as applicable to Type I and II buses:

1) Horn
2) Windshield wipers
3) Mirrors
4) Wiring and batteries
5) Service and parking brakes
6) Warning devices
7) Directional signals
8) Hazard warning signals
9) Lighting systems and signaling devices
10) Handrails and stanchions
11) Standee line and warning
12) Doors and brake interlock devices
13) Step-wells and flooring
14) Emergency exits
15) Tires and wheels
16) Suspension system
17) Steering system
18) Exhaust system
19) Seat belts
20) Safety equipment
21) Equipment for transporting wheelchairs
22) Working speedometer

A safety inspection report will be prepared by the individual(s) performing the inspection and will include the following:

- ❖ Identification of the individual(s) performing the inspection.
- ❖ Identification of the bus transit system operating the bus.
- ❖ The date of the inspection.
- ❖ Identification of the bus inspected.
- ❖ Identification of the equipment and devices inspected including the identification of equipment and devices found deficient or defective.
- ❖ Identification of corrective action(s) for any deficient or defective items found and date(s) of completion of corrective action(s).

Records of annual safety inspections and documentation of any required corrective actions will be retained for a minimum of four years for compliance review.

6.19.1 Transit Vehicle Failures

SunTran follows these guidelines for mechanical failures. If a Bus breaks down offsite away from the Transit Center, or we receive a phone call from the driver or by two-way radio, the process is as follows:

- Missing belt or a Brake Issue, the vehicle will be towed into Fleet.
- Electrical issues, Fleet may send road repair, or the vehicle will be towed.
- Vehicle Checklists sheets, Service Due remove from service send to Fleet maintenance same day or next day.
- Lift problem, remove from service send to Fleet maintenance for repair that same day.
- Brake issue; remove from service send to Fleet maintenance for repair that same day.
- Steering issue; remove from service send to Fleet maintenance for repair that same day. All vehicles for repair are placed into a serve area. Once repaired by Fleet maintenance, all completed vehicles are placed in line for use.

The Managers, Supervisors, and Dispatchers follow this process for the safe performance of all transit vehicles and equipment.

6.2 Vehicle and Equipment Standards Procurement Criteria

SunTran will procure vehicles utilizing the Transit Research-Inspection-Procurement Services (TRIPS) program, formerly known as the Florida Vehicle Procurement Program (FVPP), and the Florida Consortium and other State Programs strictly adhering to the vehicle equipment standards and procurement criteria specified in 14-90.007.

- All buses procured and operated must meet the following minimum standards, as applicable:

    a. The capability and strength to carry the maximum allowed load and not exceed the manufacturer's gross vehicle weight rating (GVWR), gross axle weighting, or tire rating.

    b. Structural integrity that mitigates or minimizes the adverse effects of collisions.

    c. Federal Motor Vehicle Safety Standards (FMVSS), 49 C.F.R. Part 571, Sections 102, 103, 104, 105, 108, 207, 209, 210, 217, 302, 403, and 404, October 1, 2008, hereby incorporated by reference.

- Proof of strength and structural integrity tests on new buses procured will be submitted by manufacturers or bus transit systems to the Department.

In addition, every bus operated by the agency will be equipped as follows:

- Mirrors. There shall be two exterior rear vision mirrors, one at each side. The mirrors shall be firmly attached to the outside of the bus and so located as to reflect to the driver a view of the highway to the rear along both sides of the vehicle. Each exterior rear vision mirror, on Type I buses shall have a minimum reflective surface of 50 square inches. Neither the mirror nor the mounting shall protrude farther than the widest part of the vehicle body except to the extent necessary to produce a field of view meeting or exceeding the requirements of

this section. All Type I buses shall, in addition to the above requirements, be equipped with an inside rear vision mirror capable of giving the driver a clear view of seated and standing passengers. Buses having a passenger exit door that is located inconveniently for the driver's visual control shall be equipped with additional interior mirrors to enable the driver to view the passenger exit door. In lieu of interior mirrors, trailer buses and articulated buses may be equipped with closed circuit video systems or adult monitors in voice control with the driver.

- Wiring and Batteries. Electrical wiring shall be maintained so as not to come in contact with moving parts, heated surfaces, or be subject to chafing or abrasion which may cause insulation to become worn. Every Type I bus manufactured on or after February 7, 1988, shall be equipped with a storage battery electrical power main disconnect switch. The disconnect switch shall be practicably located in an accessible location adjacent to or near to the battery and be legibly and permanently marked for identification. Every storage battery on a public-

- sector bus shall be mounted with proper retainment devices in a compartment which provides adequate ventilation and drainage.

- Brake Interlock Systems. All Type I buses having a rear exit door shall be equipped with a rear exit door/brake interlock that automatically applies the brake upon driver activation of the rear exit door to the open position. Brake interlock application shall remain activated until deactivated by the driver and the rear exit door returns to the closed position. The rear exit door brake interlock on such buses shall be equipped with an identified override switch enabling emergency release of the brake interlock function. The override switch shall not be located within reach of the seated driver. Air pressure application to the brake during brake interlock operation, on buses equipped with rear exit door/brake interlock, shall be regulated at the equipment's original manufacturer's specifications.

- Standee Line and Warning. Every bus designed and constructed to allow standees shall be plainly marked with a line of contrasting color at least two inches wide, or be equipped with some other means to indicate that all passengers are prohibited from occupying a space forward of a perpendicular plane drawn through the rear of the driver's seat and perpendicular to the longitudinal axis of the bus. A sign shall be posted at or near the front of the bus stating that it is a violation for a bus to be operated with passengers occupying an area forward of the line.

  Handrails and Stanchions. Every bus designed and constructed to allow standees shall be equipped with overhead handrails for standee passengers. Overhead handrails shall be continuous, except for a gap at the rear exit door, and terminate into vertical stanchions or turn up into a ceiling fastener. Every Type I and Type II bus designed for carrying more than 16 passengers shall be equipped with handrails, stanchions, or bars at least 10 inches long and installed to permit safe on-board circulation, seating and standing assistance, and boarding and alighting by elderly and handicapped persons. Type I buses shall be equipped with a safety bar and panel directly behind each entry and exit stepwell.

- Flooring, Steps, and Thresholds. Flooring, steps, and thresholds on all buses shall have slip resistant surfaces without protruding or sharp edges, lips, or overhangs, in order to prevent tripping hazards. All step edges and thresholds shall have a band of color(s) running the full width of the step or edge which contrasts with the step tread and riser, either light-on-dark or dark-on-light.
- Doors. Power activated doors on all buses shall be equipped with a manual device designed to release door closing pressure.

- Emergency Exits. All buses shall have an emergency exit door, or in lieu thereof, shall be provided with emergency escape push-out windows. Each emergency escape window shall be in the form of a parallelogram with dimensions not less than 18" by 24", and each shall contain an area of not less than 432 square inches. There shall be a sufficient number of push-out or kick-out windows in each vehicle to provide a total escape area equivalent to 67 square inches per seat, including the driver's seat. No less than 40% of the total escape area shall be on one side of the vehicle. Emergency escape kick-out or push-out windows and emergency exit doors shall be conspicuously marked with a sign or light and shall always be kept in good working order so that they may be readily opened in an emergency. All such windows and doors shall not be obstructed either inside or outside so as to hinder escape. Buses equipped with an auxiliary door for emergency exit shall be equipped with an audible alarm and light indicating to the driver when a door is ajar or opened while the engine is running. Supplemental security locks operable by a key are prohibited on emergency exit doors unless these security locks are equipped and connected with an ignition interlock system or an audio-visual alarm located in the driver's compartment. Any supplemental security lock system used on emergency exits shall be kept unlocked whenever a bus is in operation.

  - Tires and Wheels. Tires shall be properly inflated in accordance with manufacturer's recommendations.

    i. No bus shall be operated with a tread groove pattern depth:

       1. Less than 4/32 (1/8) of an inch, measured at any point on a major tread groove for tires on the steering axle of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.
       2. Less than 2/32 (1/16) of an inch, measured at any point on a major tread groove for all other tires of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.

    ii. No bus shall be operated with recapped, regrooved, or retreaded tires on the steering axle.

    iii. Wheels shall be visibly free from cracks and distortions and shall not have missing, cracked, or broken mounting lugs.

- Suspension. The suspension system of all buses, including springs, air bags, and all other suspension parts, shall be free from cracks, leaks, or any other defect which may cause its impairment or failure to function properly.

- Steering and Front Axle. The steering system of all buses shall have no indication of leaks which would or may cause its impairment to function properly, and shall be free from cracks and excessive wear of components that may cause excessive free play or loose motion in the steering system or above normal effort in steering control.

- Seat Belts. Every ~~bus~~ shall be equipped with an adjustable driver's restraining belt in compliance with the requirements of FMVSS 209, "Seat Belt Assemblies" 49 571.209 October 1, 2008, and FMVSS 210, "Seat Belt Assembly Anchorages" 49 C. F. R. 571.210 October 1,2008, hereby incorporated by reference.

- Safety Equipment. Every bus shall be equipped with one fully charged dry chemical or carbon dioxide fire extinguisher, having at least a 1A:BC rating and bearing the label of Underwriter's Laboratory, Inc. The fire extinguishers shall be maintained as follows:

    i. Each fire extinguisher shall be securely mounted on the bus in a conspicuous place or a clearly marked compartment and be readily accessible.

    ii. Each fire extinguisher shall be maintained in efficient operating condition and equipped with some means of determining if it is fully charged.

    iii. Every Type I bus shall be equipped with portable red reflector warning devices in compliance with Section 316.300, Florida Statutes.

- Persons with Disabilities. Buses used for the purpose of transporting individuals with disabilities shall meet the requirements set forth in 49 C.F.R. Part 38, October 1, 2008, hereby incorporated by reference, as well as the following:

    i. Installation of a wheelchair lift or ramp shall not cause the manufacturer's GVWR, gross axle weight rating, or tire rating to be exceeded.

    ii. Except in locations within 3 1/2 inches of the bus floor, all readily accessible exposed edges or other hazardous protrusions of parts of wheelchair lift assemblies or ramps that are located in the passenger compartment shall be padded with energy absorbing material to mitigate injury in normal use and in case of a collision. This requirement shall also apply to parts of the bus associated with the operation of the lift or ramp.

    iii. The controls for operating the lift shall be at a location where the bus driver or lift attendant has a full view, unobstructed by passengers, of the lift platform, its entrance and exit, and the wheelchair passenger, either directly or with partial assistance of mirrors. Lifts located entirely to the rear of the driver's seat shall not be operable from the driver's seat, but shall have an override control at the driver's position that can be activated to prevent the lift from being operated by the other controls (except for emergency manual operation upon power failure).

    iv. The installation of the wheelchair lift or ramp and its controls and the method of attachment in the bus body or chassis shall not diminish the structural integrity of the bus nor cause a hazardous imbalance of the bus. No part of

the assembly, when installed and stowed, shall extend laterally beyond the normal side contour of the bus or vertically beyond the lowest part of the rim of the wheel closest to the lift.

v. Each wheelchair lift or ramp assembly shall be legibly and permanently marked by the manufacturer or installer with the following information:

1. The manufacturer's name and address.
2. The month and year of manufacture.
3. A certificate that the wheelchair lift or ramp securement devices, and their installation, conform to State of Florida requirements applicable to accessible buses.

- Wheelchairs. Wheelchair lifts, ramps, securement devices, and restraints shall be inspected and maintained as required by this rule chapter. Instructions for normal and emergency operation of the lift or ramp shall be carried or displayed in every bus.

6.21 Hazard and Security Plan (HSP)

In accordance with Rule 14-90.004(2), SunTran has adopted, and implemented a Hazard and Security Plan (HSP), often referred to as the Security Program Plan (SPP), which covers the hazard and security portion of the system safety program. The HSP contains information about prevention, mitigation, preparedness, response, recovery, and associated organizational responsibilities. The purpose of the HSP/SPP is to specify:

- Actions required of employees on a daily, weekly, monthly, and annual basis to prevent or reduce the likelihood of security and emergency events from occurring, and to mitigate the effects of those events that do occur.
- Measures needed to prepare for incidents occurring within the transportation system and in the surrounding community.
- Agency procedures that should be established to respond to security hazards and emergencies that affect the system and its customers.
- Formal processes to recover from routine security events or major emergencies.
- Roles, responsibilities, and interagency coordination required to respond to a disaster or security event.

6.3 Records Management

14-90 requires that system safety documents be maintained and retained by the agency for at least four years. Records of daily bus inspections and any corrective action documentation must be retained by the agency for a minimum of two weeks.

The General Manager for SunTran is responsible for implementing a records management program that includes maintenance, retention, distribution, and safe disposal of all safety and security records of the agency in compliance with state and federal regulations.

All safety and security documents of the agency Hazard Safety Plan will be periodically revised, as needed, to ensure that they are up to date. Revisions and updates will be communicated with employees, contractors, and regulatory agencies as they occur or as deemed necessary by the management depending on the nature of the revision or update. The HSP is considered a confidential document and will be retained in a secure location by management.

SunTran will maintain and retain the following records for at least four years:

- ❖ Records of bus driver background checks and qualifications (Contractor General Manager)
- ❖ Detailed descriptions of training administered and completed by each bus driver (Contractor Operations Manager).
- ❖ A record of each bus driver's duty status, which will include total days, worked, on-duty hours, driving hours, and time of reporting on and off duty each day (Payroll).
- ❖ Event investigation reports, corrective action plans, and related supporting documentation (City of Ocala Transit Manager or assigned Contractor designee).
- ❖ Records of preventive maintenance, regular maintenance, inspections, lubrication, and repairs performed for each bus (Fleet Maintenance Manager).
- ❖ Records of annual safety inspections and documentation of any required corrective actions (City of Ocala Transit Manager).
- ❖ Completed and signed CDL Medical cards for each bus driver (Contractor Operations Manager).

In addition, SunTran will retain records of daily bus inspections and any corrective action documentation for a minimum of two weeks.
An organized electronic filing system will be maintained by the agency and adequately backed up to prevent potential loss of information. All sensitive personnel records will be protected from public access. When ready for disposal, both paper and electronic data will be disposed of in a secure manner ensuring that critical information is protected.

6.31 Safety Data

Understanding safety data is an important step towards allocating important and scarce resources to implement safety program elements. Safety data relative to transit provider operations can be used to determine safety trends in system operation. The following data will be collected and retained by SunTran on an ongoing basis:

- ❖ Accident and incident data.
- ❖ Maintenance data including daily vehicle inspection forms.
- ❖ Passenger claims and complaints.
- ❖ Records of crimes and rule violations occurring in and around the transit agency.

The data will be analyzed by SunTran management both qualitatively and quantitatively for safety hazard identification, resolution and risk management purposes. The analysis will be conducted and will account for frequency, severity, causal factors, and acceptability of occurrences. The analysis results will be useful for identifying necessary actions to minimize safety risks. Analysis of safety data will also help improve system performance, not only in respect to safety, but also in overall delivery of service to the public. In addition, trend analyses of safety data can help determine the effectiveness of safety initiatives that have been implemented. The results of such analysis will be shared with agency staff and/or law enforcement agencies on, at minimum, an annual basis for awareness and support.

6.32 Operating and Driving Requirements

14-90.006 requires that bus transit systems establish operational and driving requirements. The 14-90 requirements relating to this section are noted below and presented as general text.

The Contractor Operations Manager is responsible for overall compliance with all operating

and driving requirements.

It is the responsibility of every SunTran employee who performs driving and/or operational duties to strictly adhere to the following requirements:

a. Under no circumstances is a driver allowed to operate a vehicle without having the appropriate and valid driver's license in his or her possession.

b. Commercial operators are not permitted to drive a bus when his or her driver license has been suspended, cancelled, or revoked. A driver who receives a notice that his or her license to operate a motor vehicle has been suspended, cancelled, or revoked is required to notify his or her supervisor of the contents of the notice immediately, if possible, otherwise no later than the end of the business day following the day he or she received the notice. Violation of this policy may result in disciplinary actions including suspension or termination of employment.

c. SunTran management will annually check Motor Vehicle Records (MVR) for all commercial operators for investigating information on license suspensions, revocations, accidents, traffic violations, unpaid summons, etc. SunTran's Operations Management will also check driver license status of each driver utilizing the FDOT website - https://www6.hsmv.state.fl.us/DLCheck/main.jsp.

d. Buses must be operated at all times in compliance with applicable traffic regulations, ordinances, and laws of the jurisdiction in which they are being operated.

e. Rule 14-90 defines "On Duty" and "Off Duty" status of commercial operators as follows:

1. "On Duty" means the status of the driver from the time he or she begins work, or is required to be in readiness to work, until the time the driver is relieved from work and all responsibility for performing work. "On Duty" includes all time spent by the driver as follows:

    a. Waiting to be dispatched at bus transit system terminals, facilities, or other private or public property, unless the driver has been completely relieved from duty by the bus transit system.

    b. Inspecting, servicing, or conditioning any vehicle.

    c. Driving

    d. Remaining in readiness to operate a vehicle. (stand-by)

    e. Repairing, obtaining assistance, or remaining in attendance in or about a disabled vehicle.

2. "Off-Duty" means any time the driver is not on duty, required to be in readiness to work, or under any responsibility to perform work. Such time shall not be counted towards the maximum allowed on-duty hours within a 24-hour period.

f. Commercial operators are not permitted to drive more than 12 hours in a 24-hour period, or drive after having been on duty for 16 hours in a 24-hour period. A driver is not permitted to drive until the requirement of a minimum eight consecutive hours of off-duty time has been fulfilled. A driver's work period begins from the time he or she first reports for duty to his or her employer. A driver is permitted to exceed his or her regulated hours in order to reach a regularly established relief or dispatch point, provided the additional driving time does not exceed one hour.

g. Commercial operators are not permitted to be on duty more than 72 hours in any period of seven consecutive days; however, any 24 consecutive hours of off duty time shall constitute the end of any such period of seven consecutive days. A driver who has reached the maximum 72 hours of on duty time during the seven consecutive days is required to have a minimum of 24 consecutive hours of off duty time prior to returning to on duty status.

h. A driver is permitted to drive for more than the regulated hours for the safety and protection of the public when conditions such as adverse weather, disaster, security threat, a road or traffic condition, medical emergency, or an accident occur.

i. Commercial operators are not permitted to drive a bus when his or her ability is impaired, or likely to be impaired, by fatigue, illness, or other causes, likely to create an unsafe condition.

j. Commercial operators will not report for duty or operate any vehicle while under the influence of alcohol or any other substance, legal or illegal, that may impair driving ability. All employees are required to comply with agency's Substance Abuse Policy.

k. Commercial operators are required to conduct daily vehicle inspections and reporting of all defects and deficiencies likely to affect safe operation or cause mechanical malfunctions.

l. Commercial operators are required to immediately report any defect or deficiency that may affect safe operations or cause mechanical malfunctions. Any defect or deficiency found shall be properly documented on a Vehicle Inspection form and should be submitted to the Operations Supervisor.

m. The Supervisor will review the list of daily inspection reports that have a problem listed and document corrective actions taken as a result of any deficiencies identified by daily inspections. The Operations Supervisor will submit the deficiencies to Maintenance Department for correction.

n. A bus with any passenger doors in the open position will not be operated with passengers aboard. The doors will not be opened until the bus is stopped. A bus with any inoperable passenger door will not be operated with passengers aboard, except to move a bus to a safe location.

o. Commercial operators will ensure that during darkness, interior lighting and lighting in stepwells on buses shall be sufficient for passengers to enter and exit safely. Adherence to pre-trip inspection requirements help insure the ability of this requirement to be met.

p. Passengers will not be permitted in the stepwells of any bus while the bus is in motion, or to occupy an area forward of the standee line.

q. Passengers will not be permitted to stand on buses not designed and constructed for that purpose.

r. Buses will not be refueled in a closed building. The fueling of buses when passengers are being carried will be reduced to the minimum number of times necessary during such transportation.

s. Commercial operators are required to be properly secured to the driver's seat with a restraining belt at all times while the bus is in motion.

t. Buses will not be left unattended with passengers aboard for longer than 15 minutes. The parking or holding brake device will be properly set at any time the bus is left unattended.

u. Buses will not be left unattended in an unsafe condition with passengers aboard at any time.

v. Commercial operators are prohibited from leaving keys in the vehicle for any reason at any time the bus is left unattended.

w. Transit vehicles will not be used at any time for uses other than those that are authorized and permitted according to state and federal program requirements.

Noncompliance with these requirements may result in disciplinary actions including suspension or termination of employment.

6.33 Qualification and Selection of Commercial Operators

14-90.004(3) requires bus transit systems establish criteria and procedures for the selection, qualification, and training of all commercial operators. The criteria shall include the following:
(a) Driver qualifications and background checks meeting minimum hiring standards.
(b) Driving and criminal background checks for all new commercial operators.
(c) Verification and documentation of valid driver licenses for all employees who drive buses.
(d) Training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.
(e) Bus transit systems shall provide written operational and safety procedures to all bus commercial operators before driving on streets or highways unsupervised.
(f) The provisions in paragraphs (d) and (e), above, shall not apply to personnel licensed and authorized by the bus transit system to drive, move, or road test a bus in order to perform repairs or maintenance services when it has been determined that such temporary operation does not create unsafe operating conditions or create a hazard to public safety.
(g) Bus transit systems shall maintain the following records for at least four years:
1. Records of bus driver background checks and qualifications.
2. Detailed descriptions of training administered and completed by each bus driver.
3. A record of each bus driver's duty status which shall include total days worked, on-duty hours, driving hours, and time of reporting on and off duty each day.
(h) Each bus transit system shall establish a drug-free workplace policy statement in accordance with 49 C.F.R. Part 32 and a substance abuse management and testing program in accordance with 49 C.F.R. Parts 40 and 655, October 1, 2009, hereby incorporated by reference.
(i) Bus transit systems shall require that commercial operators write and submit a daily bus inspection report pursuant to Rule 14-90.006, F.A.C.

SunTran is responsible for ensuring that the following minimum standards are met when hiring new commercial operators:

- Must possess a valid Florida driving license of appropriate class and endorsements.
- Criminal background check (with local law enforcement and the Florida Department of Law Enforcement) and driving records check including, but not limited to, the following items:
  - Complete Driving records through the Florida Department of Motor Vehicles.
  - E-Verify is used to determine the right to work in the USA.
  - Level 2 Background Check through the Florida Department of Law Enforcement.
  - Employment reference checks.
  - Complete employment application.
  - Successful completion of pre-employment physical including an eye examination and drug-screening test.
  - Signed acknowledgement of receipt and agreement to comply with drug-free workplace policy.
  - Successful completion of required orientation, training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.
  - Signed acknowledgment of receipt and compliance with the following written operations and safety procedures before driving on a street or highway unsupervised:
    1. Communication and handling of unsafe conditions, security threats, and emergencies.

2. Familiarization and operation of safety and emergency equipment, wheelchair lift equipment, and restraining devices.
3. Application and compliance with all applicable federal and state laws, rules, and regulations.

❖ Commercial operators are required to write and submit a daily bus inspection report pursuant to Rule 14-90.006, F.A.C.

❖ Personnel licensed and authorized by the bus transit system to drive, move, or road test a bus in order to perform repairs or maintenance services when it has been determined that such temporary operation does not create unsafe operating conditions or create a hazard to public safety are not bound to the following two provisions**:**

1. Training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.
2. Bus transit systems shall provide written operational and safety procedures to all bus commercial operators before driving on streets or highways unsupervised.

Noncompliance with any regulatory or agency specific requirement may result in an employee administrative action up to and including suspension or termination of employment. It is the policy of SunTran to screen applicants to eliminate those that pose a safety or security threat to the agency or would not be able to carry out agency safety and security policies.

6.34 Driver Safety Training and Testing

14-90.004(3) establishes driver training and testing requirements to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.

All employees and commercial operators of SunTran and all contract service providers are required to complete all training and testing requirements to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.

The Operations Manager will develop and maintain a Training Manual for new hire training and testing of employees as part of the Safety Training Program. The manual will contain training course content, curriculum, lesson plans, and testing requirements. All training and testing activities will be adequately documented by the designated Driver Trainer. The Driver Trainer is responsible for conducting and documenting all training and testing activities utilizing a certification process. Noncompliance with any regulatory or agency specific guideline or requirement may result in suspension or termination of employment.

The following section discusses the training and testing programs to be administered by the Driver Trainer.

6.35 Initial Driver Training and Testing

Upon hire and prior to being placed into road service, all commercial operators are required to complete training and testing in the following areas:

a. Bus transit system safety and operational policies and procedures.
b. Operational bus and equipment pre-trip and post trip inspections for all vehicle types.
c. Emergency equipment familiarization.

d. Basic operations and maneuvering.
e. Boarding and alighting passengers.
f. Operation of wheelchair lift and other special equipment.
g. Defensive driving.
h. Passenger assistance and securement.
i. Handling of emergencies and security threats.
j. Security and threat awareness, follows Chapter 14-90 Regulations.
k. Driving conditions.

As part of the driver training program, specific procedures have been incorporated within to instruct the driver on how to safely approach and depart from a transit bus stop to avoid contact with pedestrians and other hazards.

In addition, new commercial operators are required to undergo an operator evaluation with an experienced driver trainer. A new-hire training record must be completed to ensure the employee has received all required 14-90 training and information before being authorized for over-the-road service.
After successful completion of each training and testing module, the agency is required to document and record the satisfactory completion of the employee's training and submit to the Driver Trainer. Certificates of completion will be maintained in the driver files for a minimum of 4 years.

All newly hired employees are also provided instructional training by the Operations Manager per agency's HSP. Commercial operators are given instruction in SunTran rules and standard operating procedures in the following areas:

- ❖ General rules of the agency including employee conduct codes.
- ❖ Personal appearance and conduct, covering uniforms, grooming, and employee conduct.
- ❖ Customer service, covering expectations of employees when dealing with the public, including instruction on how, to whom to report security incidents, and types of individuals and/or situations to be aware of and report.
- ❖ Traffic laws, covers applicable traffic-related laws and regulations, drug and alcohol testing, and drug and alcohol use restrictions.
- ❖ Fare handling covers fare collection procedures and provides instruction in dealing with fare disputes, conflict resolution, and notification of security personnel.
- ❖ Americans with Disabilities Act requirements, provides instruction in complying with ADA requirements and providing service to disabled patrons.
- ❖ Radio procedures, which provides instruction on radio procedure for both routine and emergency radio traffic. Including instruction on reporting crimes, suspicious acts, and potentially hazardous situations.
- ❖ Report writing, which provides instruction on report writing, and reporting requirements.
- ❖ Substance abuse policy, which implements a drug and alcohol testing program.
- ❖ Occupational Safety and Health Administration (OSHA) standards, covering blood borne pathogens and other occupational exposure to health hazards.
- ❖

6.36 Wireless Communication

According to 14-90.004, bus transit systems must implement a wireless communication plan and procedure that provides for the safe operation of the bus transit vehicle. The wireless communication plan and procedure shall assure that:

a. The use of a personal wireless communication device is prohibited while the transit vehicle is in motion, and

b. All personal wireless communications devices are turned off with any earpieces removed from the operator's ear while occupying the driver's seat.

A policy on the use of a wireless communications device issued to the operator by the bus transit system for business related purposes must be developed that assure:

a. Guidelines are developed that allow for the use of a wireless communications device in emergency situations, and

b. The use of a wireless communications device does not interfere with the operator's safety related duties.

Also, bus transit systems shall develop a driver educational training program addressing:

a. The proper use of a wireless communications device issued to the operator by the Bus Transit System while in the performance of their safety related duties, and

b. The hazards associated with driving and utilizing a wireless communications device.

"Wireless communication device" means an electronic or electrical device capable of remote communication. Examples include cell phones, personal digital assistants (PDAs) and portable computers (commonly called laptop computers). "Personal wireless communications device" means an electronic or electrical device that was not provided by the bus transit system for business purposes. "Use of a wireless communication device" means use of a mobile telephone or other electronic or electrical device, hands-on or hands-free, to conduct an oral communication; to place or receive a telephone call; to send or read electronic mail or a text message; to play a game; to navigate the Internet; to play, view, or listen to a video; to play, view, or listen to a television broadcast; to play or listen to music; to execute a computational function, or to perform any other function that is not necessary for the health or safety of the person and that entails the risk of distracting the employee from a safety-critical task. Use of an electronic or electrical device that enhances the individual's physical ability to perform, such as a hearing aid, is not included in this definition.

SunTran requires all commercial operators to fully comply with the following wireless communication policies.

Policies on the use of a personal wireless communication device:

a. The use of a personal wireless communication device is prohibited while the transit vehicle is in motion.

b. All personal wireless communication devices must be turned off with any earpieces removed from the operator's ear while occupying the driver's seat.

c. In an emergency, if a driver is unable to use the radio (e.g., driver is separated from the vehicle due to a need to evacuate, or the radio is inoperable because it is beyond the radio coverage area, or other malfunction), a personal cellular phone may be used to contact the agency. In such situation, the driver must park the vehicle in a safe place off the road and call the direct line to the dispatcher.

d. Commercial operators are not permitted to use any wireless communication device issued by the bus transit system while the transit vehicle is in motion except brief radio communications with the dispatcher. If the driver must use the radio for a long duration, he/she must stop the vehicle in a safe place off the road.

e. The use of a wireless communication device is prohibited while loading or unloading a wheelchair patron or while conducting any other safety related duty that require the driver's undivided attention. If wireless communication is necessary, the driver will use a company issued wireless communication device before or upon completion of the safety related task.

f. Employees are permitted to use wireless communication devices issued by the bus transit system in the following situations –

1. A driver needing to communicate with the dispatcher and vise-versa.
2. A driver requesting medical or emergency assistance.
3. A driver reporting an illegal activity, a traffic accident, a road hazard, or a safety or security threat.
4. A Limited English Proficient person needs translation service.

SunTran requires all employees to follow the radio operating procedures. In addition, SunTran has developed a driver educational training and testing program on the proper use of a wireless communications device while in the performance of safety related duties and hazards associated with driving and utilizing these devices. The wireless communications device training and testing is included in Driver Training which all commercial operators are required to complete upon hire, before driving on a street or highway unsupervised.

6.37 On-Going/Refresher Training and Testing

The Operations Manager will develop and maintain a Training Manual for ongoing and refresher training and testing of employees. The manual will contain training course content, curriculum, lesson plans, and testing requirements. On-going/refresher training and testing sessions will be conducted as necessary to remain compliant with Rule 14-90. The commercial operators are required to attend training and testing in all areas specified by Rule 14-90 at least once every three years. All training and testing activities are to be recorded and retained in files for a minimum of four years.

6.38 Remedial Training and Testing

SunTran will employ remedial training for commercial operators who have been involved in a serious collision or have developed unsafe driving behavior or other driving problems. Other causes for remedial training may include persistent customer complaints, supervisor recommendations, or a result of ongoing evaluations. Depending on the circumstances, the Operations Manager will determine the appropriate remedial training and testing, the results of which will also be documented and retained in files.

6.39 NIMS Training

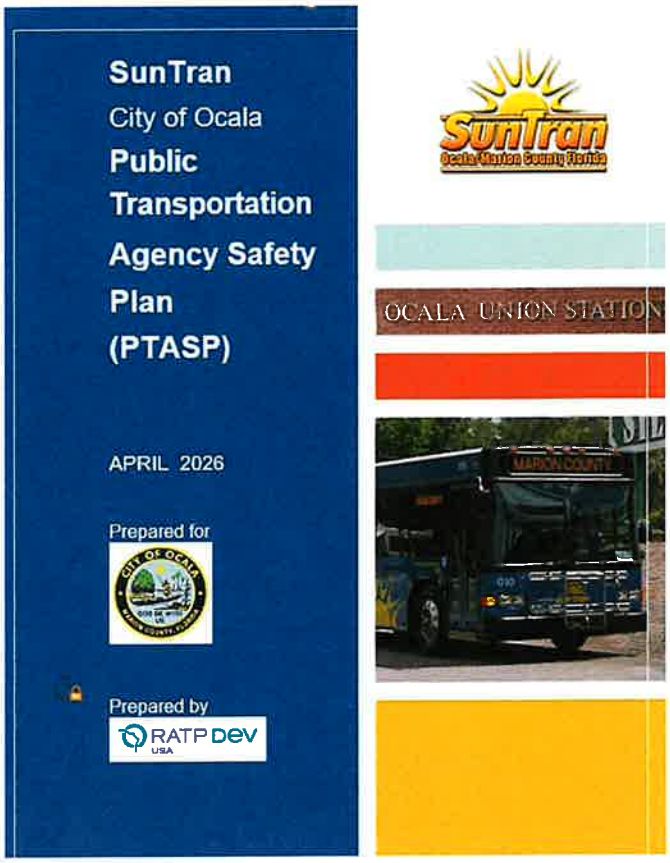
The National Incident Management System (NIMS) provides a consistent nationwide template to enable all government, private sector, and nongovernmental organizations to work together during domestic incidents (http://www.fema.gov/emergency/nims/). The NIMS system requires that transit agencies comply with number of specific activities to ensure personnel who will be conducting activities in response to emergencies use the standard Incident Command System (ICS).

SunTran HSP requires that management staff take available NIMS training to understand this requirement and to coordinate regularly with outside organizations to prepare for coordinated responses to incidents. All training and testing activities will also be recorded and retained in files.

ATTACHMENTS

Approval Page
Safety Committee Meetings
SMS Commitment Page
NTD Reports
RATP Dev PTASP
RATP Dev Policy Statement
RATP Dev Safety Management Policy
Florida Administrative Code 14.90
LYTX System
Monday.com

ATTACHMENT – SIGNATURES



SIGNATURE	TITLE	DATE
	Accountable Executive Transit Administrator	5/27/26
	Chief Safety Officer/SMS Executive Transit Administrator	5/27/26
Elizabeth Suchsland	SMS Site Coordinator Contractor General Manager Signature	4-29-2026
	SMS Executive Contractor Regional Manager Signature	

Annual Safety Certification and Adoption

Date:
Name: City of Ocala
SunTran
Address: 1805 NE 30th Avenue
Building 900
Ocala, FL 34470

In accordance with FTA 49 CFR Part 673 Final Rule, the bus system named above hereby adopts and certifies to the following:

1. The adoption of the City of Ocala Safety Management System (SMS) for calendar year 2025-2026

2. Compliance with adopted standards of the Public Transportation Agency Safety Plan (PTASP), for calendar year 2025-2026

3. Performance of safety inspections on all buses operated in accordance with Rule 14-90.009, for calendar year 2025-2026

Signature: _____
Name: Peter Lee
Title: City of Ocala, City Manager

Signature: _____ 5/27/26
Name: Tom Duncan
Title: Transit Administrator • Growth Management/SunTran

CITY OF OCALA
PUBLIC TRANSPORTATION SAFETY PLAN
PTASP 2026 UPDATE

RATP Dev / SunTran – Ocala – Safety Committee

The Safety Team commits to working to meet or exceed the Federal Transit Administration's Public Transportation Safety Plan (PTASP) / Safety Management System (SMS) requirements This Team takes safety and security in a serious manner and commits to keeping SunTran and its employees and passengers safety.

Each Team Member has committed to work to meet the goals of the Safety Management System, by committing to Remove or Reduce Risk, Do it Right, the First Time, Every Time, and No Unsafe Behaviors.

The Safety Committee is scheduled to meet on a bi-monthly basis. Agendas for the Safety Meeting, Safety Meeting Attendance Records, and notes of action will be kept on file in the General Manager's office.

The Safety Committee is responsible for the following:

- Approving the ASP and any updates to the ASP
- Identify and recommend risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment [49 U.S.C § 5329(d)(5)(A)(iii)]
- Identify mitigations or strategies that maybe ineffective, inappropriate, or were not implemented as intended [49 U.S.C § 5329(d)(5)(A)(iii)]
- Identifying safety deficiencies for purposes of continuous improvement [49 U.S.C §5329(d)(5)(A)(iii)]
- Establishing performance targets for the agency's risk reduction program

Safety Committee Team Members are as follows.

City of Ocala Name
Tom Duncan
RATP Dev SunTran Name
Elizabeth Suchsland
Eddie Dickens
Steven Roy
Eddie Santiago
RATP Dev SunTran Front Line Employee Name
Gary Simpson Operations

CITY OF OCALA
PUBLIC TRANSPORTATION SAFETY PLAN
PTASP 2026 UPDATE

RATP Dev / SunTran – Ocala – Safety Committee

January 6, 2026

Start Time: 11:30 a.m. End Time: 12:30 p.m.

Agenda Items

1. Union Station
    a. Signage for approval to post inside of bus. Requesting assistance to verify Spanish translation is correct.
    b. Training Page to be review and approved for back door deboarding.

2. Route Changes – Once a Year
    a. Need to finalize list of route changes.
    b. Route changes should be reviewed as changes to improve Safety and On Time Performance.

3. Open Discussion

CITY OF OCALA
PUBLIC TRANSPORTATION SAFETY PLAN
PTASP 2026 UPDATE

RATP Dev / SunTran – Ocala – Safety Committee

April 16, 2026

Start Time: 11:30 a.m. End Time: 12:30 p.m.

Agenda Items

1. Bikes / Bike Racks

    a. RATP Dev revised policy expected to be completed next year. Until then we will continue to operate under existing policies.
    b. Oversized tires. RATP Dev Regional Safety Manager is requesting additional information on the specific bike. Eddie Dickens and Liz Suchsland will work to film a video, take additional pictures, etc. Following this, the RATP Dev Regional Safety Manager will approve / disapprove our recommendations.

2. PTASP – Update to RATP Dev and City Staff next week.

3. Open Discussion

As a RATP Dev / Ocala SunTran Team Member,

I have received and commit to the goals outlined by the Safety Management System, Remove or Reduce Risk, Do it Right, the First Time, Every Time, and No Unsafe Behaviors.

PRINT NAME
DATE
SIGNATURE

Safety Management System

Mission

Remove or Reduce Risk

Vision

Do it Right, the First Time, Everytime

Values

No Unsafe Behaviors

Hazard Identification

Unsafe Behaviors

- Following too closely
- Unprepared for what is coming
- Not being prepared for what is around you
- Not communicating with other drivers or pedestrians
- Speeding
- Rushing
- Backing without a spotter or GOAL
- Not rocking & rolling to see around blind spots
- Turning without using your reference points
- Not adjusting your mirrors to minimize blind spots
- Operating unsafe equipment
- Having confrontations or heated discussions with passengers
- Distractions – texting, dialing, or reading maps
- Rolling through stop signs
- Driving too fast for conditions
- Driver fatigue
- Slips, trips & falls
- Drugs & alcohol

Hazard Mitigation

Remove or Reduce Risk

1. Leave room / Always stay back at least four seconds
2. Look ahead
3. Look around
4. Communicate
5. Stay within posted speed limits
6. Be in control, take your time. If late, stay late
7. Avoid backing the bus or use a spotter or GOAL
8. Rock & roll for turns
9. Use your reference points
10. Adjust your mirrors
11. Do a thorough Pre & Post Trip and only operate a safe vehicle
12. Smile and be polite at all times. Use Verbal Judo
13. Focus on the driving
14. Always stop at stop signs
15. Slow down and pull back for rain, snow, ice or fog
16. Get enough sleep, always be alert and awake
17. Always keep your balance, no rushing, use three point contact
18. Never be under the influence of drugs or alcohol

TAPTCO
TRANSIT AND PARATRANSIT COMPANY

Professionals apply these practices every day

TAPTCO
TRANSIT AND PARATRANSIT COMPANY

Operating the vehicle safely is of critical importance.

When you follow all the practices on the right side of this card, and avoid the behaviors on the left side of the card, you will be operating safely.

Please study these 18 safe practices and commit, as a professional operator, to follow these safe behaviors at all times.

Transit & Paratransit Company
5611 Hudson Drive, Suite 100, Hudson, Ohio 44236
Tel 1 855 963 3900 **www.taptco.com**

NTD ID	40120
Reporter Name	City of Ocala, Florida
Report	2025 (Revision: 2)

Safety Data (S&S-60)

Physical Assaults

	Physical Assaults in Transit Vehicle	Physical Assaults in Revenue Facility	Physical Assaults in Non-Revenue Facility	Physical Assaults in Other Location
Total event Counts				
Major Safety and Security Events	0	0	0	0
Non-Major Events (non-injury)	0	0	0	0
Injuries Counts				
Operator Injuries	0	0	0	0
Other Transit Worker Injuries	0	0	0	0
Other Injuries	0	0	0	0
Fatalities Counts				
Operator Fatalities	0	0	0	0
Other Transit Worker Fatalities	0	0	0	0
Other Fatalities	0	0	0	0

Non-Physical Assaults

	Non-Physical Assaults in Transit Vehicle	Non-Physical Assaults in Revenue Facility	Non-Physical Assaults in Non-Revenue Facility	Non-Physical Assaults in Other Location
Total event Counts				
Major Safety and Security Events	0	0	0	0
Non-Major Events (non-injury)	0	0	0	0

Injuries Counts				
Operator Injuries	0	0	0	0
Other Transit Worker Injuries	0	0	0	0
Other Injuries	0	0	0	0
Fatalities Counts				
Operator Fatalities	0	0	0	0
Other Transit Worker Fatalities	0	0	0	0
Other Fatalities	0	0	0	0

Additional Details

All Other Reportable Safety & Security Data

Event Type	Major Events	Fatalities	Injuries
Collisions with Pedestrian(s)	0	0	0
Collisions with Vehicle(s)	1	0	0
Collisions with Other (e.g. animal, manhole, shopping cart, etc.)	0	0	0
Other Major Events	0	0	0
Total reportable injuries from non-major events			0

Public Transportation Agency Safety Plan

DOCUMENT NUMBER:	RELEASE/VERSION	RELEASE/VERSION DATE:
01-SMS-GSF-002	3.0	February 10, 2025

CONTENT OWNER:

Department of Safety

RATP Dev USA

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Approvals

RATP Dev USA Public Transportation Agency Safety Plan

February, 2025

01-SMS-GSF-002

Jim Wojciechowski
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Date: 2025.02.06 20:59:00 -05'00'

Jim Wojciechowski
Senior Vice President of Safety and Industrial Engineering

Francine James
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Francine James
Vice President of Safety and Security

Ibrahima Toure
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Ibrahima Toure
Chief Development Officer

Debra Martinez
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Debra Martinez
Chief Financial Officer

Stacy Winsett
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Stacy Winsett
Chief People Officer

Bill Plisga
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Bill Plisga
Senior Vice President of Risk

Steve Sherrer
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Date: 2025.02.04 11:31:49 -05'00'

Steve Sherrer
Senior Vice President of Operations

Matthew Booterbaugh
Digitally signed by Matthew Booterbaugh
Date: 2025.02.03 13:23:12 -06'00'

Matt Booterbaugh
Chief Executive Officer

Contents

Safety Management Policy Letter

February 2025

Dear RATP Dev USA Teammates,

Our mission is to move the country through safe, equitable, reliable, and cost-effective public transportation. Safety is a core value and to accomplish our mission we are committed to implementing a world class, industry-leading Safety Management System (SMS) that is designed to proactively manage and reduce safety risks. Simply put, we take action before accidents or injuries (known as safety and security events) have the opportunity to occur.

To continue advancing safety throughout RATP Dev USA, we are publishing a new Safety Management Policy and Public Transportation Agency Safety Plan that clearly states what "being safe" really means to us. Being safe is an intentional and disciplined level of performance that we strive to achieve every day. The key principles are:

1) We **understand our safety and security risks**, what is being done about them, and how well our actions are working.
2) We take **proactive action** to reduce safety and security risks and **prevent** safety and security events from occurring.
3) We **apply lessons learned** from our performance and make **continuous** safety and security improvements.
4) We are **encouraged and empowered to voice safety and security concerns** across all levels of the company without fear of reprisal.

By living these principles, we keep passengers, pedestrians, third parties, each other, and our assets free from harm and deliver on our promise to provide the communities we serve with safe, equitable, reliable, and cost-effective public transportation. Take a moment to reflect and renew your commitment to living our values, starting with safety.

Jim Wojciechowski
Digitally signed by Jim Wojciechowski
Date: 2025.02.06 21:07:33 -05'00'

Jim Wojciechowski
Senior Vice President of Safety and Industrial Engineering

Steve Sherrer
Digitally signed by Steve Sherrer
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Steve Sherrer
Senior Vice President of Operations

Bill Plisga
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Bill Plisga
Senior Vice President of Risk

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Francine James
Vice President of Safety and Security

Debra Martinez
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Debra Martinez
Chief Financial Officer

Ibrahima Toure
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Ibrahima Toure
Chief Development Officer

Stacy Winsett
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Date: 2025.02.04 10:01:41 -06'00'

Stacy Winsett
Chief People Officer

Matthew Booterbaugh
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Date: 2025.02.03 13:20:28 -06'00'

Matt Booterbaugh
Chief Executive Officer

1.0 Transit Agency Information

The CEO is ultimately accountable for ensuring that SMS is implemented throughout RATP Dev USA in accordance with this Public Transportation Agency Safety Plan (ASP). Additionally, the CEO is accountable for ensuring action is taken to address substandard performance in RATP Dev USA's SMS when required. The Senior Vice President (SVP) of Safety and Industrial Engineering has been designated as the SMS Executive by and reports directly to the CEO. The SVP of Safety and Industrial Engineering is a safety professional that has been adequately trained, holding both the U.S. Department of Transportation (DOT) Transit Safety and Security Program (TSSP) and Public Transportation Safety Certification Training Program (PTSCTP) certificates (among other credentials). The SVP of Safety and Industrial Engineering has been empowered with the responsibility for day-to-day implementation and operation of RATP Dev USA's SMS.

Transit Agency Name	RATP Dev USA			
Transit Agency Address	300 Throckmorton Street, Suite 670, Fort Worth, TX 76102			
Name and Title of Accountable Executive	Matt Booterbaugh, Chief Executive Officer at RATP Dev USA			
Name and Title of Chief Safety Officer or SMS Executive	Jim Wojciechowski, Senior Vice President of Safety and Industrial Engineering at RATP Dev USA			
Mode(s) of Service Covered by This Plan	Rail, Bus, and Paratransit	**List All FTA Funding Types (e.g., 5307, 5337, 5339)**	N/A	
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Directly operate and maintain bus, rail, and paratransit modes as a private contractor.			
Does the agency provide transit services on behalf of another transit agency or entity?	Yes X	No	**Description of Arrangement(s)**	RATP Dev USA operates 35 contracts throughout North America to provide fixed-route, paratransit, and rail services for transit agencies; national parks, and other entities.
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	The full listing of our clients can be found at https://www.ratpdevusa.com/references			

2.0 Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Jim Wojciechowski, SVP of Safety and Industrial Engineering	
Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
	Refer to Approvals (page i)	TBD
Approval by the Board of Directors or an Equivalent Authority	**Name of Individual/Entity That Approved This Plan**	**Date of Approval**
	Refer to Approvals (page i)	TBD
	Relevant Documentation (Title and Location)	
	Refer to 01-SMS-SF-001 Safety Management Policy	
Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	RATP Dev USA self-certifies at corporate level by approving this ASP annually	N/A
	Relevant Documentation (Title and Location)	
	N/A	

Version Number and Updates

The complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1.0	New document	First version of Public Transportation Agency Safety Plan under 49 CFR Part 673.	Feb 2021
2.0	2, 3, 4, 6, 7, 12, 13, 14, 20, 25,26,28, 29, 31	2023 update	Mar 2023
3.0	Entire document	2025 update, which is a complete refresh in alignment with leadership change at the CEO and Safety levels.	Feb 2025

Annual Review and Update of the Public Transportation Agency Safety Plan		
Timeline	**Activity or Milestone**	**Responsibility**
January 1 to December 31	ASP is made available year-round on RATP Dev USA's Safety Resource Hub for review and comment. Comments are also accepted directly through email and other means.	The VP of Safety and Security ensures the document is posted and ensures the opportunity to review and provide feedback is promoted. All comments (regardless of how they are received) will be captured and considered for incorporation as part of the annual revision cycle.
Dec 1-31	Conduct general review and draft ASP revision	The VP of Safety and Security will perform an inventory of inputs resulting from comments made, investigations, policy changes, safety action plans, and other sources. This review will include partnering with Human Resources and Operations to ensure interconnected policies, procedures, work instructions, job responsibilities (etc.) that may be affected are accounted for and addressed.
Jan 1-15	Finalize ASP draft	After the final performance data for the year has been processed, the VP of Safety and Security will finalize the ASP draft by updating the proposed safety performance targets.
Jan 15-31	Executive Council (EXCO) comment period	The proposed draft ASP revision is submitted to the EXCO for their review with feedback sent back to the VP of Safety and Security.
Feb 1-15	Finalize ASP Revision	The VP of Safety and Security ensures comments received on the proposed draft ASP revision are addressed.
Feb 16-29	EXCO review and approval period	A final review is conducted to ensure all required feedback has been addressed. The CEO and EXCO approve the ASP.
Mar 1	ASP Revision Published	The VP of Safety and Security partners with Business Development and Marketing to communicate, distribute, and promote the publishing of the latest ASP and to ensure safety training and New Employee Orientation are updated (along with other training courses, as applicable).

3.0 Safety Performance Targets

Safety performance targets are set in alignment with the FTA's guidance as specified in the National Transportation Safety Plan. RATP Dev USA's safety performance targets are established annually and strive to achieve year-over-year improvement. Continued implementation of the SMS strategy defined in this ASP reflects how RATP Dev USA intends to meet and exceed these safety performance targets.

3.1 Safety Performance Target: Fatalities

In accordance with the FTA NTD Policy Manual, RATP Dev USA tracks the total number of overall fatalities and transit worker fatalities resulting from safety or security events, excluding those that occur because of illnesses, drug overdoses, or other natural causes (including individuals who are found deceased). RATP Dev USA's commitment is that no customer, employee, pedestrian, or any other human should ever experience a fatality because of the company's performance. Fatalities are tracked as a hard count with performance tracked monthly and cumulatively.

Metric	2024 Result	2025 Bus/PT Target	2025 Rail Target
Fatality Count	1	0	0
Fatality Rate	0.001	0.00	0.00
Formula: (Number of all fatalities x 100,000) / Monthly Total Service Mileage			
Transit Worker Fatality Count	0	0	0
Transit Worker Fatality Rate	0.00	0.00	0.00
Formula: (Number of transit worker fatalities x 100,000) / Monthly Total Service Mileage			

3.2 Safety Performance Target: Major Event Rate

The FTA NTD Policy Manual specifies reporting thresholds for minor and major safety events. Additionally, major events are considered any safety or security event that meet the threshold for Level 2 or above in RATP Dev USA's reporting matrix, which is available on the Safety Resource Hub (company's intranet). RATP Dev USA intends to reduce its major event rate by a minimum of 10% year over year with performance tracked monthly and cumulatively.

Metric	2024 Result Count	2024 Result Rate	2025 Target Count	2025 Target Rate
Major Safety or Security Events	193	0.25	174	0.22
Formula: (Number of Major Events x 100,000) / Monthly Total Service Mileage = Major Event Rate				

3.3 Safety Performance Target: Accident Frequency Rates

The accident frequency rate (AFR) and preventable accident frequency rate (P-AFR) track the number of both major and non-major collisions experienced. A collision includes hitting fixed objects, vehicles, and any other contact that results in fatality, injury, or property damage as specified by the NTD Policy Manual. RATP Dev USA intends to reduce its AFR by a minimum of 15% and P-AFR by a minimum of 10% year over year with performance tracked monthly and cumulatively.

Metric	2024 Bus/PT Result	2025 Bus/PT Target	2024 Rail Result	2025 Rail Target
Accident Count	1870	1589	35	29
AFR	2.42	2.06	11.53	9.8
Formula: (Number of Collisions x 100,000) / Monthly Total Service Mileage = AFR				
Preventable Accident Count	773	696	11	10
P-AFR	1.00	0.90	3.63	3.29
Formula: (Number of Preventable Collisions x 100,000) / Monthly Total Service Mileage = P-AFR				

3.4 Safety Performance Target: Pedestrian Collision Rate

Pedestrian strikes are a top risk for RATP Dev USA and the transportation industry. RATP Dev USA intends to reduce its pedestrian collision rate by a minimum of 20% year over year with performance tracked monthly and cumulatively.

Metric	2024 Result Count	2025 Target Count	2024 Result Rate	2025 Target Rate
Pedestrian Collisions	14	11	0.02	0.014
Formula: (Number of Pedestrian Strikes x 100,000) / Monthly Total Service Mileage				

3.5 Safety Performance Target: Vehicular Collision Rate

The vehicular collision rate will include collisions with all forms of motorized vehicles (cars, buses, motorcycles, etc.). The KPI was introduced by the FTA in 2024. This new metric will be measured throughout the course of 2024 with trends measured month-over-month. Specific targets for year-over-year improvements will be established starting in 2025.

3.6 Safety Performance Target: Injury Frequency Rates

In accordance with the NTD Policy Manual, an injury is defined as an employee, passenger, or third-party experiencing harm that required immediate medical attention away from the scene because of safety event. RATP tracks injury frequency rates (IFR) using both the labor hours-based Occupational Safety

and Health Administration (OSHA) methodology as well as the FTA's mileage-based methodology. RATP Dev USA intends to reduce the Occupational Safety and Health (OSH) IFR and IFR-LTI (lost time injuries) by 10%. The FTA IFR rate includes employees, passenger, pedestrian, and third-party injuries and the FTA's transit worker injury rate is specific to all transit employees. RATP Dev USA intends to reduce the FTA IFR and Transit Worker IFR by 10%.

Metric	2024 Result Count	2025 Target Count	2024 Result Rate	2025 Target Rate
OSH IFR	353	318	3.77	3.40
Formula: (Number of Employee Injuries / Total Hours Worked) x 200,000 hours				
OSH IFR-LTI	159	143	1.73	1.56
Formula: (Number of Employee Lost Time Injuries / Total Hours Worked) x 200,000 hours				
FTA IFR	666	599	0.86	0.77
Formula: (Number of all injuries x 100,000) / Monthly Total Service Mileage				
FTA Transit Worker IFR	353	318	0.46	0.41
Formula: (Number of employee injuries x 100,000) / Monthly Total Service Mileage				

3.7 Safety Performance Target: Transit Worker Assaults

The overall transportation industry is experiencing a growing trend in assaults on transit workers, especially operators. The NTD Policy Manual defines a transit worker assault as a circumstance in which an individual knowingly interferes with, disables, or incapacitates a transit worker while the transit worker is performing their duties. The KPI was introduced by the FTA in 2024. This new metric will be measured throughout the course of 2024 with trends measured month-over-month. Specific targets for year-over-year improvements will be established starting in 2025.

3.8 Safety Performance Target: System Reliability Rate

RATP Dev USA is committed to maintaining our clients' assets in a state-of-good-repair, which is foundational producing consistent, repeatable outcomes that create an environment conducive to a safe experience. In accordance with NTD Policy Manual, system reliability is measured based on the number of major mechanical failures experienced, which is defined as failure of some mechanical element of the revenue vehicle not caused by a collision, natural disaster, or vandalism, which prevent a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns. The system reliability rate is a new metric that will be measured throughout the course of 2024 with specific targets set for year-over-year improvements starting in 2025.

3.9 Safety Performance Target: Worker's Compensation Claims Rate

The Worker's Compensation (WC) claims rate is regarded as a safety performance KPI because when safety events occur, employees are injured and claims are filed. Therefore, a progressive reduction in claims is considered an outcome of an effective SMS. The rate is measured based on the number of

claims per 1,000 employees. The 2024 rate of 5.7 was worse year-over-year compared to 2023 but historically low compared to performance data going back to 2020. The company will seek to achieve a new historic low in 2025 by achieving a rate of 4.9 or lower, equating to a 15% improvement.

Metric	2023 Result	2024 Result	2025 Target
WC Claims Rate	5.0	5.7	4.9

3.10 Safety Performance Target: Auto Liability Claims Rate

The Auto Liability (AL) claims rate is regarded as a safety performance KPI because when safety events occur people are injured, and property is damaged resulting in claims filed. Therefore, a progressive reduction in claims is considered an outcome of an effective SMS. The rate is measured based on the number of claims per 10,000 service miles. The 2024 rate of .14 was a significant improvement compared to 2023 (.18) but approximately flat compared to historical performance data going back to 2020. The company will seek to achieve a new historic low in 2025 by achieving a rate of .12 or lower, equating to a 15% improvement.

Metric	2023 Result	2024 Result	2025 Target
AL Claims Rate	.18	.14	.12

4.0 Safety Management Policy

The safety management policy component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.23 *Safety Management Policy* this section of the ASP address the requirements for a safety management policy and safety management policy statement; outlines the plan for communicating the safety management policy; defines necessary organizational authorities, accountabilities, and responsibilities; describes RATP Dev USA's Employee Voluntary Safety Reporting Program; and specifies the plan forward for refreshing existing and establishing new safety related policies.

4.1 Safety Management Policy Statement

RATP Dev USA's Safety Management Policy and Safety Management Policy Statement have been included in this ASP as Appendix A and Appendix B.

4.2 Safety Management Policy Communication

RATP Dev USA's Safety Management Policy and Safety Policy Statement will be actively communicated throughout the company. A variety of communications techniques will be used to achieve this communication with the intent of reaching every employee. Upon receiving approval of by the CEO, the VP of Safety and Security will partner with Senior Director of Marketing and Communications to announce the updated policy and provide the documents to the general managers (GMs) of every location through email. The GMs will be required to print the Safety Management Policy and Safety Management Policy Statement and place them on bulletin boards, making the documents physically accessible to employees. GMs and Safety Managers (SMs) will be directed to announce the policies availability and provide an overview of the policy during their monthly safety meetings with represented employees. The VP of Safety and Security will provide a PowerPoint presentation to assist GMs and SMs with their communication and engagement. All employees will be invited to review the policy and either provide feedback directly to their management or directly to the corporate safety department through the employee voluntary safety reporting program. The Safety Management Policy will also be posted on the Safety Resource Hub, a web-based SharePoint site available through the company's intranet that serves as the centralized locations for all safety information.

4.3 Necessary Authorities, Accountabilities, and Responsibilities

The success of SMS depends on support from across the company. At a minimum, every employee at RATP Dev USA has the responsibility to report safety concerns when they are identified. This responsibility includes actively engaging in the process described in section 4.4 *Employee Voluntary Safety Reporting*. This section expands on the necessary authorities, accountabilities, and responsibilities identified in P/I 10.8 *Safety Management Policy*. The following Responsible (R), Accountable (A), Contributor (C), and Informed (I) matrix summarizes the support required from RATP Dev leadership and key staff to ensure the successful development and implementation of SMS. The ensuing sub-sections expand on the matrix to outline the specific needs identified for each position.

Role and Title		Safety Management Policy	Safety Risk Management	Safety Assurance	Safety Promotion
Accountable Executive	Chief Executive Officer	R	R	R	R
SMS Executive	Senior Vice President of Safety and Industrial Engineering	A	A	A	A
Agency Leadership and Executive Management	Senior Vice President of Operations	A	A	A	A
	Senior Vice President of Risk	C	C	C	C
	Chief People Officer	C	C	C	C
	Chief Financial Officer	C	C	C	C
	Chief Development Officer	C	C	C	C
Key Staff	VP of Safety and Security	A	A	A	A
	Regional Safety Directors	A	A	A	A
	Regional Operations Directors	A	A	A	A
	General Managers	A	A	A	A
	Operations Managers	A	A	A	A
	Safety Managers	A	A	A	A

4.3.1 Accountable Executive

The CEO is RATP Dev USA's Accountable Executive. The CEO is ultimately responsible for RATP Dev USA's safety performance. The CEO makes policy and resource decisions, supports the implementation of safety action plans, approves safety strategic initiatives, and oversees daily operations of the company. The CEO champions safety at the company to ensure that all employees understand that safety comes first. The CEO has designated the SVP of Safety and Industrial Engineering as the SMS executive, a position that reports directly to him.

4.3.2 SMS Executive

RATP Dev USA's SVP of Safety and Industrial Engineering has been designated as the company's SMS Executive and reports directly to the CEO. The SVP of Safety and Industrial Engineering is a safety professional that has been adequately trained, holding both the DOT TSSP and PTSCTP certificates (among other credentials). The SVP of Safety and Industrial Engineering has been empowered with the responsibility for day-to-day development and implementation of RATP Dev USA's SMS.

4.3.3 Agency Leadership and Executive Management

RATP Dev USA's Executive Council (EXCO) are the company's agency leadership and executive management. The EXCO is composed of the CEO's direct reports: SVP of Operations, SVP of Risk, SVP of Safety and Industrial Engineering, Chief People Officer, Chief Financial Officer, and Chief Development Officer. The SVP of Operations is accountable for the SMS along with the SVP of Safety and Industrial Engineering. The Operations Department is ultimately responsible for working together with the Safety Department to ensure the SMS is implemented, effective, and continuously improving. The SVP of Risk contributes to the safety strategy, provides input based on claims data, and helps set safety performance targets. The Chief People Officer contributes to the safety strategy and incorporates safety principles into the human resources program to include the employee handbook, hiring selection and onboarding processes, policy development, and employee engagement campaigns. The Chief Financial Officer contributes by collaborating with the safety department to determine their annual budget, support funding for key safety initiatives, track the safety program's financial performance in terms of negotiated insurance premiums and worker's compensation and auto liability claims cost reductions. The Chief Development Officer contributes by utilizing the communications and marketing team to help communicate safety information across the company, assists with implementing key safety strategic initiatives to include providing products and branding, and assists the safety department with logos, graphics, designs, and messaging.

4.3.4 Key Staff

The safety department includes a VP of Safety and Security and three regional safety directors. The operations department includes five operations directors. These safety and operational leaders are accountable for working together to develop and implement the company's SMS. The alignment of operations and safety on the strategy to develop and implement the SMS is foundational to the strategy's success. Collectively, safety and operations engage the field, which is compost of 35 locations that each have General Managers (GMs), Operations Managers (OMs) and Safety Managers (SMs). At the local level, the GM functions as an Accountable Executive and the SM functions as the SMS Executive. The GM manages their budget, controls human and capital resources, and they are held accountable for providing safe, quality operations for clients and the communities served. By implementing the SMS, SMs work with GMs and OMs to ensure the locations safety risks are understood, prioritized, and identifies the mitigations required to continuously improve safety performance. The GMs assign funding and resources against safety risks and OMs are responsible for working closely with SMs to apply those resources to drive safety risk mitigations, which translates into the systematic reduction in the quantity and severity of safety events and claims costs.

4.4 Employee Voluntary Safety Reporting Program

RATP Dev USA requires all employees to identify hazards, mitigate them immediately if possible, and to report them. This includes reporting a close call when involved directly or witnessing a near-miss incident, or if a reported safety concern persists. RATP Dev USA strives for a culture where employees feel comfortable verbally reporting their safety concerns to their direct supervisor, safety management, or senior management as soon as they are discovered. However, there may be circumstances where employees prefer reporting outside their chain of command to maintain confidentiality and to avoid the potential for retaliation. RATP Dev USA's Safety Management Policy specifically prohibits retaliation, but the concern may still exist. Consequently, the company has implemented and Employee Voluntary Safety Reporting Program. Every location's SM is responsible for ensuring the Employee Voluntary Safety Reporting Program flyer is posted. Employees can simply scan a QR code or they can email safetyreport@ratpdev.com. Employees can choose to remain confidential with identifying themselves and providing contact information optional although providing this information is encouraged. Upon receiving an employee voluntary safety report, the VP of Safety and Security reviews every report with their applicable regional safety directors. The safety directors work with their operational counterparts, GMs, and SMs to investigate the report, assess the risk, and determine the appropriate mitigation plan forward. All risk mitigations will be incorporated into each location's safety action plan. The regional safety director will coordinate to ensure the reporter receives regular updates through the review, investigation, assessment, and mitigation process. A critical component of the Employee Voluntary Safety Reporting Program is assuring the reporter their voice was heard, their reports is being actively addressed, and ultimately, what actions are being taken in response. There are conditions when a reporting employee could be subject to discipline, specifically:

- The employee's action or lack of action was intended to damage RATP Dev USA's equipment
- The employee's action or lack of action purposely places others in danger
- The employee's action or lack of action involved a criminal offense
- The employee's action or lack of action violated a traffic safety law leading to a citation
- The employee's behavior involved substance abuse
- The report contains falsified information

5.0 Safety Risk Management

The Safety Risk Management component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.25 *Safety Risk Management*, this section of the ASP includes: safety risk identification, safety risk assessment, and safety risk mitigation (corrective and preventive actions). The safety risk management process is the engine of RATP Dev USA's SMS, which is designed to enable proactive detection of safety risk and drive actions before a safety event has the opportunity occur. Through systematic implementation across the company, the quantity and severity of RATP Dev USA's accidents, injuries, property damage, and association claims will continue to progressively trend down even while the company continues on a consistent growth trajectory year-over-year.

5.1 Safety Risk Identification

The first step in the Safety Risk Management process is to identify safety risks (any real or potential condition that can cause injury, illness, or death; damage to or loss of facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment). The safety risk identification approach is data-driven and therefore, RATP Dev USA collects safety data from a variety of sources that are reviewed and analyzed to identify safety risks. Safety data is categorized as either lagging indicators and leading indicators. Lagging indicator data reflects the near-misses and safety events that have occurred also known as realized risks. Leading indicator data reflects behaviors and reports that are regarded as precursors to experiencing a safety event. The following data sources have been made available to all GMs and SMs:

- Lagging indicator data sources
    - SafeTracker software captures all near-miss and safety event reports and investigations
    - Fleet Response software captures all auto liability claims data
    - Helmsman software captures all worker's compensation claims data
    - Qlik Sense Business Intelligence tool tracks trends against safety performance targets

- Leading indicator data sources
    - Telematics software captures and trends operator risky behaviors
    - Internal and external audit findings
    - Employee voluntary safety reports
    - Reports from the FTA, clients, industry, or other external entities

GMs, SM, and OMs are expected to work together to use all these data sources to detect patterns and trends that indicate systemic risks exist on an ongoing basis. The local teams have the ability to engage with their operations and safety directors on assistance in reviewing the data. The risks identified are then captured in the risk register and action planning tool, Monday.com.

5.2 Safety Risk Assessment

The identified risks are subjected to an assessment based on the likelihood and severity formula benchmarked from MIL-STD-882E *System Safety Standard Practice*. Likelihood is measured based on the frequency (or how often risk is expected to occur). A combination of quantitative and qualitative data is used to assess likelihood. The leading and lagging indicators are considered along with existing mitigations in place, employee reporting, feedback from safety and operations management, results from safety assurance oversight, and findings from internal audits, the FTA, RATP Dev (Paris), or other entities. Determining likelihood is ultimately and exercise in interpreting data. The qualitative guideline specified in the table below is from the MIL-STD-882E criteria. The quantitative guideline is intended to help inform users interpretation based on exposure population. For example, if a particular intersection is prone to safety events, the exposure population would assess the ratio of how often a buses pass through that intersection compared to how often near-misses, safety events, or risky behaviors are detected to help determine the frequency rating.

Probability	Value	Qualitative Guideline	Quantitative Guideline
Frequent	A	Opportunity for risk to be realized expected to occur often	Probability of occurrence greater than or equal to 10^{-1} (10%) of exposure population
Probable	B	Opportunity for risk to be realized expected on a recurring basis	Probability of occurrence less than 10^{-1} (10%) but greater than or equal to 10^{-2} (1%) of exposure population
Occasional	C	Opportunity for risk to be realized expected to occur	Probability of occurrence less than 10^{-2} (1%) but greater than or equal to 10^{-3} (0.1%) of exposure population
Remote	D	Opportunity for risk to be realized not expected to occur but possible	Probability of occurrence less than 10^{-3} (0.1%) but greater than or equal to 10^{-6} (0.0001%) of exposure population
Improbable	E	Opportunity for risk to be realized not expected to occur and almost inconceivable	Probability of occurrence less than 10^{-6} (0.0001%) of exposure population

Severity is measured based on the consequences expected from the risk occurring. A combination of quantitative and qualitative inputs is also used to assess severity. Historical safety performance indicators such as the nature of the injury experienced, extent of property damage, and length of service disruption are reviewed along with existing mitigations, employee reporting, feedback from safety and operations management, results from safety assurance oversight, and findings from internal audits, the FTA, RATP Dev (Paris), or other entities. After likelihood is assessed, the GMs and SMs assess the severity of each risk based on a discussion and interpretation of this data. The MIL-STD-882E severity scale has a number-based value range from 1 to 4. The lower the number value assigned, the more severe the consequence is expected to be as reflected in the following table.

Severity	Value	Meaning
Catastrophic	1	Risk realization expected to result in one or more of the following: death, permanent total disability, loss of passenger/crew occupied volume with equipment damage causing separations in structure, infrastructure damage that suspends service through the affected area for greater than 24 hours.
Critical	2	Risk realization expected to result in one or more of the following: permanent partial disability, injuries/illness that results in hospitalization, loss of passenger/crew occupied volume with equipment damage that causes openings but no separations in structure, infrastructure damage that suspends service through the affected area for greater than 2 and up to 24 hours.
Marginal	3	Risk realization expected to result in one or more of the following: injury or illness resulting in one or more lost work day(s), loss of passenger/crew occupied volume with equipment damage that causes no openings in structure, infrastructure damage that suspends service through the affected area for more than 30 minutes and up to 2 hours.
Negligible	4	Risk realization expected to result in one or more of the following: injury or occupational illness that does not result in a lost work day, no loss of passenger/crew occupied volume, equipment or infrastructure damage that does not suspend service nor cause a delay through the affected area for more than a maximum of 30 minutes.

The assessment of likelihood and severity of a given safety risk is based on the totality of the circumstances associated with each. Upon completing the risk assessment for each risk, the GM or SM enters the results Monday.com. The following MIL-STD-88SE risk matrix is used with grading criteria resulting in the assessment for each risk depicted as either high (red), serious (orange), medium (yellow) or low (green), determining how the safety risks will be prioritized.

Risk Probability	Risk Severity			
	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Frequent – A	**1A**	**2A**	**3A**	**4A**
Probable – B	**1B**	**2B**	**3B**	**4B**
Occasional – C	**1C**	**2C**	**3C**	**4C**
Remote – D	**1D**	**2D**	**3D**	**4D**
Improbable – E	**1E**	**2E**	**3E**	**4E**

Risk Index		
Red	1A, 2A, 1B, 2B, 1C	Risk mitigating safety action plan required and reviewed at monthly safety meeting with SVP of Operations and SVP of Safety and Industrial Engineering
Orange	3A, 3B, 2C, 1D	Risk mitigating safety action plan required and reviewed at monthly safety meeting with SVP of Operations and SVP of Safety and Industrial Engineering
Yellow	4A, 4B, 3C, 2D, 3D, 1E, 2E, 3E	Risk mitigation safety action plan required and reviewed with regional Operation and Safety Directors.
Green	4C, 4D, 4E	Risk effectively mitigated with completed actions in place. The risk is under local GM and SM monitoring.

5.3 Safety Risk Mitigation

After the risk assessment is complete, the risk mitigation step involves determining what actions need to be taken to reduce them as low as reasonably practicable. The risks assessed as high are prioritized accordingly, followed by serious risks, then medium risks, and low risks (as required). The SMs perform research to determine whether there are risk mitigations already in place as well as any other mitigations that are already in work (e.g., as part of the safety action plan). The following criteria (based on the *Hierarchy of Controls*) is applied when developing risk mitigations:

- Elimination: Mitigations designed into the operation that eliminate the potential for exposure to risk (e.g., *the station is shut down when an escalator malfunctions, eliminating the possibility of customers getting hurt while using them as stairs*)
- Substitution: Mitigations designed into the operation that result in avoiding the potential for risk exposure (e.g., *the station remains open when an escalator malfunctions, but customers are re-directed to actual stairs or elevators to avoid use of the malfunctioning escalator*)
- Engineering Controls: Mitigations designed into the operation that trigger controls when the potential for risk exposure increases (e.g., *an automatic gate is activated when an escalator shuts down, creating a barrier that deters customers from using them as stairs*)
- Administrative Controls: Mitigations designed to change human performance or behaviors in response to the risk (e.g., *every three minutes, the station will announce the escalator is out of service and advise customers to use the actual stairs or elevators*)
- Personal Protective Equipment (PPE): Mitigations designed to protect from exposure to the risk while an activity is performed (e.g., *an attendant will hand out helmets to customers so in case they fall while climbing a shutdown escalator, their head is protected*).

The mitigation criteria are applied with the most feasible and effective mitigations prioritized accordingly. Any risk mitigations that require additional resources (personnel, funding, etc.) are escalated to regional Safety and Operations Directors and ultimately, the SVP of Operations and SVP of Safety and Industrial Engineering as needed. After the risk mitigation actions are determined, they are incorporated into Monday.com as safety action plans. GMs and SMs are responsible for ensuring every risk mitigation is specific, measurable, achievable, relevant, and time-sensitive with clear owners assigned. GMs are responsible for ensuring that safety action plans are implemented and maintained to stay current. GMs and SMs regularly review their safety performance to determine if their safety action plan is effectively mitigating their safety risks as intended and adjust as needs dictate. An effective safety action plan results in progressively a downward trend in safety events, property damage, injuries and ultimately, translates to progressively lower worker's compensation and auto liability claims rate as well as lower expense when claims do occur. GMs are required to participate in monthly safety meetings where they report on their top safety risks, actions being taken to mitigate them, and KPIs used to measure effectiveness. These meetings provide EXCO leadership with the opportunity to review each location's implementation of the safety risk management process and provide direction.

6.0 Safety Assurance

The Safety Assurance component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.27 *Safety Assurance*, this section of the ASP includes safety performance monitoring and measurement; safety event reporting and investigation; management of change; and continuous improvement. Additionally, the safety assurance component includes a focus on integrated claims management. If safety risk management is the engine of the SMS, safety assurance provides the fuel. The results of safety assurance are fed back into the safety risk management process, creating a systematic approach that drives continuous improvement by progressively strengthening safety actions plans.

6.1 Safety Performance Monitoring and Measurement

There are two fundamental objectives of safety performance monitoring and measurement. The first objective is to ensure that safety risk mitigations are being complied with or implemented as intended. The second objective is to measure the effectiveness of the risk mitigations to reduce the risk of having a safety event or injury as intended. To monitor compliance, each location is required to implement a variety of techniques.

6.1.1 Annual Self Assessments and Monthly Internal Controls

Each location is required to complete a self-assessment on an annual basis. The self-assessment requires each location to assess their compliance in the following control areas:

1) Commercial Driver License (CDL)
2) DOT Medical
3) Training
4) Drug and Alcohol Testing
5) Telematics (DriveCam)
6) Working Hours as defined in CBAs
7) Preventative Maintenance Inspections
8) Corrective Maintenance

In each of these areas, locations are required to rate their compliance using the following criteria:

- Rating 1 – No SOP has been established for the control area
- Rating 2 – SOP in place but internal controls (oversight) has been applied
- Rating 3 – SOP in place and internal control in place but has experienced a significant failure
- Rating 4 – SOP in place and internal control in place and working as intended

In any area where the location is reporting their maturity to be at a rating of 2 or less, they are required to work with the corporate safety department to incorporate actions into their safety action plans that will result in achieving a level 4 rating. By the 15th of every month, the managers of safety sensitive functions of each location (Operations, Dispatch, and Maintenance) are required to complete an audit internal control checklist designed to ensure that RATP dev USA is maintaining compliance in each of the control areas and proactively detecting and correcting non-compliances before they have an increase safety risk. The internal control checklists are web-based and available the following links:

- Dispatch/Traffic Internal Control Monthly Self-Assessment

- Maintenance Internal Control Monthly Self-Assessment
- Operations Internal Control Monthly Self-Assessment

Additionally, on a quarterly basis, the location's safety managers are required to complete an internal control assessment. This safety-level internal control randomly observes and samples the operation from an objective, independent perspective that encompasses all aspects of the local organization. The internal control is due for completion by the end of each quarter on a calendar year basis with the results reported to the applicable regional safety director for review and coordination with operations regional leadership and general management. The results of all internal control activity inform the continuous improvement of safety action plans.

- Safety Internal Control Monthly Self-Assessment

6.1.2 RATP Dev Corporate Audits

Parent company RATP Dev's Technical Department comes to the United States from Paris to audit four locations annually. The scope of these audits includes operations, maintenance, safety, and support functions. The audits report on good practices taking place within the location, findings or items requiring an improvement action to ensure a risk is adequately controlled, and major findings or items requiring an immediate improvement action to ensure a significant risk is adequately controlled. The risk may be safety related or may have a significant impact on operational or financial performance. All findings are captured in RATP Dev's SmartSheet software. Each location's safety manager is required to incorporate all safety-related findings and major findings into their safety action plans in Monday.com to ensure they actions taken are tracked and managed to completion.

6.1.3 RATP Dev USA Corporate Audits and Health Check Reviews

The safety department conducts audits that include every operating contract on a triennial basis. The audits focus on training compliance, records management, and risk mitigation. The safety manager of each location is required to incorporate the findings from RATP Dev USA corporate audits into their safety action plans in Monday.com to ensure the actions taken in response are managed to completion. Additionally, the Director of Quality and Standards reports directly to the SVP of Safety and Industrial Engineering. The Director of Quality conducts 3-4 health check reviews a year as directed by the CEO. The health check reviews encompass operations, maintenance, and safety and are designed to provide recommendations to locations on how they can continuously improve their performance. However, any safety risks discovered during the health check review without mitigations in place are required to be incorporated into the location's safety action plan.

6.1.4 Telematics Oversight

All RATP Dev USA operating contracts and the majority of management contracts have a DriveCam telematics system in place. This technology tracks over 70 risky behaviors such as speeding, hard braking, following distance, incomplete stops, mobility device usage, seat belt compliance, etc. The telematics systems are installed on both revenue and non-revenue vehicles. GMs and SMs are required to use this technology to track the performance of their operators. Telematics data provides a key source of leading indicators or precursor behaviors that can be addressed before a safety event or injury occurs. Therefore, GMs and SMs are expected to coach operators on risk behaviors in a timely manner with a target of having the coaching sessions within three days of the event. GMs are expected to

negotiate progressive discipline policies in their CBAs so that operators that are not responding to the coaching are held accountable progressively to include termination if required. Refer to the RATP Dev USA Telematics Policy for more information.

6.1.5 Qlik Sense for Performance Monitoring

RATP Dev USA's KPIs for Safety, People, Operations, and Finance are visualized using the business intelligence tool, Qlik Sense. Qlik Sense enables the GMs and their staff to monitor their progress against the established safety performance targets (refer to section 3.0 for RATP Dev USA's safety performance targets). The effectiveness of their safety action plans is assessed based on KPI performance. If the safety action plans are working as intended, then safety performance should be trending favorably month-over-month. Conversely, if safety performance is flat or trending unfavorably month-over-month, then safety action plans should be re-evaluated with new actions or refreshed priorities to ensure they are current and aligned with the evolving nature of dynamic transit operations. Ultimately, safety action plans are not considered effective until they are effective mitigating risk, which translate to downward trends in safety KPIs. These trends are tracked at the location, regional, and company level. The safety regional directors also monitor these trends, assess the quality of safety action plans, conduct site visits, and provide subject matter expertise to assist locations in continuously improving their safety actions plans.

6.1.6 Additional Performance Monitoring Best Practices

Each location is also expected to implement a variety of best practices to monitor performance and verify compliance. These best practices include road checks performed by operations supervisors. These checks involve supervisors riding the bus and observing operators comply with traffic laws, training requirements, and customer service. Another best practice includes trail checks, where supervisors in non-revenue vehicles follow revenue vehicles and monitor their performance for speed, braking, traffic law compliance, etc. Locations are encouraged to adopt a mystery rider program where anonymous riders complete a checklist or questionnaire evaluating their experience with the service. Each location implements a system of tracking findings and actions taken to address them. Systemic or recurring findings are required to be incorporated into each location's safety action plan for additional tracking, oversight, and support from the corporate safety department.

6.2 Safety and Security Event Reporting and Investigation

A safety or security event is defined as an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. RATP Dev USA has established a reporting matrix that specifies the criteria for five reporting levels (0-4) based on the severity of the safety or security event experienced. All safety and security events (regardless of level) are required to be reported in RATP Dev USA's safety software SafeTracker. GMs are required to ensure all safety and security events are reported promptly. Level 0s and 1s are required to be reported with 24 hours of occurring. Level 2s are required to be reported within six hours of occurring. Level 3s are required to be reported within four hours of occurring. Level 4s are required to be reported immediately or within one hour of occurring. All Level 1-4 safety and security events are required to be investigated. After completing the initial report. The investigation is required to collect information that is used to determine causal factors, corrective and preventive actions, and enable claims management:

- Pictures from the event scene
- Video from telematics system
- Operator statement / Witness statements (if applicable)
- Operator drug and alcohol testing results
- Supervisor report
- Police report
- Maintenance Work Orders and Purchase Orders

All the information collected as part of conducting the investigation is required to be uploaded into SafeTracker and also Fleet Response for auto liability claims. The data is essential for enable litigation defense when required and subrogating against another driver when they are at-fault. After the investigation is completed, the report should move from draft status in SafeTracker to complete. The lessons learned from all safety and security event investigations are captured in the locations safety action plan to drive continuous improvement. The GM is required to attend the company's Executive Accident Review Board (EARB) for all Level 2-4 Safety and Security Events. The EARB is a weekly meeting chaired by the CEO and includes safety and operations leadership as well as the applicable GMs and their support staff based on the events that have occurred. At the EARB, GMs are required to present on the event that occurred, the results of the investigation, and the actions being taken to effectively mitigate the risk of the same or similar event from re-occurring. All actions reported at the EARB are required to be incorporated into the location's safety action plan and managed as part of their overall effort to systematically reduce safety risks.

6.3 Management of Change

Any change to an existing transit operation has the potential to introduce safety risks. Change comes in a variety of forms to include new employees, equipment, routes, service levels, etc. RATP Dev USA will apply the safety risk management process described in section 5.0 to proactively identify, assess, and mitigate the risks introduced by change. GMs are required to work with their clients to understand the changes planned in the future. This includes service level changes to be introduced as part of the run cut process that takes place three to four times annually (depending on location) or future equipment changes as part of long-term fleet planning, or introduction of new modes such as micro-transit or on-demand services. By anticipating change, GMs and SMs have the ability to apply the safety risk management process and incorporate mitigating actions into their safety action plans proactively before the changes are implemented and associated risk has the opportunity to cause harm. Additionally, all employees are responsible for reporting safety concerns or risks associated with change. The frontline transit workers are often directly experiencing change in terms of new buses, streetcars, or other equipment, new route adjustments or frequencies, and other forms of change. These changes have the potential to introduce safety risks and all employees have a responsibility to proactively report their safety risks or concerns associated with change in an effort to proactively mitigate them.

6.4 Continuous Improvement

The systematic approach to continuous improvement includes: (1) identification of deficiencies in the company's SMS; (2) identification of deficiencies in performance against safety targets; (3) complying with any requirements established by RATP Dev, State Safety Oversight Agencies, FTA, state DOTs, or other entities; (4) mitigating safety risks based on implementing the SMS safety risk management and

safety assurance processes. The safety assurance component of RATP Dev USA's SMS is designed specifically to achieve these objectives.

1) The company actively seeks to identify deficiencies in the company's SMS by making this ASP available to all employees for review and feedback on the Safety Resource Hub (RATP Dev USA intranet). Additionally, the company will take advantage of the FTA's offer to conduct courtesy reviews of ASPs through the Technical Assistance Center (TAC) and incorporate their feedback. The safety department leads monthly safety reviews that include every location to report on their progress on managing risks through the implementation of effective safety risk management and safety assurance processes. RATP Dev and RATP Dev USA also implement corporate level audits and health check reviews designed to proactively assess the company's SMS in action and use the results to correct any deficiencies identified.

2) The company tracks its safety performance targets using the business intelligence tool, Qlik Sense. The dashboard enables the identification of deficiencies by visualizing progress month over month for each safety performance target and specifies the direction on how performance its trending, which is highlighted in either green (downward), yellow (flat), or red (upward). GMs are required to report on their performance at monthly safety reviews and explain how the mitigations in their safety actions plans align to what the KPIs are signaling. The ultimate effectiveness of a safety action plan is determined by its impact the KPIs that measure RATP Dev USA's safety performance targets.

3) The company implements internal controls required by RATP Dev and receives corporate audits from the parent company annually. The FTA conducts triennial reviews and state DOTs conduct periodic audits as well. The company evaluates all of the findings received and assesses them using the safety risk management process described in section 5.0 and either develops a separate corrective action plan or incorporates actions into their overall safety action plan, depending on the scope and magnitude of the effort required to address the finding. All feedback from reviews and audits are considered opportunities to drive continuous improvement of the company's SMS.

4) Regardless of their safety performance, every location in RATP Dev USA is required to actively maintain and implement a safety action plan. The safety action plan is driven by the results of the safety risk management process (section 5.0), which is fueled by the results of safety assurance activities (section 6.0). The audits, reviews, KPIs, risky behaviors, lessons learned from other locations ensure that even top performing locations have a wealth of data used to inform their safety action plans and drive continuous improvement.

6.5 Integrated Claims Management

The risk and safety departments have collaborated to establish a robust tool using Monday.com to effectively manage WC claims (pictured below). The tool enables the corporate and local teams to have a clear and shared understanding of exactly how many open WC claims are open, the status of each open claim, and the next step required. The objective is to support injured employees while managing claims as efficiently as possible to closure. Additionally, the safety and risk departments are developing a tool customized to manage AL claims, which is scheduled for implementation across the company over the course of the second quarter (Q2) of 2025.

7.0 Safety Promotion

The Safety Promotion component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.29 *Safety Promotion*, this section of the ASP includes: safety competencies and training as well as safety communication. The ultimate purpose of safety promotion is to shape and reinforce the safety culture required to ensure the long-term, sustained effectiveness of SMS. At RATP Dev USA, safety is value and the vision to achieve a safety culture where every employee has a fundamental understanding of the company's safety program and feels comfortable voicing safety concerns and reporting risks without fear of retribution.

7.1 RATP Dev USA Values

RATP Dev USA's values are Safet, United, Caring, Effective, and Daring. Safety is the first company value because the company emphasizes that safety is critical and informs every action, decision, and effort. The company is committed to maintaining a secure and healthy environment for everyone at work whether that's in the office, in a maintenance shop, or on the road. The united is value is about sharing knowledge, experiences, and ideas with each other. Especially, with approximately 40 locations across the country, RATP Dev USA's fosters a united culture that learns from one another, sharing best practices and creating a culture conducive to continuous improvement. Caring is the value that reminds us to never forget who we are working for. RATP Dev USA provides and essential community service that is there when people need us the most. The effective value is about honoring the commitment to do what we say we are going to do. Safety is essential to delivering effective, quality service that is on time, every time. The daring value is about taking on new challenges and pursuing new opportunities. RATP Dev USA seeks to be a healthy, growing business that is diversified, which can only be accomplished by establishing new relationships and taking on new challenges.

7.2 Safety Competencies and Training

RATP Dev USA's safety training program is foundational to putting the company's values into action. The training program provides courses designed for management, supervisors and functions designated as sensitive by the U.S. DOT and RATP Dev (operators, dispatchers, and mechanics). As the safety program continuously improves, the safety training program also evolves to incorporate training on trending risk areas, best practices, lessons learned, and input from external sources such as RATP Dev's Technical Department and the FTA. The safety training and safety assurance functions complement each other to ensure the training administered is being applied and working as intended. The findings from safety assurance oversight are incorporated into the safety risk management process, resulting in a continuously improving safety action plan that systematically drives training program improvements.

7.2.1 Safety Management Training

All RATP Dev USA GMs and SMs receive instructor-led, classroom-based safety management training conducted by the safety and risk departments. The training covers the principles of RATP Dev USA's SMS (Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion). The training course proceeds to train the GMs and SMs on how to use the tools provided to proactively manage their safety risks to continuously improve performance. Specifically, the safety management course covers:

- How to use SafeTracker, the company's software for safety and security event reporting, investigation, and data collection
- How to use Fleet Response, the company's software for managing AL claims.
- How to use TriageNow and Helsman, RATP Dev USA's tools for managing WC claims.
- How to use DriveCam telematics technology to detect and address risky behaviors.
- How to response to employee voluntary safety reports.
- How to use Qlik Sense, the company's business intelligence tool that is used for KPI tracking as well as data trending and analysis.
- How to use internal controls, audits, trail checks, mystery riders and other safety assurance oversight to proactive detect and systemically improve safety risk management
- How to use all the data from safety and security events, WC and AL claims, telematics, voluntary safety reports, and safety assurance oversight to create dynamic, data driven safety actions plans in Monday.com that reflect
    - The prioritized safety risks facing the operation
    - The actions being taken to mitigate them
    - The KPIs used to measure effectiveness

7.2.2 Operator Safety Training

RATP Dev USA safety training for new operators includes a minimum of 120 hours of training (15 days). The company combines the principles of SMS with curriculum incorporated from the Transit and Paratransit Company (TAPTCO), which is recognized as the industry standard for safety training in transit. RATP Dev classroom training includes the LLC methodology (Look Ahead, Look Around, Leave Room, Communicate), drug and alcohol training, defensive driving, customer service, sensitivity/empathy training, accident and emergency procedures, and mobility device loading and securement procedures. Training for new CDL operators includes the coursework outlined below, with a minimum of 40 additional hours of Behind-The-Wheel (BTW) training and a minimum of 40 additional hours of one-on-one training in revenue service.

7.2.2.1 Classroom Skills Training

RATP Dev USA's training for new operators involves a detailed examination of the rules, policies, and safety procedures. Initial operator training includes a minimum 40 hours of classroom instruction, with a strong emphasis on developing the necessary skills to operate the vehicles, assist customers, understand the routes, adhere to manifests, and drive defensively. The classroom training includes:

- Operator manual, employee rulebook and uniform requirements
- Courteous and professional customer relations
- Radio communication procedures and codes; Defensive driving; safety and accident prevention
- Sensitivity training with an emphasis on working with individuals with disabilities
- Revenue vehicle types technical and safety training

Additionally, RATP Dev USA's comprehensive operator training curriculum focuses on achieving excellence in customer service. Customer service modules are included in new hire and refresher training. Customer service training is delivered using different training techniques, such as classroom training, BTW training, role-playing exercises, and verbal de-escalation training. The company's scenario-based training sessions feature the following themes:

- Winning Attitude – Operator sets the tone for being courteous and patient
- Communication Skills – Body language, tone, eye contact
- Conflict Resolution – Knowing personal / common triggers.
- Customers with Disabilities – ADA Compliance, passenger rights, and sensitivity
- Resources – Available policy and performance expectations
- A Self-evaluation Module – Evaluates one's behavior
- Customer Loyalty – Customer assistance, positive experiences, and feedback

7.2.2.2 ADA Compliance and Mobility Device Securement Training

RATP Dev USA understands that we are providing an essential service to the communities we serve and this service includes supporting the most vulnerable among us. The company takes the preparation to serve people with disabilities seriously. Operators are trained to be sensitive and patient when interacting with customers. At least eight hours of operator classroom training is spent on sensitivity training with regards to serving older adults and people with disabilities. New operator training also includes an emphasis on proper wheelchair and scooter boarding, securement, and alighting. Additionally, the training ensures that operators understand all American with Disabilities Act (ADA) laws and passenger rights.

7.2.2.3 Behind-the-Wheel Training

RATP Dev USA's BTW training allows trainees to implement classroom lessons in a controlled operations environment, prior to in-revenue service training. Operators complete 40 hours of BTW service and must demonstrate mastery of BTW operations and procedures before they can begin the next stage of training. Examples of BTW coursework include:

- Pre-trip vehicle inspection and defect reporting
- Wheelchair and scooter lifts and accessibility devices
- Revenue vehicle type familiarization and maneuvers, including acceleration, deceleration, and turning
- Route and schedule or manifest adherence
- Application of defensive driving techniques
- Onboard equipment storage and usage

7.2.2.4 Cadet Training

Once operators have successfully completed a BTW assessment for non-revenue service training and passed a mastery test covering classroom training content, they will enter the cadet phase of training for a minimum of 40 hours. Cadet training includes the application of classroom procedures as well as BTW training. Certified senior operators who support operator training are qualified as instructors based on a safe driving record, a proven record of professional driving experience, and demonstrated ability to provide high-quality customer service.

7.2.2.5 Operator Refresher Training (Annual and Post Safety Event)

To ensure operators are prepared and continuously supported, RATP Dev creates retraining opportunities on an annual basis and as needs dictate based on performance. In mandatory annual refresher training, operators refresh their fundamental safety skills and get training on the latest advancements based on lessons learned and efforts to continuously improve. For example, refreshing training includes a review of selected customer service reports or safety and security events, which provide an opportunity to reflect and determine if the training provided was applied in each of the situations. Additionally, retaining classes will be provided for operators who have had one or more of the following occurrences in the previous 12 months:

- Preventable Accidents – Operators that had a preventable accident will receive defensive driving retraining and an onboard evaluation
- Non-Preventable Accidents – Operators that had two non-preventable accidents will receive defensive driving retraining and an onboard evaluation
- Customer Service – Operators who are charged with verified customer service complaints will receive customer service retraining
- ADA Violations – Operators who are found to violate ADA policies and procedures receive counseling, discipline, and a retraining of four hours.

7.2.3 Road Supervisor Training

Initial training for road supervisors is a minimum of 40 hours supplemented with on-the-job training and mentoring. Supervisors are educated on all the functions of service supervision, operator management, system software, and radio communications. Road supervisors are trained in customer relations skills and operating policies to handle customer service inquiries and concerns. Supervisors are given customer service training so they can respond appropriately to customers in various situations. This training includes strategies for de-escalating situations when responding to calls for assistance with passengers. At the end of their training, supervisors are proficient in the following areas:

- Daily documentation of service operations, discrepancies, and actions
- Coach/mentor operators and dispatch to enhance service delivery
- Manage communication and escalation of concerns, safety/security events, or medical emergencies
- Monitor schedule compliance and operator performance time
- Support management and maintenance to maintain a high level of performance
- Ensure daily paperwork is complete and accurate prior to the end of shift

7.2.4 Dispatch Training

RATP Dev USA hires experienced operators or supervisors to become dispatchers. Dispatchers are responsible for coordinating the safe movement of revenue vehicles and communicate directly with operators when required. Dispatchers receive on-the-job training to include how to use dispatching software, how to manage the operation's schedule efficiently, and how to follow special instructions to support operators during road calls, emergencies, safety or security event reporting, and how to address any other issues that surface outside of standard operations.

7.2.5 Maintenance Training

RATP Dev USA has a corporate maintenance director that works with maintenance management at each location to ensure mechanics are trained to meet the needs of each location's specific fleet. This on-the-job training includes servicing and repairing vehicles, maintenance software and technology, tools and equipment, service updates and technical bulletins, and complying with safety procedures to include use of personal protective equipment. Additionally, the corporate safety department recommends that all mechanics complete OSHA 30-Hour Training (for general industry). The content of OSHA safety training includes:

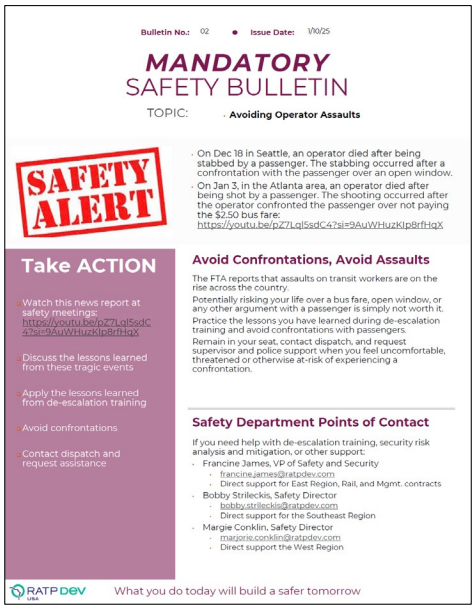
- Hazard Communication (HAZCOM)
- Hazardous Materials (HAZMAT)
- Fall Protection
- Ergonomics
- Bloodborne Pathogens
- Lockout / Tagout (Electrical Safety)
- Personal Protective Equipment
- Fire Prevention and Protection
- Welding and cutting
- Machine Guarding

7.3 Safety Communication

RATP Dev USA implements a variety of safety communication techniques to engage the workforce and shape the company's culture. The safety department issues a series of different types of safety bulletins to enhance safety knowledge, share best practices, and mandate compliance with emerging requirements when needed. The company's monthly newsletter and Blink app regularly features safety messaging, celebrates safety accomplishments, and recognizes employees for safe performance. A dedicated meeting cadence includes monthly safety meetings, monthly all-hands safety manager meetings, monthly safety meetings held locally with frontline employees, and the weekly Executive Accident Review Board (EARB) chaired by the CEO. Additionally, the safety department partners with operations and local teams to launch targets engagement campaigns and initiatives that are data driven based on safety performance trends. All this information is continuously maintained and made available on a web-based safety resource hub that provides a centralized location for processes, procedures, training materials, videos, job aids, and all other safety related materials in one place.

7.3.1 Safety Bulletins

A foundational component of RATP Dev USA's communication strategy is to engage through as series of bulletins issued by the safety department. There are three types of safety bulletins: informational, recommended, and mandatory. The informational safety bulletins contain no compliance requirements but share information such as the latest industry trends, seasonal changes, explanations of regulatory requirements, and provide guidance on SMS principles. The recommended safety bulletins share best practices, lessons learned, examples from other locations or industries but compliance with a recommendation is not required. The mandatory safety bulletins issue requirements that must be complied with by every effected location. For example, if a defective vehicle component is discovered that has the potential to cause a fire, a mandatory safety bulletin would be issued requiring a maintenance action to remove and replace the potentially faulty component proactively on all effected vehicles. The GMs and SMs are required to post safety bulletins on the bulletin board in their employee lounges and share relevant information from safety bulletins at their monthly safety meetings. The GMs and SMs are also required to update their safety action plans with requirements that come from mandatory safety bulletins. The safety and operations directors have the responsibility for performing oversight to verify compliance with mandatory safety bulletin requirements.


Bulletin No.: 02 • Issue Date: 1/10/25

MANDATORY
SAFETY BULLETIN

TOPIC: Avoiding Operator Assaults

SAFETY ALERT

- On Dec 18 in Seattle, an operator died after being stabbed by a passenger. The stabbing occurred after a confrontation with the passenger over an open window.
- On Jan 3, in the Atlanta area, an operator died after being shot by a passenger. The shooting occurred after the operator confronted the passenger over not paying the $2.50 bus fare:
https://youtu.be/pZ7LqI5sdC47si=9AuWHuzKIp8rfHqX

Take ACTION

- Watch this news report at safety meetings
https://youtu.be/pZ7LqI5sdC47si=9AuWHuzKIp8rfHqX
- Discuss the lessons learned from these tragic events
- Apply the lessons learned from de-escalation training
- Avoid confrontations
- Contact dispatch and request assistance

Avoid Confrontations, Avoid Assaults

The FTA reports that assaults on transit workers are on the rise across the country.
Potentially risking your life over a bus fare, open window, or any other argument with a passenger is simply not worth it.
Practice the lessons you have learned during de-escalation training and avoid confrontations with passengers.
Remain in your seat, contact dispatch, and request supervisor and police support when you feel uncomfortable, threatened or otherwise at-risk of experiencing a confrontation.

Safety Department Points of Contact

If you need help with de-escalation training, security risk analysis and mitigation, or other support:
- Francine James, VP of Safety and Security
  - francine.james@ratpdev.com
  - Direct support for East Region, Rail, and Mgmt. contracts
- Bobby Strileckis, Safety Director
  - bobby.strileckis@ratpdev.com
  - Direct support for the Southeast Region
- Margie Conklin, Safety Director
  - margie.conklin@ratpdev.com
  - Direct support the West Region

RATP DEV USA What you do today will build a safer tomorrow

7.3.2 Focus Newsletter and Blink

The business development and marketing department publish a monthly company newsletter that highlights the great work and community engagement that takes place across the company. The safety department works closely with the business development and marketing department to ensure the newsletter consistently features safety messaging, celebrates safety accomplishments, and recognizes employees for safe performance. Additionally, the company has implemented Blink app, which is a mobile-first, all-in-one communication and collaboration platform designed specifically for engagement with front line workers. All employees can make posts, share messages, videos, alerts, and other information that directly reaches the frontline workforce and allows them to acknowledge, comment, and communicate directly through the platform.


FOCUS
SEPTEMBER 2024
Newsletter
RATP DEV USA
RATP DEV USA
SANTA MARIA REGIONAL TRANSIT UNVEILS NEW MICROTRANSIT SERVICE
THE COMET: FIRST BATTERY ELECTRIC BUS
CTTRANSIT LAUNCHES BATTERY ELECTRIC BUS (BEBS) INITIATIVE
ZION NATIONAL PARK: CARE ON THE FOREFRONT
WSTA Hosts TAPTCO Certified Instructor Training, Welcomes Eight New Certified Trainers in NC
~ Submitted by Brandie Peterson
The Winston-Salem Transit Authority (WSTA) recently hosted a TAPTCO (Transit & Paratransit Company) Certified Instructor Training class, resulting in the certification of eight (8) new trainers. The program, held at WSTA's facility, aims to enhance safety and operational excellence within RATP Dev USA's NC locations.
The newly certified trainers are now equipped to implement TAPTCO's nationally recognized safety programs across North Carolina. The course covered key areas such as defensive driving, passenger management, and emergency response, ensuring the trainers are well-prepared to uphold the highest standards in transit operations.
With these new certifications, North Carolina continues to strengthen its commitment to safe and efficient transportation services.
PICTURED ABOVE - BACK ROW: DEXTER VINES, LEVINE HEDGEPETH, SANTOS PINEDA, BOBBY STRILECKIS, FRONT ROW: APRIL CURTIS, LATASHIA BRANNON, KATRINA JOHNSON, TANGELA TURNER, NATE BURKE, GINA AKACHAT

7.3.3 Safety Meeting Cadence

The corporate safety department conducts monthly safety meetings for each region (east, southeast, west, seasonal, management/rail). At the meetings, the corporate safety department discusses any new safety bulletins that have been published, any new campaigns or initiatives, as well as other activities such as planned corporate audits, location visits, etc. At these meetings, the GMs are required to provide reports out on 1) the top safety risks facing their operation; 2) the safety action plans in place to mitigate those risks; and 3) the KPIs that measure the effectiveness of their safety risk. The reports include a discussion around what actions are working well, what other locations are doing, and where opportunities for improvement exist. The GMs work with their SMs to strengthen and continuously improve their actions plans based on the feedback. The safety department also holds a monthly all-hands safety meeting with all the SMs in the company. This safety-specific meeting is intended to engage safety managers on expectations specifically for implementing the company's SMS to include best practices, lessons learned, examples from locations across the company, and corporate feedback. As the safety program evolves, the expectations for the SMs continue to evolve and this meeting provides the forum where those expectations are communicated and discussed to achieve a shared understanding across the corporate and field levels. The EARB is a weekly meeting chaired by the CEO that reviews all the NTD major accidents (also known as Level 2s and 3s in the safety event reporting matrix). The safety department also includes significant near-misses and employee voluntary safety reports. At this meeting, the GMs are required to present the results of the investigation conducted in in detail with video, pictures, and other information and then present the actions that will be taken to effectively mitigate the underlying risk. The actions reported are then incorporated into their safety action plans in Monday.com for implementation and oversight.

7.3.4 Targeted Safety Campaigns

The corporate safety department partners with the operations department and locations to implement targeted campaigns based on emerging trends in safety performance. For example, in 2024 an intersection safety awareness campaign was launched after a spike in pedestrian strikes revealed they were occurring at intersections. The campaign required all operators to be re-trained in the safety skills required to maneuver through intersections safely (among other actions). The campaign was successful in snapping the trend and improving safety performance. Additionally, there is a seasonality to safety performance. The timeframe from Memorial Day in May through Labor Day in September is commonly referred to as the 101 critical days of summer. Across a variety of industries safety events tend to trend higher during this period, which is attributed to an increase in distraction brought about by significant change (for example, kids being out of school, vacation being planned, adjusting to summer heat, etc.). Each year, RATP Dev USA launches a summer safety campaign designed to mitigate the effects of heat with the goal of mitigating the anticipated upward trend. A similar trend can occur after the transition to wintertime, as freezing temperatures, icy conditions, and holiday preparations create an environment conducive to elevated levels of risk and distraction that adversely affect safety performance. The GMs and SMs of each location are required to work collaboratively with corporate operational and safety leadership to implement targeted campaigns that respond to trends, seasonality, and anticipated elevation in risk levels – before safety events have the opportunity to occur.

7.3.5 Safety and Operations Resource Hubs

The safety and industrial engineering department maintains the safety resource hub, which is a SharePoint based website available on the company intranet that provides a one-stop-shop for safety bulletins, training materials, campaign information, and all other safety related information. By providing a centralized location for all safety resources, any employee can start with the safety resource hub when they are looking for the latest safety bulletin, this plan, or any other information. Additionally, the safety and industrial engineering department maintains the operations resource hub, which encompasses all the best practices, standards, and procedures covering finance, human resources, safety, management, operations, maintenance, customer service, and ethics. All the resources have been integrated into the *GM Digital Binder* providing an easily navigable tool that enables operational leaders to conduct business consistent with values and standards of RATP Dev USA.

- Internal link to the Safety Resource Hub
- Internal link to the Operations Resource Hub

8.0 Additional Information

Supporting Documentation
49 CFR Part 670 Public Transportation Safety Program
49 CFR Part 673 Public Transportation Agency Safety Plan
National Public Transportation Safety Plan (April 2024)
RATP Dev USA Employee Handbook

8.1 Definitions of Special Terms

Term	Definition
Accountable Executive	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a transit agency; responsibility for carrying out the transit agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the transit agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
Injury	Any harm to persons as a result of an event that requires immediate medical attention away from the scene.
Investigation	The process of determining the causal and contributing factors of a safety event, for the purpose of preventing recurrence and mitigating safety risk.
Performance Measure	An expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
Public Transportation Agency Safety Plan	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR Part 673.
Safety	Freedom from unintentional harm.
Safety Assurance	Processes within a transit agency's SMS 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 Event	An unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
SMS Executive	Chief Safety Officer or equivalent that is 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.
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities for the management of safety.
Safety Management System	The formal, 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 hazards and safety risk.
Safety Performance Target	A quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the agency's public transportation system.
Safety Risk	The composite of predicted likelihood and severity of a potential consequence of a hazard.
Safety Risk Assessment	The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety Risk Management	A process within a transit agency's Public Transportation Agency Safety Plan for identifying, analyzing, assessing, and mitigating the safety risk of their potential consequences.
Safety Risk Mitigation	A method(s) to eliminate or reduce the likelihood and severity of a potential consequence of a safety risk.
Security	Freedom from intentional harm.
Transit Worker	Any employee, contractor, or volunteer working on behalf of the public transit agency.

8.2 Acronyms

Acronym	Word or Phrase
ADA	Americans with Disabilities Act
ASP	Agency Safety Plan
BTW	Behind-The-Wheel
CBA	Collective Bargaining Agreement
CDL	Commercial Driver's License
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CPO	Chief People Officer
DOT	Department of Transportation
EXCO	Executive Council
FTA	Federal Transit Administration
GM	General Manager
KPI	Key Performance Indicator
MIL-STD	Military Standard
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
PTASP	Public Transportation Agency Safety Plan
SM	Safety Manager
SMS	Safety Management System
SOP	Standard Operating Procedure
SVP	Senior Vice President
TAPTCO	Transit and Paratransit Company

Appendix A – Safety Management Policy

Title Safety Management Policy	Effective Date February 15, 2025
Approver Matthew Booterbaugh	Revision Date NEW

1) Purpose.
   a) The vision of RATP Dev USA is to become the transit industry leader in safety.
   b) The mission is to achieve this vision by developing and implementing a world class, industry-leading Safety Management System (SMS).
   c) The purpose of this safety management policy is to establish RATP Dev USA's commitment to the development, implementation, and continuous improvement of an integrated SMS that encompasses both operational and occupational safety requirements in accordance with:
      i) 49 CFR Part § 673 Public Transportation Agency Safety Plan
      ii) 29 CFR Part § 1910 Occupational Safety and Health Standards
      iii) RATP Dev WE SAFE Safety Policy (RDSA_SAF_Policy_Safety)
      iv) State Safety Oversight Agency (SSOA) Program Standards (for rail operations)
      v) RATP Dev USA's Public Transportation Agency Safety Plan (ASP)

2) Scope.
   a) This policy applies to all RATP Dev USA employees to include those working under both operating and management contracts across all modes (bus, paratransit, and rail).

3) Definitions.
   a) **Accountable Executive** – In accordance with 49 CFR Part § 673.23(d)(1) and 49 CFR Part § 673.5 accountable executive means a single, identifiable person who has ultimate responsibility for developing and implementing the SMS by providing control and direction over human and capital resources.
      i) At the corporate level, RATP Dev USA's accountable executive is the Chief Executive Officer (CEO).
      ii) At the location level, RATP Dev USA's accountable executives are the General Managers (GMs).
   b) **Agency Leadership and Executive Management** – In accordance with 49 CFR Part § 673.23(d)(3), agency leadership and executive management means members of RATP Dev USA's leadership team, other than the accountable executive or SMS executive, who have authorities and responsibilities for day-to-day implementation and operation of the SMS.
      i) At the corporate level, RATP Dev USA's leadership includes the Executive Council (EXCO) who are the CEO's direct reports and the Senior Leadership Team (SLT) who are director level and above.
      ii) At the location level, RATP Dev USA's leadership includes the GMs, their Assistant General Managers (AGMs), and designated key staff.

c) **Executive Council (EXCO)** – The EXCO is composed of the CEO's direct reports. Specifically, the Chief Financial Officer (CFO), Chief People Officer (CPO), Chief Development Officer (CDO), Senior Vice President (SVP) of Operations, SVP of Safety and Industrial Engineering, and SVP of Risk.

d) **Key Staff** – In accordance with 49 CFR Part § 673.23(d)(4), staff, groups of staff, or committees designated to support the accountable executive and SMS executive in developing, implementing, and operating SMS.

   i) At the corporate level, the CEO designates key staff in coordination with the EXCO and formally identifies them in the ASP.

   ii) At the location level, the GM designates key staff in coordination with their leadership teams, and formally identifies them in the location-specific ASP.

e) **Public Transportation Agency Safety Plan** – RATP Dev USA's plan for becoming the industry leader in safety through the development and implementation of a world class SMS.

f) **Safety Assurance** – In accordance with 49 CFR Part § 673.5, safety assurance is the third component of SMS and reflects processes within RATP Dev USA's ASP that provide oversight to verify compliance, investigation to determine root cause and corrective action, and data analysis to measure effectiveness. The results of safety assurance activities are incorporated into the safety risk management component of SMS to create a systematic loop that drives continuous improvement.

g) **Safety Culture** – An environment conducive to employees feeling encouraged and empowered to voice safety concerns across all levels of the organization to include using RATP Dev USA's voluntary employee safety reporting program without fear of reprisal.

h) **Safety Management Policy** – In accordance with 49 CFR Part § 673.5, Safety Management Policy is the first component of the SMS and formalizes RATP Dev USA's commitment to developing and implementing a world class, industry leading safety program.

i) **Safety Promotion** – In accordance with 49 CFR Part § 673.5, safety promotion is the fourth component of the SMS and reflects RATP Dev USA's training and engagement efforts to shape safety culture.

j) **Safety Risk Management** – In accordance with 49 CFR Part § 673.5, safety risk management is the second component of the SMS and reflects a process for proactively identifying, assessing, and mitigating safety risk with an emphasis on taking action before a safety event occurs.

   i) At the corporate level, the SMS executive is the Senior Vice President of Safety and Industrial Engineering.

   ii) At the location level, the SMS executive is the Safety Manager (SM) or the GM may serve in this capacity at small locations where no dedicated SM exists.

k) **SMS Executive** – In accordance with 49 CFR Part § 673.23(d)(2), the SMS executive is the Chief Safety Officer or equivalent that reports directly to and has been designated by the Accountable Executive with responsibility for day-to-day implementation and operation of the SMS.

l) **SMS** – In accordance with 49 CFR § 673.5, SMS is the proactive, systematic, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigations.

   i) At the corporate level, the safety department is responsible for leading the effort to develop and oversee implementation of RATP Dev USA's SMS as defined in the company's ASP.

   ii) At the location level, the GM is responsible for working with corporate and leading the implementation of the SMS in accordance with the company's ASP and additional requirements as applicable.

4) General Policy.

a) RATP Dev USA's SMS is composed of four components:

i) Safety Management Policy

ii) Safety Risk Management

iii) Safety Assurance

iv) Safety Promotion

b) **Safety Management Policy Requirements.** RATP Dev USA's ASP incorporates and expands upon the following requirements to comply with applicable laws, regulations, and RATP Dev requirements. Refer to ASP Section 2.0 Safety Management Policy for more information.

i) Safety Management Policy Statement: In accordance with 49 CFR Part § 673.23(a):

(1) At the corporate level, the CEO is responsible for signing a Safety Management Policy Statement that includes RATP Dev USA's safety objectives on an annual basis. RATP Dev USA's Safety Management Policy Statement has been included as an appendix to this policy.

(2) At the location level, GMs are responsible for establishing and signing Safety Management Policy Statements on an annual basis and maintaining them.

(3) All employees are responsible for knowing that safety is a top value at the company, a safety management policy is in place, the policy is accessible to them, and questions or feedback can be provided directly to their management or to corporate safety through the employee voluntary safety reporting program.

ii) Employee Voluntary Safety Reporting Program: In accordance with 49 CFR Part § 673.23(b):

(1) At the corporate level, the safety department is responsible for maintaining an employee voluntary safety reporting program that allows transit workers to report safety concerns, including assaults on transit workers, near-misses, and unsafe acts and conditions to senior management. The program protects transit workers who report safety conditions to senior management.

(2) At the location level, GMs and their staff are responsible for actively promoting the employee voluntary safety reporting program, posting the information needed for employees to access and use the reporting mechanism, working with corporate to disposition reports, taking action when deemed necessary, and following up with employees to ensure they know their voices are being heard.

(3) All employees are responsible for reporting safety risks or concerns when they are identified. Employee feedback, especially from the front line is foundational to proactive safety risk management. Employees are encouraged to report safety concerns directly to the leadership or through the employee voluntary safety reporting program.

(4) There are conditions when a reporting employee could be subject to discipline, specifically:

(a) The employee's action or lack of action was intended to damage RATP Dev USA's equipment

(b) The employee's action or lack of action purposely places others in danger

(c) The employee's action or lack of action involved a criminal offense

(d) The employee's action or lack of action violated a traffic safety law leading to a citation

(e) The employee's behavior involved substance abuse

(f) The report contains falsified information

iii) Communication: In accordance with 49 CFR Part § 673.23(c):

(1) At the corporate level, the safety department is responsible for communicating this Safety Management Policy throughout the organization using email, monthly safety meetings, and other forms of communication in an effort to reach every employee.

(2) At the location level, GMs and their staff are responsible for communicating this Safety Management Policy at local safety meetings, posting the policy where the information is accessible to frontline employees, and using other forms of communication to reinforce the effort to reach every employee.

(3) All employees have the responsibility to review the safety management policy, ask questions, provide feedback, and contribute to continuously improving the policy.

iv) Necessary Authorities, Accountabilities, and Responsibilities: In accordance with 49 CFR Part § 673.23(d), RATP Dev USA has established the necessary authorities, accountabilities, and responsibilities for each of the following roles in the ASP:

(1) The CEO is the Accountable Executive at the corporate level.

(2) The GMs are the Accountable Executives as the location level.

(3) The SVP of Safety and Industrial Engineering is the SMS Executive at the corporate level.

(4) The safety managers are the SMS Executives at the location level (GMs may also serve in this role at smaller locations).

(5) The EXCO are the company's leadership and executive management at the corporate level.

(6) The AGMs and designated staff are the company's leadership at the local level.

(7) Key Staff are designated by the CEO at the corporate level and GMs designated key staff at the local level; these designations are captured in the ASP.

(a) The corporate safety directors are responsible for driving implementation of this Safety Management Policy and ASP.

(b) The corporate operations directors are responsible for overseeing implementation of this Safety Management Policy and ASP.

(c) The corporate operations and safety directors work together to drive the successful implementation of the company's SMS.

c) **Safety Risk Management Requirements.** In accordance with 49 CFR Part § 673.25(a), RATP Dev USA describes the safety risk management process in the ASP, including the methods for conducting safety risk identification, safety risk assessment, and safety risk mitigation.

i) Safety Risk Identification: In accordance with 49 CFR Part § 673.25(b), RATP Dev USA describes the method for identification of safety risks in the ASP. The methodology includes considering the following sources for data and information used in the identification of safety risks (1) leading and lagging indicator data from safety event reporting, claims, trends in Key Performance Indicators (KPIs), (2) risky behaviors detected by telematics; (3) data and information provided by an oversight authority, including but not limited to FTA, the State, or as applicable, the State Safety Oversight Agency having jurisdiction; (4) data and information regarding exposure to infectious disease provided by the Center for Disease Control (CDC) or a State health authority; (5) results from safety assurance activities to verify compliance and measure effectiveness of operations performance; (6) employee voluntary safety reporting.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include risk identification through research and data driven analysis.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk identification by collecting the data, performing risk analysis, and interpreting the results to proactively identify their safety risks.

(3) All employees are responsible for promptly reporting safety risks and concerns, providing recommendations on how to mitigate risks, and following-up or escalating when needed to ensure action is taken to effectively mitigate.

ii) Safety Risk Assessment: In accordance with 49 CFR Part § 673.25(c), RATP Dev USA describes the method for assessing safety risks in the ASP. The methodology includes assessing the likelihood of realizing the safety risk and severity of the consequences with existing mitigations considered. The safety risks shall be prioritized based on the results of the assessment.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include performing risk assessments to prioritize identified risks in accordance with the MIL-STD-882E methodology.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk assessment by applying the MIL-STD-882E methodology resulting in prioritization of risks based on their likelihood to occur and severity of consequences.

(3) All employees should maintain for understanding the top risks facing their operation, which is based on the results of the location's safety risk assessment. Employees are responsible for engaging in a constructive dialogue about the risks, how they are mitigated, and opportunities for improvement.

iii) Safety Risk Mitigation: In accordance with 49 CFR Part § 673.25(d), RATP Dev USA describes the method for identifying the required safety risk mitigations as a result of conducting safety risk assessments to reduce the likelihood of an occurrence and severity of the potential consequences. In addition to risk assessments, the company considers the following sources for risk mitigation: (1) guidance provided by oversight authorities to include the FTA and RATP Dev; (2) guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include developing mitigations that proactively reduce safety risks, resulting in the systematic reduction of safety events and claims.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk mitigation by applying developing and implementing safety action plans that are specific, measurable, achievable, relevant, and time sensitive. The safety action plans must be continuously maintained with actions, completion dates, and personnel assigned to stay current with the constantly changing risk exposure associated with dynamic transit operations.

(3) All employees are responsible for complying with actions designed to mitigate risk. Continuously improving safety performance is an inherent responsibility of all transit workers. Employees are responsible for providing feedback on how well risk mitigations are working and recommend ways to improve them and propose additional or alternative mitigations.

d) **Safety Assurance Requirements.** In accordance with 49 CFR Part § 673.27(a), RATP Dev USA describes the safety assurance process in the ASP to include safety performance monitoring and measurement, safety event reporting and investigation, management of change, and continuous improvement.

i) Safety Performance Monitoring: In accordance with 49 CFR Part § 673.27(b), RATP Dev USA describes the methods of safety performance monitoring in the ASP. The monitoring is designed to assure compliance with, and effectiveness of: (1) operations and maintenance standard operating procedures; (2) safety risk mitigations as reflected in safety action plans; (3) information reported through the employee voluntary safety reporting program; (4) KPIs to identify trends that inform proactive risk mitigations.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of safety assurance standards for safety performance monitoring. This includes providing templates for standard operating procedures, overseeing safety action plans, reviewing the quality of safety investigations, engaging locations on employee voluntary safety reports to achieve effective resolution, and providing tools to visualize KPIs.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for safety performance monitoring by maintaining standard operating procedures; implementing effective safety action plans; conducting thorough investigations into safety events; working with the corporate safety department to address employee voluntary safety reports; and monitoring and acting on trends detected in KPIs.

(3) Employees are responsible for understanding their safety performance, which can come from telematics systems, coaching, passenger feedback, and other sources. Employees are responsible for working with oversight activities, understanding the results, providing feedback, and making adjustments based on the lessons learned.

ii) Safety/Security Event Reporting and Investigation: A safety or security event means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

(1) At the corporate level, the safety department is responsible for maintaining the incident notification matrix that specifies reporting requirements based on the nature and severity of the safety or security event. The safety department facilitates partners with field on ensure investigations are performed thoroughly with a focus on causal factors and corrective and preventive actions that will effectively mitigate the risk of recurrence. The safety department facilitates the Executive Accident Review Board (EARB) designed to ensure high-severity safety or security events (as defined by the notification matrix) have visibility at CEO and SVP levels with ability to provide leadership direction to further drive thorough investigations and effective action planning.

(2) At the location level, the GMs are responsible for promptly reporting safety or security events. Specifically, any security or safety event at Level 2 or above in the notification matrix shall be reported to the GMs corresponding operations director within four hours of becoming aware of the event. The event must be reported in RATP Dev's safety software within the same time period. GMs are responsible for working with the safety department, operations department, and their staff to ensure thorough investigations are conducted that focus on underlying causal factors and lessons learned, which are used to inform robust corrective and preventive actions that are incorporated into the locations safety action plan. GMs are required to present their safety or security events, investigation findings, and planned actions at EARBs.

(3) All employees are responsible for cooperating fully with safety reporting and investigation requirements. This responsibility includes promptly reporting safety or security events when they

occur, providing detailed statements, completing drug and alcohol testing when required, and providing any additional information that can help effectively mitigate the risk of a recurrence.

iii) Management of Change: In accordance with 49 CFR Part § 673.27(c), RATP Dev USA describes how change is managed in the ASP to include identifying and assessing changes that may introduce risk to safety performance. The safety risk management process shall be used to evaluate how a change may impact safety performance and determine how those risks are managed.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety assurance standards for change management. This includes guidance on how to apply the safety risk management approach to identify, assess, and mitigate the risk(s) introduced by change, which comes in a variety of forms such as new equipment, new personnel, new routes or service levels, etc.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for change management by working with safety department to proactively identify changes coming to the operation and applying the safety risk management approach to identify, assess, and mitigate the risk(s) resulting from the changes being introduced.

(3) All employees are responsible for reporting safety concerns or risks associated with change. The frontline transit workers are often experiencing change in terms of new buses, streetcars, or other equipment, new route adjustments or frequencies, and other forms of change. These changes have the potential to introduce risk and all employees have a responsibility to proactively report their safety risks or concerns associated with change in an effort to proactively mitigate them.

iv) Continuous Improvement: In accordance with 49 CFR Part § 673.27(d), RATP Dev USA describes its method of continuous improvement in the ASP to include a process for assessing safety performance and under the direction of the CEO. The systematic approach to continuous improvement includes: (1) identification of deficiencies in the company's SMS; (2) identification of deficiencies in performance against safety targets; (3) complying with any requirements established by RATP Dev, State Safety Oversight Agencies, FTA, state DOTs, or other entities; (4) mitigating safety risks based on implementing the SMS safety risk management and safety assurance processes.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety assurance standards for continuous improvement. This includes conducting audits of training programs, supporting FTA triennial audits, facilitating RATP Dev corporate audits, requiring mitigations that target company-wide systemic risks, and implementing additional initiatives that are designed to strengthen the company's SMS.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for continuous improvement by preparing for and supporting RATP Dev USA audits, RATP Dev corporate audits, FTA triennial audits, implementing companywide risk mitigations, and implementing additional companywide initiatives that are designed to strengthen the company's SMS. GMs and SMs are responsible for ensuring all findings resulting from audits are incorporated into safety action plans and effectively resolved.

(3) There is always room for improvement and often, frontline transit workers know these opportunities better than anyone. All employees have a responsibility to communicate opportunities to improve safety by either reporting them directly to their management or using the employee voluntary safety reporting program.

e) **Safety Promotion Requirements.** RATP Dev USA's ASP incorporates and expands upon the following requirements in an effort to cultivate a safety culture that is foundational to the development and implementation of an industry-leading, world class safety program.

i) Competencies and Training: In accordance with 49 CFR Part § 673.29(a), RATP Dev USA describes its safety training program for those directly responsible for safety in the ASP. For the frontline workforce, The RATP Dev USA certified instructor program incorporates the Transit and Paratransit Company (TAPTCO) industry standard. For location managers, the safety management training program incorporates SMS principles and best practices to include use of internal processes and tools that enable effective implementation. The safety training program shall be continuously improved in alignment with the development and implementation of the SMS.

(1) At the corporate level, the safety department is responsible for developing and facilitating the implementation of training standards as described in the ASP.

(2) At the location level, GMs, SMs, as well as operations and training managers (where applicable) are responsible for meeting corporate training standards by implementing processes, investing resources, and managing their employees to ensure compliance with all training requirements. GMs and SMs are responsible for ensuring that employee and training records are maintained, managed, and retrievable.

(3) All employees are responsible for completing their training requirements. This responsibility includes knowing that your training records are on file, current, and complete. Management and employees have joint responsibility for ensuring that all training requirements are met and that employee records properly reflect training completion and currency.

ii) Safety Communication: In accordance with 49 CFR Part § 673.29(b), RATP Dev USA describes how safety performance information is communicated throughout the company in the ASP. The communication and engagement approach includes a safety meeting cadence, mandatory and informational safety bulletins, a safety resource hub, field visits, a safety bulletin board, and employee recognition. Transit workers are informed of the safety risks relevant to their roles and responsibilities and the mitigations (actions being taken) at monthly safety meetings, posts on bulletin boards, coaching sessions, and other forms of communication and engagement.

(1) At the corporate level, the safety department is responsible for conducting monthly safety meetings, issuing safety bulletins, maintaining the safety resource hub, managing the employee voluntary safety reporting program, conducting field visits, facilitating the executive accident review board, and continuously engaging to ensure RATP Dev USA's safety program reaches every employee.

(2) At the location level, GMs and SMs are responsible for holding safety meetings with the frontline workforce, disseminating and complying with safety bulletin requirements, addressing employee voluntary safety reports, participating in the executive accident review board, and developing creative ways to engage the workforce to ensure the safety program reaches every employee.

(3) All employees are responsible for knowing where they can access the latest safety information whether online or physically. Employees are responsible for knowing they have a voice and have the ability to use it either by communicating directly with their management or using the voluntary employee safety reporting program. Employees are responsible for actively participating in their locations safety meeting cadence, complying with training requirements, safety campaigns, and related activities designed to continuously improve safety performance.

Appendix B – Safety Management Policy Statement

Safety Management Policy Statement

Corporate

In support of RATP Dev USA's vision of being the transportation industry leader in safety and the company's Public Transportation Agency Safety Plan (PTASP), as the quality choice in public transportation, we are committed to continuously improving our safety performance through the development and implementation of a world class, robust Safety Management System (SMS).

COMMITMENT TO SAFETY MANAGEMENT SYSTEM

RATP Dev USA is committed to developing and delivering high quality transit systems, while operating in a manner that continuously improves the operational safety of our services and occupational safety for our employees. RATP Dev USA is committed to the implementation and continuous improvement of an effective SMS aligned with applicable regulatory standards and requirements. Successful implementation of a robust SMS reflects the following outcomes:

- We (all employees) are encouraged and empowered to voice safety and security concerns without fear of reprisal
- We take proactive action in response to safety risks to prevent injuries and safety/security events from occurring
- We know if our actions are working by measuring their effectiveness and we make adjustments when needed
- We apply lessons learned from our safety performance to drive continuous improvement

RATP Dev USA will provide the necessary financial and human resources to develop, implement, and oversee the SMS. Be establishing an industry leading, world class SMS, RATP Dev USA will systematically integrate proactive safety risk reduction practices into operations management that encompass service delivery, rolling stock and facility maintenance, and support services to continuously advance toward achieving the stated outcomes.

2025 RATP DEV USA SAFETY PERFORMANCE TARGETS

- Fatalities: The target is always zero
- Major Event Rate: Reduce Level 2/3 events by at least 10%
- Preventable AFR (P-AFR) – Reduce preventable safety and security events by at least 10%
- Injury Frequency Rate for Loss Time Injuries (IFR-LTI) – Reduce LTIs by at least 10%

0 – Fatalities Target

0.22 – Major Event Rate Target

0.90 – P-AFR Target

1.56 – IFR-LTI Target

0.014 – Pedestrian Collision Rate

2025 RATP DEV USA SAFETY OBJECTIVES

- Refresh RATP Dev USA's Public Transportation Agency Safety Plan
- Expand RATP Dev USA's Safety Key Performance Indicators
- Introduce company standards for Safety Risk Management and Safety Assurance
- Continuously improve Safety Action Plans
- Implement the Employee Voluntary Safety Reporting Program
- Incorporate the latest telematics capability and other safety technologies
- Complete rollout of the claims management process for worker's comp and auto liability
- Centralize and digitize recordkeeping
- Provide safety training for managers and frontline transit workers
- Perform internal audits, support RATP Dev and FTA Triennial audits to drive compliance and improvement

SAFETY STARTS WITH ME

ALL Managers have the responsibility to ensure that safe work conditions are maintained in their assigned work areas for all employees, clients, visitors, and contractors in accordance with regulatory, contractual, CBA, and company requirements. **ALL Employees** shall perform their jobs safely in accordance with regulatory, contractual, CBA, and company requirements. Employees shall promptly report safety risks to their supervision or through the voluntary safety reporting program.

Matt Booterbaugh – Chief Executive Officer
Date: February 2025

Matthew Booterbaugh

Digitally signed by Matthew Booterbaugh
Date: 2025.02.03 13:11:09 -06'00'

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i) **Safety Promotion** – In accordance with 49 CFR Part § 673.5, safety promotion is the fourth component of the SMS and reflects RATP Dev USA's training and engagement efforts to shape safety culture.

j) **Safety Risk Management** – In accordance with 49 CFR Part § 673.5, safety risk management is the second component of the SMS and reflects a process for proactively identifying, assessing, and mitigating safety risk with an emphasis on taking action before a safety event occurs.

   i) At the corporate level, the SMS executive is the Senior Vice President of Safety and Industrial Engineering.

   ii) At the location level, the SMS executive is the Safety Manager (SM) or the GM may serve in this capacity at small locations where no dedicated SM exists.

k) **SMS Executive** – In accordance with 49 CFR Part § 673.23(d)(2), the SMS executive is the Chief Safety Officer or equivalent that reports directly to and has been designated by the Accountable Executive with responsibility for day-to-day implementation and operation of the SMS.

l) **SMS** – In accordance with 49 CFR § 673.5, SMS is the proactive, systematic, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigations.

   i) At the corporate level, the safety department is responsible for leading the effort to develop and oversee implementation of RATP Dev USA's SMS as defined in the company's ASP.

   ii) At the location level, the GM is responsible for working with corporate and leading the implementation of the SMS in accordance with the company's ASP and additional requirements as applicable.

4) General Policy.

a) RATP Dev USA's SMS is composed of four components:

i) Safety Management Policy

ii) Safety Risk Management

iii) Safety Assurance

iv) Safety Promotion

b) **Safety Management Policy Requirements.** RATP Dev USA's ASP incorporates and expands upon the following requirements to comply with applicable laws, regulations, and RATP Dev requirements. Refer to ASP Section 2.0 Safety Management Policy for more information.

i) Safety Management Policy Statement: In accordance with 49 CFR Part § 673.23(a):

(1) At the corporate level, the CEO is responsible for signing a Safety Management Policy Statement that includes RATP Dev USA's safety objectives on an annual basis. RATP Dev USA's Safety Management Policy Statement has been included as an appendix to this policy.

(2) At the location level, GMs are responsible for establishing and signing Safety Management Policy Statements on an annual basis and maintaining them.

(3) All employees are responsible for knowing that safety is a top value at the company, a safety management policy is in place, the policy is accessible to them, and questions or feedback can be provided directly to their management or to corporate safety through the employee voluntary safety reporting program.

ii) Employee Voluntary Safety Reporting Program: In accordance with 49 CFR Part § 673.23(b):

(1) At the corporate level, the safety department is responsible for maintaining an employee voluntary safety reporting program that allows transit workers to report safety concerns, including assaults on transit workers, near-misses, and unsafe acts and conditions to senior management. The program protects transit workers who report safety conditions to senior management.

(2) At the location level, GMs and their staff are responsible for actively promoting the employee voluntary safety reporting program, posting the information needed for employees to access and use the reporting mechanism, working with corporate to disposition reports, taking action when deemed necessary, and following up with employees to ensure they know their voices are being heard.

(3) All employees are responsible for reporting safety risks or concerns when they are identified. Employee feedback, especially from the front line is foundational to proactive safety risk management. Employees are encouraged to report safety concerns directly to the leadership or through the employee voluntary safety reporting program.

(4) There are conditions when a reporting employee could be subject to discipline, specifically:

(a) The employee's action or lack of action was intended to damage RATP Dev USA's equipment

(b) The employee's action or lack of action purposely places others in danger

(c) The employee's action or lack of action involved a criminal offense

(d) The employee's action or lack of action violated a traffic safety law leading to a citation

(e) The employee's behavior involved substance abuse

(f) The report contains falsified information

iii) Communication: In accordance with 49 CFR Part § 673.23(c):

(1) At the corporate level, the safety department is responsible for communicating this Safety Management Policy throughout the organization using email, monthly safety meetings, and other forms of communication in an effort to reach every employee.

(2) At the location level, GMs and their staff are responsible for communicating this Safety Management Policy at local safety meetings, posting the policy where the information is accessible to frontline employees, and using other forms of communication to reinforce the effort to reach every employee.

(3) All employees have the responsibility to review the safety management policy, ask questions, provide feedback, and contribute to continuously improving the policy.

iv) Necessary Authorities, Accountabilities, and Responsibilities: In accordance with 49 CFR Part § 673.23(d), RATP Dev USA has established the necessary authorities, accountabilities, and responsibilities for each of the following roles in the ASP:

(1) The CEO is the Accountable Executive at the corporate level.

(2) The GMs are the Accountable Executives as the location level.

(3) The SVP of Safety and Industrial Engineering is the SMS Executive at the corporate level.

(4) The safety managers are the SMS Executives at the location level (GMs may also serve in this role at smaller locations).

(5) The EXCO are the company's leadership and executive management at the corporate level.

(6) The AGMs and designated staff are the company's leadership at the local level.

(7) Key Staff are designated by the CEO at the corporate level and GMs designated key staff at the local level; these designations are captured in the ASP.

(a) The corporate safety directors are responsible for driving implementation of this Safety Management Policy and ASP.

(b) The corporate operations directors are responsible for overseeing implementation of this Safety Management Policy and ASP.

(c) The corporate operations and safety directors work together to drive the successful implementation of the company's SMS.

c) **Safety Risk Management Requirements.** In accordance with 49 CFR Part § 673.25(a), RATP Dev USA describes the safety risk management process in the ASP, including the methods for conducting safety risk identification, safety risk assessment, and safety risk mitigation.

i) Safety Risk Identification: In accordance with 49 CFR Part § 673.25(b), RATP Dev USA describes the method for identification of safety risks in the ASP. The methodology includes considering the following sources for data and information used in the identification of safety risks (1) leading and lagging indicator data from safety event reporting, claims, trends in Key Performance Indicators (KPIs), (2) risky behaviors detected by telematics; (3) data and information provided by an oversight authority, including but not limited to FTA, the State, or as applicable, the State Safety Oversight Agency having jurisdiction; (4) data and information regarding exposure to infectious disease provided by the Center for Disease Control (CDC) or a State health authority; (5) results from safety assurance activities to verify compliance and measure effectiveness of operations performance; (6) employee voluntary safety reporting.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include risk identification through research and data driven analysis.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk identification by collecting the data, performing risk analysis, and interpreting the results to proactively identify their safety risks.

(3) All employees are responsible for promptly reporting safety risks and concerns, providing recommendations on how to mitigate risks, and following-up or escalating when needed to ensure action is taken to effectively mitigate.

ii) Safety Risk Assessment: In accordance with 49 CFR Part § 673.25(c), RATP Dev USA describes the method for assessing safety risks in the ASP. The methodology includes assessing the likelihood of realizing the safety risk and severity of the consequences with existing mitigations considered. The safety risks shall be prioritized based on the results of the assessment.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include performing risk assessments to prioritize identified risks in accordance with the MIL-STD-882E methodology.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk assessment by applying the MIL-STD-882E methodology resulting in prioritization of risks based on their likelihood to occur and severity of consequences.

(3) All employees should maintain for understanding the top risks facing their operation, which is based on the results of the location's safety risk assessment. Employees are responsible for engaging in a constructive dialogue about the risks, how they are mitigated, and opportunities for improvement.

iii) Safety Risk Mitigation: In accordance with 49 CFR Part § 673.25(d), RATP Dev USA describes the method for identifying the required safety risk mitigations as a result of conducting safety risk assessments to reduce the likelihood of an occurrence and severity of the potential consequences. In addition to risk assessments, the company considers the following sources for risk mitigation: (1) guidance provided by oversight authorities to include the FTA and RATP Dev; (2) guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include developing mitigations that proactively reduce safety risks, resulting in the systematic reduction of safety events and claims.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk mitigation by applying developing and implementing safety action plans that are specific, measurable, achievable, relevant, and time sensitive. The safety action plans must be continuously maintained with actions, completion dates, and personnel assigned to stay current with the constantly changing risk exposure associated with dynamic transit operations.

(3) All employees are responsible for complying with actions designed to mitigate risk. Continuously improving safety performance is an inherent responsibility of all transit workers. Employees are responsible for providing feedback on how well risk mitigations are working and recommend ways to improve them and propose additional or alternative mitigations.

d) **Safety Assurance Requirements.** In accordance with 49 CFR Part § 673.27(a), RATP Dev USA describes the safety assurance process in the ASP to include safety performance monitoring and measurement, safety event reporting and investigation, management of change, and continuous improvement.

i) Safety Performance Monitoring: In accordance with 49 CFR Part § 673.27(b), RATP Dev USA describes the methods of safety performance monitoring in the ASP. The monitoring is designed to assure compliance with, and effectiveness of: (1) operations and maintenance standard operating procedures; (2) safety risk mitigations as reflected in safety action plans; (3) information reported through the employee voluntary safety reporting program; (4) KPIs to identify trends that inform proactive risk mitigations.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of safety assurance standards for safety performance monitoring. This includes providing templates for standard operating procedures, overseeing safety action plans, reviewing the quality of safety investigations, engaging locations on employee voluntary safety reports to achieve effective resolution, and providing tools to visualize KPIs.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for safety performance monitoring by maintaining standard operating procedures; implementing effective safety action plans; conducting thorough investigations into safety events; working with the corporate safety department to address employee voluntary safety reports; and monitoring and acting on trends detected in KPIs.

(3) Employees are responsible for understanding their safety performance, which can come from telematics systems, coaching, passenger feedback, and other sources. Employees are responsible for working with oversight activities, understanding the results, providing feedback, and making adjustments based on the lessons learned.

ii) Safety/Security Event Reporting and Investigation: A safety or security event means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

(1) At the corporate level, the safety department is responsible for maintaining the incident notification matrix that specifies reporting requirements based on the nature and severity of the safety or security event. The safety department facilitates partners with field on ensure investigations are performed thoroughly with a focus on causal factors and corrective and preventive actions that will effectively mitigate the risk of recurrence. The safety department facilitates the Executive Accident Review Board (EARB) designed to ensure high-severity safety or security events (as defined by the notification matrix) have visibility at CEO and SVP levels with ability to provide leadership direction to further drive thorough investigations and effective action planning.

(2) At the location level, the GMs are responsible for promptly reporting safety or security events. Specifically, any security or safety event at Level 2 or above in the notification matrix shall be reported to the GMs corresponding operations director within four hours of becoming aware of the event. The event must be reported in RATP Dev's safety software within the same time period. GMs are responsible for working with the safety department, operations department, and their staff to ensure thorough investigations are conducted that focus on underlying causal factors and lessons learned, which are used to inform robust corrective and preventive actions that are incorporated into the locations safety action plan. GMs are required to present their safety or security events, investigation findings, and planned actions at EARBs.

(3) All employees are responsible for cooperating fully with safety reporting and investigation requirements. This responsibility includes promptly reporting safety or security events when they

occur, providing detailed statements, completing drug and alcohol testing when required, and providing any additional information that can help effectively mitigate the risk of a recurrence.

iii) Management of Change: In accordance with 49 CFR Part § 673.27(c), RATP Dev USA describes how change is managed in the ASP to include identifying and assessing changes that may introduce risk to safety performance. The safety risk management process shall be used to evaluate how a change may impact safety performance and determine how those risks are managed.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety assurance standards for change management. This includes guidance on how to apply the safety risk management approach to identify, assess, and mitigate the risk(s) introduced by change, which comes in a variety of forms such as new equipment, new personnel, new routes or service levels, etc.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for change management by working with safety department to proactively identify changes coming to the operation and applying the safety risk management approach to identify, assess, and mitigate the risk(s) resulting from the changes being introduced.

(3) All employees are responsible for reporting safety concerns or risks associated with change. The frontline transit workers are often experiencing change in terms of new buses, streetcars, or other equipment, new route adjustments or frequencies, and other forms of change. These changes have the potential to introduce risk and all employees have a responsibility to proactively report their safety risks or concerns associated with change in an effort to proactively mitigate them.

iv) Continuous Improvement: In accordance with 49 CFR Part § 673.27(d), RATP Dev USA describes its method of continuous improvement in the ASP to include a process for assessing safety performance and under the direction of the CEO. The systematic approach to continuous improvement includes: (1) identification of deficiencies in the company's SMS; (2) identification of deficiencies in performance against safety targets; (3) complying with any requirements established by RATP Dev, State Safety Oversight Agencies, FTA, state DOTs, or other entities; (4) mitigating safety risks based on implementing the SMS safety risk management and safety assurance processes.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety assurance standards for continuous improvement. This includes conducting audits of training programs, supporting FTA triennial audits, facilitating RATP Dev corporate audits, requiring mitigations that target company-wide systemic risks, and implementing additional initiatives that are designed to strengthen the company's SMS.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for continuous improvement by preparing for and supporting RATP Dev USA audits, RATP Dev corporate audits, FTA triennial audits, implementing companywide risk mitigations, and implementing additional companywide initiatives that are designed to strengthen the company's SMS. GMs and SMs are responsible for ensuring all findings resulting from audits are incorporated into safety action plans and effectively resolved.

(3) There is always room for improvement and often, frontline transit workers know these opportunities better than anyone. All employees have a responsibility to communicate opportunities to improve safety by either reporting them directly to their management or using the employee voluntary safety reporting program.

e) **Safety Promotion Requirements.** RATP Dev USA's ASP incorporates and expands upon the following requirements in an effort to cultivate a safety culture that is foundational to the development and implementation of an industry-leading, world class safety program.

i) Competencies and Training: In accordance with 49 CFR Part § 673.29(a), RATP Dev USA describes its safety training program for those directly responsible for safety in the ASP. For the frontline workforce, The RATP Dev USA certified instructor program incorporates the Transit and Paratransit Company (TAPTCO) industry standard. For location managers, the safety management training program incorporates SMS principles and best practices to include use of internal processes and tools that enable effective implementation. The safety training program shall be continuously improved in alignment with the development and implementation of the SMS.

(1) At the corporate level, the safety department is responsible for developing and facilitating the implementation of training standards as described in the ASP.

(2) At the location level, GMs, SMs, as well as operations and training managers (where applicable) are responsible for meeting corporate training standards by implementing processes, investing resources, and managing their employees to ensure compliance with all training requirements. GMs and SMs are responsible for ensuring that employee and training records are maintained, managed, and retrievable.

(3) All employees are responsible for completing their training requirements. This responsibility includes knowing that your training records are on file, current, and complete. Management and employees have joint responsibility for ensuring that all training requirements are met and that employee records properly reflect training completion and currency.

ii) Safety Communication: In accordance with 49 CFR Part § 673.29(b), RATP Dev USA describes how safety performance information is communicated throughout the company in the ASP. The communication and engagement approach includes a safety meeting cadence, mandatory and informational safety bulletins, a safety resource hub, field visits, a safety bulletin board, and employee recognition. Transit workers are informed of the safety risks relevant to their roles and responsibilities and the mitigations (actions being taken) at monthly safety meetings, posts on bulletin boards, coaching sessions, and other forms of communication and engagement.

(1) At the corporate level, the safety department is responsible for conducting monthly safety meetings, issuing safety bulletins, maintaining the safety resource hub, managing the employee voluntary safety reporting program, conducting field visits, facilitating the executive accident review board, and continuously engaging to ensure RATP Dev USA's safety program reaches every employee.

(2) At the location level, GMs and SMs are responsible for holding safety meetings with the frontline workforce, disseminating and complying with safety bulletin requirements, addressing employee voluntary safety reports, participating in the executive accident review board, and developing creative ways to engage the workforce to ensure the safety program reaches every employee.

(3) All employees are responsible for knowing where they can access the latest safety information whether online or physically. Employees are responsible for knowing they have a voice and have the ability to use it either by communicating directly with their management or using the voluntary employee safety reporting program. Employees are responsible for actively participating in their locations safety meeting cadence, complying with training requirements, safety campaigns, and related activities designed to continuously improve safety performance.

CHAPTER 14-90
EQUIPMENT AND OPERATIONAL SAFETY STANDARDS FOR BUS TRANSIT SYSTEMS

14-90.001 Scope.

Rulemaking Authority 334.044(2), 341.061(2)(a) FS. Law Implemented 344.044(12), (21), 341.041(3), 341.061(2) FS. History–New 9-7-87, Amended 11-10-92, 8-2-94, Repealed 8-7-05.

14-90.002 Definitions.

Terms used in this rule chapter shall mean as defined in Section 341.031, F.S., in addition:

(1) "Bus" means any motor vehicle, other than a taxicab, which is designed or constructed for the public transport of persons for compensation and is owned, operated, leased, or controlled by a bus transit system. Buses are designated in two categories:

(a) Type I means over 22 feet in length, including bumpers.

(b) Type II means 22 feet or less in length, including bumpers and paratransit type vehicles, such as minibuses, standard vans, modified vans, station wagons, and sedans.

(2) "Bus Transit System" means a community transportation coordinator; a public transit provider; or a private contract transit provider which owns, operates, leases, or controls buses or taxicabs where such transportation consists of continuous or recurring transportation under the same contract; or a privately owned or operated transit provider that receives operational or capital funding from the Department and owns, operates, leases, or controls buses, other than nonpublic sector buses that provides transportation services available for use by the general riding public.

(3) "Community Transportation Coordinator" means a provider of transportation services or an entity that ensures such services are provided by another bus transit system.

(4) "Department" means the Florida Department of Transportation.

(5) "Drive" or "Operate" means all time spent at the controls of a bus in operation.

(6) "Driver" means any person trained and designated to drive a bus on a street or highway being used for the public transport of persons for compensation.

(7) "FMVSS" means the Federal Motor Vehicle Safety Standards in effect at the time the bus or component is manufactured.

(8) "For Compensation" means for money, property, or anything else of value whether paid, received, or realized, directly or indirectly.

(9) "Manufacturer" means the original producer of the chassis, the producer of any type of bus, or the producer of equipment installed on any bus for the purpose of transporting individuals with disabilities.

(10) "Off-Duty" means any time the driver is not on duty, required to be in readiness to work, or under any responsibility to perform work. Such time shall not be counted towards the maximum allowed on-duty hours within a 24-hour period.

(11) "On Duty" means the status of the driver from the time he or she begins work, or is required to be in readiness to work, until the time the driver is relieved from work and all responsibility for performing work. "On Duty" includes all time spent by the driver as follows:

(a) Waiting to be dispatched at bus transit system terminals, facilities, or other private or public property, unless the driver has been completely relieved from duty by the bus transit system.

(b) Inspecting, servicing, or conditioning any vehicle.

(c) Driving.

(d) Remaining in readiness to operate a vehicle (stand-by).

(e) Repairing, obtaining assistance, or remaining in attendance in or about a disabled vehicle.

(12) "Passenger" means a person who is on board, boarding, or alighting from a bus for the purposes of public transport.

(13) "Paratransit" means those elements of public transit which provide service between specific origins and destinations selected by the individual user with such service being provided at a time that is agreed upon by the user and the provider of the service. Paratransit service is provided by taxis, limousines, "dial-a-ride" buses, and other demand-responsive operations that are characterized by their nonscheduled, non-fixed route nature.

(14) "Safe Condition" means a condition where hazards are reduced to the lowest level feasible and substantial compliance exists with all safety rules, regulations, and requirements.

(15) "Safety Review" means an on-site assessment to determine if a bus transit system has adequate safety management controls in place and functioning in accordance with the safety standards provided and incorporated by reference in this rule chapter.

(16) "Security" means freedom from harm resulting from intentional acts against passengers, employees, equipment, and facilities.

(17) "Security Program Plan" or "SPP" means a document developed and adopted by the bus transit system detailing its policies, objectives, responsibilities, and procedures for the protection and defense of the system and persons from intentional acts of harm.

(18) "Security Review" means an on-site assessment to determine if a bus transit system has security management controls in place and functioning in accordance with the security requirements provided in this rule chapter.

(19) "System Safety Program Plan" or "SSPP" means a document developed and adopted by the bus transit system detailing its policies, objectives, responsibilities, and procedures against injuries or damage.

(20) "Taxicab" means any motor vehicle of nine passenger capacity or less, including the driver, engaged in the general transportation of persons for compensation, not on a regular schedule, between fixed termini, or over regular routes, where such vehicle does not provide transportation services as a result of a contractual agreement with a bus transit system.

(21) "Trailer Bus" means a trailing or towed vehicle designed or used for the transportation of more than 10 persons, e.g., tram buses.

(22) "Twenty-four Hour Period" or "24-Hour Period" means the consecutive time beginning at 12:00.01 a.m. to 12:00.00 a.m.

(23) "Unsafe Condition" means anything which endangers human life or property.

(24) "Personal wireless communications device" means an electronic or electrical device that was not provided by the bus transit system for business purposes.

(25) "Use of a wireless communications device" means use of a mobile telephone or other electronic or electrical device, hands-on or hands-free, to conduct an oral communication; to place or receive a telephone call; to send or read electronic mail or a text message; to play a game; to navigate the Internet; to play, view, or listen to a video; to play, view, or listen to a television broadcast; to play or listen to music; or to execute a computational function. Use of an electronic or electrical device that enhances the individual's physical ability to perform, such as a hearing aid, is not included in this definition.

(26) "Wireless communications device" means an electronic or electrical device capable of remote communication. Examples include cell phones, personal digital assistants (PDAs) and portable computers (commonly called laptop computers).

Rulemaking Authority 334.044(2), 341.061(2), 341.041(3), 341.031 FS. Law Implemented 341.041(3), 341.061(2) FS. History–New 9-7-87, Amended 11-10-92, 8-7-05, 9-16-10.

14-90.003 Department Responsibilities and Authority.

Rulemaking Authority 334.044(2), 341.061(2)(a) FS. Law Implemented 341.041(3), 341.061(2) FS. History–New 9-7-87, Amended 11-10-92, Repealed 8-7-05.

14-90.004 Bus Transit System Operational Standards.

(1) Each bus transit system shall develop and adopt an SSPP that complies with or exceeds the established safety standards set

forth in this rule chapter.

(a) The SSPP shall address the following safety elements and requirements:

1. Safety policies and responsibilities.

2. Vehicle and equipment standards and procurement criteria.

3. Operational standards and procedures.

4. Bus driver and employee selection.

5. Driving requirements.

6. Bus driver and employee training. As part of the driver training program, specific procedures, and training shall be implemented to instruct the driver on how to safely approach and depart from a transit bus stop to avoid contact with pedestians and other hazards.

7. Vehicle maintenance.

8. Investigations of events described under subsection 14-90.004(5), F.A.C.

9. Hazard identification and resolution.

10. Equipment for transporting wheelchairs.

11. Safety data acquisition and analysis.

12. A wireless communication plan and procedure that provides for the safe operation of the bus transit vehicle. The wireless communication plan and procedure shall assure that:

a. The use of a personal wireless communication device is prohibited while the transit vehicle is in motion, and

b. All personal wireless communications devices are turned off with any earpieces removed from the operator's ear while occupying the driver's seat.

13. A policy on the use of a wireless communications device issued to the operator by the bus transit system for business related purposes. Policies developed shall assure that:

a. Guidelines are developed that allow for the use of a wireless communications device in emergency situations, and

b. The use of a wireless communications device does not interfere with the operator's safety related duties.

14. The Bus Transit System shall develop a driver educational training program addressing:

a. The proper use of a wireless communications device issued to the operator by the Bus Transit System while in the performance of their safety related duties, and

b. The hazards associated with driving and utilizing a wireless communications device.

15. Safety standards for private contract bus transit system(s) that provide(s) continuous or recurring transportation services for compensation as a result of a contractual agreement with the bus transit system.

(b) Each bus transit system shall implement and comply with the SSPP during the operation of the system.

(c) Each bus transit system shall require that all operable transit buses be inspected at least once per year in accordance with established standards.

(d) Each bus transit system shall submit an annual safety certification to the Department verifying the following:

1. Adoption of an SSPP, which meets or exceeds the established standards set forth in this rule chapter.

2. Compliance with its adopted SSPP and that safety inspections have been performed at least once a year on all buses operated by the bus transit system, by persons meeting the requirements set forth in Rule 14-90.009, F.A.C.

(e) Bus transit systems shall immediately suspend affected system service operations if, at any time, continued operation of the system, or a portion thereof, poses an immediate danger to public safety.

(2) Each bus transit system shall develop and adopt an SPP that meets or exceeds the security requirements set forth in this rule chapter. The SPP shall be adopted separately from the SSPP.

(a) The SPP shall address the following security requirements:

1. Security policies, goals, and objectives.

2. Organization, roles, and responsibilities.

3. Emergency management processes and procedures for mitigation, preparedness, response, and recovery.

4. Procedures for investigation of events described under subsection 14-90.004(5), F.A.C.

5. Procedures for the establishment of interfaces with emergency response organizations.

6. Procedures for interagency coordination with local law enforcement jurisdictions.

7. Employee security and threat awareness training programs.

8. Security data acquisition and analysis.

9. Emergency preparedness drills and exercises.

10. Requirements for private contract transit providers that engage in continuous or recurring transportation services for compensation as a result of a contractual agreement with the bus transit system.

11. Procedures for SPP maintenance and distribution.

(b) Each bus transit system shall implement and comply with the SPP during the operation of the system.

(c) Bus transit systems that engage in a contract with a private contract transit provider shall:

1. Establish minimum security requirements which apply to private contract transit providers.

2. Monitor and assure that each private contract transit provider complies with established security requirements during the term of the contract.

(d) Bus transit systems are prohibited by Section 119.071(3)(a), F.S., from publicly disclosing the SPP or the security portion of the SSPP, as applicable, under any circumstance.

(3) Bus transit systems shall establish criteria and procedures for the selection, qualification, and training of all drivers. The criteria shall include the following:

(a) Driver qualifications and background checks meeting minimum hiring standards.

(b) Driving and criminal background checks for all new drivers.

(c) Verification and documentation of valid driver licenses for all employees who drive buses.

(d) Training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised. As a minimum requirement, drivers shall be given explicit instructional and procedural training and testing in the following areas:

1. Bus transit system safety and operational policies and procedures.

2. Operational bus and equipment inspections.

3. Bus equipment familiarization.

4. Basic operations and maneuvering.

5. Boarding and alighting passengers.

6. Operation of wheelchair lifts and other special equipment.

7. Defensive driving.

8. Passenger assistance and securement.

9. Handling of emergencies and security threats.

10. Security and threat awareness.

11. Driving conditions.

(e) Bus transit systems shall provide written operational and safety procedures to all bus drivers before driving on streets or highways unsupervised. At a minimum, these procedures and instructions shall address the following:

1. Communication and handling of unsafe conditions, security threats, and emergencies.

2. Familiarization and operation of safety and emergency equipment, wheelchair lift equipment, and restraining devices.

3. Application and compliance with all applicable federal and state laws, rules, and regulations.

(f) The provisions in paragraphs (d) and (e), above, shall not apply to personnel licensed and authorized by the bus transit system to drive, move, or road test a bus in order to perform repairs or maintenance services when it has been determined that such temporary operation does not create unsafe operating conditions or create a hazard to public safety.

(g) Bus transit systems shall maintain the following records for at least four years:

1. Records of bus driver background checks and qualifications.

2. Detailed descriptions of training administered and completed by each bus driver.

3. A record of each bus driver’s duty status which shall include total days worked, on-duty hours, driving hours, and time of reporting on and off duty each day.

(h) Each bus transit system shall establish a drug-free workplace policy statement in accordance with 49 C.F.R. Part 32 and a substance abuse management and testing program in accordance with 49 C.F.R. Parts 40 and 655, October 1, 2009, hereby incorporated by reference.

(i) Bus transit systems shall require that drivers write and submit a daily bus inspection report pursuant to Rule 14-90.006, F.A.C.

(4) Bus transit systems shall establish a maintenance plan and procedures for preventative and routine maintenance for all buses operated. The maintenance plan and procedures shall assure that:

(a) All buses operated, and all parts and accessories on such buses, including those specified in Rule 14-90.007, F.A.C., and any additional parts and accessories which may affect safety of operation, including frame and frame assemblies, suspension systems, axles and attaching parts, wheels and rims, and steering systems, are regularly and systematically inspected, maintained, and lubricated to standards that meet or exceed the bus manufacturer's recommendations and requirements.

(b) A recording and tracking system is established for the types of inspections, maintenance, and lubrication intervals documenting the date or mileage when these services are due. Required maintenance inspections shall be more comprehensive than daily inspections performed by the driver.

(c) Proper preventive maintenance is performed when a bus is assigned away from the system's regular maintenance facility or when maintenance services are performed under contract.

(d) Records are maintained and provide written documentation of preventive maintenance, regular maintenance, inspections, lubrication, and repairs performed for each bus under their control. Such records shall be maintained by the bus transit system for at least four years and, at a minimum, provide the following information:

1. Identification of the bus, the make, model, and license number, or other means of positive identification and ownership.

2. Date, mileage, description, and each type of inspection, maintenance, lubrication, or repair performed.

3. If not owned by the bus transit system, the name of any person furnishing a bus.

4. The name and address of any entity or contractor performing an inspection, maintenance, lubrication, or repair.

(5) Each bus transit system shall investigate, or cause to be investigated, any event involving a bus or taking place on bus transit system controlled property resulting in a fatality, injury, or property damage as follows:

(a) A fatality, where an individual is confirmed dead within 30 days of a bus transit system related event, excluding suicides and deaths from illnesses.

(b) Injuries requiring immediate medical attention away from the scene for two or more individuals.

(c) Property damage to bus transit system buses, non-bus transit system vehicles, other bus system property or facilities, or any other property. The bus transit system shall have the discretion to investigate events resulting in property damage less than $1,000.

(d) Evacuation of a bus due to a life safety event where there is imminent danger to passengers on the bus, excluding evacuations due to operational issues.

(6) Each investigation shall be documented in a final report that includes a description of investigation activities, identified causal factors, and any identified corrective action plan.

(a) Each corrective action plan shall identify the action to be taken by the bus transit system and the schedule for its implementation.

(b) The bus transit system shall monitor and track the implementation of each corrective action plan.

(7) Investigation reports, corrective action plans, and related supporting documentation shall be maintained by the bus transit system for a minimum of four years from the date of completion of the investigation.

Rulemaking Authority 334.044(2), 341.061(2) FS. Law Implemented 119.071, 341.041(3), 341.061(1)(b), 341.061(2)(a) FS. History–New 9-7-87, Amended 11-10-92, 8-7-05, 6-24-08, 9-16-10.

14-90.0041 Medical Examinations for Bus Transit System Drivers.

(1) Bus transit systems shall establish medical examination requirements for all applicants to driver positions and for existing drivers. The medical examination requirements shall include a pre-employment examination for applicants, an examination at least once every two years for existing drivers, and a return to duty examination for any driver prior to returning to duty after having been off duty for 30 or more days due to an illness, medical condition, or injury.

(2) Medical examinations shall be performed and recorded according to qualification standards adopted by the bus transit system, provided the medical examination qualification standards adopted by the bus transit system meet or exceed those provided in Department Form Number 725-030-11, Medical Examination Report for Bus Transit System Driver, Rev. 05/09, hereby incorporated by reference. Copies of Form Number 725-030-11 are available from the Florida Department of Transportation, Public Transit Office, 605 Suwannee Street, Mail Station 26, Tallahassee, Florida 32399-0450 or on-line at www.dot.state.fl.us/transit.

(3) Medical examinations shall be performed by a Doctor of Medicine or Osteopathy, Physician Assistant, or Advanced Registered Nurse Practitioner licensed or certified by the State of Florida. If medical examinations are performed by a Physician

Assistant or Advanced Registered Nurse Practitioner, they must be performed under the supervision or review of a Doctor of Medicine or Osteopathy.

(a) An ophthalmologist or optometrist licensed by the State of Florida may perform as much of the medical examination as pertains to visual acuity, field of vision, and color recognition.

(b) Upon completion of the medical examination, the medical examiner shall complete, sign, and date the medical examination form and maintain the original at his or her office.

(c) Upon completion of the medical examination, the examiner shall complete, sign, and date the medical examination certificate and provide a copy to the driver's employer. If the transit agency decides to adopt qualification standards other than those listed in Department form 725-030-11, the adopted standard's medical examination certificate or a signed letter from the medical examiner attesting to the completion of a medical examination shall be given to the transit agency in lieu of the Department's medical examination certificate. The adopted standards medical certification or letter must provide all of the information required on the Department's medical examination certificate.

(d) Upon completion of the medical examination the driver shall provide their driver license number, signature, and date on the medical examination certificate.

(4) Bus transit systems shall have on file a completed and signed medical examination certificate or a signed letter from the medical examiner attesting to the completion of a medical examination for each bus driver, dated within the past 24 months.

(a) Medical examination certificates or a signed letter from the medical examiner attesting to the completion of a medical examination of the employee bus drivers shall be maintained by the bus transit system for a minimum of four years from the date of the examination.

(b) Bus Transit Systems shall not allow a driver to operate a transit bus without having on file a completed medical examination certificate or a signed letter from the medical examiner attesting to the completion of a medical examination dated within the past 24 months.

Rulemaking Authority 334.044(2), 341.061(2) FS. Law Implemented 334.044(12), 341.041(3), 341.061(1)(a), (b), (2) FS. History–New 11-10-92, Amended 8-7-05, 6-24-08, 9-16-10.

14-90.005 Transit Bus Accidents.

Rulemaking Authority 334.044(2), 341.061(2)(a) FS. Law Implemented 341.041(3), 341.061(2) FS. History–New 9-7-87, Amended 11-10-92, Repealed 8-7-05.

14-90.006 Operational and Driving Requirements.

(1) Bus transit systems shall not permit a driver to drive a bus when such driver's license has been suspended, cancelled, or revoked. Bus transit systems shall require a driver who receives a notice that his or her license to operate a motor vehicle has been suspended, cancelled, or revoked to notify his or her employer of the contents of the notice immediately, no later than the end of the business day following the day he or she received the notice.

(2) Buses shall be operated at all times in compliance with applicable traffic regulations, ordinances, and laws of the jurisdiction in which they are being operated.

(3) A driver shall not be permitted or required to drive more than 12 hours in a 24-hour period, or drive after having been on duty for 16 hours in a 24-hour period. A driver shall not be permitted to drive until the requirement of a minimum eight consecutive hours of off-duty time has been fulfilled. A driver's work period shall begin from the time he or she first reports for duty to his or her employer. A driver is permitted to exceed his or her regulated hours in order to reach a regularly established relief or dispatch point, provided the additional driving time does not exceed one hour.

(4) To ensure uniform interpretation of subsections 14-90.002(10), (11), (22) and 14-90.006(3), F.A.C., the following practical applications are provided:

(a) A driver is required to drive from 4 a.m. – 8 a.m., off-duty from 8 a.m. – 3 p.m., then required to drive from 3 p.m. – 11 p.m. Driving hours and on-duty hours are the same. 4 hours + 8 hours = 12 hours driving. This driver has met the maximum allowed driving hours within a 24-hour period and cannot be permitted or required to drive until a minimum eight consecutive hours off-duty has been fulfilled. This driver cannot be permitted or allowed to drive before 7 a.m.

(b) A driver is required to drive from 4 a.m. – 8 a.m., off-duty from 8 a.m. – 11 a.m., then required to be on-duty, not driving, from 11 a.m. – 11 p.m. Driving hours = 4 hours and on-duty not driving hours = 12 hours for a total of 16 hours on-duty. This driver

has met the maximum allowed on-duty hours within a 24-hour period and cannot be permitted or required to drive until a minimum eight consecutive hours off-duty has been fulfilled. This driver cannot be permitted or allowed to drive before 7 a.m.

(c) A driver is required to be on-duty, not driving, from 4 a.m. – 8 a.m., off-duty from 8 a.m. – 11 a.m., then on-duty, not driving from 11 a.m. – 11 p.m. On-duty not driving hours = 4 hours + 12 hours for a total of 16 hours on-duty. This driver has met the maximum allowed on-duty hours within a 24-hour period and cannot be permitted or required to drive until a minimum eight consecutive hours off-duty has been fulfilled. The driver cannot be permitted or allowed to drive before 7 a.m.

(d) A driver is required to be on-duty, not driving, from 4 a.m. – 8 a.m., then off-duty from 8 a.m. – 11 a.m., then on-duty, driving from 11 a.m. – 11 p.m. On-duty, not driving hours = 4 hours and on-duty driving hours = 12 hours for a total of 16 hours on-duty. This driver has met the maximum allowed driving and on-duty hours within a 24-hour period and cannot be permitted or required to drive until a minimum eight consecutive hours off-duty has been fulfilled. This driver cannot be permitted or allowed to drive before 7 a.m.

(5) A driver shall not be permitted or required to be on duty more than 72 hours in any period of seven consecutive days; however, any 24 consecutive hours of off duty time shall constitute the end of any such period of seven consecutive days. A driver who has reached the maximum 72 hours of on duty time during the seven consecutive days shall be required to have a minimum of 24 consecutive hours off duty prior to returning to on duty status.

(6) A driver is permitted to drive for more than the regulated hours for the safety and protection of the public when conditions such as adverse weather, disaster, security threat, a road or traffic condition, medical emergency, or an accident occur.

(7) Bus transit systems shall not permit or require any driver to drive a bus when his or her ability is impaired, or likely to be impaired, by fatigue, illness, or other causes, likely to create an unsafe condition.

(8) Bus transit systems shall require pre-operational or daily inspection and reporting of all defects and deficiencies likely to affect safe operation or cause mechanical malfunctions.

(a) An inspection or test shall be made of the following parts and devices to ascertain that they are in safe condition and in good working order:

1. Service brakes.
2. Parking brakes.
3. Tires and wheels.
4. Steering.
5. Horn.
6. Lighting devices.
7. Windshield wipers.
8. Rear vision mirrors.
9. Passenger doors.
10. Exhaust system.
11. Equipment for transporting wheelchairs.
12. Safety, security, and emergency equipment.

(b) Bus transit systems shall review daily inspection reports and document corrective actions taken as a result of any deficiencies identified by daily inspections.

(c) Bus transit systems shall retain records of daily bus inspections and any corrective action documentation a minimum of two weeks.

(9) A bus with any passenger door in the open position shall not be operated with passengers aboard. The doors shall not be opened until the bus is stopped. A bus with any inoperable passenger door shall not be operated with passengers aboard, except to move a bus to a safe location.

(10) During darkness, interior lighting and lighting in stepwells on buses shall be sufficient for passengers to enter and exit safely.

(11) Passengers shall not be permitted in the stepwells of any bus while the bus is in motion, or to occupy an area forward of the standee line.

(12) Passengers shall not be permitted to stand on buses not designed and constructed for that purpose.

(13) Buses shall not be refueled in a closed building. The fueling of buses when passengers are being carried shall be reduced to the minimum number of times necessary during such transportation.

(14) Bus transit systems shall require the driver to be properly secured to the driver's seat with a restraining belt at all times while the bus is in motion.

(15) Buses shall not be left unattended with passengers aboard for longer than 15 minutes. The parking or holding brake device shall be properly set at any time the bus is left unattended.

(16) Buses shall not be left unattended in an unsafe condition with passengers aboard at any time.

Rulemaking Authority 334.044(2), 341.041(3), 341.061(2)(a) FS. Law Implemented 341.061(2) FS. History–New 9-7-87, Amended 5-31-89, 11-10-92, 8-7-05, 6-24-08, 9-16-10.

14-90.007 Vehicle Equipment Standards and Procurement Criteria.

(1) Every bus transit system shall ensure that buses procured and operated meet the following minimum standards:

(a) The capability and strength to carry the maximum allowed load and not exceed the manufacturer's gross vehicle weight rating (GVWR), gross axle weighting, or tire rating.

(b) Structural integrity that mitigates or minimizes the adverse effects of collisions.

(c) Federal Motor Vehicle Safety Standards (FMVSS), 49 C.F.R. Part 571, Sections 102, 103, 104, 105, 108, 207, 209, 210, 217, 302, 403 and 404, Rev. 10/09, hereby incorporated by reference.

(2) Proof of strength and structural integrity tests on new buses procured shall be submitted by manufacturers or bus transit systems to the Department.

(3) In addition to the above, every bus operated in this state shall be equipped as follows:

(a) Mirrors. There shall be two exterior rear vision mirrors, one at each side. The mirrors shall be firmly attached to the outside of the bus and located as to reflect to the driver a view of the highway to the rear along both sides of the vehicle. Each exterior rear vision mirror, on Type I buses, shall have a minimum reflective surface of 50 square inches. Neither the mirror nor the mounting shall protrude farther than the widest part of the vehicle body except to the extent necessary to produce a field of view meeting or exceeding the requirements of this section. All Type I buses shall, in addition to the above requirements, be equipped with an inside rear vision mirror capable of giving the driver a clear view of seated and standing passengers. Buses having a passenger exit door that is located inconveniently for the driver's visual control shall be equipped with additional interior mirrors to enable the driver to view the passenger exit door. In lieu of interior mirrors, trailer buses and articulated buses may be equipped with closed circuit video systems or adult monitors in voice control with the driver.

(b) Wiring and Batteries. Electrical wiring shall be maintained so as not to come in contact with moving parts, heated surfaces, or be subject to chafing or abrasion which may cause insulation to become worn. Every Type I bus manufactured on or after February 7, 1988, shall be equipped with a storage battery electrical power main disconnect switch. The disconnect switch shall be practicably located in an accessible location adjacent to or near to the battery and be legibly and permanently marked for identification. Every storage battery on a public-sector bus shall be mounted with proper retainment devices in a compartment which provides adequate ventilation and drainage.

(c) Brake Interlock Systems. All Type I buses having a rear exit door shall be equipped with a rear exit door/brake interlock that automatically applies the brake upon driver activation of the rear exit door to the open position. Brake interlock application shall remain activated until deactivated by the driver and the rear exit door returns to the closed position. The rear exit door brake interlock on such buses shall be equipped with an identified override switch enabling emergency release of the brake interlock function. The override switch shall not be located within reach of the seated driver. Air pressure application to the brake during brake interlock operation, on buses equipped with rear exit door/brake interlock, shall be regulated at the equipment's original manufacturer's specifications.

(4) Standee Line and Warning. Every bus designed and constructed to allow standees shall be plainly marked with a line of contrasting color at least two inches wide, or be equipped with some other means to indicate that all passengers are prohibited from occupying a space forward of a perpendicular plane drawn through the rear of the driver's seat and perpendicular to the longitudinal axis of the bus. A sign shall be posted at or near the front of the bus stating that it is a violation for a bus to be operated with passengers occupying an area forward of the line.

(5) Handrails and Stanchions. Every bus designed and constructed to allow standees shall be equipped with overhead handrails for standee passengers. Overhead handrails shall be continuous, except for a gap at the rear exit door, and terminate into vertical stanchions or turn up into a ceiling fastener. Every Type I and Type II bus designed for carrying more than 16 passengers shall be equipped with handrails, stanchions, or bars at least 10 inches long and installed to permit safe on-board circulation, seating and

standing assistance, and boarding and alighting by elderly and handicapped persons. Type I buses shall be equipped with a safety bar and panel directly behind each entry and exit stepwell.

(6) Flooring, Steps, and Thresholds. Flooring, steps, and thresholds on all buses shall have slip resistant surfaces without protruding or sharp edges, lips, or overhangs, in order to prevent tripping hazards. All step edges and thresholds shall have a band of color(s) running the full width of the step or edge which contrasts with the step tread and riser, either light-on-dark or dark-on-light.

(7) Doors. Power activated doors on all buses shall be equipped with a manual device designed to release door closing pressure.

(8) Emergency Exits. All buses shall have an emergency exit door, or in lieu thereof, shall be provided with emergency escape push-out windows. Each emergency escape window shall be in the form of a parallelogram with dimensions of not less than 18" by 24", and each shall contain an area of not less than 432 square inches. There shall be a sufficient number of push-out or kick-out windows in each vehicle to provide a total escape area equivalent to 67 square inches per seat, including the driver's seat. No less than 40% of the total escape area shall be on one side of the vehicle. Emergency escape kick-out or push-out windows and emergency exit doors shall be conspicuously marked with a sign or light and shall always be kept in good working order so that they may be readily opened in an emergency. All such windows and doors shall not be obstructed, either inside or outside, so as to hinder escape. Buses equipped with an auxiliary door for emergency exit shall be equipped with an audible alarm and light indicating to the driver when a door is ajar or opened while the engine is running. Supplemental security locks operable by a key are prohibited on emergency exit doors unless these security locks are equipped and connected with an ignition interlock system or an audio visual alarm located in the driver's compartment. Any supplemental security lock system used on emergency exits shall be kept unlocked whenever a bus is in operation.

(9) Tires and Wheels. Tires shall be properly inflated in accordance with manufacturer's recommendations.

(a) No bus shall be operated with a tread groove pattern depth:

1. Less than 4/32 (1/8) of an inch, measured at any point on a major tread groove for tires on the steering axle of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.

2. Less than 2/32 (1/16) of an inch, measured at any point on a major tread groove for all other tires of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.

(b) No bus shall be operated with recapped, regrooved, or retreaded tires on the steering axle.

(c) Wheels shall be visibly free from cracks and distortions and shall not have missing, cracked, or broken mounting lugs.

(10) Suspension. The suspension system of all buses, including springs, air bags, and all other suspension parts shall be free from cracks, leaks, or any other defect which may cause its impairment or failure to function properly.

(11) Steering and Front Axle. The steering system of all buses shall have no indication of leaks which would or may cause its impairment to function properly, and shall be free from cracks and excessive wear of components that may cause excessive free play or loose motion in the steering system or above normal effort in steering control.

(12) Seat Belts. Every bus shall be equipped with an adjustable driver's restraining belt in compliance with the requirements of FMVSS 209, "Seat Belt Assemblies" 49 C.F.R. 571.209, Rev. 10/09, and FMVSS 210, "Seat Belt Assembly Anchorages" 49 C.F.R. 571.210, Rev. 10/09, hereby incorporated by reference.

(13) Safety Equipment. Every bus shall be equipped with one fully charged dry chemical or carbon dioxide fire extinguisher, having at least a 1A:BC rating, and bearing the label of Underwriter's Laboratory, Inc. The fire extinguishers shall be maintained as follows:

(a) Each fire extinguisher shall be securely mounted on the bus in a conspicuous place or in a clearly marked compartment and be readily accessible.

(b) Each fire extinguisher shall be maintained in efficient operating condition and be equipped with some means of determining if it is fully charged.

(c) Every Type I bus shall be equipped with portable red reflector warning devices in compliance with Section 316.300, F.S.

(14) Persons with Disabilities. Buses used for the purpose of transporting individuals with disabilities shall meet the requirements set forth in 49 C.F.R. Part 38, Rev. 10/09 hereby incorporated by reference, as well as the following:

(a) Installation of a wheelchair lift or ramp shall not cause the manufacturer's GVWR, gross axle weight rating, or tire rating to be exceeded.

(b) Except in locations within 3 1/2 inches of the bus floor, all readily accessible exposed edges or other hazardous protrusions of parts of wheelchair lift assemblies or ramps that are located in the passenger compartment shall be padded with energy absorbing material to mitigate injury in normal use and in case of a collision. This requirement shall also apply to parts of the bus associated

with the operation of the lift or ramp.

(c) The controls for operating the lift shall be at a location where the bus driver or lift attendant has a full view, unobstructed by passengers, of the lift platform, its entrance and exit, and the wheelchair passenger, either directly or with partial assistance of mirrors. Lifts located entirely to the rear of the driver's seat shall not be operable from the driver's seat, but shall have an override control at the driver's position that can be activated to prevent the lift from being operated by the other controls (except for emergency manual operation upon power failure).

(d) The installation of the wheelchair lift or ramp and its controls and the method of attachment in the bus body or chassis shall not diminish the structural integrity of the bus nor cause a hazardous imbalance of the bus. No part of the assembly, when installed and stowed, shall extend laterally beyond the normal side contour of the bus, nor vertically beyond the lowest part of the rim of the wheel closest to the lift.

(e) Each wheelchair lift or ramp assembly shall be legibly and permanently marked by the manufacturer or installer with the following information:

1. The manufacturer's name and address.

2. The month and year of manufacture.

3. A certificate that the wheelchair lift or ramp securement devices, and their installation, conform to State of Florida requirements applicable to accessible buses.

(15) Wheelchairs. Wheelchair lifts, ramps, securement devices, and restraints shall be inspected and maintained as required by this rule chapter. Instructions for normal and emergency operation of the lift or ramp shall be carried or displayed in every bus.

Rulemaking Authority 334.044(2), 341.041(3), 341.061(2)(a) FS. Law Implemented 341.061(2)(a) FS. History–New 9-7-87, Amended 11-10-92, 8-2-94, 8-7-05, 6-24-08, 9-16-10.

14-90.008 Standards for Accessible Buses.

Rulemaking Authority 334.044(2), 341.061(2)(a) FS. Law Implemented 341.041(3), 341.061(2) FS. History–New 9-7-87, Amended 11-10-92, Repealed 8-7-05.

14-90.009 Bus Safety Inspections.

(1) Each bus transit system shall require that all buses operated by such bus transit system, and all buses operated by a private contract transit provider, be inspected at least annually in accordance with bus inspection procedures set forth in this rule.

(2) It shall be the bus transit system's responsibility to ensure that each individual performing a bus safety inspection is qualified as follows:

(a) Understands the requirements set forth in this rule chapter and can identify defective components.

(b) Is knowledgeable of and has mastered the methods, procedures, tools, and equipment used when performing an inspection.

(c) Has at least one year of training and/or experience as a mechanic or inspector in a vehicle maintenance program, and has sufficient general knowledge of buses owned and operated by the bus transit system to recognize deficiencies or mechanical defects.

(3) Each bus receiving a safety inspection shall be checked for compliance with the requirements for safety devices and equipment, as referenced or specified herein. Specific operable equipment and devices as required by this rule chapter, include the following as applicable to Type I and II buses:

(a) Horn.

(b) Windshield wipers.

(c) Mirrors.

(d) Wiring and batteries.

(e) Service and parking brakes.

(f) Warning devices.

(g) Directional signals.

(h) Hazard warning signals.

(i) Lighting systems and signaling devices.

(j) Handrails and stanchions.

(k) Standee line and warning.

(l) Doors and brake interlock devices.

(m) Stepwells and flooring.
(n) Emergency exits
(o) Tires and wheels.
(p) Suspension system.
(q) Steering system.
(r) Exhaust system.
(s) Seat belts.
(t) Safety equipment.
(u) Equipment for transporting wheelchairs.
(v) Working speedometer.
(4) A safety inspection report shall be prepared by the individual(s) performing the inspection and shall include the following:
(a) Identification of the individual(s) performing the inspection.
(b) Identification of the bus transit system operating the bus.
(c) The date of the inspection.
(d) Identification of the bus inspected.
(e) Identification of the equipment and devices inspected including the identification of equipment and devices found deficient or defective.
(f) Identification of corrective action(s) for any deficient or defective items found and date(s) of completion of corrective action(s).
(5) Records of annual safety inspections and documentation of any required corrective actions shall be retained a minimum of four years by the bus transit system for compliance review.

Rulemaking Authority 334.044(2), 341.041(3), 341.061(2)(a) FS. Law Implemented 341.061(2) FS. History–New 9-7-87, Amended 11-10-92, 8-7-05, 9-16-10.

14-90.010 Certification.
(1) Each bus transit system shall annually submit a safety and security certification to the Department. The certification shall be submitted no later than February 15, for the prior calendar year period. The certification shall attest to the following:
(a) The adoption of an SSPP and an SPP in accordance with established standards set forth in this rule chapter.
(b) Compliance with its adopted SSPP and SPP.
(c) Performance of safety inspections on all buses operated by the system in accordance with this rule chapter.
(d) Reviews of the SSPP and SPP have been conducted to ensure they are up to date.
(2) The certification shall include:
(a) The name and address of the bus transit system, and the name and address of the entity(ies) who performed bus safety inspections and security assessments during the prior calendar year, if different from that of the bus transit system.
(b) A statement signed by an officer or person directly responsible for management of the bus transit system attesting to compliance with this rule chapter.

Rulemaking Authority 334.044(2), 341.041(3), 341.061(2) FS. Law Implemented 334.044(28), 341.061(1), 341.061(2) FS. History–New 9-7-87, Amended 8-7-05, 9-16-10.

14-90.011 Inspection of Buses by Law Enforcement Officers.

Rulemaking Authority 334.044(2), 341.061(2)(a) FS. Law Implemented 341.041(3), 341.061(2), 316.610 FS. History–New 9-7-87, Repealed 8-7-05.

14-90.012 Safety and Security Inspections and Reviews.
(1) The Department, or its contractor, shall conduct inspections of bus transit systems to ascertain compliance with the provisions of this rule chapter.
(2) The Department, or its contractor, shall conduct safety and security reviews of any bus transit system the Department believes to be in noncompliance with its SSPP or SPP, or providing passenger service operations in an unsafe manner, or if there is

evidence of an immediate danger to public safety. The Department shall prepare and submit a report of the review to the affected bus transit system. The report shall be submitted to the bus transit system within three business days of completion of the review and shall contain the following:

(a) Identification of the findings, including a detailed description of any deficiency.

(b) Required corrective action and a schedule for implementation of the corrective action to be taken for each deficiency.

(c) Any required suspension of bus transit system service, should the Department determine the continued operation of the service, or a portion thereof, poses an immediate danger to public safety.

(3) The Department shall initiate the following actions to suspend the affected bus transit system service if any deficiency or unsafe condition exists, to the extent that the continued operation of the system, or a portion thereof, poses an immediate danger or threat to public safety.

(a) Immediately notify the affected bus transit system of the unsafe condition, followed by a certified letter describing the deficiency or unsafe condition. The notification shall include the following:

1. The required corrective action for the deficiency or unsafe condition.

2. The requirement for the bus transit system to certify, in writing to the Department, the completion of the required corrective action in accordance with an established implementation schedule.

(b) Conduct an on-site review of the bus transit system to verify the correction of the deficiency in accordance with this rule and the established implementation schedule.

(c) Suspend affected passenger service operations if the bus transit system fails to correct the deficiency in accordance with this rule and the established implementation schedule.

Rulemaking Authority 334.044(2), 341.041(3), 341.061(2)(a) FS. Law Implemented 334.044(28), 341.041(3), 341.061(1)(d), 341.061(2)(c) FS. History–New 11-10-92, Amended 8-7-05, 9-16-10.

CITY OF OCALA
PUBLIC TRANSPORTATION SAFETY PLAN
PTASP 2026 UPDATE

LYTX

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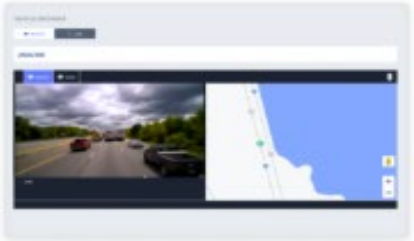

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Sample information form LYTX for RATP Dev – Ocala

DEVICE	EVENT DATE	SCORE	STATUS	TRIGGER	BEHAVIORS
QM00581883	May 19, 2025, 7:45:57 AM **CST**	0	New	Braking	
QM00579400	May 17, 2025, 6:55:53 PM **CST**	0	Resolved	Braking	
QM00581883	May 17, 2025, 10:36:30 AM **CST**	3	Face-To-Face	Braking	Other Distraction
QM00581883	May 17, 2025, 9:29:17 AM **CST**	0	Resolved	Other	
QM00568133	May 16, 2025, 1:45:31 PM **CST**	0	Resolved	Braking	
QM00579400	May 16, 2025, 8:05:14 AM **CST**	0	Resolved	Driver Tagged	Driver Tagged
QM00581709	May 16, 2025, 8:03:15 AM **CST**	0	Resolved	Braking	
QM00579502	May 15, 2025, 10:26:29 AM **CST**	0	Resolved	Braking	
QM40108309	May 15, 2025, 9:59:12 AM **CST**	0	Resolved	Braking	
QM00579420	May 14, 2025, 3:11:04 PM **CST**	0	Resolved	Other	

Monday. Com

Monday.com is used for project management, allow us to track progress on minimizing safety risks, setting goals, and to make improvements to safety processes and procedures.

Introduction to monday.com

3 min read

Welcome to monday.com - the Work OS that provides you with all of the no-code building blocks so you can shape your workflows, your way. Here, you can run every aspect of your work by layering industry-specific products on top of the Work OS. Combine building blocks, like apps and integrations, to customize anything you need to improve the way your business runs. Let's take a look at what makes monday.com Work OS so unique.

Your workflows your way

monday.com offers 3 end-to-end products to choose from to run the core of your business. Our products are dedicated solutions built on top of our Work OS and designed to answer the needs of specific industries and verticals. You can add as many products to your account as you need so your team can manage anything and everything in one place.

Sample project list from Monday. Com for RATP Dev- Ocala

Table Calendar

New item | Search

Past Dates 7 items

		Group	Board	People	Date	Status
Realign training program: order supplies		Location	Subitems of OOC - Safety ...	ES	Mar 3	Done
Implement findings from GM's biweekly ride alongs		Location	Subitems of OOC - Safety ...	ES	Mar 3	Done
Assign training to a certified instructor		Location	Subitems of OOC - Safety ...	ES	Mar 3	Done
Implement close coaching with Operators managers		Location	Subitems of OOC - Safety ...	ES	Mar 3	Done
Implement daily TED Safety talks on Intersections with Operators		Location	Subitems of OOC - Safety ...	ES	Mar 22	Done
Retrain all operators with light book		Location	Subitems of OOC - Safety ...	ES	Apr 19	Done
Operators re-complete baseline training		Location	Subitems of OOC - Safety ...	ES	Apr 30	Done

+ Add risk